

## Equality and Health Impact Assessment

### Position Statement – Branded Generic Prescribing in Primary Care

**AWTTC will fill in an Equality and Health Impact Assessment in parallel with each development stage of our projects. This will help us to follow the five ways of working for public bodies, and work to achieving the wellbeing goals, outlined in the Well-Being of Future Generations (Wales) Act 2015.**

**Date: 10/10/2024**

1.	AWTTC contact details	Tel: 02921 826900 Email: <a href="mailto:awttc@wales.nhs.uk">awttc@wales.nhs.uk</a>
2.	State the objectives of the project.	The objective of the position statement is to provide clear direction to prescribers in NHS Wales that they are required to prescribe generically (use a medicine's generic name when prescribing), unless there is a clinical reason to prescribe by brand (branded or branded generic prescribing).
3.	Evidence and background information considered. For example: <ul style="list-style-type: none"> <li>• population data</li> <li>• staff and service users' data, as applicable</li> <li>• needs assessment</li> <li>• engagement and involvement findings</li> <li>• research</li> <li>• good practice guidelines</li> <li>• participant knowledge</li> <li>• list of stakeholders and how stakeholders have engaged in the development stages</li> </ul>	Generic prescribing allows any suitable generic (or its branded equivalent) to be dispensed and opens the possibility for a number of benefits to be realised by both patients in Wales as well as the NHS in Wales. This statement was developed following input from a Branded Generics Short Life Working Group (SLWG), and was subsequently revised by this group, comprising stakeholders from health boards, Community Pharmacy Wales, Association of the British Pharmaceutical Industry, British Generics Manufacturers Association, Medicines Value Unit, lay representation and Welsh Government. The resulting document was considered by members of the All Wales Prescribing Advisory Group and updated to incorporate changes before disseminating for public consultation. Similar position statements from various Integrated Care Systems (NHS England Health Boards) were considered when drafting the document.



	<ul style="list-style-type: none"><li>• comments from those involved in the designing and development stages</li></ul> <p><a href="#">Population pyramids</a> are available from Public Health Wales Observatory.</p>	
4.	Who will this project affect?	Prescribers across NHS Wales, dispensers and patients (who do not fall within any of the medicine categories where prescribing by brand is clinically important, please see statement for more details) may be directly affected by this statement.



## 5. EQIA - How will the project impact on people?

Questions in this section relate to the impact on people based on the 'protected characteristics' of the Equality Act 2010, and other factors.

How will the project impact on, or affect:	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Actions taken (and who by).
<p><b>5.1 Age</b> For most purposes, the main categories are people aged:</p> <ul style="list-style-type: none"><li>• under 18 years;</li><li>• between 18 and 65 years;</li><li>• over 65 years.</li></ul>	<p>We do not expect a potential negative, or unequal, impact on people based on their age.</p> <p>[Note: For prescription medicines we expect the prescriber to have prescribed or advised their use within the terms of their UK marketing authorisations. Healthcare professionals should take note of the contraindications, warnings, safety recommendations and any monitoring needs for a specific medicine. These are explained in the Summary of Product Characteristics (SmPC) for the medicine or the British National Formulary.</p>	N/A	N/A



How will the project impact on, or affect:	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Actions taken (and who by).
	Healthcare professionals should follow relevant professional guidance and take full responsibility for the decision when prescribing or advising the use of off-label or unlicensed medicines. This includes considering the contraindications, warnings, monitoring requirements and other safety recommendations for the medicine ( <a href="#">MHRA guidance on off-label or unlicensed use of medicines</a> )]		
<b>5.2 Persons with a disability as defined in the Equality Act 2010</b> Those with physical impairments, learning disability, sensory loss or impairment, mental health conditions, long-term medical conditions such as diabetes.	This guidance will have a positive impact as it highlights clinical factors and patient factors that must be taken into account when considering whether to prescribe generically or by brand or branded generic.	All related documents published on the AWTTC website will meet accessibility requirements.	
<b>5.3 People of different genders:</b>	We do not expect a potential negative, or unequal, impact on	N/A	N/A



How will the project impact on, or affect:	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Actions taken (and who by).
<p>Consider men, women, people undergoing gender reassignment. <b>N.B.</b> Gender-reassignment is anyone who proposes to, starts, is going through or who has completed a process to change his or her gender with or without going through any medical procedures. Sometimes referred to as Trans or Transgender.</p>	<p>people based on their gender, or on people undergoing gender reassignment.</p>		
<p><b>5.4 People who are married or who have a civil partner.</b></p>	<p>We do not expect a potential negative, or unequal, impact on people based on their marital status or being in a civil partnership.</p>	<p>N/A</p>	<p>N/A</p>
<p><b>5.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding.</b> They are protected for 26 weeks after having a baby whether or not they are on maternity leave.</p>	<p>We do not expect a potential negative, or unequal, impact on women who are expecting a baby, are breastfeeding, or are on a break from work after having a baby.</p>	<p>Prescribers should take account of the Summary of Product Characteristics (SmPC) when prescribing any medicines for women who are pregnant, or who are breastfeeding.</p>	<p>The SmPC criteria specify which people are excluded from treatment due to the associated risks of treatment. This will be identified for consideration of any change to the advice at the next review if there is a change to the current</p>



How will the project impact on, or affect:	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Actions taken (and who by).
			advice for pregnant and breastfeeding women.
<b>5.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies and travellers, migrant workers.</b>  <a href="#">The Runnymede Trust</a>	We do not expect a potential negative, or unequal, impact on people of a different race, nationality, colour, culture or ethnic origin.  People of different race and ethnicities can have varying responses to medicines.	Note in the project document that people of different race and ethnicities can have varying responses to medicines.	N/A
<b>5.7 People with a religion or belief or with no religion or belief.</b> The term 'religion' includes a religious or philosophical belief.  <a href="#">Implications of religious beliefs on selection of medicines (BMJ)</a>  <a href="#">In practice: guidance on religion, personal values and beliefs</a> (General Pharmaceutical Council)	We do not expect a potential negative, or unequal, impact on people who have a religion or belief, or people with no religion or belief.  Some medicines are made from certain animal products and people might not want to take them because of religion or belief.	N/A	N/A
<b>5.8 People who are attracted to other people of:</b>	We do not expect a potential negative, or unequal, impact on	N/A	N/A



How will the project impact on, or affect:	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Actions taken (and who by).
<ul style="list-style-type: none"><li>the opposite sex (heterosexual);</li><li>the same sex (lesbian or gay);</li><li>both sexes (bisexual).</li></ul> <a href="#">Stonewall</a>	people based on who they are attracted to.		
<b>5.9 People who communicate using the Welsh language in terms of correspondence, information leaflets, or service plans and design.</b>	We do not expect a potential negative, or unequal, impact on people who communicate using the Welsh language.	N/A	N/A
<b>5.10 People according to their income related group.</b>	We do not expect a potential negative, or unequal, impact on people based on their income-related group.  In Wales, all prescription medicines are free-of-charge for patients; positive recommendations through this project will not affect people depending on their income-related group.	N/A	N/A



How will the project impact on, or affect:	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Actions taken (and who by).
<b>5.11 People according to where they live.</b>	We do not expect a potential negative, or unequal, impact on people based on where they live.	N/A	N/A
<b>5.12 Consider others who face health inequalities, such as:</b> <ul style="list-style-type: none"><li>• Looked after and accommodated children and young people</li><li>• Carers: paid/unpaid, family members</li><li>• People who are homeless or those who experience homelessness: people on the street; those staying temporarily with friends/family; those in hostels/B&amp;Bs</li><li>• People involved in the criminal justice system: offenders in prison or on probation, ex-offenders</li><li>• People with addictions and substance misuse problems</li><li>• People who have poor literacy</li><li>• People living in remote, rural and island locations</li></ul>	We do not expect a potential negative, or unequal, impact on people who face health inequalities.	N/A	N/A



<b>How will the project impact on, or affect:</b>	<b>Potential positive and/or negative impacts</b>	<b>Recommendations for improvement/ mitigation</b>	<b>Actions taken (and who by).</b>
<b>5.13 Consider any other groups and risk factors relevant to this project.</b>	N/A	N/A	N/A

## 6. HIA - How will the project impact on the health and wellbeing of people in Wales and help address inequalities in health?

Questions in this section relate to the impact on the overall health of individual people, and the impact on the population in Wales.

How will the project impact on, or affect:	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/ mitigation	Actions taken (and who by)
<b>6.1 People being able to access the service offered.</b>	We do not expect a potential negative, or unequal, impact on people's ability to access the service offered. People may be less likely to experience difficulty in receiving their prescribed medicines if generic medicines are prescribed.	N/A	N/A
<b>6.2 People being able to improve or maintain healthy lifestyles.</b>	We do not expect a potential negative, or unequal, impact on people's ability to improve or maintain healthy lifestyles. However, with consistently receiving a named generic medicine on a prescription (rather than frequent medicine name changes), people may be more confident in their medicines, supporting medicine adherence.	N/A	N/A



<b>How will the project impact on, or affect:</b>	<b>Potential positive and/or negative impacts and any particular groups affected</b>	<b>Recommendations for improvement/ mitigation</b>	<b>Actions taken (and who by)</b>
<b>6.3 People in terms of their income and employment status.</b>	We do not expect a potential negative, or unequal, impact on people in terms of their income and employment status.	N/A	N/A
<b>6.4 People in terms of their use of the physical environment.</b>	We do not expect a potential negative, or unequal, impact on people's use of the physical environment.	N/A	N/A
<b>6.5 People in terms of social and community influences on their health.</b>	We do not expect a potential negative, or unequal, impact on people in terms of social and community influences on their health.	N/A	N/A
<b>6.6 People in terms of macro-economic, environmental and sustainability factors.</b>	We do not expect a potential negative, or unequal, impact on people in terms of macroeconomic, environmental and sustainability factors. There may be positive impacts on sustainability as people will not have to travel to different pharmacies in order to source a branded generic medicine where a generic medicine could have been prescribed.	N/A	N/A

**7. Please fill in section 7.1 after completing the EqHIA, and fill in the action plan.**

<p><b>7.1 Please summarize the potential positive and/or negative impacts of the project.</b></p>	<p>No potential negative impacts of the project have been identified. A number of potential positive impacts have been identified:</p> <ul style="list-style-type: none"> <li>• On patient care, as people may be more confident in their medicines, supporting medicine adherence. People may be less likely to experience difficulty in receiving their prescribed medicines (if generic medicines are consistently prescribed when clinically appropriate). People may be at reduced risk of prescribing and dispensing errors.</li> <li>• On financial viability of community pharmacies.</li> </ul>
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**Action plan for mitigation or improvement and implementation**

	Action	Lead(s)	Timescale	Actions taken
<p><b>7.2 What are the key actions identified as a result of completing the EqHIA?</b></p>	N/A	N/A	N/A	N/A
<p><b>7.3 Is a more comprehensive Equalities Impact Assessment or Health Impact Assessment needed?</b></p>	N/A	N/A	N/A	N/A

	Action	Lead(s)	Timescale	Actions taken
<b>7.4 What are the next steps?</b>	The position statement and impact assessment shall proceed to consultation.	AWTTC	Consultation July 2024	Completed.
	Document and EqHIA reviewed by AWPAG following consultation.	AWTTC	Sep 2024	Completed.
	Document to be considered for endorsement by AWMSG	AWTTC	Oct 2024	Completed.
	Document published on AWTTC website	AWTTC	Oct 2024	Completed.
<b>7.5 Review of project and EqHIA</b>	EqHIA will be reviewed at each stage of progression of the project and this info recorded in boxes above.  All finished projects will be reviewed after a specified time, and the EqHIA will be reviewed at the same time.	AWTTC	Post consultation – September 2024	Section 5.2 updated in line with consultation comments to note a positive impact.

AWTTC's EqHIA template is adapted from the Cardiff & Vale University Health Board EHIA template.