

RETIREMENT (AND RETIREMENT GIFT) POLICY AUGUST 2019

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Name of Policy:	Retirement (and Retirement Gift) Policy
Date Issued:	
Date to be reviewed:	4 years

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Description of Amendment(s):	3 Year review. <i>Updated format, including the bookmarks, correction of some typographical errors and removal of some outdated references and the inclusion of a revised EIA. NHS pension and Government pension information updated. No other amendments to policy in terms of process, procedure or timeframes since previous version.</i>	
This policy will impact on:	All CCG employees	
Policy Area:	HR	
Version No:	2	
Author:	HR	
Effective Date:		
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1. INTRODUCTION

NHS Hull CCG (hereafter referred to as 'the CCG') is committed to assisting employees who are considering, or have taken the decision to retire from service and outlines the options available and support that can be expected from management.

The CCG wishes to encourage employees to work as long as they wish to do so, enabling the CCG to retain necessary skills and experience of employees. The CCG therefore does not have a compulsory organisational retirement age.

2. SCOPE

This policy will apply to all employees of the CCG.

3. POLICY PURPOSE AND AIMS

This policy is intended to demonstrate the CCG's commitment to promoting age diversity in the workforce. The CCG does not operate a compulsory retirement age.

The purpose of this policy is therefore:

- To be a signpost for staff considering retirement in the short or medium term
- A signpost for managers to help them support employees
- To offer options for flexible retirement for employees to consider
- To facilitate the change from working to not working over a period of time to suit individual needs, whilst helping the CCG retain valuable skills and experience
- To encourage staff to consider their work-life balance when nearing the time they may wish to retire
- To encourage managers to be supportive of employees' needs.

When considering retirement options employees are to bear in mind the potential impact on their pension.

The provisions of Section 16 of NHS Agenda for Change (AfC) Terms and Conditions will apply to employees retiring early on grounds of redundancy.

The Normal Pension Age is the age an individual can retire from NHS employment and have their pension paid without reduction for early payment.

An employee may choose to retire from work early before the Normal Pension Age but, on or after the *minimum* pension age. If an employee chooses to retire and access their pension, their benefits will be reduced because, their pension will be paid earlier and for longer than expected.

The minimum pension age for members of the NHS Pension Scheme 1995 section is 50, except for staff who joined on or returned to the scheme after 6 April 2006 for whom the minimum early retirement age is 55. The minimum early retirement age

for members of the 2008 & 2015 sections is 55.

The normal pension age for members of the NHS Pension Scheme 1995 section is 60 and age 65 for members of the 2008 section. In the 2015 NHS Pension Scheme, the Normal Pension Age is the same as the scheme member's State Pension Age.

Employees considering retirement, particularly flexible retirement, are to discuss their plans, initially with their line manager.

Information on retirement options and benefits is available from the NHS Pensions website at www.nhsbsa.nhs.uk/pensions.

Employees are to bear in mind NHS Pensions requires 4 months' notice of any request for payment of pension benefits.

Flexible retirement requests will be considered in line with the procedure set out in the Flexible Working policy.

Advice and support on the application of this policy is available from the HR team.

4. GENERAL DATA PROTECTION REGULATION (GDPR)

The CCG is committed to ensuring all personal information is managed in accordance with current data protection legislation, professional codes of practice and records management and confidentiality guidance. More detailed information can be found in the CCGs Data Protection and Confidentiality and related policies and procedures.

5. IMPACT ANALYSIS

5.1 Equality

The CCG is committed to eliminating discrimination and promoting equality and diversity in its Policies, Procedures and Guidelines.

In applying this policy, the CCG will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation.

In developing this policy, an Equality Impact Analysis has been undertaken and is attached as an appendix. As a result of the initial screening, the policy does not appear to have any adverse effects on people who share protected characteristics and no further actions are required at this stage. However, monitoring the use of the policy will be essential in order to ensure it is implemented equitably.

5.2 Bribery Act 2010

NHS Hull Clinical Commissioning Group has a responsibility to ensure all staff are made aware of their duties and responsibilities arising from The Bribery Act 2010.

The Bribery Act 2010 makes it a criminal offence to bribe or be bribed by another person by offering or requesting a financial or other advantage as a reward or incentive to perform a relevant function or activity improperly performed. The penalties for any breaches of the Act are potentially severe. There is no upper limit on the level of fines that can be imposed and an individual convicted of an offence can face a prison sentence of up to 10 years.

For further information see <http://www.justice.gov.uk/guidance/docs/bribery-act2010-quick-start-guide.pdf>.

If you require assistance in determining the implications of the Bribery Act please contact the Local Counter Fraud Specialist on telephone number 01482 866800 or email at nikki.cooper1@nhs.net.

Due consideration has been given to the Bribery Act 2010 in the development/review of this policy document and consistent application and monitoring of this policy will mitigate bribery in relation to retirement.

6. NHS CONSTITUTION

6.1 The CCG is committed to:

Designing and implementing services, policies and measures that meet the diverse needs of its population and workforce, ensuring no individual or group is disadvantaged.

6.2 This Policy supports the NHS Constitution as follows:

The NHS aspires to the highest standards of excellence and professionalism in the provision of high-quality care that is safe, effective and focused on patient experience; in the planning and delivery of the clinical and other services it provides; in the people it employs and the education, training and development they receive; in the leadership and management of its organisations; and through its commitment to innovation and to the promotion and conduct of research to improve the current and future health and care of the population.

7 DEFINITIONS

Minimum Retirement Age:

The minimum retirement age for members of the NHS Pension Scheme – 1995 section is 50, except for staff who joined on or returned to the scheme after 6 April 2006 for whom the minimum retirement age is 55. The minimum retirement age for members of the 2008 and 2015 sections is 55.

Normal Retirement Age:

The normal pension age for members of the NHS Pension Scheme – 1995 section is 60 and age 65 for members of the 2008 section. Under the 2015 section, the normal pension age is the individual's State Pension Age.

Flexible Retirement:

Flexible retirement options provide flexibility regarding the age at which an employee retires, the length of time it takes to retire and the nature and intensity of work in the lead up to final retirement. It assists the CCG by retaining the skills of key employees who are approaching, or are at, retirement age and provides a greater choice for employees. Further details on Flexible Retirement are set out in Section 15 of the policy.

Ill Health Retirement:

When an employee becomes incapable of carrying out their duties on a permanent basis, and no reasonable adjustments can be made or suitable alternative employment secured (see Absence Management Policy and Redeployment Policy), employee's with more than two year's pensionable service may wish to apply to NHS Pensions for retirement on the grounds of ill-health. Further details are in Section 15 of the Policy.

NEST Pension:

Government backed workplace pension.

8. ROLES / RESPONSIBILITIES / DUTIES

Managers

Are responsible for ensuring this policy is applied fairly to all, and to have discussions with staff concerning retirement, in line with the guidance in the policy.

Employees

Are responsible for ensuring they are aware of the policy and request retirement options in accordance with it and

Requesting a pension forecast and the completion of appropriate paperwork when planning to retire, giving a minimum of 4 months' notice to the CCG. Contact is to be made with their Payroll Pensions Officer in order to discuss retirement processes and request relevant paperwork.

HR Team

Are Responsible for providing advice and guidance where necessary for line managers and individuals on all aspects of retirement and flexible retirement in accordance with this policy.

9. IMPLEMENTATION

This policy will be communicated to staff via email and will be available on the CCG's website.

Any deliberate breaches in the application of this policy and procedure may be investigated and may result in the matter being treated as a disciplinary offence under the CCG's disciplinary procedure.

10. TRAINING AND AWARENESS

Guidance and support will be provided to all Line Managers by the HR Team, in the implementation and application of this policy upon request.

11. MONITORING AND EFFECTIVENESS

The implementation of this policy will be monitored on an annual basis by the CCG and reported to the Senior Leadership Team.

12. POLICY REVIEW

The policy will be reviewed every 4 years following implementation by the HR Team in conjunction with operational managers and trade union representatives. Where review is necessary due to legislative change, changes to the NHS Pension Scheme or changes to the NHS national terms and conditions of employment, this will happen immediately.

13. REFERENCES

NHS Pensions website: www.nhsbsa.nhs.uk/pensions
NEST Pensions website: www.nestpensions.org.uk

14. ASSOCIATED DOCUMENTATION

Flexible Working Policy
Redeployment Policy
Absence Management Policy

15. PART 2 - PROCEDURE

This section is intended to give brief details about the NHS Pensions Schemes (1995/2008 and 2015). The schemes are subject to change therefore information in this policy and procedure may alter. Managers and employees are to refer to the NHS Pensions website for further information.

Employees, who have decided they wish to retire or are considering retirement particularly flexible retirement, are to discuss their plans initially with their line manager.

The process of taking retirement is two-way between the employee and the line manager but, will also involve interaction with Human Resources, Payroll and their Payroll Pensions Officer.

Line managers and all employees irrespective of age are to have regular meetings, as part of the performance annual review process or at any other appropriate meeting, to discuss short, medium and long term plans. This type of conversation will assist with workforce and career planning and may include discussions concerning future plans. Employees are advised to plan well in advance for their retirement and the inevitable changes in circumstance which that will bring.

One of the important factors in making a decision as to when to retire will be the amount of pension benefits an employee will be entitled to receive once they have retired. The annual pension benefit statement will give a projection of the amount an employee will receive once they have retired. Active and deferred members of the NHS Pension scheme can access their Annual Benefit Statement and obtain an estimate through the NHS [Total Reward Statement portal](#).

If an employee decides to retire and has continued their employment beyond normal pension age, the CCG will need to have reasonable advance warning of their intention to retire.

Employees wishing to request to retire and return (see below) are to provide a written request to their line manager, as far in advance as possible. The request must include the proposed retirement date and in what capacity, the individual would like to return to work afterwards. Requests would be considered in line with the Flexible Working Policy.

Employees wishing to claim their NEST pension, which is the alternative scheme made available to those not eligible to join the NHS Pension Scheme, must ensure they complete the necessary NEST procedure available at www.nestpensions.org.uk.

STATE PENSION

The state pension age for women has been increasing since April 2010. Between 2019 and 2020 the state pension age for both men and women will rise from 66 and under current legislation the age for both men and women will reach 68 by 2046. Employees can check their state pension age on the GOV.UK website at <https://www.gov.uk/state-pension-age>.

Public workers, including members of the NHS Pension Scheme, who have previously been “contracted out” of additional state pension entitlements and SERPS and retire after April 2016, may be entitled to less than the full new state pension. This is due to paying lower National Insurance contributions over the years.

Employees reaching State Pension Age between April 2016 and August 2021 can obtain a personalised written estimate of their state pension, plus information on anything they can do to enhance this at <https://www.gov.uk/state-pension-statement>.

NHS PENSION SCHEME

The NHS Pension Scheme is a defined benefit public service pension scheme, which operates on a pay-as-you-go basis. A new reformed scheme was introduced on 1 April 2015 that calculates pension benefits based on career average earnings. Transitional arrangements permit individuals who on 1 April 2012 were within ten years of normal pension age to continue participating in the old ‘final salary’ NHS Pension Scheme arrangements (the 1995 and 2008 sections).

The NHS Pension Scheme is administered by the [NHS Business Service Authority](#), where you can find more information about the scheme.

Full guidance on all of the NHS Pension Schemes, 1995, 2008 and 2015, is available by accessing the *Member Guides* available at:

<https://www.nhsbsa.nhs.uk/member-hub>

These documents run through the variety of options available to employees who are active or deferred members of any of the NHS Pension Schemes.

GUARANTEED MINIMUM PENSION (GMP)

Employees who are considering retirement must request the Guaranteed Minimum Pension (GMP) check from the Pensions Service in the first instance. Retirement cannot go ahead unless the GMP check has been passed.

NORMAL AGE RETIREMENT

Employees wishing to fully retire from work must resign from their employment, giving the appropriate contractual notice. They will be expected to take all accrued annual leave prior to their leaving date.

FLEXIBLE RETIREMENT

Flexible retirement provides flexibility regarding the age at which an employee retires, the length of time it takes to retire and the nature and intensity of work in the lead up to final retirement. It assists the CCG by retaining the skills of key employees who are approaching, or are at, retirement age and provides a greater choice for employees.

The options available are summarised below:

	1995	2008	2015	
Wind Down	✓	✓	✓	<i>Remain in your existing post, but reduce the number of working hours or days.</i>
Step Down	✓	✓	✓	<i>'Step down' to a different role, e.g. reduce your level of responsibility, whilst remaining in NHS employment.</i>
Retire & Return	✓	✓	✓	<i>Retire, take all your pension benefits and return to NHS employment, with a break in service of at least 2 weeks between employments.</i>
Draw Down	✗	✓	✓	<i>Take between 20 per cent and 80 per cent of your pension benefits and continue to build up future membership in the scheme.</i>
Late retirement enhancement	✗	✓	✓	<i>Increase the pension benefits available to at full retirement by working beyond your normal pension age, up to the age of 75.</i>
Early retirement reduction buy out	✗	✗	✓	<i>Pay additional contributions to buy out, or reduce, the reduction that would be applied to your pension for retiring early i.e. before normal pension age.</i>

PRE-RETIREMENT WIND DOWN (EXISTING POST)

An employee approaching their retirement may wish to gradually reduce the number of hours they work leading up to their actual date of retirement.

The employee must put their request in writing to their line manager, clearly outlining their proposed work pattern, start date and retirement date.

Requests will be considered in line with the procedure in the Flexible Working policy, and judged on the basis of business needs.

If a reduction in hours is agreed, the employee will be paid pro rata to hours worked.

Employees considering requesting a reduction in hours prior to retirement are advised to obtain further information on how their pension would be affected.

PRE-RETIREMENT STEP DOWN (LESS DEMANDING ROLE)

An employee approaching retirement may request to continue working in a less demanding role.

The employee must put their request in writing to their line manager, clearly outlining their proposed role, hours of work, start date of the arrangements and retirement date..

Requests will be considered in line with the procedure in the Flexible Working policy, and judged on the basis of business needs.

If a change in role is agreed, the employee will be paid the appropriate rate for that post. If there is a reduction in working hours, the employee will be paid pro rata to hours worked.

Members of the NHS 1995/2008 Pension Scheme who are over the minimum pension age, and whose pay reduces by at least 10%, may apply for the higher rate of pay to be protected for pension purposes. The application must be made within 15 months of the date the rate of pay is reduced.

When the employee leaves, their pension up to the date they stepped down will be based on the higher rate of pay, and their pension earned after the step down date will be based on the reduced rate of pay. Cost of living increases will be applied to the protected higher rate of pay and both pensions will be added together for payment.

Employees considering requesting a reduction in hours prior to retirement are advised to obtain further information on how their pension would be affected.

RETIRE AND RETURN

Under the provisions of the NHS Pension Scheme, employees have the option to retire from service and take all their pension benefits before returning to NHS employment.

Employees considering this option, and who wish to return to NHS employment, must make their request in writing, to their line manager, as far in advance as possible. The request must include the proposed retirement date and when, and in what capacity, the individual would like to return to work afterwards.

Requests to return to work will be considered in line with the procedure in the Flexible Working policy, and judged on the basis of business needs.

If the request is agreed, there must be at least a 2 week break between employments, to include a minimum 24-hour break in pensionable employment to satisfy the requirements of the NHS Pension scheme.

Members of the 1995 section must work less than 16 hours per week within one calendar month of retirement, and/or be under the normal retirement age, to avoid their pension being suspended. This restriction does not apply to members of the 2008 or 2015 sections.

Employees who are in receipt of any earnings related protection will lose that protection on their return to work following the break in service.

Once an employee retires and receives their pension benefits in relation to their NHS service, this service will no longer be counted as 'reckonable' for redundancy purposes (paragraph 16.6 of NHS Agenda for Change Terms and Conditions). Where an employee takes their pension benefits and returns to work at the CCG, reckonable service will begin from the date of return to employment after the break in service.

Members of the 1995 scheme who retire and take their pension benefits before returning to work will not be able to re-join the NHS Pension Scheme.

DRAW DOWN (PARTIAL RETIREMENT)

Members of the NHS Pension Scheme 2008 and 2015 sections may elect to partially retire and take some of their benefits. To do this the employee must have reached at least the minimum pension age of 55 and have reduced their pensionable pay by at least 10%.

Between 20% and 80% of pension entitlement may be taken and pension membership will continue to build up. Pensionable pay must remain reduced for at least a year otherwise eligibility to a pension will cease. Benefits can be drawn down twice before final retirement.

LATE RETIREMENT

Employees who remain in employment beyond the normal retirement age, and remain in the NHS Pension Scheme, may continue to earn benefits to age 75 or until they reach 45 years membership. There are no provisions to increase benefits for members of the 1995 section if they are paid late. Members of the 2008 and 2015 sections will have any pension earned before age 65 increased to take account of the fact it is being paid later than the normal retirement age. A table of the current uplift factors can be found on the pension agency website at: www.nhsbsa.nhs.uk/nhs-pensions.

VOLUNTARY EARLY RETIREMENT (VER)

An employee may claim payment of their pension before the normal pension age if they meet all of the following criteria:

- have reached normal minimum pension age for their scheme but not yet reached normal pension age
- have been in the Scheme long enough to qualify for pension benefits
- have ceased all NHS employment.

An early retirement pension is reduced because it is being paid early and for longer.

The amount of the reduction depends on how many years before the normal pension age the pension is being claimed and is applied to the pension before commutation (the exchange of some pension for a lump sum). The early retirement factors are available on the Pension Agency website at:
www.nhsbsa.nhs.uk/pensions.

Pension protection associated with flexible retirement does not apply to members of the 2015 scheme. Any previous protection taken prior to joining the 2015 scheme would still apply.

REJOINING THE 2015 NHS PENSION SCHEME AFTER RETIREMENT

Members are eligible to re-join this Scheme, after drawing their 2015 Scheme pension benefits, up to the maximum age limit of 75, and build a separate pension from that in payment. If the employee was previously a member of the 1995/2008 Scheme and have claimed or intend to claim benefits from that Scheme, please read the factsheet 'Members with benefits in both the 1995/2008 Scheme and the 2015 Scheme' available on the NHS Pensions website at:
www.nhsbsa.nhs.uk/pensions

OTHER TYPES OF RETIREMENT

ILL HEALTH RETIREMENT

When an employee becomes incapable of carrying out their duties on a permanent basis, and no reasonable adjustments can be made or suitable alternative employment secured (see Redeployment Policy), the employee may wish to apply to NHS Pensions for retirement on the grounds of ill-health. This option is only available to employees who have two years continuous pensionable NHS service.

Where ill-health retirement is identified as an option, the employee will be provided with an estimate of pension benefits via the Payroll Provider. The application must be made on the appropriate form which is available from the NHS Pensions.

Medical advisers, appointed by NHS Pensions, will assess the available medical evidence and will confirm whether the employee is permanently incapable of carrying out either their present NHS duties or any regular work. A Tier 1 or enhanced Tier 2 pension may be paid dependent upon this decision. Further information may be obtained from the NHS Pensions website
<http://www.nhsbsa.nhs.uk/pensions>

PREMATURE RETIREMENT AND RETIREMENT IN THE INTERESTS OF EFFICIENCY

If you are retired prematurely because of redundancy or in the interests of the efficiency of the service, pension benefits may be paid immediately. Employees must have:

- at least two years' continuous membership
- reached the minimum pension age
- two years' continuous employment with the employer who is prematurely retiring you

- contractual terms and conditions which entitle you to claim the redundancy pension as an alternative to receiving, either in whole or in part, the cash redundancy payment from your employer.

Section 16, paragraph 16.1 of Agenda for Change, sets out the terms and conditions of early retirement on the grounds of redundancy for employees entitled to pension benefits.

Section 16 of Agenda for Change, paragraphs 16.29 - 16.31 inclusive set out the terms and conditions of early retirement in the interests of the efficiency of the service.

If an employee has more than one job in the NHS they may either:

- take the benefits in respect of all the pensionable NHS jobs. If an employee chooses to do this, the employee must leave all jobs for at least one day unless they total no more than 16 hours per week; or
- take the benefits only in respect of the employment from which they are retiring prematurely.

In either case the employee can remain in or re-join the 2015 NHS Pension Scheme if the employee continues or subsequently returns to NHS employment.

Employees wishing to fully retire from work must resign from their employment, giving the appropriate contractual notice. They will be expected to take all accrued annual leave prior to their leaving date.

16. RETIREMENT GIFT

Staff must have a minimum of 15 years reckonable service within the NHS to receive a retirement gift from NHS Hull CCG. For every full year of eligible service staff will be entitled to a gift or alternative to the value of £5 (i.e. 15 years services x £5 = £75) up to a maximum amount of £100. Their Line Manager must fund this via their departmental budget.

The CCG acknowledges retiring staff may not wish to choose a gift but may want to choose an alternative (e.g. undertake a training course which may help them to develop a new hobby, or may wish to join a fitness club). In this case, the organisation concerned must provide the CCG with an invoice to the appropriate value and the CCG would be happy to deem it the same as a gift.

It is the responsibility of the line manager to organise the retirement presentation, meeting any costs from their Departmental budget.

17. APPEAL PROCEDURE

If an employee believes their request has not been properly considered, they may appeal the decision. They must submit their appeal in writing in line with the Flexible Working Policy.

APPENDICES

Appendix 1



Hull

Clinical Commissioning Group

HR / Corporate Policy Equality Impact Analysis:	
Policy / Project / Function:	Retirement and Retirement Gift Policy
Date of Analysis:	August 2019
Completed by: (Name and Department)	HR
What are the aims and intended effects of this policy, project or function?	This policy is designed to assist employees who are considering or have taken the decision to retire from service and this policy outlines the options available and support that can be expected from management.
Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?	No
Please list any other policies that are related to or referred to as part of this analysis	Flexible Working Policy Redeployment Policy Absence Management Policy
Who will the policy, project or function affect?	Employees
What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?	Consultation has taken place both locally and nationally with Trade Unions and employees. SLT CCG employees SPF policy sub group SPF Governing Body (approval)
Promoting Inclusivity and Hull CCG's Equality Objectives. How does the project, service or function	This Policy does not directly promote inclusivity, however it is designed to assist employees who are considering or have taken the decision to

<p>contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation?</p> <p>How does the policy promote our equality objectives:</p> <ol style="list-style-type: none"> 1. Ensure patients and public have improved access to information and minimise communications barriers 2. To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone's day-to-day job 3. Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve 4. Ensure the that NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs 5. To demonstrate leadership on equality and inclusion and be an active champion of equalities in partnership programmes or arrangements 	<p>retire from service and outlines the options available and support that can be expected from management. Applied equitably, it should contribute to the elimination of discrimination.</p> <p>This policy is intended to demonstrate NHS Hull Clinical Commissioning Group's commitment to promoting age diversity in the workforce.</p>
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Equality Data	
<p>Is any Equality Data available relating to the use or implementation of this policy, project or function?</p> <p>Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine <i>Protected Characteristics</i> – referred to hereafter as '<i>Equality Groups</i>'.</p> <p>Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <ol style="list-style-type: none"> 1: Recruitment data, e.g. applications compared to the population profile, application success rates 2: Complaints by groups who share / 	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document). If you answered No, what information will you use to assess impact?</p> <p>Please note that due to the small number of staff employed by the CCG, data with returns small enough to identify individuals cannot be published. However, the data should still be analysed as part of the EIA process, and where it is possible to identify trends or</p>

represent protected characteristics 4: Grievances or decisions upheld and dismissed by protected characteristic group 5: Insight gained through engagement	issues, these should be recorded in the EIA.

Assessing Impact

**Is this policy (or the implementation of this policy) likely to have a particular impact on any of the protected characteristic groups?
(Based on analysis of the data / insights gathered through engagement, or your knowledge of the substance of this policy)**

Protected Characteristic:	Neutral Impact:	Positive Impact:	Negative Impact:	Evidence of impact and, if applicable, justification where a <i>Genuine Determining Reason</i> ¹ exists (see footnote below – seek further advice in this case)
<p>It is anticipated that these guidelines will have a positive impact as they support policy writers to complete meaningful EIAs, by providing this template and a range of potential issues to consider across the protected characteristics below. There may of course be other issues relevant to your policy, not listed below, and some of the issues listed below may not be relevant to your policy.</p>				
Gender	x			The policy does not discriminate between employees based on gender. Consistent application will ensure no negative impact.
Age		x		This policy may have a positive impact on this protected characteristic as the CCG does not operate a compulsory retirement age. Employees can make a choice as to when to retire and how once they reach the age at which they can retire and may choose to retire and return or step down in order to continue working.

1. ¹ *The action is proportionate to the legitimate aims of the organisation (please seek further advice)*

Race / ethnicity / nationality	x			The policy does not include vocabulary or content that discriminates against employees on the grounds of race. Consistent application will ensure no negative impact.
Disability		x		Potential for positive impact where members of the NHS pension scheme with qualifying year's membership retire on the grounds of ill health or for members to step down/retire and return which may contribute to support for employees to maintain some work as an adjustment.
Religion or Belief	x			The content of this policy and vocabulary used does not discriminate against employees based on their religion or belief. Consistent application will ensure no negative impact.
Sexual Orientation	x			The content of this policy and vocabulary used does not discriminate against employees based on their sexual orientation. Consistent application will ensure no negative impact.
Pregnancy and Maternity	x			The policy does not discriminate against employees that are currently pregnant or on maternity leave as it can be accessed while on maternity leave or any other leave of absence on the CCG's website.
Transgender / Gender reassignment	x			The policy does not include vocabulary or content that discriminates against employees on the grounds of

				transgender/gender reassignment. Consistent application will ensure no negative impact.
Marriage or civil partnership	x			The policy does not include vocabulary or content that discriminates against employees that may be married or part of a civil partnership. Consistent application will ensure no negative impact.

Action Planning:

As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse impact or strengthen the promotion of equality?

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:

Sign-off

All policy EIAs must be signed off by Mike Napier, Associate Director of Corporate Affairs

I agree with this assessment / action plan

If *disagree*, state action/s required, reasons and details of who is to carry them out with timescales:

A handwritten signature in black ink, appearing to read 'M. J. ...', is centered in the upper portion of a rectangular box.

Signed: _____

Date: 04.12.19