

PAY PROGRESSION POLICY and PROCEDURE

APRIL 2019

Important: This document can only be considered valid when viewed on the CCG's website.

If this document has been printed or saved to another location, you must check that the version number on your copy matches that of the document online.

If you need this document in a different format or language (e.g. large print, Braille, audio or easy read), please contact us on 01482 344700, or email HULLCCG.contactus@nhs.net, or write to: NHS Hull Clinical Commissioning Group, 2nd Floor, Wilberforce Court, Alfred Gelder Street, Hull HU1 1UY.

Name of Policy:	Pay Progression Policy and Procedure
Date Issued:	
Date to be reviewed:	One year after ratification

Policy Title:	Pay Progression Policy and Procedure	
Supersedes: (Please List)	New policy	
Description of Amendment(s):		
This policy will impact on:	All CCG staff employed under Agenda for Change (AfC) terms and conditions of service	
Policy Area:	HR	
Version No:	1	
Author:	HR team	
Effective Date:		
Review Date:		
Equality Impact Assessment Date:	12/07/2019	
APPROVAL RECORD		Date:
	Social Partnership Policy Group	09/10/19
	Social Partnership Forum	
	Governing Body	
Consultation:	Employee	20/08/19
	SLT	22/07/19

CONTENTS

		Page
1.	INTRODUCTION	4
2.	SCOPE	4
3.	POLICY PURPOSE AND AIMS	5
4.	GENERAL DATA PROTECTION REGULATION (GDPR)	5
5.	IMPACT ANALYSIS	
5.1	Equality	5
5.2	Bribery Act 2010	6
6.	NHS CONSTITUTION	6
6.1	The CCG is committed to:	
6.2	This Policy supports the NHS Constitution and	
7.	ROLES / RESPONSIBILITIES / DUTIES	7
8.	PAY STEP PROGRESSION PROCEDURE Pay Affecting Step Progression only and annual process for Bands 8C, 8D and 9	8
9.	APPROVING THE REQUEST FOR PAY STEP PROGRESSION	10
10.	DECLINING THE REQUEST FOR PAY STEP PROGRESSION	10
11.	THE RIGHT OF APPEAL	11
12.	IMPLEMENTATION AND MONITORING	12
13.	POLICY REVIEW	12
14.	REFERENCES AND ASSOCIATED DOCUMENTATION	12
	APPENDICES	
1	Pay Progression Pro Forma	14
2	Equality Impact Analysis	16

1. INTRODUCTION

- 1.1 Nationally agreed changes to Agenda for Change (AfC) were agreed by the NHS Staff Council in February 2013 clarifying new arrangements for employees progressing through pay bands (incremental pay progression). This procedure applies to all employees of the organisation employed under Agenda for Change terms and conditions of service and describes the approach to be followed concerning pay progression.
- 1.2 The 2018 framework agreement on the reform of AfC subsequently introduced provisions to move to a new pay system with faster progression to the top of pay bands through fewer pay step points underpinned by mandatory local appraisal policies and procedures.
- 1.3 These provisions came into effect for new starters or existing employees promoted to a new role on or after 1st April 2019. Pay progression is no longer automatic on an annual basis under the new system.
- 1.4 Transitional pay progression procedures apply to all other staff until 31st March 2021, after which time they will also be subject to the provisions of the 2018 framework agreement.
- 1.5 Staff in post before 1st April 2019 will retain their existing pay step date (previously referred to as incremental date) and move automatically through their pay journey during transition. On their pay step date, (if they have not already benefited from deletion of a pay point) it is expected that they will automatically move to the next pay point reflecting their additional complete year of experience. The NHS Electronic Staff Record (ESR) system is able to progress existing staff automatically.
- 1.6 Staff in post after 1st April 2019. Pay progression should not be seen as an automatic right by employees but rather is something to be earned and is a reward that is dependent on satisfactory performance, conduct and demonstration of meeting all statutory and mandatory training requirements relevant to their role.
- 1.7 Any amendments to the NHS terms and conditions of service handbook will supersede this policy as new pay arrangements are agreed. This policy will be updated to reflect any changes.

2. SCOPE

- 2.1 This policy applies to all employees on Agenda for Change (AfC) terms and conditions of employment (including those on permanent and temporary contracts). Secondees from other organisations will be subject to the policy of their employing organisation.

The CCG will determine a fair and consistent approach to applying the Pay Progression Policy and will give due consideration to an employee's individual circumstances when considering a request for pay progression.

3. POLICY PURPOSE AND AIMS

3.1 NHS Hull Clinical Commissioning Group (hereafter referred to as 'the CCG'), has a duty to provide high quality services to our stakeholders and partners, and strives to be a high performing organisation that continuously improves quality, safety and the patient experience. It is a key part of the organisation's strategy to achieve its goals through maximising the contribution of each employee.

3.2 In support of this aim, and in accordance with AfC, this policy sets out the basis upon which an individual's performance drives pay progression. It is expected that employees who can demonstrate the required level of performance and conduct, who have met their objectives and are compliant as regards their statutory and mandatory training will progress annually through the pay points in their salary band.

3.3 For staff in pay bands 8C, 8D and 9, pay progression to the top pay band is earned on an annual basis and therefore not subject to pay protection. Where staff in these pay points/bands do not meet the locally determined performance standards for a given year, the annually earned pay point may be withdrawn.

4. GENERAL DATA PROTECTION REGULATION (GDPR)

The CCG is committed to ensuring that 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 at Appendix 2. 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.

The application of this policy will be monitored to ensure fair application.

5.2 Bribery Act 2010

NHS Hull Clinical Commissioning Group has a responsibility to ensure that 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-act-2010-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 of this policy document and consistent application and monitoring of this policy will mitigate bribery in relation to pay progression.

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 that 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. ROLES / RESPONSIBILITIES / DUTIES

Good working relations are vital for the organisation to operate successfully and provide services. There is a joint responsibility for management, trade unions and employees to accept the responsibility of working together on issues in good faith and with the shared intention of facilitating good working relations.

7.1 The **Senior Management** Team is responsible for:

- Setting and communicating organisational objectives, competencies and standards.
- Ensuring all staff receive regular supervision/1:1s from line managers and arrangements are made during times of line managers' absences.
- Ensuring that line managers have the requisite skills and expertise to appraise staff fairly and equitably, in accordance with CCG equality and diversity standards.
- Ensuring the policy is applied in a consistent and equitable manner.
- Reviewing the application of this policy.

7.2 It is the responsibility of **Line Managers** to ensure that they:

- Have discussed with the employee their pay affecting step date and have scheduled a pay affecting progression meeting to meet the timescales required.
- Undertake annual appraisals for all members of their team.
- Conduct an objective review of an employee's work based on feedback, examples and previous informal discussions.
- Ascertain that performance that falls below the accepted levels is managed effectively in line with the Managing Work Performance Policy and that appropriate coaching, support and a personal development plan (PDP) is provided to address any concerns.
- Demonstrate they have supported the employee to achieve the criteria for pay progression ie with regular documented supervision/1:1s.
- Ensure the employee is given the opportunity to undertake statutory and mandatory training.
- Approve or decline pay affecting progression on the receipt of a completed Pro forma (Appendix 1), evidencing compliance with the criteria in Section 8.5 below.
- Ensure that the NHS Electronic Staff Record system (ESR) is maintained in an accurate, timely manner to support the delivery of the pay progression framework and appraisal system.
- **For Bands 8C, 8D and 9** Contact Payroll, via email, at the beginning of the month prior to the employee pay step date, if pay progression is to be declined or deferred for any reason.
- Make the employee aware of the right of appeal review where the decision has been made that the required level of performance has not been met.
- Ensure that if absence or other circumstances delay or prevent the completion of a pay step review, this is escalated to a senior manager in a timely manner to ensure that appropriate contingency measures can be implemented.

7.3 It is the responsibility of **employees** to ensure that they:

- Initiate the process by completing and submitting the Pay Progression Pro forma (Appendix 1) to their line manager within the specified timescale, as outlined in section 8.2.
- Actively participate in the annual and on-going appraisal process and jointly agree and work towards their objectives.
- Make their line manager aware of any constraints that are preventing them from achieving their objectives and agree a solution.

- Demonstrate that they have reached a satisfactory level of performance and achievement of objectives, as described in the CCG's Performance and Appraisal Procedure, within the previous 12 months.
- Ensure that all statutory and mandatory training relevant to their post is up to date and recorded as compliant.
- Make their line manager aware of any organisational constraints that are preventing them from being compliant in statutory and mandatory training.
- Have achieved a satisfactory level of conduct in the previous 12 months prior to their pay step date, as described in the CCG's Performance and Appraisal Procedure and in section 8.5.

7.4 The **HR Team** will provide advice and support on all aspects of this policy to ensure application and will make managers aware of their team's statutory and mandatory training compliance.

8. PAY STEP PROGRESSION PROCEDURE

- Pay Affecting Step Progression only and annually for Bands 8C, 8D and 9

8.1 Making a request for pay progression

Pay Step Progression is a joint responsibility of the employee and the line manager. The employee's pay step date should be discussed during 1:1 meetings throughout the year so that both the employee and the line manager know and agree when they need to schedule the pay step review meeting.

8.2 The employee needs to **initiate the process 2 months prior** to the month that their pay step date is due by submitting a completed Pro forma to their line manager requesting pay progression (Appendix 1).

This timescale is to ensure that the line manager has the opportunity to review the employee against the criteria set out in Section 8.5 below and that ESR can be updated, by the line manager, to reflect the pay progression meeting outcome, in a timely manner. For example, for a pay step date of 16th December 2019 the employee would submit their request to their line manager no later than 1st October 2019. Any late submissions will be considered individually and may not be accepted.

8.3 **It is the employee's responsibility to make a request for pay step progression, in the specified timescale. Pay step dates can be found on the employee's *My ESR Dashboard*, which also includes when a pay step is due, last appraisal date, next appraisal date and appraisal or review type.**

ESR Self Service users will also receive notifications generated by the system to advise employees and managers when a pay step date is imminent. Employees will receive a notification 4 months and 1 month prior to a pay step date. Managers will be sent a monthly email detailing the pay step dates of their direct reports which are due within the next 90 days.

8.4 It is the line manager's responsibility to arrange a pay step review meeting with the employee in a timely manner to discuss whether the standards have been met. This

should be based on the employee's most recent appraisal, within the previous 12 month period, and any relevant progress since then. The manager must summarise and record the outcome of this discussion on the Pay Step Progression Pro forma (Appendix 1), provide appropriate feedback and confirm their decision to the employee. A copy of the form should be retained by the employee and also included on the employee's personal file.

8.5 **Pay progression will be conditional upon:**

- Individuals demonstrating that they have achieved the required level of performance, confirmed on the Pay Step Progression Pro forma.
- The achievement of agreed objectives, measured in accordance with the CCG's Appraisal Framework within the previous 12 months.
- All statutory and mandatory training relevant to the employee's role is up-to-date and recorded as compliant.
- No live disciplinary sanctions (including any attached to professional registrations, where applicable).
- Not on a formal stage of the CCG's Managing Work Performance Policy.
- **For line managers only** – have completed appraisals for all their direct reports, as required.

8.6 If the employee has failed to meet the pay progression criteria as a consequence of constraints, beyond their control, they must evidence this on the Pay Progression Pro forma (Appendix 1). The line manager will consider this when making a decision about pay progression.

8.7 **Pay progression that falls within a prolonged period of agreed or recognised leave**

8.7.1 For employees whose pay step date falls within a period of long term leave, for example; sickness, maternity, shared parental leave or adoption leave or suspension, the line manager would consider the 12 month period prior to the commencement of the current episode of leave to make a decision on pay progression. In these instances, if employees have not had the opportunity to complete the relevant appraisal paperwork then they will automatically progress if they have met the other requirements in 8.5. Further guidance is available from the HR team.

8.7.2 Employees on secondment will undertake the pay progression procedure of the employing organisation. Further detail can be found in the CCG's Secondment Policy.

8.7.3 In line with the Career Break Policy, the pay step date of any employee on a career break is frozen until their return to work. If the pay step date is imminent on their return then they will progress as normal to the next pay step point within their pay band to ensure they are not penalised. However, it is recommended that a review takes place to ascertain that their statutory and mandatory training is up-to-date and recorded as compliant. If the pay step date is 3 months or more in advance of their return the normal process would apply.

8.8 **Employees on pay bands 8C, 8D and 9**

For employees on pay bands 8C, 8D and 9, progression to the top point on their pay band is annually earned in the same way as for other AfC employees. The top pay point on their pay band is only retained where the appropriate level of performance has been reached. For example, an employee on the top pay step who doesn't meet the criteria set out in Section 8.5 will drop a pay step for a 12 month period. No protection will apply. Support will be given in line with Section 10.

8.9 Employees not on AfC terms and conditions of employment

It is expected that all employees directly employed by the CCG will be subject to the organisation's appraisal procedure.

Pay progression for Very Senior Managers (VSMs) will need to be agreed in accordance with their contractual arrangements and subject to agreement at Board where applicable.

Pay progression for staff employed under the national Medical and Dental terms and conditions of employment will need to be agreed in accordance with their contractual arrangements and the national agreement.

Pay progression for staff employed under the locally agreed Medical and Dental terms and conditions of employment will need to be agreed in accordance with their contractual arrangements and subject to agreement at Remuneration Committee.

9. APPROVING THE REQUEST FOR PAY STEP PROGRESSION

- 9.1 Pay progression of one step point will be conditional upon employees demonstrating that they have achieved the requisite criteria in Section 8.5. The line manager will review the employee's performance against the criteria for pay progression in conjunction with Section A of the Pro forma (Appendix 1).
- 9.2 The line manager will need to ascertain that the employee has no 'live' disciplinary warnings in place at the time of the application date and/or are not being managed at a formal stage of the Managing Work Performance Policy. If a disciplinary sanction is issued to an employee between their application for pay step progression and their pay step date the line manager will decline the request, update ESR and contact Payroll to stop the progression.
- 9.3 If the employee has not actively participated in an appraisal, has failed to meet the agreed objectives or is not compliant with statutory and mandatory training applicable to their role pay step progression would not be approved.
- 9.4 However, if the employee has failed to meet the criteria due to valid organisational constraints beyond their control pay step progression would be approved.
- 9.5 If the employee has met the criteria for pay progression their request would be approved.

When approving a request the line manager must complete Section B of the Pro forma to confirm that they have made the employee and Payroll aware of the pay progression. It is imperative that the line manager updates ESR, and notifies Payroll via email at the beginning of the month prior to the date to ascertain the timescale is met to achieve the increase for the specified date.

10. DECLINING THE REQUEST FOR PAY STEP PROGRESSION

10.1 Deferral of pay step progression

At the pay step date, any employee remaining non-compliant in line with the associated timescales will not receive their pay step progression. In such circumstances pay progression will subsequently be deferred for up to 12 months until the next annual pay step date. Where an employee does not meet the required level of performance, a personal development plan (PDP) will be implemented after the original review and achievement against this will be used to determine whether an increment will be paid. If at this stage the employees request for pay step progression is approved, it will be paid from this date, no retrospective payments would be due. Further PDP guidance is available in the Managing Work Performance Policy.

10.2 The decision to defer pay step progression must have been discussed with the employee prior to any deferment being implemented. The Line Manager will complete section B of the Pro forma (Appendix 1) to record that pay step progression has been deferred and update ESR.

10.3 Any individual for whom pay step progression has been deferred must be offered the appropriate support in order that they have the fairest opportunity to meet the performance requirements in future.

Managers are expected to agree a 3 month development plan to improve performance. The Managing Work Performance Policy should be instigated at this point if it is not already in progress. Advice should be sought from a HR representative. Employees have the opportunity to request a review of their development plan at the end of the 3 month period. If the employee has improved and met requirements they can follow the procedure in 8.1 to make a request for pay step progression.

10.4 If pay step progression is awarded after the 3 month development plan, the employees' increment date will remain the same and they will receive an uplift in payment for the remaining 9 months of the year onto the next pay step point. No retrospective payments would be due for the outstanding development period. If the employee does not meet the criteria of the development plan they cannot apply for pay progression again until the following year (for example a pay step date of the 4th October 2019, pay progression will not be considered again until the 4th October 2020). The Managing Work Performance Policy will continue to be applied.

11. THE RIGHT OF APPEAL

11.1 Where an employee disagrees with the decision made to defer pay step progression, the employee has the right to request a review of the decision. To do so, they must follow the process as described in the Managing Work Performance Policy and set out the grounds of their appeal. The employee has the right to be accompanied at the meeting by a work colleague or Trade Union representative, providing that they are not acting in a legal capacity.

- 11.2 An appeal panel hearing will be set up to review the decision. The review will be undertaken by a Senior Manager and a HR representative. The employee's Line Manager will also be required to attend the appeal to explain why they believe the pay step progression cannot be agreed. The employee will be given 5 working days' notice of the review panel hearing and be entitled to be accompanied at the meeting by a work colleague or Trade Union representative, provided they are not acting in a legal capacity.
- 11.3 It will be up to the appeal panel to decide, on the basis of the evidence provided by both the employee and the Line Manager, whether or not pay step progression is approved.
- 11.4 Where a panel considers that pay step progression has been inappropriately deferred, the pay progression will be reinstated from the step point date and retrospective payments made from that date.
- 11.4 The employee must be informed of the outcome of their review in writing within 5 working days of the date of the meeting. This is the final decision and the end of the formal procedure, there is no right to evoke the grievance policy.

12. IMPLEMENTATION AND MONITORING

- 12.1 The Governing Body is responsible for formal approval and monitoring compliance with this policy. Following ratification the policy will be shared with staff and will be available on the website.
- 12.2 Records will be kept by the CCG of all instances of declined pay progression made under this policy and any appeals raised in respect of it. This information will be audited on a periodic basis.

13. POLICY REVIEW

This policy and procedure will be reviewed after one year by the CCG Governing Body in conjunction with Trade Union representatives. Where review is necessary due to legislative change or amendments to the NHS terms and conditions of service, this will happen immediately.

14. REFERENCES AND ASSOCIATED DOCUMENTATION

- NHS Terms and Conditions of Service Handbook ([Annex 23](#))
- NHS Knowledge and Skills Framework and the Development Review Process
- Statutory and Mandatory Training.
- The NHS Staff Council Additional Staff Council FAQs for England
- NHS Core Competencies

To be read in conjunction with the following:

- CCG's Performance and Development Appraisal Framework and Procedure
- CCG's Induction and Probation Policy
- CCG's Disciplinary Policy

- CCG's Managing Work Performance Policy
- CCG's Career Break Policy
- CCG's Professional Registration Policy
- CCG's Maternity, Maternity Support (Paternity), Adoption and Parental Leave Policy
- CCG's Secondment Policy
- CCG's Equality and Diversity Policy

15. APPENDICES

- Appendix 1 - Pay Progression Pro forma
- Appendix 2 – Equality Impact Assessment

APPENDIX 1

Pay Step Progression Pro forma

Section A – Employee Declaration

To be completed for **all pay affecting progression applications** and **annually where staff on the top two spine points of bands 8Cc, 8D and 9 request to retain their pay step.**

Please ensure that you submit this to your line manager 2 months prior to the month that your pay step date is due.

Employee Name:

Manager Name:

Job Title:

Pay Step due date:

Band:

Last appraisal date:

I can confirm that:	Yes/No
All statutory and mandatory training is up-to-date & recorded as compliant	
I have achieved satisfactory appraisals and associated objectives	
I have no live formal disciplinary warnings, including any attached to professional registration where applicable	
I am not in the formal stage of the capability process	

Please note any mitigation

Signed:

Date:

Section B - Line Manager Declaration

Please select one option from the tables below.

Progression Confirmed	Tick	Yes/No/Add Comments
The employee has met the pay progression criteria and will progress to the next pay step point.		
The employee has met the performance standards and will retain their current pay point (pay bands 8C, 8D & 9 only for the last 2 spine points only).		
The employee has failed to meet the required criteria for pay step progression but that there are constraints beyond their control that have prevented the achievement of this and will therefore progress to the next increment.		Discuss with HR team and detail reasons:
I confirm the employee is on maternity/adoption leave, or on long term sickness absence and they have been assessed on their performance over the 12 months prior to their current period of leave where possible and will progress to the next pay step point.		

Progression Declined	Tick	Yes/No/Add Comments and Evidence
The employee has failed to meet the criteria for pay step progression and there are no valid constraints that have prevented this therefore pay step progression is declined.		
The request for pay step progression has been declined and the employee will reduce to the previous pay point (pay bands 8C, 8D & 9 only for the last 2 spine points).		Email Payroll to advise.

By signing I confirm that: the employee has been made aware of the outcome of the review, and where appropriate they have been made aware of their right of appeal; ESR has been updated; and payroll has been advised of any necessary actions.

Date of Pay Step Review meeting:

Name:

Position:

Signature:

Date:

A copy of this form must be sent to the PA to the Director of Quality and Clinical Governance and retained on the employee's personal file.



We are, we care.
Every day we are creating a healthier Hull

Appendix 2



Clinical Commissioning Group

Please refer to the EIA Overview & Navigation Guidelines located in Y:\HULLCCG\Corporate Templates and Forms\Equality and Diversity Information before completing your EIA)

HR / Corporate Policy Equality Impact Analysis:	
Policy / Project / Function:	Pay Progression Policy
Date of Analysis:	20 June 2019
Completed by: (Name and Department)	HR
What are the aims and intended effects of this policy, project or function?	To provide an agreed and standardised process for measuring satisfactory performance against AfC staff, designed to reward good performance and to make individuals accountable for their own performance and behaviour. Potentially motivational as incremental progression is regarded as a reward for good performance rather than an automatic right irrespective of performance.
Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?	New policy
Please list any other policies that are related to or referred to as part of this analysis	NHS Hull CCG Career Break Policy NHS Hull CCG Maternity, Paternity, Adoption & Parental Leave Policy NHS Hull CCG Absence Management Policy
Who will the policy, project or function affect?	All CCG staff employed under AfC terms and conditions of service
What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?	Consultation has taken place both nationally and locally with Trade Unions and staff

<p>Promoting Inclusivity and Hull CCG's Equality Objectives.</p> <p>How does the project, service or function 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>This policy is applicable to all employees and adheres to NHS standards, statutory requirements and best practice. The policy makes all reasonable provision to ensure equity of access to all employees and includes measures to support those where there may be a detriment.</p>
---	--

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</p>	<p>Yes X</p> <p>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing</p>

<p>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> <p>1: Recruitment data, e.g. applications compared to the population profile, application success rates</p> <p>2: Complaints by groups who share / represent protected characteristics</p> <p>4: Grievances or decisions upheld and dismissed by protected characteristic group</p> <p>5: Insight gained through engagement</p>	<p>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 issues, these should be recorded in the EIA.</p>
--	--

Assessing Impact				
<p>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)</p>				
Protected Characteristic:	Neutral Impact:	Positive Impact:	Negative Impact:	Evidence of impact and, if applicable, justification where a <i>Genuine Determining Reason¹</i> 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 supports both maternity and paternity absence.
Age	x			Considered, No local evidence of impact. To be monitored.
Race / ethnicity / nationality	x			The policy ensures equitable pay progression. No local evidence of impact. To

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

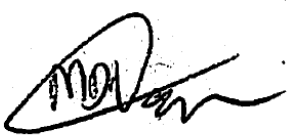
				be monitored.
Disability		x		The policy supports reasonable adjustments for those who may be suffering a long term health condition classed as a disability or with adjusting to a new disability. Or those who may need a career break due to caring responsibilities related to disability.
Religion or Belief		x		The policy supports pay progression that falls within a prolonged period of leave such as an employee undergoing a religious rite of passage or taking an extended faith related journey.
Sexual Orientation	x			Considered, no local evidence of impact. To be monitored.
Pregnancy and Maternity		x		The policy supports employees on long term sickness absence and/or maternity leave.
Transgender / Gender reassignment		x		The policy supports those who may be using a career break whilst undergoing gender reassignment.
Marriage or civil partnership	x			Considered, no local evidence of impact. To be monitored.

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:
Unjustifiable reasons for declined pay progression	Monitor where pay progression is declined against the protected groups	HR	On going	

	to ensure they are not adversely affected due to unjustifiable reasons			

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

Signed:
Date 04.12.19