

# **STARTING SALARIES POLICY**

**June 2014**

<b>Authorship:</b>	North Yorkshire and Humber Commissioning Support Unit on behalf NHS Scarborough and Ryedale CCG
<b>Committee Approved:</b>	SRCCG Committees Joint Trade Union Partnership Forum
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<b>Sustainability Impact Assessment</b>	Completed
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**The on-line version is the only version that is maintained. Any printed copies should, therefore, be viewed as 'uncontrolled' and as such may not necessarily contain the latest updates and amendments.**

## POLICY AMENDMENTS

Amendments to the Policy will be issued from time to time. A new amendment history will be issued with each change.

<b>New Version Number</b>	<b>Issued by</b>	<b>Nature of Amendment</b>	<b>Approved by</b>	<b>Date approved</b>	<b>Date on Intranet</b>
DRAFT	SRCCG	Draft policy for CCG	Senior Management Team	22/04/14	n/a
DRAFT	SRCCG	Draft policy for CCG	JTUPF	25/06/14	n/a
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## **1 INTRODUCTION**

- 1.1 Scarborough and Ryedale Clinical Commissioning Group (the CCG) is committed to recognising individual abilities and will ensure that it creates an environment where employees can thrive and develop and where everyone feels valued and respected.
- 1.2 The Starting Salaries Policy has been introduced to ensure a consistent approach is adopted, by recruiting managers, when establishing the starting salary for appointments to or within the CCG.
- 1.3 This policy is intended to ensure fairness and equity within this process and is based on the Agenda for Change Terms and Conditions Handbook.
- 1.4 Reckonable service should be identified by recruiting managers at the same time as starting salaries, see Appendix 1.

## **2 ENGAGEMENT**

This policy has been developed by the North Yorkshire and Humber Commissioning Support Unit's workforce team in partnership with employees, managers and trade unions and approved at the Joint Trade Union Partnership Forum.

## **3 IMPACT ANALYSES**

### **3.1 Equality**

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 the results are attached at Appendix 4. As a result of the initial screening, the policy does appear to have adverse effects on people who share protected characteristics and further mitigating factors are included in the EIA and EIA action plan.

The application of this policy will be monitored to ensure fair application and a consistent approach:

- Annual audit of pay to review all decisions to appoint staff above the minimum of the scale to ensure consistency and to monitor impact and assess whether any further action is required in any protected group
- These records will be cross referenced with ESR Recruitment and Equality and Diversity monitoring to ensure a consistent approach across the organisation
- Any deviation from this policy and procedure must be investigated on a case by case basis to ensure that the principles of fair pay both within equal pay legislation and within the National agreement on Terms and Conditions are

followed.

### **3.2 Sustainability**

The policy has been assessed against the CCG's Sustainability themes and the results are attached at Appendix 5.

### **3.3 Bribery Act 2010**

The CCG follows good NHS business practice as outlined in the Business Conduct Policy and has robust controls in place to prevent bribery.

Under the Bribery Act 2010, it is a criminal offence to:

- Bribe another person by offering, promising or giving a financial or other advantage to induce them to perform improperly a relevant function or activity, or as a reward for already having done so; and
- Be bribed by another person by requesting, agreeing to receive or accepting a financial or other advantage with the intention that a relevant function or activity would then be performed improperly, or as a reward for having already done so.

Due consideration has been given to the Bribery Act 2010 in the development of this policy document. Consistent application and monitoring of this policy will mitigate bribery in relation to starting salaries.

## **4 SCOPE**

4.1 This policy will apply to all new appointments, transfers or promotions to, or within the CCG for those employed on Agenda for Change Terms and Conditions of Service.

- The starting salaries for employees employed on other terms and conditions of service, ie clinical or VSM contracts, will be determined in accordance with the relevant terms and conditions and approval process.

4.2 This policy should be read in conjunction with the Recruitment and Selection Policy, the Recruitment and Retention Premium Policy and other relevant recruitment policies.

## **5 POLICY PURPOSE & AIMS**

The aim of this policy is to give guidance to recruiting managers to ensure there is a consistent approach in determining a starting salary.

## **6 DEFINITIONS**

**Unsocial Hours** – hours worked any time on Saturdays, Sundays, Public Holidays and

any week day after 8pm or before 6am.

**Overtime** – authorised extra time worked in a week above standard hours (37.5 hours)

**Recruitment and Retention Premia** – an additional payment made to an individual or specific group of posts where market pressures would otherwise prevent the employer from being able to recruit staff to and retain staff in sufficient numbers for the post (s) concerned at the normal salary for a job of that weight

**Reckonable Service** – is any previous employment in the NHS or listed recognised organisations (see Appendix 1)

## **7 ROLES/RESPONSIBILITIES/DUTIES**

- 7.1 Recruiting managers are responsible for ensuring that all offers made comply with this policy.
- 7.2 New appointees are expected to provide all relevant information/evidence of previous service and salary details to establish the correct starting salary and reckonable service.
- 7.3 Workforce Managers will offer advice and guidance to recruiting managers.

## **8 IMPLEMENTATION**

A copy of the Policy will be stored electronically on the Intranet

## **9 TRAINING & AWARENESS**

- 9.1 A communication will be sent to managers to make them aware that the policy has been issued. Support and guidance is available for the EMBED Workforce Team.

## **10 MONITORING & AUDIT**

- 10.1 Records (of Appendix 2) will be kept in all cases where non NHS service is taken into account in determining a starting salary. These records will be cross referenced with ESR Equality and Diversity monitoring to ensure a consistent approach across the organisation and where it is identified that the application of the policy is not consistent, appropriate action will be taken.
- 10.2 The policy and procedure will be reviewed periodically. Where review is necessary due to legislative change, this will happen immediately.
- 10.3 The implementation of this policy will be audited at appropriate intervals and reported to the CCG's Management Team.

## **PART 2 PROCEDURE**

This procedure applies to individuals joining or re-joining the NHS as well as transferring from one NHS organisation to another. The procedure aims to set out clear and fair principles for determining the starting point at which new starters commence on the Agenda for Change Pay Band associated with their role.

### **1 GENERAL PRINCIPLES**

- 1.1 The general principle is that new starters should start on the bottom of the scale and thereafter progress through pay band 'gateways' in accordance with Agenda for Change.
- 1.2 Any deviation from this must be investigated on a case by case basis to ensure that the principles of fair pay both within equal pay legislation and within the National agreement on Terms and Conditions are followed. Each case should be discussed with a Workforce Representative to ensure consistency across the organisation.
- 1.3 Where there is a break in service, depending on the length of the 'gap', this service may be counted in full, in part or not at all towards incremental credit.
- 1.4 Where a recruiting manager believes there is sound business reason for appointing to a higher incremental point, they must provide clear, documented reasons for giving incremental credit to a Workforce Manager and seek approval at Director level (Appendix 2) prior to the start date. Requests will not be considered after the start date.
- 1.5 Recruiting managers should ensure that the new starter is aware of the whole remuneration package, including pension scheme, other benefits, hours of work and generous annual leave allowance as particularly for non-NHS appointees, these factors will often make NHS employment more attractive. Verbal offers of employment should not commit to a starting salary above the bottom of the scale.
- 1.6 Any additional payments such as unsocial hours, overtime or recruitment and retention premia should NOT be taken into account in the determining of a starting salary.

### **2 APPOINTMENT OF NEW STAFF JOINING THE NHS FOR THE FIRST TIME OR RE-JOINING THE NHS**

- 2.1 Offers will normally be made at the minimum of the relevant pay band for those who have had no or less than 12 months' aggregated previous relevant experience of the role to which they are recruited.
- 2.2 Current salary should NOT be used as a way of determining starting salary, but may be a factor in deciding to take the level of any relevant previous experience into account.

- 2.3 **Directly relevant** experience, at the same level of responsibility as, or higher than the new post, may be taken into account in determining starting salary. Only whole years of experience should be credited when the knowledge, skills and experience are directly transferable. Experience at a higher level may not be directly relevant. Where experience is not like for like, e.g. a registered nurse working in a nursing home, it may be appropriate to consider the experience and assess what element is directly relevant to the post appointed to.
- 2.4 Documentary evidence must be provided for any periods of employment that count towards a higher than the minimum starting salary.
- 2.5 In all cases where a new member of staff is appointed on a starting salary above the minimum point of the pay band the recruiting manager must be able to justify the basis for incremental credit and must first obtain approval from the relevant Director. No employee will be put on the payroll above the minimum of the scale unless a signed Appendix 2 form is attached to the starter documentation.
- 2.6 Managers must also ensure that new starters are not placed on a point on the band that would put them in a better position than existing staff or those who have gained similar experience within the NHS.
- 2.7 New staff appointed from outside the NHS will have an incremental date of the anniversary of their NHS appointment.

### **3 NEW STAFF TRANSFERRING FROM WITHIN THE NHS (INCLUDING THE CCG)**

#### **3.1 Staff Moving to the Same Pay Band**

- 3.1.1 Staff who transfer to a post on the same pay band will remain on the same salary point with the same incremental date.

#### **3.2 Staff Moving to a Higher Pay Band**

- 3.2.1 **Permanent Movement to Higher Pay Band** - Employees appointed to a higher pay band will start on the minimum of the pay band. If this point is lower or equal to their current salary, they will receive a pay increase to the first point on the band which would deliver an increase to pay. The anniversary date of any promotion becomes the employee's incremental date.

- 3.2.2 **Temporary Movement into a Higher Pay Band** - Employees appointed to a higher band on a temporary basis should start at the minimum of the new pay band or, if this would result in no pay increase the first pay point in the band which would deliver an increase in pay. Refer to other relevant policies for further information.

#### **3.3 Staff Moving to a Lower Pay Band**

- 3.3.1 **Same area of work** – There are various reasons why a member of staff may wish to voluntarily take a lower graded post but in the same field of work. In such cases, employees appointed to a lower pay band will remain on their current spine point. If this point does not fall within the new pay band, they will start on the maximum spine point of the new pay band. Individuals will retain their existing incremental date.



- 3.3.2 **Staff Moving to a Different Area of Work** - Sometimes individuals decide to move to a new post within a different area of work of their own volition e.g. a clinical person applying for an office based role. In these cases the starting salary will normally be the minimum of the relevant pay band and may involve a decrease in salary for an individual. The starting salary may take into consideration the knowledge and skills required for the post (see sections 2.3 and 2.5). However, it would not be the case that they would automatically be entitled to keep their existing salary. This also applies in cases where the member of staff is moving to the same band in a different area of work.
- 3.3.3 Where an individual re-trains in a different area of work for wider service or operational reasons i.e. not of their own volition, with the explicit agreement of the CCG their existing level of pay should be protected in line with the CCG's protection arrangements.
- 3.4 **Staff Moving to a Lower Pay Band and later Moving Back to Original Band** - In some occasions staff may voluntarily move to a lower band and later they may return to the higher band. In these situations the new salary should be calculated by using the same rationale as out lined in section 3.2 above.

#### **4 APPOINTMENT OF STAFF TO THE NHS 'BANK'**

- 4.1 Offers will normally be made at the minimum of the relevant pay band for those who join the NHS 'Bank', unless an individual has been employed previously in the same role (permanent/temporary/fixed term) within the NHS, in which case they will be appointed on their most recent pay point. This will not apply if an individual has returned following an absence period of over 12 months in which case the recruiting manager will appoint them to a point which reflects their knowledge and previous experience, as in section 2 above.
- 4.2 All staff will have an incremental date of the anniversary of their appointment to the Bank.

## **APPENDICES**

- Appendix 1 Reckonable Service Guidance
- Appendix 2 Determination of Starting Salary
- Appendix 3 Equality Impact Assessment
- Appendix 4 Sustainability Impact Assessment

## APPENDIX 1: Reckonable Service Guidance

### RECKONABLE SERVICE GUIDANCE

**What is reckonable service?** Reckonable Service is any previous employment in the NHS or listed recognised organisations (refer to Section 12 of the Agenda for Change Terms and Conditions Handbook).

**Who does reckonable service apply to?** It applies to individuals returning to the NHS, transferring within the NHS or joining the NHS with service from one of the recognised organisations listed below:

- **NHS Employment**

For the purposes of NHS reckonable service, the following organisations shall be regarded as NHS employment:

**England:**

NHS England  
Clinical Commissioning Groups  
NHS Trusts including Foundation Trusts  
Special Health Authorities  
The Health and Social Care Information Centre  
National Institute for Health and Clinical Excellence

**Northern Ireland:**

Health Boards  
Trusts  
Special Agencies  
Public Health Agency  
Business Services Organisation  
Patient and Client Council

**Scotland:**

Health Boards  
Special Health Boards

**Wales:**

NHS Trusts  
Local Health Boards

and any predecessor or successor of the above organisations.

- **Additional Recognised Organisations.**

In addition to service with the NHS, for the purposes of annual leave, the CCG includes service with the following organisations:

GP Practice or NHS Dentist working exclusively on NHS Work

County Council / City Council / Social Services.

The Department of Health

Social Enterprise delivering NHS services

**When does service with an additional recognised organisation count?** For service with the above additional recognised organisations to count, previous service needs to be comparable and in *highly relevant roles*. For these purposes, a highly relevant role is defined as a role which is within the same area of work to which they have been recruited to, e.g. children's services, finance, health or social care records, therapy. Workforce guidance should be sought to confirm whether a role is deemed to be highly relevant.

**How do I claim reckonable service?** Any reckonable service must be recorded using the

'Determination of Previous Service' form (Appendix 3). This form should be completed by the new employee and signed by the manager to confirm that they have seen evidence of all reckonable service, and then sent to payroll with the new employee's starter documents and a copy placed on their personal file.

## FAQ's / INFORMATION FOR CALCULATING RECKONABLE SERVICE

**I've had a Break in Service, what am I entitled to?** The rules for determining entitlement for redundancy, maternity, sick pay and annual leave are different, so this guidance is designed to set out the rules for calculating reckonable service under the different circumstances which may arise.

- **Annual Leave** –all previous period(s) of NHS service or service with a listed recognised organisation may be aggregated and count as reckonable service towards the employee's entitlement to annual leave, regardless of any breaks in employment.
- **Sick Leave** – previous period(s) of NHS service will be counted towards entitlement to sick leave/pay where there has been a break in service of twelve months or less.
- **Maternity Leave** – employees can have a break in service of three months or less and not affect their entitlement to maternity leave. Employees must have twelve months continuous NHS service at the beginning of the eleventh week before the expected week of childbirth in order to be eligible for Occupational Maternity Pay.
- **Redundancy** –to be eligible for a contractual redundancy payment there must not have been a break in NHS service of more than a week (7-days, measured Sunday to Saturday) between periods of employment.
- **Incremental Date** – for newly appointed (including those with a break in service) or promoted staff the incremental date will be the date they take up their post. All other staff retain their current incremental date.
- **All other terms and conditions of service** - For these purposes, the CCG will include employment with a break in service of up to a maximum of 3 months at any one time, unless otherwise stated.

**What isn't classed as a Break in Service?** For the purposes of calculating entitlements, the following *do not count* as a break in employment:

- Maternity Leave
- Birth Leave
- Annual Leave
- Parental Leave
- Adoption Leave
- Sick Leave
- Carer / Compassionate Leave
- Employment Break.

All contractual entitlements will accrue as normal during all of the above periods of absence, **except** during the Employment Break. An employee returning from an Employment Break will receive the same entitlements they had accrued before they

started their Employment Break. Pay progression will continue as normal during Maternity / Adoption Leave, Birth Leave, Sick Leave, Annual Leave, Carer / Compassionate Leave and Parental Leave, but not during an Employment Break. An employee returning from an Employment Break, or other special leave will resume their pay progression from the point at which they started their leave.

**I was TUPE transferred out of the NHS, am I still entitled to reckonable service?**

When an employee transfers out of NHS employment to a non NHS employer and then returns to NHS employment, their continuous service with the non NHS employer will count as reckonable in respect of NHS agreements on sick pay, annual leave and incremental credit.

**Does service with the NHS Bank count as reckonable service?** Any service with the NHS Bank is counted as reckonable service when the employee has worked for a minimum of 12 months and has worked at least 488 hours. For all entitlements, the above definition equates to one year's service and only full years may be counted.

For additional guidance or support, please contact a member of the Workforce Team: [EMBED Staff Directory, Workforce Team](#)

**APPENDIX 2: Determination of Starting Salary**

**DETERMINATION OF STARTING SALARY**

<b>Name of Candidate</b>		<b>Job Title</b>		
<b>AfC Pay Band</b>		<b>Spine Point</b>		
<b>Proposed Starting Salary</b>		<b>Date of Appointment</b>		
<b>Reason for starting point above the minimum of the pay band. Include consideration of impact on colleagues / team / department.</b>				
<b>Previous Experience:</b>				
<b>Start Date</b>	<b>End Date</b>	<b>Organisation</b>	<b>Job Title</b>	<b>Previous Salary/Grade</b>


New staff appointed from outside the NHS will normally commence on the minimum point of a pay band. Directly relevant experience at the same level of responsibility as the new post, may be taken into account in determining a starting salary. Only whole years of experience should be credited when the knowledge, skills and experience are directly transferrable.

**Proposed by:**  
Line Manager

**Name:**

**Signature:**

**Date:**

**Agreed by:**  
Workforce Manager

**Name:**

**Signature:**

**Date:**

**Approved by:**  
Director

**Name:**

**Signature:**

**Date:**

### APPENDIX 3: Determination of Previous Service

#### DETERMINATION OF PREVIOUS SERVICE

In all cases, appointees will need to provide documentary evidence of any employment they wish to be considered as reckonable service, e.g. an offer letter or contract of employment, payslips, P60 or a letter from the employing organisation. Employees may state their reckonable service on the form below and provide the necessary documentation at a later date. However failure to provide this information or provision of incorrect information will lead to appropriate adjustments being made. If employees do not wish to sign a statement to this effect, they will receive the minimum entitlements until they provide the relevant documentary evidence, at which point any entitlement will be backdated appropriately.

The Starting Salaries Policy identifies those organisations which are recognised for the calculation of previous service. Please note that any breaks in service may mean that previous employment is not included for the purposes of certain entitlements.

Please give details of relevant previous service below:

Start Date	End Date	Job Title	Salary	Band & SCP	Organisation	Evidence




At the time of, or within 6 weeks\* of, the submission of this form, you must submit a written statement of employment from a previous organisation to your manager, in order to confirm the information. Failure to submit this or contradiction of any information provided may result in an overpayment of salary or a more generous entitlement under the terms and conditions of service. If so, you will be informed of the discrepancy and it will be recovered appropriately.

Please Note, current salaries *will not* be used as a way of determining starting salary, but *may be a factor* in deciding to take relevant previous experience into account. Managers must ensure that new starters are not placed on a point on the band that would put them in a better position than existing staff or those who have gained similar experience within the NHS.

Any queries should be referred to a Workforce Representative to ensure consistency across the organisation.

\*this time period may be extended in exceptional circumstances

I wish to have my entitlements and starting salary determined under the method outlined above. I understand and agree that any overpayments resulting from the application of this method will be recovered in accordance with the Overpayments Policy.

Employee's Signature

Print Name

Date

Manager's Signature

Print Name

Date

## APPENDIX 4: Equality Impact Analysis

1. Equality Impact Analysis									
<b>Policy / Project / Function:</b>	STARTING SALARIES POLICY								
<b>Date of Analysis:</b>	8/1/2014								
<b>This Equality Impact Analysis was completed by: (Name and Department)</b>	Christine Brown – Workforce Service								
<b>What are the aims and intended effects of this policy, project or function ?</b>	The Starting Salaries Policy has been introduced to ensure a consistent approach is adopted, by recruiting managers, when establishing the starting salary for appointments to or within the CCG. AfC requires “that all NHS employers should have fair and non-discriminatory systems for recruiting, developing and promoting people.” (Para 31.1)								
<b>Please list any other policies that are related to or referred to as part of this analysis?</b>	<ul style="list-style-type: none"> <li>• Recruitment and Selection Policy</li> <li>• Recruitment Retention Premium Policy</li> </ul>								
<b>Who does the policy, project or function affect ?</b>  Please Tick ✓	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">Employees</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>Service Users</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Members of the Public</td> <td style="text-align: center;"><input checked="" type="checkbox"/> (at offer of appointment)</td> </tr> <tr> <td>Other (List Below)</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Employees	<input checked="" type="checkbox"/>	Service Users	<input type="checkbox"/>	Members of the Public	<input checked="" type="checkbox"/> (at offer of appointment)	Other (List Below)	<input type="checkbox"/>
Employees	<input checked="" type="checkbox"/>								
Service Users	<input type="checkbox"/>								
Members of the Public	<input checked="" type="checkbox"/> (at offer of appointment)								
Other (List Below)	<input type="checkbox"/>								

## 2.Equality Impact Analysis: Screening

	Could this policy have a positive impact on...		Could this policy have a negative impact on...		Is there any evidence which already exists from previous (e.g. from previous engagement) to evidence this impact
	Yes	No	Yes	No	
<b>Race</b>		✓		✓	Considered, no impact.
<b>Age</b>	✓		✓		Potential Positive Impact - older employees and Potential Negative Impact – younger employees. See full assessment.
<b>Sexual Orientation</b>		✓		✓	Considered, no impact.
<b>Disabled People</b>		✓		✓	Considered, no impact.
<b>Gender</b>		✓	✓		Potential Negative Impact – female employees. See full assessment.
<b>Transgender People</b>		✓		✓	Considered, no impact.
<b>Pregnancy and Maternity</b>		✓		✓	Considered, no impact.
<b>Marital Status</b>		✓		✓	Considered, no impact.
<b>Religion and Belief</b>		✓		✓	Considered, no impact.
<b>Reasoning</b>	The policy provides some useful safeguards to support the justification of appointing staff fairly in accordance with the Equality Act 2010.The policy is clear that ‘no employee will be put on the payroll above the minimum of the scale unless a signed Appendix 2 form is attached to the starter documentation.’ See Action Planning section for further details.				

**If there is no positive or negative impact on any of the Nine Protected Characteristics go to Section 7**

### 3.Equality Impact Analysis: Local Profile Data

Local Profile/Demography of the Groups affected (population figures) updated Feb 2014

<b>General</b>	Total number of employees in the CCG is 94
<b>Age</b>	63.84% of staff are aged 30-55 21.27% of staff are over 55 14.89% of staff employed are under 30
<b>Race</b>	87.24% of staff employed in the CCG declared themselves White 9.58% of staff are not stated/undefined 1.06% of staff declared themselves Black 1.06% of staff declared themselves Mixed 1.06% of staff declared themselves Other
<b>Sex</b>	79.79% of staff employed are female 20.21% of staff employed are male
<b>Gender reassignment</b>	No information
<b>Disability</b>	82.98% of staff employed declared themselves as having no disability 17.02% of staff did not declare /undefined 0% of staff declared a disability
<b>Sexual Orientation</b>	65.96% of staff described themselves as heterosexual 32.98% did not wish to respond /undefined 1.06% described themselves as bisexual
<b>Religion, faith and belief</b>	Christianity is the largest religious group declared by staff in the CCG (55.32%) 34.05% were undefined or did not wish to declare 10.63% of staff declared other faith or religious beliefs
<b>Marriage and civil partnership</b>	62.77% of employees are married. 1.06% of employees are in a civil partnership
<b>Pregnancy and maternity</b>	No information yet as the CCG has not been established long enough to build meaningful data

## 4. Equality Impact Analysis: Equality Data Available

<p><b>Is any Equality Data available relating to the use or implementation of this policy, project or function?</b></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"> <li>1. Application success rates <i>Equality Groups</i></li> <li>2. Complaints by <i>Equality Groups</i></li> <li>3. Service usage and withdrawal of services by <i>Equality Groups</i></li> <li>4. Grievances or decisions upheld and dismissed by <i>Equality Groups</i></li> <li>5. <i>Previous EIAs</i></li> </ol>	<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).</p>
<p><b>List any Consultation e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this policy, project or function</b></p>	<p>Consultation has taken place both locally and nationally with Trade Unions and staff</p>
<p><b>Promoting Inclusivity</b>  <b>How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation</b></p>	<p>The Starting Salaries Policy has been introduced to ensure a consistent approach is adopted by recruiting managers when establishing the starting salary for appointments to or within the CSU. AfC requires “that all NHS employers should have fair and non-discriminatory systems for recruiting, developing and promoting people.” (Para 31.1)</p>

## 5.Equality Impact Analysis: Assessment Test

**What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?**

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
<b>Gender</b> (Men and Women)			✓	<p>Potential Negative Impact-female employees. AfC provides for incremental progression through salary bands which is maintained on transfers within the NHS. Appointees from outside the NHS can similarly benefit from their relevant years of service being taken into account in determining appointment salaries. This policy therefore potentially favours employees who have fewer employment breaks as they will have more years of service but this is a long-standing and agreed practice for recognising <i>relevant</i> experience, knowledge and skills and is subject to review of performance</p> <p>Breaks in employment can lead to women having less service due to caring responsibilities. This is potentially a negative impact. However this is mitigated by a range of other employment policies that allow flexibility in hours of work and leave arrangements to reduce the need for employment breaks and allow staff to continue to progress through the pay bands. In addition robust recruitment processes will ensure that capability to perform a role rather than length of time in the role support a good appointment.</p>
<b>Race</b> (All Racial Groups)	✓			Considered, no impact.
<b>Disability</b> (Mental and Physical)	✓			Considered, no impact.
<b>Religion or Belief</b>	✓			Considered, no impact.
<b>Sexual Orientation</b> (Heterosexual, Homosexual and Bisexual)	✓			Considered, no impact.

**What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?**

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
Pregnancy and Maternity	✓			Considered, no impact.
Transgender	✓			Considered, no impact.
Marital Status	✓			Considered, no impact.
Age		✓	✓	<p><u>Potential Positive Impact - older employees. Potential Negative Impact – younger employees.</u></p> <p>AfC provides for incremental progression through salary bands which is maintained on transfers within the NHS. Appointees from outside the NHS can similarly benefit from their number of years of <i>directly relevant experience</i> being taken into account in determining appointment salaries. This policy therefore potentially favours older employees as they will have more years of service but this is a long-standing and agreed practice for recognising relevant experience, knowledge and skills and is subject to review of performance. Age is not taken into account when the decision to shortlist and/or interview is taken, as this information is not available to the recruiter at that stage. Once appointed a younger employee may be on a lower point on the pay scale, having less years of service/experience than an older employee doing the same role. However, increment payments are made consistently to all employees and progression through incremental pay points are conditional on individuals demonstrating they meet performance requirements. During recruitment, AfC requires that “Emphasis should be placed on quality, rather than length of experience, and consideration should be given to experience gained outside paid employment” (Para 31.7) ie quality of experience not the age of the applicant.</p>

## 6.Action Planning

**As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?**

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:
The application of this policy should be regularly monitored to ensure a consistent approach	1. Annual audit of pay to review all decisions to appoint staff above the minimum of the scale to ensure consistency and to monitor impact and assess whether any further action is required in any protected group	Head of HR	1 year from implementation	Annually
	2.These records will be cross referenced with ESR Recruitment and Equality and Diversity monitoring to ensure a consistent approach across the organisation			
	3.Any deviation from this policy and procedure must be investigated on a case by case basis to ensure that the principles of fair pay both within equal pay legislation and within the National agreement on Terms and Conditions are followed.			



## 7. Equality Impact Analysis Findings

<b>Analysis Rating:</b>	Red	Red/Amber	<b>X Amber</b>	Green
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		Actions	Wording for Policy / Project / Function
<b>Red</b> <b>Stop and remove the policy</b>	<b>Red:</b> As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	<b>Remove the policy</b>  Complete the action plan above to identify the areas of discrimination and the work or actions which needs to be carried out to minimise the risk of discrimination.	No wording needed as policy is being removed
<b>Red Amber</b> <b>Continue the policy</b>	As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy and further professional advice should be taken.	<b>The policy can be published with the EIA</b>  List the justification of the discrimination and source the evidence (i.e. clinical need as advised by NICE).  Consider if there are any potential actions which would reduce the risk of discrimination.  Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.	As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason exists which justifies the use of this policy and further professional advice.  <b><i>[Insert what the discrimination is and the justification of the discrimination plus any actions which could help what reduce the risk]</i></b>

**Equality Impact Findings (continued):**

		Actions	Wording for Policy / Project / Function
<p><b>Amber</b></p> <p><b>Adjust the Policy</b></p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p><b>The policy can be published with the EIA</b></p> <p>The policy can still be published but the Action Plan must be monitored to ensure that work is being carried out to remove or reduce the discrimination.</p> <p>Any changes identified and made to the service/policy/ strategy etc. should be included in the policy.</p> <p>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p> <p><b><i>[Insert what the discrimination is and what work will be carried out to reduce/eliminate the risk]</i></b></p>
<p><b>Green</b></p> <p><b>No major change</b></p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p><b>The policy can be published with the EIA</b></p> <p>Another EIA must be completed if the policy is changed, reviewed or if any discrimination is identified at a later date</p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>

<b>Brief Summary/Further comments</b>	<p>As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. However, a genuine determining reason exists which justifies the use of this policy. In addition other safeguards exist to mitigate the impact of this</p>
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<b>Approved By</b>		
<b>Job Title:</b>	<b>Name:</b>	<b>Date:</b>
Chief Officer	Simon Cox	29.07.14

## APPENDIX 5: Sustainability Impact Assessment

### SUSTAINABILITY IMPACT ASSESSMENT

Staff preparing a policy, Governing Body (or Sub-Committee) report, service development or project are required to complete a Sustainability Impact Assessment (SIA). The purpose of this SIA is to record any positive or negative impacts that this is likely to have on sustainability.

<b>Title of the document</b>	Starting Salaries Policy
<b>What is the main purpose of the document</b>	The Starting Salaries Policy has been introduced to ensure a consistent approach is adopted, by recruiting managers, when establishing the starting salary for appointments to or within the CCG.
<b>Date completed</b>	12 <sup>th</sup> June 2014
<b>Completed by</b>	CSU Workforce

<b>Domain</b>	<b>Objectives</b>	<b>Impact of activity</b> Negative = -1 Neutral = 0 Positive = 1 Unknown = ? Not applicable = n/a	<b>Brief description of impact</b>	<b>If negative, how can it be mitigated?</b> <b>If positive, how can it be enhanced?</b>
<b>Travel</b>	Will it provide / improve / promote alternatives to car based transport? Will it support more efficient use of cars (car sharing, low emission vehicles, environmentally friendly fuels and technologies)? Will it reduce 'care miles' (telecare, care closer) to home? Will it promote active travel (cycling, walking)? Will it improve access to opportunities and facilities for all groups?	N/A		

<b>Procurement</b>	<p>Will it specify social, economic and environmental outcomes to be accounted for in procurement and delivery?</p> <p>Will it stimulate innovation among providers of services related to the delivery of the organisations' social, economic and environmental objectives?</p> <p>Will it promote ethical purchasing of goods or services?</p> <p>Will it promote greater efficiency of resource use?</p> <p>Will it obtain maximum value from pharmaceuticals and technologies (medicines management, prescribing, and supply chain)?</p> <p>Will it support local or regional supply chains?</p> <p>Will it promote access to local services (care closer to home)?</p> <p>Will it make current activities more efficient or alter service delivery models?</p>	N/A		
<b>Facilities Management</b>	<p>Will it reduce the amount of waste produced or increase the amount of waste recycled?</p> <p>Will it reduce water consumption?</p>	N/A		
<b>Workforce</b>	<p>Will it provide employment opportunities for local people?</p> <p>Will it promote or support equal employment opportunities?</p> <p><u>Will it promote healthy working lives (including health and safety at work, work-life/home-life balance and family friendly policies)?</u></p> <p>Will it offer employment opportunities to disadvantaged groups?</p>	N/A		
<b>Community Engagement</b>	<p>Will it promote health and sustainable development?</p> <p>Have you sought the views of our communities in relation to the impact on sustainable development for this activity?</p>	N/A		

<b>Buildings</b>	<p>Will it improve the resource efficiency of new or refurbished buildings (water, energy, density, use of existing buildings, designing for a longer lifespan)?</p> <p>Will it increase safety and security in new buildings and developments?</p> <p>Will it reduce greenhouse gas emissions from transport (choice of mode of transport, reducing need to travel)?</p> <p>Will it provide sympathetic and appropriate landscaping around new development?</p> <p>Will it improve access to the built environment?</p>	N/A		
<b>Adaptation to Climate Change</b>	<p>Will it support the plan for the likely effects of climate change (e.g. identifying vulnerable groups; contingency planning for flood, heat wave and other weather extremes)?</p>	N/A		
<b>Models of Care</b>	<p>Will it minimising 'care miles' making better use of new technologies such as telecare and telehealth, delivering care in settings closer to people's homes?</p> <p>Will it promote prevention and self-management?</p> <p>Will it provide evidence-based, personalised care that achieves the best possible outcomes with the resources available?</p> <p>Will it deliver integrated care, that co-ordinate different elements of care more effectively and remove duplication and redundancy from care pathways?</p>	N/A		