

TRAVEL AND EXPENSES POLICY

July 2015

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HR Policy – Travel and Expenses:	HR34
Date Issued:	July 2015
Date to be reviewed:	Periodically or if statutory changes are required.

Policy Title:	Travel and Expenses Policy	
Supersedes:	All previous Travel and Expenses Policies	
Description of Amendment(s):	New Policy for CCG employees	
This policy will impact on:	All staff.	
Financial Implications:	Change to the travel and expenses rates	
Policy Area:	HR	
Version No:	1	
Issued By:	YHCS Workforce Team	
Author:	HR Policy Lead- adapted for local use by Yorkshire and Humber commissioning Support on behalf of Hull CCG	
Document Reference:		
Effective Date:	July 2015	
Review Date:	July 2018	
Impact Assessment Date:		
APPROVAL RECORD		
	JTUPF Sub Group	29 May 2015
	JTUPF	24 June 2015
	Governing Body	31 July 2015
Consultation:	All Staff via intranet	12 September 2014
	SLT Members Consultation:	8 May 2014

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1 POLICY STATEMENT

Travel is an integral part of the work of many NHS Hull Clinical Commissioning Group (CCG) staff and it is right that expenses incurred in travelling should be reimbursed.

Before travelling, employees should consider whether their journey is absolutely necessary and/or if they can car share.

Sections 17 & 18 of the Agenda for Change NHS Terms & Conditions of Service Handbook provides for the reimbursement of staff for mileage allowances and subsistence cost. To view the Agenda for Change NHS Terms & Conditions of Service Handbook go to the NHS Employers web site at www.nhsemployers.org and look for the Terms and Conditions handbook.

The purpose of this policy is to provide:

- A structured framework to claiming travel expenses
- Practical guidance to staff and managers on process and procedure
- Guidance to ensure that travel and expenses are claimed in a consistent, accurate and timely way
- Guidance on mileage allowance.

2 PRINCIPLES

The policy will be communicated to staff via team meetings/team brief and will be available on the website.

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.

All staff are in receipt of the same travel and expense rates and we would expect employees to consider their own personal needs and plan so accordingly. The Equality Impact Analysis is attached at Appendix 3.

The application of this policy will be monitored alongside recruitment monitoring data to ensure fair application.

3.2 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 and consistent application of this policy will mitigate bribery in relation to travel and expenses.

4 SCOPE

This policy and procedure is for employees on Agenda for Change terms and conditions.

5 POLICY PURPOSE AND AIMS

- 5.1 The purpose of this policy and procedure is to outline the rules set out by the CCG for the reimbursement of travel and expenses that are necessarily incurred by any individual engaged on business approved by the organisation.
- 5.2 The primary purpose of travel and subsistence allowances is to reimburse the necessary costs of meals, accommodation and travel arising as a result of official duties away from home.
- 5.3 The rates and conditions are, where appropriate, those set out in the relevant Terms and Conditions Handbooks, or otherwise agreed by the organisation.
- 5.4 This document is mandatory and applies to all staff on Agenda for Change Terms and Conditions and interview candidates.
- 5.5 Any abuse of this policy will be investigated and may result in disciplinary action being taken.
- 5.6 Travel and expenses claims are subject to Tax and National Insurance Liabilities. Further details and HM Revenue and Customs guide to personal taxable allowance and rates are available at: www.hmrc.gov.uk

6 TRAVEL EXPENSES

6.1 ELIGIBLE MILES

Staff will be reimbursed for miles travelled in the performance of their duties for the CCG which are in excess of the home to agreed work base return journey. Eligible miles are normally those travelled from the agreed work base and return. However when the journey starts at a location other than the agreed work base e.g. home, the eligible miles will be as set out in Appendix 1.

6.2 CAR ALLOWANCE

All car mileage will be reimbursed at one of two Standard Rates for car drivers registered with the CCG regardless of the vehicle size. The mileage rate is dependent on car usage (see Agenda for Change).

6.3 RESERVE RATE

Any member of staff who does not register their vehicle with the CCG will be reimbursed at the Reserve Rate for any mileage claimed. The reserve rate is also implemented for specific reasons for travel such as – excess mileage due to NHS merger or organisational change, temporary moves or secondment.

6.4 LEASE CARS

For former NHS employer/organisation Lease Cars that transferred to a CCG on 1st April 2013 the mileage rate will be that at the point of transfer until the scheme expires. For Lease Cars from 1st April 2013 see the Agenda for Change Handbook.

6.5 MOTORCYCLE ALLOWANCE

Members of staff using a motorcycle for official journeys will be reimbursed a mileage rate as set out in the Agenda for Change Handbook.

6.6 PEDAL CYCLES

Members of staff using a pedal cycle for official journeys will be reimbursed a mileage rate as set out in the Agenda for Change Handbook.

6.7 PASSENGER RATE

When members of staff travel together on CCG business and separate claims would otherwise be made, the driver may claim a passenger allowance as set out in the Agenda for Change Handbook. The name and designation of all passengers must be shown on the claim form. Passenger allowance is not payable to lease car drivers.

6.8 OTHER ALLOWANCES

Staff will be reimbursed the reasonable parking, garage, toll and ferry costs when on CCG business on production of a valid parking receipt.

Managers will be expected to discuss and consider any request for a reasonable adjustment to allow an employee with a protected characteristic to be treated in a non-discriminatory way as a result of the application of this policy and the required adjustment put in place.

6.9 CALL OUT

Any member of staff called out to return to work following the normal completion of their shift will be paid at the Reserve Rate.

6.10 TRAINING COURSES/CONFERENCES/EVENTS

All employees attending manager approved training courses, conferences or events are eligible to claim mileage over and above home to work mileage on the Standard Rate. Course trainers providing training at a base other than their normal work base will claim mileage over and above home to work mileage on the rate that they are registered to receive.

Subject to the prior agreement of the manager, travel costs incurred when staff attend training courses or conferences and events, in circumstances when the attendance is not required by the CCG, will be reimbursed at the reserve rate.

6.11 EXCESS MILEAGE

Where there is a compulsory requirement for an employee to change their base of work on a temporary or permanent basis e.g. a merger of NHS employers, acceptance of another post as an alternative to redundancy, change of work base, the employee may be reimbursed their extra daily travelling expenses for a period of four years from the date of transfer. Mileage will be reimbursed at the reserve rate or through the submission of receipts, the cost of public transport. The HR30, Excess Travel Authorisation Form is available on the intranet.

If a member of staff who is claiming excess travel subsequently moves home they must complete a new Excess Travel Agreement Form (HR30) in order that the new mileages may be calculated and adjusted accordingly. Refer to the Agenda for Change Handbook for further information.

6.12 BULKY EQUIPMENT

Where, at the requirement of the employer, an employee carries heavy or bulky equipment in a private car, an allowance will be paid for journeys on which the equipment is carried. (The equipment must be either of a weight that is unreasonable to be carried or alter the seating capacity of the vehicle). Refer to the Agenda for Change Handbook for current rates.

6.13 PUBLIC TRANSPORT

If an employee uses public transport for business purposes the cost of bus fares and standard rail fares will be reimbursed.

7 SUBSISTENCE

Any member of staff who is required to be away from home for business purposes may claim for additional costs that are incurred. Refer to the Agenda for Change Handbook for current maximum reimbursement limits. Claims will be reimbursed on the basis of original receipts that must be attached to all claims. Copy receipts are acceptable, if agreed by the manager but these payments will be subject to income tax deductions. The organisation will not pay for the cost of any alcoholic beverages.

7.1 OVERNIGHT ACCOMMODATION

If a member of staff stays overnight in a hotel, or other similar accommodation, for business purposes that have been approved by their manager, the overnight costs, for bed and breakfast, will be reimbursed. In exceptional circumstances where accommodation is not available within the agreed limit, the employee should seek the most competitive rates and ensure that these are approved by the line manager prior to the expenditure being incurred. Any claims that exceed the agreed limit must be clearly noted to show that prior approval for the expenditure has been given. The cost of up to two further day time meals may be reimbursed in any 24 hours, up to the maximum of the appropriate meals allowance as detailed in the Agenda for Change Handbook.

8 OTHER EXPENSES

8.1 EXPENSES OF CANDIDATE FOR APPOINTMENT

Agreement to pay candidates interview expenses must be approved with the recruiting manager prior to interview. The recruiting manager is responsible for informing candidates of the process and handling the associated internal administration. Candidates must complete a Travel and Expenses Claim Form and Registration Form in order to facilitate payment. Payments will be made by BACS through the payroll system, never by cash. Reimbursement of expenses shall not be made to employees who withdraw their application or refuse an offer of appointment. Please refer to the CCG Recruitment and Selection Policy.

8.2 RELOCATION EXPENSES

Please refer to CCG Relocation Assistance Policy and Procedure.

8.3 REIMBURSEMENT OF SUNDRY EXPENSES

In exceptional circumstances it may be necessary for a member of staff to purchase sundry items which may be required in order to carry out their duties. The budget-

holding manager must give prior approval for all such expenditure and original receipts must accompany the claim for reimbursement. The Clinical Commissioning Group would not expect sundry items to be purchased if they could be obtained through the normal purchasing procedure.

9 PROCEDURE

9.1 TRAVEL AND EXPENSES CLAIMS FORM SUBMISSION

All employees required to use their own vehicle for business purposes will have to provide the following documentation which will be copied and added to the employee's personal file. The documents must be kept up to date at all times.

- Driving Licence (paper and photo card)
- Car Insurance – including cover for business travel
- Car Tax
- MOT
- Completed registration form

A registration form checklist for recording is available in Appendix 2.

9.2 METHODS OF PAYMENT

Expenses payments will be made monthly with salary payments. All completed claim forms should be submitted monthly, usually by the 4th working day of the month following the claim, to ensure payment in the next month's salary. Payment will be withheld or delayed if the necessary documentation is not completed and appropriate procedures followed. It is the manager's/budget holder's responsibility to ensure that staff are made aware of the correct procedure to follow for the claiming of expenses. Refer to the intranet for claim submission deadlines and pay dates.

All claims should be made within 3 months of the expense taking place. Failure to do so may result in the claim being forfeited. The Chief Financial Officer will make a decision based on the facts available and their decision shall be final.

The CCG is committed to reimbursing legitimate claims that meet the criteria within this policy for travel and expenses. Any claims found to have been falsified or inflated in any way will be investigated and may result in disciplinary action being taken.

9.3 CLAIM FORM

Expenses payments will only be authorised if they are submitted on the correct form and accompanied by original receipts (except for mileage). The claim form (HR9) is available on the CCG intranet.

9.4 AUTHORISATION

Forms will only be accepted if the most direct route of travel is used. Only forms signed by an authorising manager will be accepted for payment. If the form is not signed it will be returned to the authorising manager, as will incorrectly completed forms.

9.5 EXEMPTIONS

There will be no reimbursement of:

- Parking fines
- Speeding fines
- A contribution towards vehicle running costs or additional personal motoring costs, (the mileage allowance is set at a level to include this).

The CCG forbids the use of handheld mobile phones whilst driving.

10 IMPLEMENTATION

- 10.1 The implementation of this policy will be audited at appropriate intervals by the YHCS Workforce Team and reported to the CCG Governing Body.

Breaches of this policy may be investigated and may result in the matter being treated as a disciplinary offence under the CCG disciplinary procedure.

11 MONITORING AND REVIEW

This Policy is subject to frequent review in line with Agenda for Change NHS Terms and Conditions of Service and in line with the publication of the AA Guides indicating motoring costs. Amendments to mileage allowances will only take place if rates increase or decrease by 5%.

Date of review	Date of impact
November 2013	January 2014
April / May 2014	July 2014

- 11.1 The policy and procedure will be reviewed periodically by the YHCS Workforce Team in conjunction with operational managers and Trade Union representatives. Where review is necessary due to legislative change, this will happen immediately.

12 ASSOCIATED LOCAL DOCUMENTATION

- Disciplinary Policy
- Agenda for Change Handbook
- Recruitment and Selection Policy

Appendix 1 - Eligibility Mileage

Eligible mileage – illustrative example

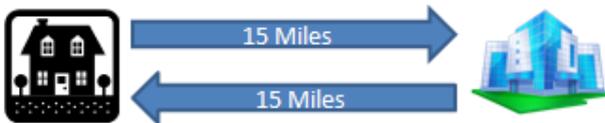
In this example the distance from the employee’s home to the agreed base is 15 miles

Journey (outward)	Distance	Eligible miles
Home to base	15 miles	None
Home to first call	Less than 15 miles	None - Eligible mileage starts after 15 miles have been travelled
Home to first call	More than 15 miles	Eligible mileage starts from home, less 15 miles
Journey (return)		
Last call to base		Eligible mileage ends at base
Last call to home	Less than 15 miles	None - Eligible mileage ends 15 miles from home
Last call to home	More than 15 miles	Eligible mileage ends 15 miles from home

Examples:

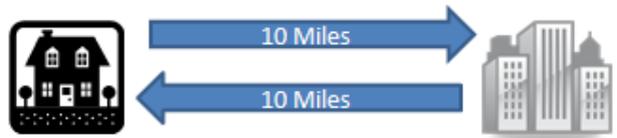
No Eligible Miles

Home to Base to Home



No Eligible Miles

Home to Meeting / Training to Home



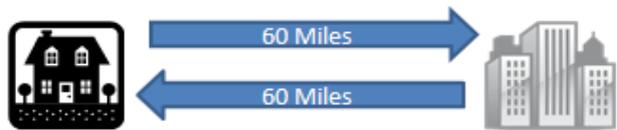
15 Miles to Claim

Home to Meeting / Training to Home



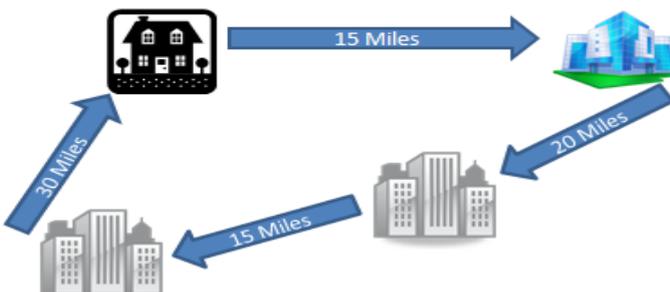
90 Miles to Claim

Home to Meeting/Training to Home



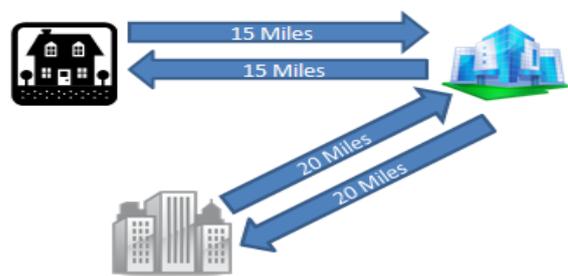
50 Miles to Claim

Home to Base to Meeting to Meeting to Home



40 Miles to Claim

Home to Base to Meeting/Training to Base to Home



Appendix 2

‘All employees required to use their own vehicle for business purposes will have to provide the following documentation which will be copied and added to the employee’s personal file. The documents must be kept up to date at all times.’ (Travel and Expenses Policy section 6.1)

The employee shall produce documents for the line manager to scrutinise and record the relevant details. A new form shall be completed as documents are renewed e.g. insurance

	Effective date and expiry date (where applicable)	Manager name and date seen
Driving Licence (paper and photo card)		
Car Insurance - including cover for business travel		
Car Tax		
MOT		

This form shall be stored in the employee’s personal file.

Payroll form HR3, Record of Vehicle Details, (available on the intranet) should also be completed and returned to payroll.

Equality Impact Assessment: Travel Expenses Policy

Equality Impact Analysis:

Policy / Project / Function:	Travel Expenses Policy	
Date of Analysis:	December 14	
This Equality Impact Analysis was completed by: (Name and Department)	Christine Brown - Workforce Service	
What are the aims and intended effects of this policy, project or function ?	<p>The purpose of this policy is to provide:</p> <ul style="list-style-type: none"> • A structured framework to claiming travel expenses • Practical guidance to staff and managers on process and procedure • To ensure that travel expenses are claimed in a consistent, accurate and timely way. • Guidance on mileage allowance 	
Please list any other policies that are related to or referred to as part of this analysis	<ul style="list-style-type: none"> • Disciplinary Policy • Agenda for Change Handbook • Excess Mileage Policy • Recruitment and Selection Policy 	
Who does the policy, project or function affect ? Please Tick ✓	Employees	<input checked="" type="checkbox"/>
	Service Users	<input type="checkbox"/>
	Members of the Public	<input type="checkbox"/>
	Other (List Below)	<input type="checkbox"/>

Equality Impact Analysis:

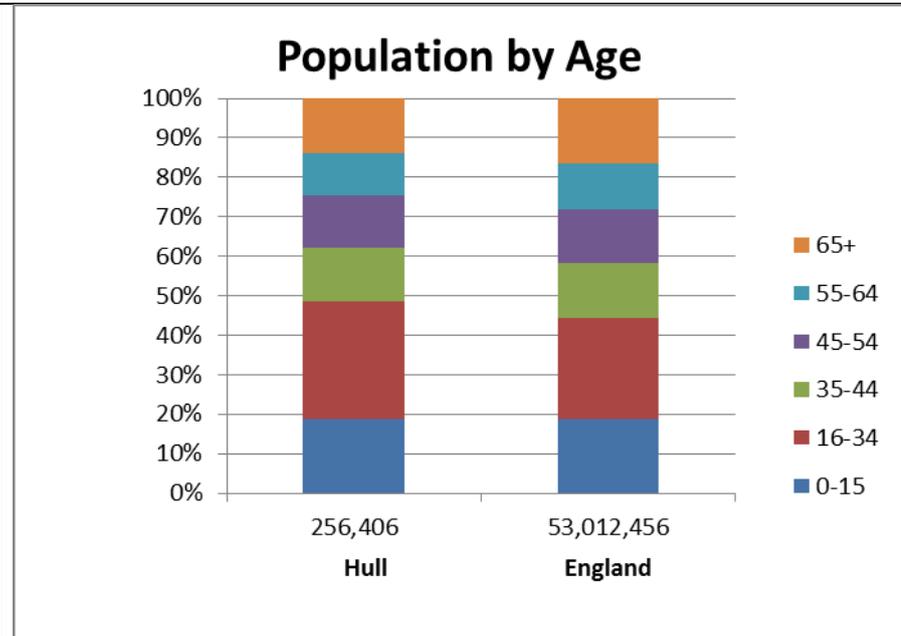
Local Profile/Demography of the Groups affected (population figures) Relevant data can be found in the attached Knowledge Management Toolkit Data as at July 2014

General

There are 57 GP practices in the Hull area which spans 7,154 hectares and, as a city, has relatively tight geographical boundaries with most of the 'leafy suburb' areas outside Hull's boundaries in East Riding of Yorkshire. As a result, Hull has a relatively high deprivation score, as measured by the Index of Multiple Deprivation 2010, with Hull ranked as the 10th most deprived local authority out of 326 (bottom 4%).

The resident population of Hull is 256,406 based on the 2011 Census data and 265,369 residents based on estimates from the local GP registration file as at October 2011. This equates to approximately 37 residents per hectare. The Joint Strategic Needs Assessment (JSNA) identifies considerable inequalities in health between Hull and England, and between populations within Hull.

Age



Compared to England, Hull has lower percentages of residents aged 10-19 years and 55+ years, but slightly higher percentages aged under 5, 20-34 years and 45-54 years. There is a relatively large difference between Hull and England for the age group 20-34 years, due to Hull's colleges and Universities.

There were 2,869 live births occurring to Hull residents in 2001, but this has increased steadily to 3,771 for 2010. The number of deaths occurring to Hull residents has decreased from 2,571 to 2,310 between 2001 and 2010. ONS estimated the resident population to be 243,596 in 2001 compared to 260,424 residents based on the GP registration file, with the difference between these estimates narrowing over time. So, whilst it is difficult to quantify the exact increase in Hull's population, it has increased over recent years.

	<p>Between 2010 and 2030, ONS estimate that Hull's population will increase from 266,100 to 311,900 residents, an increase of 17%.</p> <p>The figure above shows the population of Hull (2011 Census Data).</p>																
Race	<p>The percentage of the population from Black and Minority Ethnic (BME) groups has increased substantially since 2001. For the 2001 Census, it was estimated that 3.3% of Hull's population was not White British or White Irish, whereas Census data shows that this figure increased to 10.2% for 2011. There is no single BME group in Hull with much higher percentages compared to other groups. The 2011 census data shows:</p> <p>White British - 89.7% White Other - 4.4% Mixed - 1.3% Asian - 2.5% Black - 1.2% Other - 0.8%</p>																
Sex	<p>The gender split in Hull is approximately 50.1% men and 49.9% women. For 2008-2010, life expectancy in Hull was 75.7 years for men and 80.2 years for women compared to 78.6 years and 82.6 years for men and women respectively in England.</p>																
Gender reassignment	<p>No local information provided.</p>																
Disability	<p>According to the 2011 Census, it is estimated that approximately 19.7% of the Hull population lives with a long term health problem or disability compared with 17.6% for England. This information can be broken down further (Source: Projecting Older People Population Information System and Projecting Adult Needs and Service Information) to include learning disabilities, physical disabilities, hearing impairments and visual impairments, as follows:</p> <table border="1"> <thead> <tr> <th>2012 Estimates</th> <th>Hull</th> </tr> </thead> <tbody> <tr> <td>Learning Disability (Age 18 – 64)</td> <td>4,078</td> </tr> <tr> <td>Learning Disability (Age 65 and over)</td> <td>762</td> </tr> <tr> <td>Physical Disability – Moderate (Age 18 – 64)</td> <td>12,222</td> </tr> <tr> <td>Physical Disability – Serious (Age 18 – 64)</td> <td>3,491</td> </tr> <tr> <td>Visual Impairment (Age 18 – 64)</td> <td>108</td> </tr> <tr> <td>Visual Impairment (Age 65 and over)</td> <td>3,263</td> </tr> <tr> <td>Hearing Impairment – Moderate or Severe (Age 18 – 64)</td> <td>5,765</td> </tr> </tbody> </table>	2012 Estimates	Hull	Learning Disability (Age 18 – 64)	4,078	Learning Disability (Age 65 and over)	762	Physical Disability – Moderate (Age 18 – 64)	12,222	Physical Disability – Serious (Age 18 – 64)	3,491	Visual Impairment (Age 18 – 64)	108	Visual Impairment (Age 65 and over)	3,263	Hearing Impairment – Moderate or Severe (Age 18 – 64)	5,765
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	Hearing Impairment – Moderate or Severe (Age 65 and over)	15,707																				
	Hearing Impairment – Profound (Age 18 – 64)	49																				
	Hearing Impairment – Profound (Age 65 and over)	402																				
Sexual Orientation	There are no local statistics for how many Lesbian, Gay or Bisexual (LGB) people live within Hull however, nationally, the Government estimates that 5% of the population are lesbian, gay, bi and transgender communities.																					
Religion, faith and belief	According to the 2011 Census, 54.9% of the population have identified themselves as Christian and 3.1% of the population is made up of other religions. The remainder of the population did not state anything (7.2%) or stated 'no religion' (34.8%).																					
	<table border="1"> <thead> <tr> <th>Religion</th> <th>2011</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>54.9%</td> </tr> <tr> <td>Buddhist</td> <td>0.3%</td> </tr> <tr> <td>Hindu</td> <td>0.2%</td> </tr> <tr> <td>Jewish</td> <td>0.1%</td> </tr> <tr> <td>Muslim</td> <td>2.1%</td> </tr> <tr> <td>Sikh</td> <td>0.1%</td> </tr> <tr> <td>Other Religion</td> <td>0.3%</td> </tr> <tr> <td>No Religion</td> <td>34.8%</td> </tr> <tr> <td>Religion Not Stated</td> <td>7.2%</td> </tr> </tbody> </table>		Religion	2011	Christian	54.9%	Buddhist	0.3%	Hindu	0.2%	Jewish	0.1%	Muslim	2.1%	Sikh	0.1%	Other Religion	0.3%	No Religion	34.8%	Religion Not Stated	7.2%
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Sikh	0.1%																					
Other Religion	0.3%																					
No Religion	34.8%																					
Religion Not Stated	7.2%																					
Marriage and civil partnership	This protected characteristic generally only applies in the workplace. Data from the Office of National Statistics covering the period 2008-2010 indicates that there were 18,049 Civil Partnerships in England and Wales during this three-year period – 52% men and 48% women.																					
Pregnancy and maternity	There were 2,869 live births occurring to Hull residents in 2001, but this has increased steadily to 3,771 for 2010.																					

Equality Impact Analysis:

<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> <p>1: Application success rates <i>Equality Groups</i></p> <p>2: Complaints by <i>Equality Groups</i></p> <p>3: Service usage and withdrawal of services by <i>Equality Groups</i></p> <p>4: Grievances or decisions upheld and dismissed by <i>Equality Groups</i></p>	<div style="text-align: right;"> <input checked="" type="checkbox"/> </div> <p>Yes employee data has been used to support the monitoring of the impact of this policy in the future. The employee data is not included due to the low number of CCG employees and concern around anonymity</p> <div style="text-align: right;"> <input type="checkbox"/> </div> <p>No</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>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</p>	<ul style="list-style-type: none"> • SLT • CCG Employees • JTUPF Sub group • JTUPF • Governing Body (approval)
<p>Promoting Inclusivity</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>This Policy does not promote inclusivity but provides a framework to pay travel expenses</p>

Equality Impact 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
Gender (Men and Women)	✓			This has been considered and has a neutral impact.
Race (All Racial Groups)			✓	This has been considered and has a neutral impact ,
Disability (Mental and Physical)	✓			This has been considered and has a neutral impact.
Religion or Belief	✓			This has been considered and has a neutral impact.
Sexual Orientation (Heterosexual, Homosexual and Bisexual)	✓			This has been considered and has a neutral impact. .

Equality Impact 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
Pregnancy and Maternity	✓			This has been considered and has a neutral impact.
Transgender	✓			This has been considered and has a neutral impact. .
Marital Status	✓			This has been considered and has a neutral impact. .
Age	✓			This has been considered and has a neutral impact.

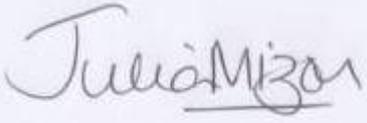
Action Planning:

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:
As the policy is written in English there is a potential impact on employees whose first language is not English and therefore may struggle reading the policy.	The CCGs internal 'portal' and external website signpost individuals to alternative formats such as large print, braille or another language.	CCG Communications	Oct 2014 continued updating of the facility is ongoing	Oct 2014

Equality Impact Findings:	
Analysis Rating:	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; width: 40px; height: 40px; display: flex; align-items: center; justify-content: center;"> </div> <div style="border: 1px solid black; width: 40px; height: 40px; display: flex; align-items: center; justify-content: center;"> </div> <div style="border: 1px solid black; width: 40px; height: 40px; display: flex; align-items: center; justify-content: center;"> </div> <div style="border: 1px solid black; width: 40px; height: 40px; display: flex; align-items: center; justify-content: center;">✓</div> </div> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> Red Red Amber Amber Green </div>
Red – Stop and remove the policy	Red: 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.
Red Amber – Continue the policy	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.
Amber – Adjust the Policy	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.
Green – No major change	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.

Brief Summary/Further comments	
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Other Comments:	
Confirmed by (Manager): (Name and Title)	 Julia Mizon Director of Commissioning and Partnerships
Date:	19 March 2015