

CHANGE MANAGEMENT POLICY

September 2015

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1 INTRODUCTION

- 1.1 The NHS Hull Clinical Commissioning Group (the CCG) actively manages its services so as to ensure the provision of the most effective health care for patients and customers within its resources. It recognises that as a result, changes may need to be made to the CCG's organisational requirements which may affect staffing needs.
- 1.2 "Organisational changes" may include the reorganisation, relocation, merger, significant expansion or reduction of a function, competitive tendering or outsourcing, or a major change in working practice. All such changes will be conducted in accordance with this document which incorporates best practice and legal requirements and aims to provide a framework for common understanding for managers, staff and trade unions.
- 1.3 This policy and procedure applies to local CCG change and the impact of change across the health/social care community.

2 PRINCIPLES

- 2.1 The purpose of this document is to set out the CCG's approach to the management of organisational change and the procedures that should be followed by managers wishing to implement major change. Where national change management processes apply, these will supersede local arrangements.
- 2.2 The principles and procedures support the aim of managing strategic and operational change in a way that is both supportive to staff and enhances the assurance of the highest quality provision of patient care.

3 IMPACT ANALYSES

3.1 Equality

In applying this policy, the CCG will have due regard to 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 addition to offending background, trade union membership, socio-economic class or any other personal characteristic.

In addition, section 13.1 below states, 'staff will be treated as individuals with due regard to their personal and employment circumstances and their career aspirations at all stages of the change management procedure'. As a result of performing the analysis, it is evident that a risk of discrimination exists and this risk may be removed or reduced by implementing the actions detailed within the *Action Planning* section of this document. An Equality Impact Assessment is attached at Appendix 1.

3.2 Bribery Act 2010

The Bribery Act is particularly relevant to this policy. Under the Bribery Act 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.

These offences can be committed directly or by and through a third person and other related policies and documentation (as detailed on the CCG intranet) when considering whether to offer or accept gifts and hospitality and/or other incentives.

Anyone with concerns or reasonably held suspicions about potentially fraudulent activity or practice should refer to the Local Anti-Fraud and Corruption Policy and contact the Local Counter Fraud Specialist

4 SCOPE

This document applies to all NHS staff employed by the CCG with agenda for changes terms and conditions, including those who are seconded out to another organisation and will be applied consistently and equitably to all staff. It does not apply to staff employed elsewhere and seconded into the CCG (those staff are the responsibility of their substantive employer) or to agency staff.

5 DEFINITIONS

For the purpose of applying the provisions contained in this document, the following definitions shall have the following meanings:

Affected by Change staff are those who may be affected by the change e.g. change of line manager, changes to responsibilities but are not at risk of redundancy

At Risk staff are those whose posts may potentially be redundant as a result of organisational change if suitable alternative employment cannot be found.

Continuous Service means full or part time employment with the CCG or any previous NHS employer provided there has not been a break of more than one week (Sunday to Saturday) between employments. This reflects the provisions of the Employment Rights Act 1996 and Agenda for Change (AfC) handbook (where applicable) on continuous employment.

COSOP means Cabinet Office Statement of Practice. National NHS guidance should be referred to if COSOP applies.

Mutually Agreed Resignation (MAR) is a scheme under which an individual employee, in agreement with their employer, chooses to leave employment in return for a severance payment.

Reckonable Service means Continuous Service plus any service with a previous NHS employer where there has been a break of 12 months or less which will then relate to annual leave and sickness leave calculations. At the CCG's discretion any period of employment outside the NHS which is relevant to NHS employment may be counted as Reckonable Service. For further information, refer to the AfC handbook.

Redeployment means the transferring or recruitment of Staff At Risk into a suitable alternative post.

Ringfencing means the process by which staff 'At Risk' will be considered for a post in a new staffing or management structure which is similar to their current post and where there is more than one contender for that post.

Slotting In means the process by which staff who are 'At Risk' are confirmed into a post in a new staffing or management structure which is similar to their current post and where that individual is the only contender for that post. Slotting in may occur where a post is in the same band as the individual's current post or where it remains substantially the same with regard to job content, responsibility, grade, status and requirements for skills, knowledge, experience and location.

Suitable Alternative Employment (SAE) describes an equivalent post defined in terms of pay, working hours, status, grade, duties and responsibilities, location and location allowances. It must be suitable to personal circumstances, skills and experience. It may be on any site operated by the CCG subject to individual travel considerations.

TUPE means the Transfer of Undertaking (Protection of Employment) Regulations 2006. Collective Redundancies and Transfer of Undertakings (Protection of Employment) (Amendment) Regulations 2014

6 ROLES / RESPONSIBILITIES / DUTIES

- 6.1 Staff are central to the achievement and success of organisational change. The CCG acknowledges that change can cause concern and uncertainty and should therefore be managed fairly and consistently in accordance with established good practice.

The CCG will engage with Trade Unions and consult staff in any change management procedure. Staff also have a role to play in this procedure in engaging with the consultation process.

- Managers are critical to the change management process and shall therefore be regularly briefed by Senior Managers, so that they are in a

position to respond to the concerns of staff in their teams. In turn managers should provide information to staff and trade unions so that they are able to make meaningful contributions to the consultation process.

- Managers must ensure that no member of staff is discriminated against on the grounds of contractual status, caring responsibilities, any protected characteristic as defined by the Equality Act e.g. ethnic origin, nationality, race, disability, gender, marital or partnership status, age, religion or belief, sexual orientation or transgender status, when applying this policy. Managers should have had formal training in Equality and Diversity.
- Managers should liaise with HR to ensure the CCG is not open to claims of discrimination as a result of a change management process and should be mindful of the need to consider making reasonable adjustments at the job design stage, when considering the suitability of alternative employment for an individual and in the arrangements for filling posts.
- Staff are expected to play an active role during the pre-consultation and consultation stages, in the further processes of implementation and in identifying new career opportunities; particularly if they are at risk of redundancy.
- Trade unions play a vital role in advising and representing staff undergoing organisational change and in working with managers to ensure that organisational change is managed with the least disruption and in accordance with the principle of avoiding compulsory redundancies wherever possible. The CCG will formally notify the trade unions of any proposed organisational changes and will undertake consultation with them in line with legal requirements.

The CCG will arrange additional paid facility time for agreed Trade Union representative members, where necessary, to ensure they are able to fully participate in this process.

7 IMPLEMENTATION

- 7.1 This policy will be communicated to staff via team meetings/team brief and will be available for staff on the intranet.
- 7.2 Breaches of this policy may be investigated and may result in the matter being treated as a disciplinary offence under the CCG's disciplinary procedure.

8 TRAINING & AWARENESS

- 8.1 A copy of the policy will be available on the CCG intranet. Training needs will be identified via the appraisal process and training needs analysis.

9 MONITORING & AUDIT

- 9.1 This policy is intended to be non-discriminatory, promote fairness and equity in the treatment of individuals and good employee relations. Use and compliance of this policy will therefore be monitored by the CSU Workforce Team, the Joint Trade Union Partnership Forum and reported to the Senior Leadership Team. Annual workforce monitoring reports will include reporting on all incidences of use of this policy and procedure, any redundancies and the selection criteria used. Reporting of redundancies and down-gradings will be against all equality strands.

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

The implementation of this policy will be audited on an annual basis by CCG Senior Leadership Team.

10 POLICY REVIEW

- 10.1 The policy and procedure will be reviewed after 3 years for the CCG Governing Body in conjunction with Trade Union representatives. Where review is necessary due to legislative change, this will happen immediately.

11 ASSOCIATED DOCUMENTATION

- Disciplinary Policy
- Grievance Policy
- Travel and Expenses Policy
- Pay Protection Policy
- Redeployment Policy
- Starting Salaries Policy
- Maternity, Maternity Support (Paternity), Adoption and Parental Leave Policy
- Agenda for Change Handbook

12 APPENDICES

Appendix 1 Equality Impact Assessment

13 CHANGE MANAGEMENT

13.1 Statement and principles

Organisational change is driven by the business needs of the CCG. Change can be triggered either by the external environment or by an internal review of organisational requirements. Examples of significant organisational change include the reorganisation, relocation, merger, expansion or closure of a service, competitive tendering or outsourcing, or a major change in working practice.

In order to meet changing business needs more effectively, there may be occasions when managers need to implement relatively minor changes. Reasonable minor changes and adjustments to duties and working practices may be implemented without recourse to the formal procedures in this document but will require reasonable consultation with staff affected, for example an individual job description. Any situation which may lead to redundancy will not be deemed to be a minor change.

The CCG is responsible for deciding the size and most efficient use of the workforce but in doing so is committed to the following principles for managing organisational change:

- the CCG will provide such information about the proposed organisational change in accordance with good employee relations practice to disclose to staff and the trade unions
- the CCG will work in partnership with the Trade Union and Staff Organisation representatives from the earliest stage possible
- staff will receive notice of any organisational change which may affect their futures at the earliest opportunity
- staff will be treated as individuals with due regard to their personal and employment circumstances and their career aspirations at all stages of the change management procedure
- staff will have the right to be accompanied by a trade union representative or workplace colleague at formal meetings to discuss the organisational change
- requests by the employee for additional support at any individual meetings should be considered e.g. where disability is involved and familiarity with the impairment or the individual or specialist input would be beneficial.
- the CCG will consider all reasonably practicable steps to avoid compulsory redundancies
- staff will be able to access training and development, as appropriate to meet new skill requirements and where appropriate to identify new career opportunities, with funding and time to attend training and development activities given
- career support is available from the CSU workforce team. This may include access to support in seeking SAE e.g. interview skills

Staff will be considered against their substantive post and contractual arrangements

throughout the process e.g. regarding their suitability for 'slotting in' and 'ring fencing'.

14 CONSULTATION

14.1 Purpose of consultation

In accordance with legislation and the partnership working principles of the NHS, the CCG commits itself to meaningful and appropriate consultation with trade unions and staff affected by the organisational change with a view to reaching agreement on the way forward although there will be times when organisational change will need to proceed without a consensus being reached on all issues. The timing and extent of consultation will be proportionate to the degree of proposed change, the number of staff affected and the impact on individuals.

The purpose of the consultation meetings with trade unions and staff will be:

- to receive and where possible address any questions on the consultation document
- to consider any comments or views on the consultation document including any alternative proposals and costings (which the CCG shall as far as practicable make available) before determining any final decision to proceed
- to clarify any change processes and timeframes specific to the proposed organisational change exercise under discussion.

14.2 Consultation Procedure

Managers shall prepare a consultation document on the proposed organisational change having gathered information to support the need for change and consulted with HR as appropriate.

The consultation document may include details of the following, as appropriate:

- current situation analysis including staffing structure
- impact on service/business
- impact on other areas / services
- consideration of any relevant health and safety assessment
- the need for change and the rationale behind the change
- the options that have been considered

- the proposals for change including the proposed staffing structure(s) and any location change
- the financial, staffing and workload implications of the proposals
- the number and grades/bands of staff who may be at risk of redundancy as a result of the proposal
- proposed timescale for consultation and implementation of the proposed change
- the way in which staff will be selected for posts within the new structure or transferred
- if necessary, the selection criteria for redundancy
- MAR scheme details, if available
- the measures to be taken to avoid compulsory redundancies which may include natural wastage, redeployment with retraining, or voluntary early retirement or voluntary redundancy
- details of any suitable alternative employment which may exist
- details of how this information will be disseminated to staff
- description of the consultation process, including planned meetings, timetable, how staff and representatives can respond and the deadline.

The consultation document will include an equality impact assessment.

14.3 Time periods for consultation

In all cases the CCG will allow sufficient time for meaningful consultation with staff and their representatives. In exceptional circumstances where changes need to be made very quickly, the trade unions will be briefed immediately and the verbal briefing will be followed by a written brief.

In a collective redundancy scenario, consultation will commence for a period of no less than the statutory time scales:

- where 20 - 99 redundancies are proposed then consultation should commence at least 30 days before the first redundancy takes place
- where 100 or more redundancies are proposed then consultation should commence at least 45 days before the first redundancy takes place.

The employer and the staff representatives can mutually decide that they have informed and consulted on the issues in a period less than the statutory timescales above. If that is the case, then the organisational change can begin to be implemented earlier, including sending out dismissal notices, if applicable. Note that this can only happen if the staff representatives agree that they have been fully informed and consulted as per section 13.2 above.

Trade unions and staff may request additional information or an extension of time if this is necessary to enable them to understand and contribute to an informed discussion on the merits of the proposal. Such requests will not unreasonably be refused, and where they cannot be accommodated a reason will be given.

14.4 Consultation with the trade unions

Early informal consultation with the trade unions is encouraged and should occur where possible. This is also known as pre-consultation. Meaningful pre-consultation often leads to an agreed shorter formal consultation time and greater staff satisfaction with the process.

Formal consultation (see section 13.2 above) with the trade unions will commence within the minimum timescales above once any informal comments have been considered and the consultation document has been finalised. This will take the form of:

- ongoing discussions with the local accredited representatives
- trade unions representing staff affected by the change should be invited to the first meeting with all affected staff and given reasonable notice to attend.

In a redundancy scenario, the information provided in writing to the trade unions shall include the following:

- the numbers and descriptions of employees whom it is proposed to dismiss as redundant
- the total number of employees of any such description employed by the CCG at the establishment in question
- the proposed method of selecting employees who may be dismissed
- the proposed method of carrying out the dismissals, with due regard to any agreed procedure, including the period over which the dismissals are to take effect (reference NHS Terms and Conditions Handbook: section 16)

- the proposed method of calculating the amount of any redundancy payments to be made (over and above the statutory redundancy payment) to employees who may be dismissed.

During a period of change, management will ensure that trade unions are kept informed of developments and will meet with the trade unions as appropriate.

14.5 Consultation with individual staff

A meeting will be held with all staff affected by the organisational change to announce the proposed change and explain the consultation process which will follow.

Each member of staff affected by the organisational change will be provided with a copy of the consultation document. Staff who are absent from work for any reason including maternity leave, sickness absence, secondment to another organisation, career breaks etc will be sent a copy of the consultation document at their home address/other suitable address so that they can participate in the consultation process and should be offered the opportunity to discuss the documentation further.

Each member of staff, including those absent from work, will be offered the opportunity of at least one individual meeting with their manager at which they have the right to be accompanied by a trade union representative or workplace colleague. HR advisory support will also be offered to support the process including engaging with manager, staff member and staff representatives. In a redundancy scenario, the meeting will be to discuss the issues set out at section 13.3.

At the meeting, each member of staff will be invited to comment and respond to the proposals, including how they may impact on their personal circumstances. It is recognised that staff may require time to respond and may not be able to do so at that particular meeting. Staff will therefore be made aware of their right to request further meetings with their manager during the consultation period.

A written record of the individual meetings will be kept and provided to the employee and their trade union representative where applicable. The record will be a note of the main points discussed at the meeting, not verbatim notes.

Regular updates and frequently asked questions may be circulated to staff throughout the formal consultation period. Throughout this period staff should be encouraged to discuss their concerns and queries with their line manager and trade union.

In addition to the individual consultation meetings, staff can be kept informed as appropriate by management, team meetings and briefings, newsletters, trade union meetings, email and other written communication and information supplied by the trade unions.

14.6 End of consultation

At the end of the consultation period the manager will give full consideration to all comments received from staff and the trade unions and will make a decision on the way forward. A written report will be provided to the staff and trade unions covering the change process to be followed and the timeframe. The report should (where appropriate) include:

- the reasons for the decision
- any relevant health and safety assessments
- an explanation where the management decision is in conflict with the views of the trade unions representatives/staff and any actions taken in an effort to resolve any areas of conflict; or where the proposal has changed as a result of consultation
- identification of posts which are the same or substantially the same in the old and new structures
- arrangements for filling posts via Slotting In or Ring fencing
- selection arrangements for posts within the new structure
- measures that will be taken to avoid compulsory redundancies
- arrangements for seeking suitable alternative employment
- reference to the CCG's protection arrangements and how these will apply
- support for staff who are affected by the change, including career counselling and reasonable time off to seek other employment or undertake training
- proposed timescales for each stage of the change process.
- equality impact assessment on the outcome of the consultation and the proposed changes on the individuals affected

Where redundancies are inevitable the CCG will set selection criteria for inclusion in the final consultation report. These criteria should be objective, clearly defined, measurable and non-discriminatory. Managers should seek advice from HR on the selection criteria to be used to ensure the CCG is not open to legal challenge. Selection criteria will be discussed, and agreed, with trade unions.

Under normal circumstances, staff will be selected on the basis of their relevant

skills, experience and qualifications to undertake the remaining jobs, as assessed through formal interviews held in accordance with CCG selection procedures. However there may be occasions where additional selection criteria are agreed with the trade unions during the consultation process, such as for example,

- Conduct and performance (as evidenced through the disciplinary and performance review records)
- Attendance records (with due regard to the causes of absence, whether these are disability related, in which additional support is available, and the equality impact of use of this criterion)

In considering any measures to avoid compulsory redundancies, including requests for voluntary redundancy or early retirement, operational efficiency and service needs must be taken into consideration. If a member of staff volunteers for redundancy/early retirement, approval of the request will be subject to the needs of the service and the cost implications. Care must be taken to ensure that decisions are based on sound organisational reasons and do not breach equality legislation. All efforts will be made to mitigate redundancies.

15 Support for staff

All staff affected by the organisational change will be encouraged to seek the advice and support of their trade union. Relevant support will be available and may include:

- help with the production of CVs/application forms (including assistance with NHS Jobs) and preparation for interviews from the CSU workforce team
- support in developing coping strategies and stress management, with support of the counselling service, through Occupational Health
- time to meet with recognised trade union representatives to discuss the change
- further assistance to staff who are at risk of redundancy will include reasonable time off to seek other employment or undertake training
- placement on the CCG's "At Risk" register via the CSU workforce team.

Even after the change has taken place, the CCG acknowledges that staff may take some time to adjust to the change itself. Managers should remain available to staff to manage any issues that arise and support staff through the transition.

15.1 The process for filling posts in the new structure

There will be three stages in the process for filling posts in a new structure:

- Stage One. For those staff that are affected by the change. Posts in the new structure are filled either by 'slotting in' or by 'ringfencing' (see section 5 Definitions).
- Stage Two. Any posts that remain vacant in the new structure following Stage 1 will be opened up to access by any staff on the CCG 'at risk' register for whom the post is considered suitable alternative employment, this could include 'ring fencing' to a specific department in the first instance. This may include posts a lower pay band, in which case pay protection might apply. Priority will be given to employees who are in a redundancy notice period over employees who are on the register for other reasons e.g. pay protection.
- Stage 3. Any posts that still remain vacant will be advertised internally and/or externally, in line with the normal recruitment process.

The three stages may run concurrently but priority will still be implemented in this order to ensure that all reasonably practicable steps will be taken to avoid compulsory redundancies. Priority will be given to employees that are affected by the change.

Job descriptions and person specifications will be produced for new posts. Jobs will be matched or evaluated in partnership in accordance with the national NHS job evaluation scheme.

In cases of workforce re-profiling the principles of AfC Annex X shall be applied.

Selection criteria for all posts in the new structure (whether or not there is competition) must be non-discriminatory, fair, objective, clearly defined and based on the skills and competency requirements of the post. The selection criteria must be made available with the consultation document.

Staff who are offered posts during Stage One will be deemed to have been offered suitable alternative employment by the CCG. This will be confirmed in writing by the manager. [This is on the basis that if staff are Slotted In or offered Ring fenced posts it will be assumed that the posts offered are suitable alternative employment and hence the consequences of refusing to accept these posts will be as per refusing suitable alternative employment.]

Employees shall have the right to appeal during Stage One against the decision to be chosen to slot/not to slot in to a post or for selection or non-selection to a ring-fenced pool. Employees shall have 5 working days from the date of the letter to submit an appeal in writing to the appointing manager. The appeal shall be considered by an independent manager equal to or above the change manager and shall be responded to within 5 working days from receipt of the letter.

Employees should only be turned down for posts where they fail to meet the

essential criteria or where others in the at risk pool are considered to meet the requirements better (the fact that there may be better candidates in the external labour market is not a reason for non-selection). Any member of staff who is not appointed to a post in the new structure will be offered post-interview feedback and further support where appropriate, and has the right to appeal via local grievance procedures.

15.2 Staff At Risk

When changes in staffing levels or skill mix are proposed which will lead to a reduction in the numbers of staff employed in particular grades, occupational groups or specialties, management will identify the positions, individual staff or pool of staff who are at risk of redundancy as a result of the changes in line with the agreed criteria (see section 13.7). Staff who are acting up or on a secondment will be placed in the pool relating to their substantive post.

The identification of being at risk of redundancy is not a notice of redundancy.

Staff At Risk will be invited to a meeting(s) with their manager and trade union representative or work colleague to:

- discuss how the proposed changes affect the individual
- explain why the individual is at risk of redundancy
- discuss ideas for avoiding redundancy dismissals, reducing the number of Staff At Risk who are made redundant and mitigating the consequences of any redundancy dismissals
- explore the possibility of Redeployment
- explain the process for Redeployment
- explain the arrangements for protection of pay and terms and conditions where applicable
- offer support and assistance
- discuss any other relevant issues and processes which may include providing a redundancy payment estimate if requested.

Following the meeting, Staff At Risk will be given a letter within five working days to confirm their at risk status and the key points discussed at the meeting including answers, wherever possible, to questions raised at the meeting for which there were no immediate answers available at the time.

Staff At Risk will be given prior consideration for posts within the new structure where they meet the selection criteria, under Stage One of the process. Where they are selected for a new post they will normally be given the offer in writing within seven working days of the interview. Any training required will be discussed with the member of staff as part of the offer process; and they will have a right to a four week trial period to allow both sides to decide if the work provides a suitable alternative, whilst still protecting the individual's right to a redundancy payment (see section 18 below).

In the case of significant change which spans a number of NHS organisations, the CCG will endeavour to reach an agreement with those organisations regarding the establishment of job redeployment opportunities. The agreement will contain a commitment to equality of opportunity for all staff who will then have the same access to opportunities and vacant posts with any of the organisations.

Staff who are not selected for a post in the new structure will be formally declared at risk of redundancy and given notice of redundancy in accordance with the contract of employment. They will continue to be listed on the CCG's at risk register until their contract ceases or they are successfully redeployed.

There may be situations where it is necessary to give notice of redundancy in accordance with the contract of employment at the end of the consultation process.

Staff At Risk will be required to register with NHS Jobs and apply for suitable posts within the NHS. The Workforce Team will use the full functionality of NHS Jobs (including "internal only" and "restricted vacancy" functionality) to support redeployment of staff at risk.

Staff At Risk will be given prior consideration for other posts that are or become vacant in the CCG and, subject to the arrangements regarding suitable alternative employment and trial periods, they will remain on the register until their last day of service or until successful redeployment.

Special provision is made in law where an employee's job becomes redundant while he or she is absent on maternity, adoption, paternity, or parental leave; the employee is entitled to be offered any suitable alternative vacancy before the existing contract ends, in preference to employees who are not absent on such leave (even if other employees are more suitable for the role).

16 Redundancy

16.1 Definition of redundancy

A member of staff may become redundant if they are dismissed and the reason for the dismissal is wholly or mainly due to:

- the fact that the CCG has ceased, or intends to cease, to carry on the activity for the purposes of which the individual was employed, or has ceased, or intends to cease, to carry out the activity in the place where the individual was employed OR
- the fact that the requirements of the CCG for staff to carry out work of a particular kind in the place where they were so employed, have ceased or diminished or are expected to cease or diminish.

16.2 Suitable Alternative Employment

Suitable alternative employment will be an equivalent post defined in terms of pay, working hours, status, grade, duties and responsibilities, location and location allowances. It must be suitable to the individual's personal circumstances, skills and experience. It may be on any site operated by the CCG subject to individual travel considerations. Staff At Risk will be given prior consideration for suitable posts in line with their skills, experience and capabilities and where appropriate will receive protection of pay.

Where there are insufficient numbers of vacant posts within the CCG, the Human Resources Team will endeavour to identify suitable redeployment opportunities within the wider NHS and draw these to the attention of the staff.

Staff are reminded that under Agenda for Change terms and conditions an unreasonable refusal to accept suitable alternative employment offered by the CCG, or another NHS employer, will mean that they are not entitled to a redundancy payment (see section 13.15 of this policy and AfC Section 16).

In considering suitable alternative employment priority will be given to staff with a Contract of Employment with the CCG.

Following identification of potentially suitable posts at either Stage One or Stage Two, individual staff 'At Risk' will be offered the position in writing and be given a copy of the job description/person specification and a deadline of at least five working days within which to apply. In some circumstances e.g. annual leave and other types of leave, this period may be appropriately extended. During this period the individual may meet with the appropriate manager informally to discuss their interest.

If the individual is offered the post, this will be treated as an offer of suitable alternative employment and a trial period will apply.

Staff who unreasonably refuse an offer of suitable alternative employment may lose their right to a redundancy payment.

16.3 Trial Periods and Training

A trial period will only apply to Staff At Risk where a formal offer of suitable

alternative employment has been made. This also includes those staff who have been offered SAE whilst absent on maternity, adoption, paternity, or parental leave.

The purpose of a trial period is for both the manager and the individual to assess the suitability of the post as alternative employment.

Where staff have the potential ability but not the immediate experience to undertake full duties of the role, they will be provided with appropriate skills development/training. This will be provided where it is reasonable, practical and cost effective and where the member of staff demonstrates a willingness to learn and can apply the new skills within an agreed timeframe.

The trial period will normally last for four weeks but may be extended by mutual agreement in special circumstances, including where a member of staff requires additional training and development.

If the trial period is unsuccessful, as determined by the individual and/or the manager concerned, redundancy arrangements will apply as from the date when the original contract of employment will terminate. Until the end of their notice period Staff At Risk will be considered for other suitable alternative employment if available which will be subject to the same arrangements including a trial period.

16.4 Change of location

If, as a result of organisational change, there is a requirement to move staff from their normal place of work to another location within the CCG on a temporary or permanent basis and this results in increased travel costs to and from work, staff may be reimbursed their extra daily travelling expenses in line with the CCG's Travel and Expenses Policy and section 17 of AfC.

16.5 Redundancy arrangements

A member of staff will have their contract of employment terminated on the grounds of redundancy if no suitable alternative employment can be found or if a trial period is unsuccessful.

The terms under which a redundancy payment and/or early retirement benefit are payable are available in section 16 of the AfC handbook.

- Some staff may be subject to locally-agreed contractual arrangements in respect of redundancy which will need to be honoured.
- In some circumstances tax benefit may be applied to the payments. Individuals should source independent financial advice.

Staff will not be entitled to redundancy payments/early retirement on the grounds of redundancy if they:

- are dismissed for reasons of misconduct
- at the date of the termination of the contract have obtained without a break, or with a break not exceeding four weeks, suitable alternative employment with the CCG or other NHS employer
- unreasonably refuse to accept or apply for suitable alternative employment with the CCG or another NHS employer
- leave their employment before expiry of notice, except if they are being released early
- are offered a renewal of contract with the substitution of a new employer for the CCG.

Staff whose employment is subject to TUPE transfer will not be redundant and therefore will not be entitled to redundancy payments/early retirement on the grounds of redundancy.

For further information please refer to Part 3, Section 16, of Agenda for Change: NHS Terms and Conditions of Service Handbook and the NHS Pension Scheme early retirement booklet or seek further advice from the CCG's HR department or your trade union.

The manager will liaise with HR in order to obtain details of redundancy entitlements and other aspects of the redundancy process. The manager will provide, in writing, the individual and their trade union representative with the following details:

- the number of weeks' notice, in accordance with the contractual notice period
- the effective date of the redundancy, which will also be the last day of service
- the number of days' outstanding annual leave, where applicable, to be paid in lieu
- the amount of redundancy payment/enhanced pension benefits that will be paid, where applicable
- what efforts will be made to assist the individual in seeking suitable alternative employment during the notice period
- what support is offered during the notice period e.g. help with job search, CV and interview preparation

- what work the individual will be expected to undertake during their notice period
- that reasonable time off with pay will be given to seek and prepare for alternative work
- that early release will normally be given, unless there are compelling service reasons to the contrary, if the individual is successful in obtaining other employment outside the NHS and wishes to take this up during the notice period; the date of early release will then become the revised date of redundancy for the purpose of calculating any entitlement to a redundancy payment
- the right of appeal against selection for redundancy or the terms of the redundancy.

17 Protection arrangements

Protection of Pay Policy provisions will be put in place in order to support staff who, as a result of organisational change, are required to move to a new post which would entail a reduction of earnings and certain terms and conditions of employment.

Pay protection will apply for the agreed periods as set out in the Pay Protection Policy or until the member of staff moves voluntarily to a new post within the CCG.

18 TUPE

18.1 Transfers of services and staff

Where there is a proposal to transfer services and staff to a different employer, there will be consultation with the trade unions at the earliest opportunity. This will usually be a minimum of 30 days (unless otherwise agreed) and where 100 or more staff are affected will be 45 days where reasonably practicable.

When services are transferred from one organisation to another in line with TUPE or by virtue of a Transfer Order under the National Health Service Act 1977, which mirrors TUPE, the employment of staff who are assigned to the services which are being transferred will transfer to the new organisation. TUPE applies in contracting out scenarios, retendering and where the services are brought back into the NHS.

Where TUPE is applicable, all the terms and conditions within the transferring employee's contract of employment (including relevant policies and procedures) will transfer with them and should not be changed as a consequence of the transfer.

Where staff have responsibilities spanning more than one NHS organisation or more than one service, discussions will take place with the individual, their trade union

representative and the organisations concerned to determine if their employment should transfer. The options in this situation might be that the individual will transfer to one organisation with an agreement to provide services to the other(s), or have more than one contract of employment, or, in exceptional circumstances, to be declared at risk.

In all of these circumstances, for the purposes of the consultation that will be carried out, the manager will identify the functions, posts and individual staff that will transfer or be affected in accordance with the obligations of TUPE and shall write to the staff affected and the trade unions informing them of the intention that staff will transfer. They will also share information relating to the implications of the transfer and any measures which will be taken in connection with the transfer as declared by the receiving organisation.

The manager will then hold one-to-one meetings with individual staff and their trade union representative to discuss the implications of the transfer, measures to be taken in connection with the transfer, answer any concerns or queries, discuss possible options if appropriate and consider personal circumstances. These discussions will be documented and confirmed in writing. Every possible support will be given to staff to understand the reasons for and implications of the transfer and to ensure they have the necessary information with which to prepare themselves.

Formal notice of a transfer will be issued as long before the date of the transfer as possible in order to comply with the obligations of TUPE and this policy. The CCG will make every effort to give up to 3 months' notice of a transfer, where possible. Where 3 months' notice is not possible, for example where the timing of external announcements or decisions of approval, a shorter notice period will be provided after consultation with the Partnership Forum.

19 Appeals

The appeals process against slotting or ring fence pool decisions is set out in section 13.9.

Appeals against the selection criteria for redundancy or the decision to dismiss an employee by reason of redundancy or against the offer of a suitable alternative post will be heard in accordance with the CCG's Grievance Policy. The decision of the Appeal Panel will be final and there will be no further opportunity for recourse to the Grievance Procedure.

Complaints about misapplication of the Change Management Policy and Procedure in the way that the consultation or redeployment processes have been handled will be dealt with in accordance with the CCG's Grievance Policy.

20 Mutually Agreed Resignation

MAR is a scheme under which an individual employee, in agreement with their

employer, chooses to leave employment in return for a severance payment. MAR is not a redundancy or a voluntary redundancy. Severance payments should not be made where the circumstances entitle an employee to a contractual redundancy payment or redundancy benefits under the NHS Pension Scheme Regulations

There may be a risk of a future redundancy claim if an employee is paid under MARS when their post is in fact redundant.

A MAR is viewed as being a voluntary resignation on the part of the individual employee, in return for a severance payment. As there may be significant financial implications, employees may wish to seek advice from a regulated financial advisor. Refer to section 20 of Agenda for Change handbook for further information.

Equality Impact Assessment:

Change Management Policy

Equality Impact Analysis:

Policy / Project / Function:	Change Management Policy
Date of Analysis:	November 2014
This Equality Impact Analysis was completed by: (Name and Department)	YHCS Workforce Team
What are the aims and intended effects of this policy, project or function ?	<p>The purpose of this document is to set out the CCG's approach to the management of organisational change and the procedures that should be followed by managers wishing to implement major change.</p> <p>The principles and procedures support the aim of managing strategic and operational change in a way that is both supportive to staff and enhances the provision of the highest quality provision of patient care</p>
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 • Grievance Policy • Travel and Expenses Policy • Pay Protection Policy • Redeployment Policy • Starting Salaries Policy • Maternity, Maternity Support (Paternity), Adoption and Parental Leave Policy • Agenda for Change Handbook
Who does the policy, project or function affect ? Please Tick ✓	<p>Employees ✓</p> <p>Service Users</p> <p>Members of the Public</p> <p>Other (List Below)</p>

Equality Impact Analysis:

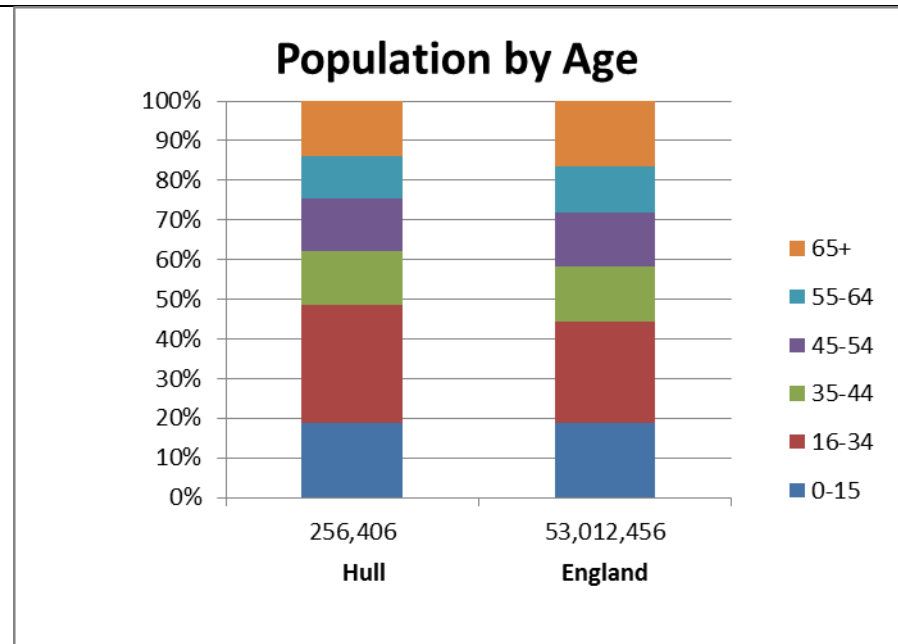
Local Profile/Demography of the Groups affected (population figures) Relevant data can be found in the attached Knowledge Management Toolkit (Employee data as at Jan 2015)

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> <tr> <td>Hearing Impairment – Moderate or Severe (Age 65 and over)</td> <td>15,707</td> </tr> <tr> <td>Hearing Impairment – Profound (Age 18 – 64)</td> <td>49</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	Hearing Impairment – Moderate or Severe (Age 65 and over)	15,707	Hearing Impairment – Profound (Age 18 – 64)	49
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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	<p>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%).</p> <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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Marriage and civil partnership	<p>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.</p> <p>In Hull 36.6% of people are married, 14.6% cohabit with a member of the opposite sex, 0.9% live with a partner of the same sex, 30.6% are single and have never married or been in a registered same sex partnership, 10.1% are separated or divorced. There are 15,612 widowed people living in Kingston upon Hull (Census 2011).</p>																					
Pregnancy and maternity	<p>There were 2,869 live births occurring to Hull residents in 2001, but this has increased steadily to 3,771 for 2010.</p> <p>From JSNA, 2013 the fertility rate in Hull is slightly higher than national and regional comparisons. The total period fertility rate for Hull in 2013 was 1.9 compared with 1.86 regionally and 1.85 for England.</p>																					

Equality Impact Analysis:

<p>Is any Equality Data available relating to the use or implementation of this policy, project or function ? 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) 1: Application success rates <i>Equality Groups</i> 2: Complaints by <i>Equality Groups</i> 3: Service usage and withdrawal of services by <i>Equality Groups</i> 4: Grievances or decisions upheld and dismissed by <i>Equality Groups</i></p>	<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> <p style="text-align: center;">No <input style="width: 60px; height: 30px; border: 1px solid black;" 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>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>	<p>Consultation has taken place both locally and nationally with Trade Unions and staff</p> <ul style="list-style-type: none"> • SLT • CCG Employees • JTUPF Sub group • JTUPF • Governing Body (approval)
<p>Promoting Inclusivity How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation</p>	<p>The Policy does not specifically promote Inclusivity but provides a framework for the management of change in order to reduce the risk of discrimination</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)	✓			<p>Any redeployment should take account of the employee's ability to work a particular pattern. This is covered in 13.1 <i>staff will be treated as individuals with due regard to their personal and employment</i> This is important for staff with caring responsibilities</p> <p>Human Rights Commission in their report <i>How Fair is Britain?</i> <i>'Throughout their lives, women are much more likely than men to take on unpaid care responsibilities both for children, and for older people.'</i></p> <p>In addition the following data is available from the 2011 ONS census: <i>Just over half (58%) of the 5.41 million people providing some level of unpaid care in England are female and 42% are male. Female carers are representative of 11.9% of the total female population of England and Wales, and male carers are representative of 9% of the male population.</i></p> <p>It is possible that para 13.1 will have a potential positive impact on women carers as a group undergoing redeployment, though the same consideration will be given to men.</p>
Race (All Racial Groups)	✓			<p>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. However this potential impact is minimised due to the development of the 'portal' facilities detailed in the action plan. An employee of the CCG would require sufficient</p>

				language proficiency to undertake their job roles. Any risk is also mitigated by being able to be accompanied at meetings so to be able to understand policy implications to each individual's circumstances
Disability (Mental and Physical)	✓			<p>Para 6.1 states <i>Managers should be mindful of the need to consider making reasonable adjustments</i> and para 13.1 states <i>staff will be treated as individuals with due regard to their personal and employment circumstances.</i></p> <p>Discrimination by association should also be considered here ensuring the rights for employees who for example need to care for a disabled child.</p> <p>The above are clear and positive statements to staff with disabilities</p>
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.
Pregnancy and Maternity	✓			<p>Policy makes specific reference to ensure that staff on maternity leave are given the opportunity to participate in consultation.</p> <p>Special provisions in place where staff who are absent due to maternity, adoption or paternity leave would have preference for roles over staff who are not absent on such leave, even if they are not the most suitable for the role.</p>

Transgender	✓			This has been considered and has a neutral impact.
Marital Status	✓			This has been considered and has a neutral impact.
Age			✓	The policy applies irrespective of age but does refer to the fact that eligible employees have the option of accessing early retirement. <u>Negative Impact</u> If costs are viewed as a method of determining voluntary redundancies, this could be considered a disadvantage to older people

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	April 2015	Next policy review
If costs are viewed as a method of determining voluntary redundancies, this could be considered a disadvantage to older people	Careful consideration should be given to groups of staff where voluntary redundancy is refused on the basis of cost	Head of HR	When policy is implemented	When policy is reviewed
Both negative impacts could affect the criterias for selections for posts	Endure that a fair and transparent process for assessing the protected characteristics of a staff member is completed so the any disadvantage is remedied. Describe in the policy and ensure systems (absence reporting) are aligned.	Head of HR	When policy is implemented	When policy is reviewed

Equality Impact Findings:

Analysis Rating:	AMBER
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	<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>
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Signatures	
Other Comments	
Confirmed by (manager): (Name and Title)	
Date:	20.07.15