

ON-CALL POLICY

Date Issued:	April 2015
Date to be reviewed:	April 2018 or earlier if legislation requires

Hull Clinical Commissioning Group

Policy Title:	On-Call Policy	
Supersedes:	New Policy for CCG	
Description of Amendment(s):	New Policy for CCG	
This policy will impact on:	Selective staff within the CCG service	
Financial Implications:	Yes	
Policy Area:		
Version No:	1.0	
Issued By:	HR	
Author:	Yorkshire and Humber Commissioning Support	
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Review Date:	To be reviewed periodically or if legislation changes	
APPROVAL RECORD		
	<u>Committees / Groups / Individual</u>	Date
Consultation:	CCG SLT	January 2015
	CCG Employees	January 2015
	Joint Trades Union Partnership Forum – Sub Group	February 2015
Approved by Committees:	CCG SLT	
	Joint Trades Union Partnership Forum	25 February 2015
	CCG Remuneration Committee	
	CCG Governing Body	27 March 2015

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ON-CALL POLICY

1.0 POLICY STATEMENT

- 1.1 As part of NHS Hull CCGs (the CCG) emergency preparedness plan there will be a requirement for certain groups of staff to provide an on-call service outside of normal working hours.
- 1.2 This policy has been developed in accordance with the Principles for Harmonised On-Call Arrangements in Annex 3 of the NHS Agenda for Change Handbook and the NHS Staff Council Implementation Guidance.
- 1.3 This policy will apply to all employees with Agenda for Change Terms and Conditions who are required to be on-call.
- 1.4 VSM roles do not attract any additional payment for being on-call. However, the principles of this policy will apply to VSMS on-call, excluding any remuneration as set out in section 7.0.

2.0. PRINCIPLES

- 2.1 This policy will be communicated to staff via team meetings/team brief and will be available for staff on the intranet.
- 2.2 Training and support will be available to all Line Managers whose staff are required to be on-call in the implementation and application of this policy
- 2.3 Exemptions will be made for individuals with exceptional personal circumstances. Further information on this is detailed in section 8.0.

3.0 DEFINITIONS

- 3.1 **On-call:** A member of staff is on-call when, as part of an established arrangement with his/her employer, he/she is available outside his/her normal working hours – either at the workplace, at home or elsewhere – to work as and when required.
- 3.2 **Work done:** Work done as part of the on-call service will include time spent resolving queries either at the workplace, at home or elsewhere and will include travel time if required. It will include resolving calls over the telephone as well as on site, but will not include referring telephone calls elsewhere (e.g. to another on-call worker) or providing advice. See 7.2 Remuneration for more information.

4.0 IMPACT ANALYSES

4.1 Equality

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

In developing this policy, an Equality Impact Analysis has been undertaken and is attached at Appendix 1. As a result of performing the analysis, the policy could have an adverse impact on CCG employees with protected characteristics, however a process exists for individuals to apply for exemptions; monitoring of these requests will form part of the review arrangements.

The application of this policy will be monitored alongside employee demographic data to ensure fair application.

4.2 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 this policy.

5. MONITORING & REVIEW

- 5.1 The policy and procedure will be reviewed and audited periodically by the Commissioning Support Units Workforce Team in conjunction with the senior

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leadership team and Trade Union representatives. Where review is necessary due to legislative change, this will happen immediately.

- 5.2 The implementation of this policy will be audited on an annual basis by the CCG Senior Leadership Team (SLT).

6.0 KEY POINTS

6.1 The on-call rotas

- 6.1.1 The out of hours on-call rota will be provided between the hours of 5pm – 8am (Monday to Friday) and 24 hours a day on weekends and bank holidays.
- 6.1.2 The on-call rota will rotate once a week and the on-call individual will remain on-call between the hours stipulated above (6.1.1) until rotation of the next weekly on-call shift.
- 6.1.3 There will be a primary 'on-call rota' identifying the employee who is on call during the period. On-call managers will be allocated a 'deputy' on the on-call rota, who they must also notify in accordance with the Lone Worker policy on the rare occasion that they travel to sites outside of normal working hours and who can be contacted in case of sickness.
- 6.1.4 The on-call rota will be available at least 6 months in advance and usually longer to allow individuals to plan ahead. Swapping on-call shifts is allowed but will be managed by the on-call staff within each rota. Individuals will be responsible for updating the rota accordingly so that management have access to the most up to date record of who will be on each shift
- 6.1.5 For part-time employees, all terms, conditions and rotas will be applied on a pro-rata basis.

6.2 Resolving calls

- 6.2.1 Where possible, on-call issues will be dealt with remotely via telephone in order to avoid the need to travel.
- 6.2.2 Employees on-call will be provided with an agile kit in order to respond to calls remotely wherever possible. It will be the responsibility of each employee to raise any issues with their agile kit or make requests for additional equipment to their line manager.

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- 6.2.3 For the safety and security of staff, where it is necessary for an employee to visit a site outside of normal working hours in order to resolve a call, they must telephone the on-call deputy to notify them that they are setting off to a site, arrived at a site, and again when leaving the site and upon arrival at home to ensure that the on-call deputy is always aware of their whereabouts and movements while working. Should they be at a site for long periods at a time, they may also need to update the deputy at designated intervals.
- 6.2.4 All on-call employees must be aware of and act in accordance with all other CCG Health and Safety policies; particularly, the CCGs Lone Worker policy, including awareness of the escalation process where an employee has concerns about their own or another individual's health and safety.

6.3 Handover

- 6.3.1 On completion of an on-call shift, it will be the responsibility of the finishing employee to fully handover to the next on-call worker. This will include; informing them of the nature of any calls resolved and any unresolved calls, areas of concern or query. Staff will use their own equipment (laptops, mobiles etc.) as part of the on-call rota, with a divert put to their mobile for the week shift.
- 6.3.2 When commencing an on-call shift, it will be the responsibility of the starting employee to learn which other employees and deputy will be on-call that week by checking the most up-to-date rota. They must also ensure they have access to the On-Call Employee documentation.
- 6.3.3 The On-Call Employee Handbook will be continually updated to serve as a reference point for individuals while on-call. The handbook will be version controlled and will be the responsibility of the CCGs Emergency Preparedness Officer, or a delegated representative of the senior management team in their absence. Staff covering the rota will be responsible for obtaining the latest version of the handbook from the network once notified of any updates. It may include, but is not limited to: names and useful telephone numbers and webpage links; relevant updates.

6.4 Availability for work

- 6.4.1 While on an on-call shift employees must be available to resolve calls in a timely manner.

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- 6.4.2 If the on-call employee is unable to answer a call, for example if driving, it is normally expected that voicemail messages will be returned within one hour. It will be the responsibility of the on-call employee to ensure that the voicemail tool is enabled.
- 6.4.3 Employees must also ensure that they have access to their agile kit in order to respond to calls within an hour.
- 6.4.4 Where possible, calls will be resolved remotely from the employee's home or other location. If a site visit is required in order to resolve a call, it is anticipated that the individual will be within a reasonable travel time distance based on employee's home and site location.
- 6.4.5 If an on-call employee becomes unavailable to work outside of normal working hours for reasons such as sickness absence, they must telephone the on-call deputy who will make appropriate arrangements with the remaining on-call individuals. The on-call employee must also follow normal sickness reporting arrangements if they are still unable to work the next day.
- 6.4.6 Employees must be available to work while on-call and as such they must ensure that they comply with the CCGs Substance Misuse Policy.

6.5 Recording work done

- 6.5.1 All calls taken during the on-call shift must be recorded, regardless of whether or not these were resolved. These will be used as a record of the work done by employees during an on-call shift. This record will be used for audit purposes together with any payroll documentation.
- 6.5.2 On-call employees who are eligible to claim overtime must complete a HR-8 Overtime Payments form in order to claim payment for any work done during the on-call shift. This form can be found by accessing XXX The on-call pay enhancement will be paid automatically as a pro-rata payment.

6.6 Compensatory Rest

- 6.6.1 In accordance with Section 27 of Agenda for Change, on-call employees may not always have a daily rest period of 11 uninterrupted hours. However, where the employee's rest period has been interrupted to cause a total rest period of less than 11 hours, the employee will be able to take a compensatory rest period the following morning equivalent to the rest missed.

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- 6.6.2 We will allow employees to take time back the following day when they have taken a call after midnight that lasts more than one hour.
- 6.6.3 In both circumstances the employee will be responsible for contacting their line manager to advise the time that they will be in work the following morning.

7.0 REMUNERATION

7.1 On-call pay enhancement

- 7.1.1 Employees on the on-call rota will receive an on-call pay enhancement exclusive of payments made to reimburse on-call employees for work done. This enhancement recognises their availability to provide cover.
- 7.1.2 The on-call pay enhancement will be paid as a percentage of employee's basic salary dependent on the frequency that they are expected to be on-call, as follows:

Frequency of on-call	Value of enhancements as percentage of basic pay
1 in 3 or more frequent	9.5%
1 in 7 or more but less than 1 in 3	4.5%
1 in 9 or more but less than 1 in 7	3.0%
1 in 12 or more but less than 1 in 9	2.0%
Less frequent than 1 in 12	By local agreement - 2.0%

Table 1: On-call pay enhancements by frequency

- 7.1.3 In accordance with Agenda for Change, on-call payments are calculated on basic pay only (plus any long-term recruitment/ retention premium where in place) and therefore will not include any pay protection arrangement.

7.2 Remuneration for work done

- 7.2.1 For those eligible employees, payment for work done (see 3.0 Definitions) Monday to Sunday will be paid at time and a half, with the exception of work on contracted Public Holidays which will be paid at double time (in accordance with section 2.45 & 3.1 of Agenda for Change Terms & Conditions).
- 7.2.2 A minimum payment of 1 hour at the appropriate rate will be paid for the first call taken in each 24-hour period, with actual time to be paid for work undertaken beyond

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the first hour. Thereafter, work done will be paid in 15 minute blocks at a time, with employees rounding up or down appropriately as follows

Round to 0 minutes	Round to 15 minutes	Round to 30 minutes	Round to 45 minutes	Round to 1 hour
0 – 7 minutes	8 – 22 minutes	23 – 37 minutes	38 – 52 minutes	53 – 67 minutes

- 7.2.3 Staff have the option to take Time Off in Lieu (TOIL) at plain time rather than payment for work done, but this can only be with the agreement of the member of staff. It must be agreed in advance of the on-call shift with their line manager and must be taken in line with paragraph 3.5 of the NHS Terms and Conditions of Service Handbook. This cannot be taken as part of a session; either TOIL or payment will apply but not a mix.
- 7.2.4 It is not expected that an on-call member of the Senior Leadership Team will carry out duties that amount to work done, except in very rare circumstances. On such occasions, members of SLT working under Agenda for Change Terms and Conditions will have the opportunity to take TOIL at plain time rate but will not be eligible to receive payment for work done.

7.3 Travel and Expenses

- 7.3.1 As referred to under 3.0 'Definitions' travel time required to resolve telephone queries while on-call will be counted towards work done and will be paid in accordance with section 7.2 of this policy.
- 7.3.2 Travel expenses accrued on such journeys will be paid in line with Section 17 of the NHS Terms and Conditions of Service Handbook and by following the CCG's normal payroll procedures. The only exception to the principles of Section 17 is that on-call employees will be paid for the full journey from home to site where site visits are required during the on-call shift. Additional mileage will not be paid if the on-call employee must travel further than this because they were away from home at the time. See Section 17 of the NHS Terms and Conditions of Service Handbook for more information.

7.4 Public Holidays

- 7.4.1 Staff required to work or to be on-call on a general public holiday are entitled to equivalent time to be taken off in lieu at plain time rates, in addition to the appropriate payment for the duties undertaken (see Section 2 (a) (England) and Annex A3 of NHS Terms and Conditions of Service Handbook).

7.5 Pension

- 7.5.1 All on-call payments will be pensionable in accordance with the NHS Pensions Agency regulations. This means that regular on-call pay enhancements made in recognition of being available for on-call work where there is a specific rota commitment are pensionable for both whole-time and part-time members. To be eligible for this, the member of staff must have a definite commitment to the rota for which they are paid on a regular basis i.e. weekly, monthly or annually. For whole-time members payments for work done whilst on-call are non-pensionable. For part-time members payments for work done whilst on-call are pensionable at plain time rates, up to the whole time weekly hours. Hours up to whole time should be credited for pension purposes.

8.0 OPT-OUT PROCESS

- 8.1 Where employees feel that they are unable to provide an on-call service due to exceptional personal circumstances, they can make a request in writing to the Chief Officer, or a delegated representative of the senior management team in their absence, stating the reason(s) why. The senior manager will review the request with a representative from the Workforce team. In some cases, a meeting may be set up so that further questions and suggestions could be discussed with the employee prior to making a decision. The senior manager will then confirm in writing their decision to the employee stating whether the employee's request warrants exception from the on-call rota.
- 8.2 Should an individual feel that the decision is unfair, they can appeal by submitting a grievance in accordance with the CCGs Grievance policy and procedure.
- 8.3 Employees' personal exceptional circumstances will be reviewed periodically to ensure consistency and fairness in the application of this policy.
- 8.4 Unless an individual has a request approved due to exceptional personal circumstances, there will be no other opt-out process.

Equality Impact Assessment:

Equality Impact Analysis:	
Policy / Project / Function:	On-call policy
Date of Analysis:	10/1/15
This Equality Impact Analysis was completed by: (Name and Department)	Workforce Service
What are the aims and intended effects of this policy, project or function ?	As part of Hull CCG's (the CCG) emergency preparedness plan there will be a requirement for certain groups of staff to provide an on-call service outside of normal working hours.
Please list any other policies that are related to or referred to as part of this analysis	<ul style="list-style-type: none"> • Grievance Policy • Lone Worker Policy • Payroll procedures • Terms and Conditions of Service • Substance Misuse Policy
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:

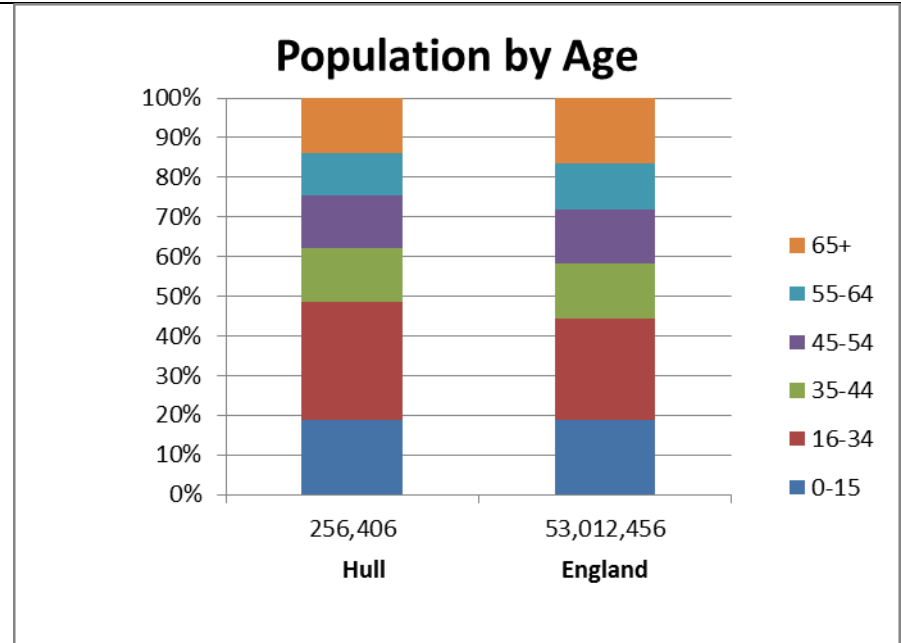
Local Profile/Demography of the Groups affected (population figures) Relevant data can be found in the attached Knowledge Management Toolkit

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

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	<p>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. 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>

	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																		
	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> </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	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%
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> <ol style="list-style-type: none"> 1: Application success rates 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>Yes employee data has been used to support the development and 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>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document).</p>
<p>List any Consultation e.g. with employees, service users, Unions or members of the</p>	<p>Consultation has taken place both locally and nationally with Trade Unions and staff</p> <ul style="list-style-type: none"> • SLT

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<p>public that has taken place in the development or implementation of this policy, project or function</p>	<ul style="list-style-type: none"> • 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>This Policy does not directly promote inclusivity, but provides a framework to meet on-call requirements for the organisation</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)	✓			Considered – neutral impact On-call arrangements might have an adverse impact on employees based on their gender as they may find they cannot meet on-call obligations however the policy provides for opting out in certain circumstances by application and agreement and the facility exists in the policy to swap shifts with colleagues.
Race (All Racial Groups)	✓			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 and an expectation that employees should be able to comprehend all policy documents.
Disability (Mental and Physical)	✓			Considered – neutral impact On-call arrangements might have an adverse impact on those with disabilities as they may find they cannot meet on-call obligations however the policy provides for opting out in certain circumstances by application and agreement and the facility exists in the policy to swap shifts with colleagues.

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Religion or Belief	✓			Considered – neutral impact On-call arrangements might have an adverse impact on those with religious beliefs however this is mitigated by the facility in the policy to swap shifts with colleagues which would support the employee.
Sexual Orientation (Heterosexual, Homosexual and Bisexual)	✓			Considered – neutral impact
Pregnancy and Maternity	✓			On-call arrangements might have an adverse impact on those employees who are pregnant, however the facility exists in the policy to swap shifts with colleagues which would support the employee or apply for an exemption due to exceptional personal circumstances.
Transgender	✓			Considered – neutral impact
Marital Status	✓			Considered – neutral impact
Age	✓			Considered – neutral impact

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Action Planning:

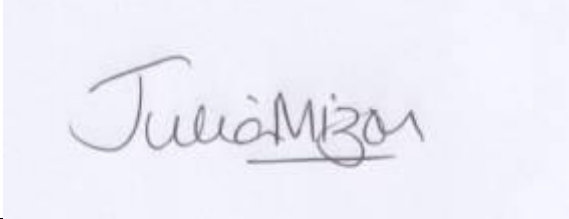
As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

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 Communication Team has developed the 'portal' to signpost individuals to alternative formats. As of January 15 there have been no requests for information in alternative formats, however this will be monitored.	CCG Communications	April 2016	Next policy review
The policy could have an adverse impact on CCG employees with protected characteristics, however a process exists for individuals to apply for exemptions; monitoring of these requests will form part of the review arrangements.	Monitor the application / approval of exceptions against the protected characteristics	CCG / CS HR	April 2016	Next policy review

Equality Impact Findings:	
Analysis Rating:	Amber - continue with the policy and monitor the requests for exemption under exceptional personal circumstances.
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.

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Brief Summary/Further comments	<p>As a result of performing the analysis, the policy could have an adverse impact on CCG employees with protected characteristics, however a process exists for individuals to apply for exemptions; monitoring of these requests will form part of the review arrangements.</p>
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Signatures	
Other Comments	<p>The policy could have an adverse impact on CCG employees with protected characteristics, however a process exists for individuals to apply for exemptions; monitoring of these requests will form part of the review arrangements.</p>
Confirmed by (manager): (Name and Title)	
Date:	<p>20.01.15</p>