

EQUALITY IMPACT ANALYSIS STARTING SALARIES POLICY – HaRD 025

1. Equality Impact Analysis									
Policy / Project / Function:	Starting Salaries Policy								
Date of Analysis:	26 March 2014								
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 ?	<ul style="list-style-type: none"> The Starting Salaries Policy has been introduced to ensure a consistent approach is adopted, by recruiting managers, when establishing the starting salary for appointments to or within the CCG. This policy is intended to ensure fairness and equity within this process and is based on the Agenda for Change Terms and Conditions Handbook. 								
Please list any other policies that are related to or referred to as part of this analysis?	<ul style="list-style-type: none"> Recruitment and Selection Policy Recruitment Retention Premium Policy 								
Who does the policy, project or function affect ? Please Tick ✓	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">Employees</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>Service Users</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Members of the Public</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Other (List Below)</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Employees	<input checked="" type="checkbox"/>	Service Users	<input type="checkbox"/>	Members of the Public	<input type="checkbox"/>	Other (List Below)	<input type="checkbox"/>
Employees	<input checked="" type="checkbox"/>								
Service Users	<input type="checkbox"/>								
Members of the Public	<input type="checkbox"/>								
Other (List Below)	<input type="checkbox"/>								

2. Equality Impact Analysis: Screening

	Could this policy have a positive impact on...		Could this policy have a negative impact on...		Is there any evidence which already exists from previous (e.g. from previous engagement) to evidence this impact
	Yes	No	Yes	No	
Race		✓		✓	Considered – no impact
Age	✓		✓		Potential Positive Impact - older employees and Potential Negative Impact – younger employees. See full assessment.
Sexual Orientation		✓		✓	Considered – no impact
Disabled People		✓		✓	Considered – no impact
Gender		✓	✓		Potential Negative Impact – female employees. See full assessment.
Transgender People		✓		✓	Considered – no impact
Pregnancy and Maternity		✓		✓	Considered – no impact
Marital Status		✓		✓	Considered – no impact
Religion and Belief		✓		✓	Considered – no impact
Reasoning					

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

3. Equality Impact Analysis: Local Profile Data

Local Profile/Demography of the Groups affected (population figures)	
General	Total number of employees in the CCG is 24
Age	71% are aged 30-55 17% of staff are over 55 12% of staff employed are under 30
Race	79% staff employed in the CCG are White 13% of staff have are not stated/undefined their ethnicity 8% staff are Non-white
Sex	54% staff employed are male 46% staff employed are female
Gender reassignment	No information at this stage
Disability	83% of staff employed declared themselves as having no disability 17% did not declare /undefined No staff have declared a disability
Sexual Orientation	75% of staff described themselves as heterosexual 25% did not wish to respond /undefined
Religion, faith and belief	Christianity is the largest religious group declared by staff in the CCG (38%) 33% of staff have other beliefs/religious beliefs 29% were undefined or did not wish to declare
Marriage and civil partnership	73% of employees are married. No employees are in a civil partnership
Pregnancy and maternity	No information yet as the CCG has not been established long enough to build meaningful data

4. Equality Impact Analysis: Equality Data Available

<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 <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> 5. <i>Previous EIAs</i> 	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document).</p>
<p>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>
<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 Starting Salaries Policy has been introduced to ensure a consistent approach is adopted by recruiting managers when establishing the starting salary for appointments to or within the CSU. AfC requires “that all NHS employers should have fair and non-discriminatory systems for recruiting, developing and promoting people.” (Para 31.1)</p>

5. Equality Impact Analysis: Assessment Test

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

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

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

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

6. Action Planning

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

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

7. Equality Impact Analysis Findings

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

Equality Impact Findings (continued):

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

Brief Summary/Further comments	
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Approved By		
Job Title:	Name:	Date: