

Pay Progression Policy

July 2022 – February 2025

CONTROL RECORD			
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			Team Human Resources and Organisational Development
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Purpose	The ensure a fair and consistent approach for employees progressing through pay bands (incremental pay progression)		
Superseded Documents	Pay Progression Policy v1.2		
Audience	All staff in Nottingham and Nottinghamshire Integrated Care Board		
Consulted with	Integrated Care Board Senior Leadership Team and Staff Engagement Group		
Equality Impact Assessment	See Appendix B		
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Contents

	Page
1 Introduction	4
2 Purpose	4
3 Scope	5
4 Roles and Responsibilities	5
5 General Data Protection Regulation (GDPR)	7
6 Impact Analysis	7
7 NHS Constitution	8
8 Pay Step Progression Procedure	9
9 Approving the Request for Pay Step Progression	11
10 Declining the Request for Pay Step Progression	11
11 The Right to Appeal	12
12 Equality and Diversity Statement	13
13 Communication, Monitoring and Review	13
14 Staff Training	13
15 Interaction with other ICB Policies	14
16 References	14
Appendix A: Pay Step Progression Pro forma	15
Appendix B: Equality Impact Assessment	18

1. Introduction

- 1.1 This policy applies to the NHS Nottingham and Nottinghamshire Integrated Care Board, hereafter referred to as 'the ICB'.
- 1.2 Nationally agreed changes to Agenda for Change (hereafter referred to as AfC) were agreed by the NHS Staff Council in February 2013 clarifying new arrangements for employees progressing through pay bands (incremental pay progression). This policy applies to all employees of the organisation employed under Agenda for Change terms and conditions of service and describes the approach to be followed concerning pay progression.
- 1.3 The 2018 framework agreement on the reform of AfC subsequently introduced provisions to move to a new pay system with faster progression to the top of pay bands through fewer pay step points underpinned by mandatory local appraisal policies and procedures.
- 1.4 These provisions came into effect for new starters or existing employees promoted to a new role on or after 1st April 2019. Pay progression is no longer automatic on an annual basis under the new system.
- 1.5 Transitional pay progression procedures applied to all other staff until 31st March 2021 after which time they also became subject to the provisions of the 2018 framework agreement.
- 1.6 Staff in post before 1st April 2019 will retain their existing pay step date (previously referred to as incremental date) and move automatically through their pay journey during transition. On their pay step date, (if they have not already benefited from deletion of a pay point) it is expected that they will automatically move to the next pay point reflecting their additional complete year of experience. The NHS Electronic Staff Record (ESR) system is able to progress existing staff automatically.
- 1.7 Staff in post after 1st April 2019; pay progression should not be seen as an automatic right by employees but rather is something to be earned and is a reward that is dependent on satisfactory performance, conduct and demonstration of meeting all statutory and mandatory training requirements relevant to their role.
- 1.8 Any amendments to the NHS terms and conditions of service handbook will supersede this policy as new pay arrangements are agreed. This policy will be updated to reflect any changes.

2. Purpose

- 2.1 The ICB has a duty to provide high quality services to our stakeholders and partners and strives to be a high performing organisation that continuously improves quality, safety, and the patient experience. It is a key part of the

organisation's strategy to achieve its goals through maximising the contribution of each employee.

- 2.2 In support of this aim, and in accordance with AfC, this policy sets out the basis upon which an individual's performance drives pay progression. It is expected that employees who can demonstrate the required level of performance and conduct, who have met their objectives and are compliant as regards their statutory and mandatory training will progress annually through the pay points in their salary band.
- 2.3 For staff in pay bands 8C, 8D and 9, pay progression to the top pay band is earned on an annual basis and therefore not subject to pay protection. Where staff in these pay points/bands do not meet the locally determined performance standards for a given year, the annually earned pay point may be withdrawn.

3. Scope

- 3.1 This policy applies to all employees on Agenda for Change (AfC) terms and conditions of employment (including those on permanent and temporary contracts). Secondees from other organisations will be subject to the policy of their employing organisation.
- 3.2 The ICB will determine a fair and consistent approach to applying a Pay Progression Policy and will give due consideration to an employee's individual circumstances when considering a request for pay progression.

4. Roles and Responsibilities

- 4.1 Good working relations are vital for the organisation to operate successfully and provide services. There is a joint responsibility for management, trade unions and employees to accept the responsibility of working together on issues in good faith and with the shared intention of facilitating good working relations.

Roles	Responsibilities
<p>Senior Management Team</p>	<ul style="list-style-type: none"> ● Setting and communicating organisational objectives, competencies, and standards. ● Ensuring all staff receive regular supervision/1:1's from line managers and arrangements are made during times of line managers' absences. ● Ensuring that line managers have the requisite skills and expertise to appraise staff fairly and equitably, in accordance with ICB equality and diversity standards. ● Ensuring the policy is applied in a consistent and equitable manner. ● Reviewing the application of this policy.

Roles	Responsibilities
Line Managers	<ul style="list-style-type: none"> • Have discussed with the employee their pay affecting step date and have scheduled a pay affecting progression meeting to meet the timescales required. • Undertake annual appraisals for all members of their team. • Conduct an objective review of an employee's work based on feedback, examples and previous informal discussions. • Ascertain that performance that falls below the accepted levels is managed effectively in line with the Capability Policy and that appropriate coaching, support and a personal development plan (PDP) is provided to address any concerns. • Demonstrate they have supported the employee to achieve the criteria for pay progression i.e. with regular documented supervision/1:1's. • Ensure the employee is given the opportunity to undertake statutory and mandatory training. • Approve or decline pay affecting progression on the receipt of a completed proforma, evidencing compliance with the criteria in section 8.5 below. • Ensure that the NHS Electronic Staff Record (ESR) is maintained in an accurate, timely manner to support the delivery of the pay progression framework and appraisal system. • For bands 8C, 8D and 9 contact payroll, via email, at the beginning of the month prior to the employee pay step date, if pay progression is to be declined or deferred for any reason. • Make the employee aware of the right to appeal review where the decision has been made that the required level of performance has not been met. • Ensure that if absence or other circumstances delay or prevent the completion of a pay step review, this is escalated to a senior manager in a timely manner to ensure that appropriate contingency measures can be implemented.
Employees	<ul style="list-style-type: none"> • Initiate the process by completing and submitting the pay progression pro-forma to their line manager within the specified timescale, as outlined in 8.2.

Roles	Responsibilities
	<ul style="list-style-type: none"> • Actively participate in the annual and on-going appraisal process and jointly agree and work towards their objectives. • Make their line manager aware of any constraints that are preventing them from achieving their objectives and agree a solution. • Demonstrate that they have reached a satisfactory level of performance and achievement of objectives, as described in the ICB's Staff Appraisal Policy, within the previous 12 months. • Ensure that all statutory and mandatory training relevant to their post is up to date and recorded as compliant. • Make their line manager aware of any organisational constraints that are preventing them from being compliant in statutory and mandatory training. • Have achieved a satisfactory level of conduct in the previous 12 months prior to their pay step date, as described in the ICB's Staff Appraisal Policy and in section 8.5.
HR Team	<ul style="list-style-type: none"> • Will provide advice and support on all aspects of this policy to ensure application and will make managers aware of their team's statutory and mandatory training compliance.

5. General Data Protection Regulation (GDPR)

5.1 The ICB is committed to ensuring that all personal information is managed in accordance with current data protection legislation, professional codes of practice and records management and confidentiality guidance. More detailed information can be found in the ICBs Data Protection and Confidentiality and related policies and procedures.

6. Impact Analysis

Equality

6.1 The ICB is committed to eliminating discrimination and promoting equality and diversity in its policies, procedures, and guidelines.

- 6.2 In applying this policy, the ICB 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.
- 6.3 In developing this policy, an Equality Impact Assessment has been undertaken and is attached at Appendix A. As a result of initial screening, the policy does not appear to have any adverse effects on people who share protected characteristics and no further actions are required at this stage.
- 6.4 The application of this policy will be monitored to ensure fair application.

Bribery Act 2010

- 6.5 The ICB has a responsibility to ensure that all staff are made aware of their duties and responsibilities arising from The Bribery Act 2010.
- 6.6 The Bribery Act 2010 makes it a criminal offence to bribe and be bribed by another person by offering or requesting a financial or other advantage as a reward or incentive to perform a relevant function or activity improperly performed. The penalties for any breaches of the Act are potentially severe. There is no upper limit on the level of fines that can be imposed and an individual convicted of an offence can face a prison sentence of up to 10 years. For further information see <http://www.justice.gov.uk/guidance/docs/bribery-act-2010-quick-start-guide.pdf>
- 6.7 Due consideration has been given to the Bribery Act 2010 in the development of this policy document and consistent application and monitoring of this policy will mitigate bribery in relation to pay progression.

7. NHS Constitution

- 7.1 The ICB is committed to designing and implementing services, policies and measures that meet the diverse needs of its population and workforce, ensuring that no individual or group is disadvantaged.
- 7.2 This policy supports the NHS constitution in the provision of high-quality care that is safe, effective and focused on patient experience; in the planning and delivery of the clinical and other services it provides; in the people it employs and the education, training and development they receive; in the leadership and management of its organisations; and through its commitment to innovation and to the promotion and conduct of research to improve the current and future health and care of the population.

8. Pay Step Progression Procedure

- 8.1 Making the request is of joint responsibility of the employee and the line manager. The employee's pay step date should be discussed during 1:1 meetings throughout the year so that both the employee and the line manager know and agree when they schedule the pay step review meeting.
- 8.2 The employee needs to initiate the process 2 months prior to the month that their pay step date is due by submitting a completed pro forma to their line manager requesting pay progression. This timescale is to ensure that the line manager has the opportunity to review the employee against the criteria set out in section 8.5 below and that ESR can be updated, by the line manager, to reflect the pay progression meeting outcome, in a timely manner. For example, for a pay step date of 16th December 2019 the employee would submit their request to their line manager no later than 1st October 2019. Any late submissions will be considered individually and may not be accepted.
- 8.3 It is the employee's responsibility to make a request for pay step progression, in the specified timescale. Pay step dates can be found on the employee's My ESR Dashboard, which also includes when a pay step is due, last appraisal date, next appraisal date and appraisal or review type. ESR Self Service users will also receive notifications generated by the system to advise employees and managers when a pay step date is imminent. Employees will receive a notification 4 months and 1 month prior to a pay step date. Managers will be sent a monthly email detailing the pay step dates of their direct reports which are due within the next 90 days.
- 8.4 It is the line manager's responsibility to arrange a pay step review meeting with the employee in a timely manner to discuss whether the standards have been met. This should be based on the employee's most recent appraisal, within the previous 12 month period, and any relevant progress since then. The manager must summarise and record the outcome of this discussion on the Pay Step Progression pro forma, provide appropriate feedback and confirm their decision to the employee. A copy of the form should be retained by the employee and also included on the employee's personal file.
- 8.5 Pay progression will be conditional upon:
 - Individuals demonstrating that they have achieved the required level of performance, confirmed on the Pay Step Progression pro forma
 - The achievement of agreed objectives, measured in accordance with the ICB's Appraisal Framework within the previous 12 months
 - All statutory and mandatory training relevant to the employee's role is up-to-date and recorded as compliant
 - No live disciplinary sanctions (including any attached to professional registrations, where applicable)
 - Not on a formal stage of the ICB's Capability Policy
 - Have completed appraisals for all their direct reports (for line managers only)

- 8.6 If the employee has failed to meet the pay progression criteria as a consequence of constraints, beyond their control, they must evidence this on the pay progression pro forma. The line manager will consider this when making a decision about pay progression.
- 8.7 Pay progression that falls within a prolonged period of agreed or recognised leave
- For employees whose pay step date falls within a period of long term leave, for example; sickness, maternity, shared parental leave or adoption leave or suspension, the line manager would consider the 12 month period prior to the commencement of the current episode of leave to make a decision on pay progression. In these instances, if employees have not had the opportunity to complete the relevant appraisal paperwork then they will automatically progress if they have met the other requirements in 8.5. Further guidance is available from the HR team.
 - Employees on secondment will undertake the pay progression procedure of the employing organisation. Further detail can be found in the ICB's secondment policy.
 - In line with the Leave policy, the pay step date of any employee on a career break is frozen until their return to work. If the pay step date is imminent on their return then they will progress as normal to the next pay step point within their pay band to ensure they are not penalised. However, it is recommended that a review takes place to ascertain that their statutory and mandatory training is up-to-date and recorded as compliant. If the pay step date is 3 months or more in advance of their return the normal process would apply.

Employees on pay bands 8C, 8D and 9

- 8.8 For employees on pay bands 8C, 8D and 9, progression to the top point on their pay band is annually earned in the same way as for other AfC employees. The top pay point on their pay band is **only retained** where the appropriate level of performance has been reached. For example, an employee on the top pay step who doesn't meet the criteria set out in section 8.5 will drop a pay step for a 12 month period. No protection will apply. Support will be given in line with section 10.
- ok

Employees not on AfC terms and conditions of employment

- It is expected that all employees directly employed by the ICB will be subject to the organisation's appraisal procedure.
- Pay progression for Very Senior Managers (VSMs) will need to be agreed in accordance with their contractual arrangements and subject to agreement at Board where applicable.
- Pay progression for staff employed under the national Medical and Dental terms and conditions of employment will need to be agreed in accordance with their contractual arrangements and the national agreement.

- Pay progression for staff employed under the locally agreed Medical and Dental terms and conditions of employment will need to be agreed in accordance with their contractual arrangements and subject to agreement at Remuneration Committee.

9. Approving the Request for Pay Step Progression

- 9.1 Pay progression of one step point will be conditional upon employees demonstrating that they have achieved the requisite criteria in section 8.5. The line manager will review the employee's performance against the criteria for pay progression in conjunction with section A of the proforma.
- 9.2 The line manager will need to ascertain that the employee has no 'live' disciplinary warnings in place at the time of the application date and/or are not being managed at a formal stage of the Capability Policy. If a disciplinary sanction is issued to an employee between their application for pay step progression and their pay step date the line manager will decline the request, requesting HR contact Payroll to stop the progression.
- 9.3 If the employee has not actively participated in an appraisal, has failed to meet the agreed objectives or is not compliant with statutory and mandatory training applicable to their role pay step progression would not be approved.
- 9.4 However, if the employee has failed to meet the criteria due to valid organisational constraints beyond their control pay step progression would be approved.
- 9.5 If the employee has met the criteria for pay progression their request would be approved. When approving a request the line manager must complete Section B of the pro forma (see **Appendix A**). It is imperative that the line manager notifies HR via email at the beginning of the month prior to the date to ascertain the timescale is met to achieve the increase for the specified date.

10. Declining the Request for Pay Step Progression

- 10.1 Deferment of pay step progression:
- At the pay step date, any employee remaining non-compliant in line with the associated timescales will not receive their pay step progression. In such circumstances pay progression will subsequently be deferred for up to 12 months until the next annual pay step date.
 - Where an employee does not meet the required level of performance, a personal development plan (PDP) will be implemented after the original review and achievement against this will be used to determine whether an increment will be paid. If at this stage the employees request for pay step progression is approved, it will be paid from this date, no retrospective payments would be due. Further PDP guidance is available.

- 10.2 The decision to defer pay step progression must have been discussed with the employee prior to any deferment being implemented. The line manager will complete Section B of the pro forma to record that pay step progression has been deferred.
- 10.3 Any individual for whom pay step progression has been deferred must be offered the appropriate support in order that they have the fairest opportunity to meet the performance requirements in future. Managers are expected to agree a 3 month development plan to improve performance. The capability policy should be instigated at this point if not already in progress. Advice should be sought from the HR team. Employees have the opportunity to request a review of their development plan at the end of the 3 month period. If the employee has improved and met requirements they can follow the procedure in 8.1 to make a request for pay step progression.
- 10.4 If pay step progression is awarded after the 3-month development plan, the employee's increment date will remain the same and they will receive an uplift in payment for the remaining 9 months of the year onto the next pay step point. No retrospective payments would be due for the outstanding development period. If the employee does not meet the criteria of the development plan they cannot apply for pay progression again until the following year (for example a pay step date of 4 October 2019, pay progression would not be considered again until 4 October 2020). The capability policy would continue to apply.

11. The Right to Appeal

- 11.1 Where an employee disagrees with the decision made to defer pay step progression, the employee has the right to request a review of the decision. To do so, they must follow the process as described in the capability policy and set out in the grounds of their appeal. The employee has the right to be accompanied at the meeting by a work colleague or Trade Union representative providing they are not acting in a legal capacity.
- 11.2 An appeal hearing will be set up to review the decision.
- 11.3 It will be up to the appeal panel to decide on the basis of the evidence provided by both the employee and the line manager, whether or not the pay step progression is approved.
- 11.4 Where a panel considers that pay step progression has been inappropriately deferred, the pay progression will be reinstated from the step point date and retrospective payments made from that date.
- 11.5 The employee must be informed of the outcome of their review in writing within 5 working days of the date of the meeting. This is the final decision and the end of the formal procedure, there is no right to evoke the grievance policy.

12. Equality and Diversity Statement

- 12.1 Nottingham and Nottinghamshire ICB pays due regard to the requirements of the Public Sector Equality Duty (PSED) of the Equality Act 2010 in policy development and implementation as a commissioner and provider of services as well as an employer.
- 12.2 The ICB is committed to ensuring that the way we provide services to the public and the experiences of our staff does not discriminate against any individuals or groups on the basis of their age, disability, gender identity (trans, non-binary), marriage or civil partnership status, pregnancy or maternity, race, religion or belief, gender or sexual orientation.
- 12.3 We are committed to ensuring that our activities also consider the disadvantages that some people in our diverse population experience when accessing health services. Such disadvantaged groups include people experiencing economic and social deprivation, carers, refugees and asylum seekers, people who are homeless, workers in stigmatised occupations, people who are geographically isolated, gypsies, roma and travellers.
- 12.4 As an employer, we are committed to promoting equality of opportunity in recruitment, training and career progression and to valuing and increasing diversity within our workforce.
- 12.5 To help ensure that these commitments are embedded in our day-to-day working practices, an Equality Impact Assessment has been completed for, and is attached to, this policy.

13. Communication, Monitoring and Review

- 13.1 The Pay Progression Policy will be highlighted to new employees at staff induction and is stored on the ICB's HR/OD Intranet pages and by the ICB's HR&OD Team.
- 13.2 The Pay Progression Policy will be reviewed periodically every three years (or earlier if changes in the law or any other circumstances require it) and will be approved by the Remuneration Committee.
- 13.3 Any individual who has queries regarding the content of this policy, or has difficulty understanding how this policy relates to their role, should contact the HR Lead.

14. Staff Training

- 14.1 Any individual who has queries regarding the content of this policy, or has difficulty understanding how this policy relates to their role, should contact the HR Team via email at nnicb-nn.hr@nhs.net.

15. Interaction with other ICB Policies

15.1 This policy should be read in conjunction with the following ICB policies and procedures:

- Leave Policy
- Staff Appraisal Policy
- Capability Policy
- Grievance Policy
- Data Protection and Confidentiality Policy.

16. References

16.1 The following guidance was used in the development of this policy:

- Equality Act 2010
- Bribery Act 2010
- NHS terms and conditions of service handbook.

Appendix A:

Pay Step Progression Pro forma

Section A – Employee Declaration

To be completed for all pay step progression applications and where staff on the top two spine points of bands 8c, 8d and 9 request to retain their pay step.

Please ensure that you submit this to your line manager the month prior to the month that your pay step date is due to give sufficient time for processing.

Employee Name		Manager Name	
Job Title		Pay Step Due Date	
Band		Last Appraisal Date	

I can confirm that:	Yes/No
All statutory and mandatory training is up-to-date and recorded as compliant	
I have achieved satisfactory appraisals and associated objectives	
I have completed appraisals for all my direct reports (<i>for line managers only</i>)	
I have no live formal disciplinary warnings, including any attached to professional registration (where applicable)	
I am not in the formal stage of the capability process	

Please note any mitigations (you should complete this if you have answered no to any of the above providing a rationale for why you should receive your pay step anyway)

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Signed	
Date	

Section B – Line Manager Declaration

Please select one option from the tables below.

Progression Confirmed	Tick	Yes/No/Add comments
The employee has met the pay progression criteria and will progress to the next pay step point		
The employee has met the performance standards and will retain their current pay point (pay bands 8c, 8d & 9 only for the last 2 spine points)		
The employee has failed to meet the required criteria for pay step progression but that there are constraints beyond their control that have prevented the achievement of this and will therefore progress to the next increment		Discuss with HR team and detail reasons:
I confirm the employee is on maternity/adoption leave, or on long term sickness absence and they have been assessed on their performance		

over the 12 months prior to their current period of leave where possible and will progress to the next pay step point		
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Progression Declined	Tick	Yes/No/Add comments and evidence
The employee has failed to meet the criteria for pay step progression and there are no valid constraints that have prevented this therefore pay step progression is declined		
The request for pay step progression has been declined and the employee will reduce to the previous pay point (pay bands 8C, 8D & 9 only for the last 2 spine points).		

By signing I confirm that; the employee has been made aware of the outcome of the review, and where appropriate they have been made aware of their right to appeal. Please instruct payroll of the necessary actions.	
Date of pay step review	
Name	
Signature	

A copy of this form must be sent to HR at nnicb-nn.hr@nhs.net for processing by the 1st of the month in which the pay step is due.

Appendix B: Equality Impact Assessment

Date of assessment:	June 2022			
For the policy, and its implementation, please answer the questions against each of the protected characteristic and inclusion health groups:	Has the risk of any potential adverse impact on people in this protected characteristic group been identified, such as barriers to access or inequality of opportunity?	If yes, are there any mechanisms already in place to mitigate the adverse impacts identified?	Are there any remaining adverse impacts that need to be addressed? If so, please state any mitigating actions planned.	Are there any positive impacts identified for people within this protected characteristic group? If yes, please briefly describe.
Age¹	Potential impact for younger and older employees as statistically more likely to be subject to other processes in which this policy relies on – i.e. capability and disciplinary policies.	Line manager and employee training on the dependent policies Support from HR	No	No
Disability²	Potential impact for individuals with a disability where online mandatory	Reasonable adjustment plans to consider mandatory training and	No	No

¹ A person belonging to a particular age (for example 32 year olds) or range of ages (for example 18 to 30 year olds).

² A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Date of assessment:	June 2022			
For the policy, and its implementation, please answer the questions against each of the protected characteristic and inclusion health groups:	Has the risk of any potential adverse impact on people in this protected characteristic group been identified, such as barriers to access or inequality of opportunity?	If yes, are there any mechanisms already in place to mitigate the adverse impacts identified?	Are there any remaining adverse impacts that need to be addressed? If so, please state any mitigating actions planned.	Are there any positive impacts identified for people within this protected characteristic group? If yes, please briefly describe.
	training may not be the most appropriate or suitable method to complete their training and the lack of availability of face to face training	the appropriateness of delivery. Support from HR		
Gender identity (trans, non-binary)³	None identified	N/A	No	No
Marriage or civil partnership status⁴	None identified	N/A	No	No
Pregnancy or maternity⁵	Potential impact for individuals that are on maternity leave that will not be able to submit	Provision to cover this eventuality within AfC terms and conditions of employment.	No	No

³ The process of transitioning from one gender to another.

⁴ Marriage is a union between a man and a woman or between a same-sex couple.

Same-sex couples can also have their relationships legally recognised as 'civil partnerships'.

⁵ Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Date of assessment:	June 2022			
For the policy, and its implementation, please answer the questions against each of the protected characteristic and inclusion health groups:	Has the risk of any potential adverse impact on people in this protected characteristic group been identified, such as barriers to access or inequality of opportunity?	If yes, are there any mechanisms already in place to mitigate the adverse impacts identified?	Are there any remaining adverse impacts that need to be addressed? If so, please state any mitigating actions planned.	Are there any positive impacts identified for people within this protected characteristic group? If yes, please briefly describe.
	request for pay progression.			
Race⁶	Potential impact for Black and Minority Ethnic employees as statistically more likely to be subject to other processes in which this policy relies on – i.e. capability and disciplinary policies.	Line manager and employee training on the dependent policies Support from HR	No	No
Religion or belief⁷	None identified	N/A	No	No
Gender⁸	None identified	N/A	No	No
Sexual orientation⁹	None identified	N/A	No	No

⁶ Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

⁷ Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

⁸ A man or a woman.

⁹ Whether a person's sexual attraction is towards their own sex, the opposite sex, to both sexes or none. <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

Date of assessment:	June 2022			
For the policy, and its implementation, please answer the questions against each of the protected characteristic and inclusion health groups:	Has the risk of any potential adverse impact on people in this protected characteristic group been identified, such as barriers to access or inequality of opportunity?	If yes, are there any mechanisms already in place to mitigate the adverse impacts identified?	Are there any remaining adverse impacts that need to be addressed? If so, please state any mitigating actions planned.	Are there any positive impacts identified for people within this protected characteristic group? If yes, please briefly describe.
Carers¹⁰	None identified	N/A	No	No

¹⁰ Individuals within the ICB which may have carer responsibilities.