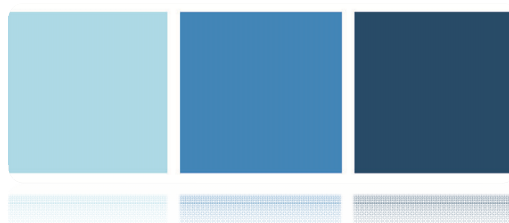


Pension Contribution Alternative Reward Scheme Policy

| | | |
|---|---|-------------|
| Author and Contact details: | [REDACTED] | |
| Responsible Director: | Director of Workforce & Innovation | |
| Approved by and date: | Remuneration Committee | |
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Think of the environment...Do you have to print this out this document? You can always view the most up to date version electronically on the Trust intranet.



Executive Summary

This policy outlines possible arrangements and options for employees who are members of the NHS Pension Scheme (referred to as the Pension Scheme) who are, or would be, affected by the Annual Allowance and/or Lifetime Allowance in respect of their pension savings in the NHS Pension Scheme.

The purpose of this policy is to provide an optional alternative to pension contribution for those employees who can demonstrate that they are impacted by the pension tax thresholds and have decided to opt out of the pension scheme as a direct result.

This policy is effective for the 2022/23 financial year.

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1. Introduction

- 1.1. This policy outlines an option for employees who are current active members of the NHS Pension Scheme (the NHS Scheme) who are affected by the annual allowance (AA) or lifetime allowance (LTA) in respect of their pension savings in registered pension schemes in the UK.
- 1.2. For most employees, it will likely be in their best financial interests to remain in the NHS Pension Scheme. This policy is only intended for employees affected by the potential additional tax charges which will result from exceeding the allowances. This policy proposes one option for these individuals. This may not be the best financial option for affected employees and so individuals should consider this policy and any associated information carefully before making a decision. Employees are strongly encouraged to obtain their own financial advice before making any changes.
- 1.3. This policy has been introduced to address operational risks that have been identified because of the current pension tax regime. For example, the Trust has experienced a reluctance to take on senior roles, requests for reduced contractual hours, and individuals exploring options of early retirement as a direct result of the pension tax regime. This policy is an attempt to address these operational issues by setting out an alternative option. Other options for addressing the issue may be available but are outside the scope of this policy.
- 1.4. Although some amendments were made to pensions tax for from April 2020 these predominately focused on increasing the thresholds which determine the taper (which reduces an individual's AA to below £40,000), the actual level of AA permitted did not change. This means some individuals will still be affected by the AA and no real changes were made to LTA, other than an increase in line with CPI.
- 1.5. This policy does not form part of any employee's contract of employment and the Trust may amend or remove it as its sole and absolute discretion.
- 1.6. No retrospective payments will be made for staff who had opted out of the pension scheme prior to the period covered by this policy, but all eligible staff – irrespective of whether they had previously opted out – may apply from the date the policy is initiated.

2. Scope

- 2.1. Employees who can demonstrate that they are impacted by the pension tax thresholds.

3. Definitions

- 3.1. Annual Allowance (AA): the maximum amount of saving that you can make in a registered pension scheme each tax year without incurring a tax charge.
- 3.2. Lifetime Allowance (LTA): the maximum amount of pension savings that you can build up in all your registered pension schemes without incurring a tax charge.

4. Annual Allowance (AA)

- 4.1. While there are no limits on the amount of pension savings an individual may make each tax year, the AA is the maximum amount of saving that you can make in a registered pension scheme each tax year without incurring a tax charge.
- 4.2. For the 2020/21 tax year the AA is £40,000. Any pension savings in excess of this will be subject to an AA tax charge. Pensions savings for the purpose of calculating the AA include both employer and employee contributions. The government may change these limits in the future. Different AA limits may apply to any separate defined contribution pension savings you may have.
- 4.3. In April 2016, an AA taper for “high income individuals” was introduced. Following some changes from April 2020 this has the potential to reduce an individual’s AA from £40,000 to £4,000 depending on their level of income. Individuals affected are those whose “threshold (net) income” exceeds £200,000 and whose “adjusted income” (net income plus annual pension growth) exceeds £240,000. For these individuals, every £2 of income (including pension contributions) earned over £240,000 will reduce their AA by £1, subject to a maximum reduction of £36,000. If your adjusted income exceeds £300,000 then you will have a reduced annual allowance of £4,000 only.
- 4.4. The calculation of the taper is based on levels of pensionable and non-pensionable income from all sources, including any private work earnings, additional income from property rentals, any existing pension payments, interest from savings/investments etc.
- 4.5. Any unused AA from the preceding three tax years can be carried forward, and can be used to reduce, or in some cases eliminate, an AA charge that would otherwise apply.
- 4.6. If an individual exceeds their AA, and has no carry forward to offset this, they will have to report this in their annual tax return, and any pension savings which exceed the AA will be taxed at the individual’s marginal rate.
- 4.7. If an AA tax charge arises, individuals may (depending on the circumstances) be able to request that the NHS Scheme pays the tax charge on their behalf. This means that any tax charge is paid from their pension rather than the individual having to pay this from their savings. This is referred to as “scheme pays”.

5. Lifetime Allowance (LTA)

- 5.1. While there are no limits on the amount of pension you can build up, or the amount which can be paid into your pension arrangement over the course of your working life, LTA is the maximum amount of pension savings that you can build up in all registered pension schemes without incurring a tax charge.
- 5.2. In the 2022/23 tax year the LTA is set at £1,073,100 (unless you have LTA protection). This normally increases annually in line with Consumer Prices Index (CPI).
- 5.3. LTA is normally assessed at the date that any of your benefits are drawn, or age 75 if you have not taken your benefits by then. This is known as a benefit crystallisation event.

- 5.4. Currently, in basic terms, pension savings which exceed the LTA on the date of a benefit crystallisation event will be subject to a one-off tax charge of 25% and will then be taxed at your marginal income tax rate. Additionally, any benefits above the LTA taken as a lump sum payment will be subject to a tax charge of 55%.
- 5.5. Those staff with pension benefits that are approaching the LTA value may wish to discuss their options with an independent financial advisor.

6. How do Annual and Lifetime Allowances operate?

- 6.1. The AA and LTA operate differently depending on the relevant pension scheme arrangement as summarised in the table below:

| | AA | LTA |
|---|---|--|
| Defined Contribution | Total amount of contributions paid in by you or anyone else. | Capital value of all pension pots that goes towards paying benefits, however you decide to take them. |
| Defined Benefit (such as the NHS Scheme) | The annual increase in the pension benefits promised to you when you retire in accordance with the rules of the scheme. | Calculated using a set formula of usually 20 times the pension you get in the first year plus your lump sum. |

- 6.2. If you have been building up pension benefits or have pensions savings in more than one registered pension scheme in the UK, you will need to add up the amount in all the pension schemes you belong to when determining if you are approaching or have reached the AA or the LTA (as applicable).

7. Responsibilities

7.1. Employee Responsibilities

- 7.1.1 The Trust cannot advise you if the options set out below will be right for you. If you believe that you may be affected by the AA or the LTA (as applicable) you must take a decision based on your individual circumstances and we strongly advise you to take independent financial advice. Some Trade Unions (including the BMA) offer advice to their members as part of their membership offering.
- 7.1.2 Evidence that you have taken independent financial advice (such as a statement from your Financial Advisor) or a statement from you that you have fully understood the risks of choosing a particular option regarding your pension will need to be submitted with your Request Form. The Trust accepts no liability or responsibility for the consequences of any changes to your pension benefits or arrangements, or consequences of no changes being made.

- 7.1.3 The Trust will not provide you with financial advice. You may receive notifications from the NHS Pension Scheme about your annual and lifetime allowances. However, ultimately you are responsible for keeping track of your total pension benefits and for managing your personal tax allowances and affairs. You are responsible for notifying the Trust if you are affected by the AA or the LTA and wish for your pension arrangements to be changed in accordance with this policy.
- 7.1.4 You are responsible for monitoring the AA and the LTA limits (as applicable). If you are affected by the AA or the LTA (as applicable) it is your responsibility to report this to HMRC and to ensure that any tax charges are paid.
- 7.1.5 Completing and submitting form SD502 'Application to Leave the NHS Pension Scheme'

8. Options

- 8.1. NHS Pensions have developed a Ready Reckoner from 2020/21 to help staff understand if they could be affected by an AA charge. <https://www.nhspensionaatax.org/>
- 8.2. If you are currently an active member of the NHS Scheme, and will be affected by the AA or LTA you can:
- Continue in the NHS Pension Scheme and bear any additional tax charges that arise (other varied steps could be taken to try to minimise this); or
 - Opt out of the NHS Scheme and be paid a separate cash payment as explained in Section 9 below ("Separate Cash Payment").
- 8.3. If you opt out of the NHS Scheme you will become a deferred member. You will also not be able to make any further money purchase additional voluntary contributions into the NHS Pension Scheme.
- 8.4. The Separate Cash Payment that will be paid to you if you opt out of the NHS Pension Scheme will be the sum equivalent to the Employer's Contribution (amount that the employer would pay into the relevant NHS Pension Scheme if you were still a member of that NHS Pension Scheme) net of the employer's National Insurance contributions, maintaining cost neutrality to the NHS. This will be paid as a supplement to your salary and so will be subject to income tax.
- 8.5. NHS Employers have confirmed that 6.3% of the employers' 20.6% contribution for 2022/23 has already been passed to the NHS Pension Agency, meaning this is not available for the employer to pass onto staff. In addition, any increase in salary as a result of receiving employer contributions will be liable for national insurance contributions.
- 8.6. Your pensionable pay for the purpose of calculating the Separate Cash Payment will be determined by the Trust but will be based on what your pensionable pay would have been for the purpose of calculating employer contributions to the NHS Scheme had you continued to participate in the NHS Scheme.
- 8.7. If you opt out of the NHS Pension Scheme, it is your responsibility to provide the pension scheme administrator with effective notice of the opt-out. You must provide the Trust with a copy of this notification and evidence that the opt-out is effective before any cash payment will be paid. Please see the application form for more information.

- 8.8. If you opt out of the NHS Scheme, there may be a significant impact on the level of benefits you may receive from the NHS Scheme. There is likely to be a notable reduction in your ill-health benefits and death benefits from the NHS Scheme. Some of these benefits will no longer apply to your employment and you are advised to ensure you understand these changes before opting out. Additionally, benefits on redundancy may be affected. You should carefully review and consider the impact of opting out of the NHS Pension Scheme on all your benefits. You may also wish to consider implementing your own personal insurance or other protection to replace these lost benefits.
- 8.9. This is only one option that may be available to you. Other options may be available. If you are concerned about this issue, we suggest you discuss the matter with HR / Pensions Team to determine any other possible options available to you e.g., TOIL. You are also strongly encouraged to obtain your own financial advice before making any decisions.

9. Impact of the Separate Cash Payment

- 9.1. The Separate Cash Payment would not form part of your base salary and would not be included in the calculation of any overtime, bonus, long-term incentive plan, or other benefit entitlements that you may have.
- 9.2. Although not forming part of your base salary, the Separate Cash Payment will increase the amount that you receive each month. It will also impact on the following:
- a) The Separate Cash Payment will be included in the calculation of holiday pay.
 - b) The amount of any redundancy pay calculation, but only in so far as the statutory cap applies (currently £538). Where your week's pay is higher than the statutory cap applicable at the point of redundancy, then the Separate Cash Payment will not be included in the calculation.
- 9.3. Where possible the Separate Cash Payment would be paid in equal monthly instalments in arrears. However, this will depend on the number of requests and the Payroll and Pension team's capacity. Individuals will be notified when payments will be processed if their application is approved.
- 9.4. Payments would be subject to deduction for income tax and national insurance contributions.
- 9.5. As receipt of the Separate Cash Payment will increase your income, depending on the period opted out of the NHS Pension Scheme consideration should still be given to the impact this may have on your total income, and therefore AA taper.
- 9.6. As noted at the onset of this policy document, the Trust may amend or remove the policy at any time. The Trusts' discretion is absolute in relation to the policy as a whole and/or its ongoing application to any individual employee, and that discretion will be exercised considering the purpose of this policy as set out in paragraph 1.2 above (i.e., there will need to be a clear and justifiable operational need to retain the member of staff before the Trust can agree to making a Separate Cash Payment).

10. Making a Request

- 10.1. To make a request under this policy you must provide evidence that you are affected (or about to be affected) by the AA (including the tapered AA) or the LTA if your current pension arrangements were to continue.
- 10.2. Individuals are responsible for obtaining whatever advice is necessary for them to make an informed decision, including where appropriate (though not limited to) professional advice from an accountant or independent financial advisor, guidance from the NHS pension scheme: (<https://www.nhsbsa.nhs.uk/nhs-pensions>) information from reputable sources such as professional organisations and unions, HM Revenue & Customs.
- 10.3. Retrospective evidence that you are or would be affected by:
 - a) AA will usually be in the form of acceptable document evidence from NHS Business Services (and any other pension provider) confirming the annual increase in your NHS pension benefits (and any other contributions paid to any other applicable pension scheme) and acceptable documentary evidence confirming that you may be subject to an AA tax charge (note that if you are subject to the tapered AA this may take the form of proof of earnings from all income sources).
 - b) The LTA will usually be in the form of confirmation (such as benefit statements) from all your pension arrangements detailing your total pension entitlement
- 10.4. Prospective evidence that you will be affected will typically be in the form of pension/pay modelling data using evidence from sources contained within 10.2 & 10.3 considering for ample, incremental pay progression and changes in working patterns and/or proof of projected income from multiple sources.
- 10.5. If your request is granted and the Trust subsequently determines that you did not have reasonable grounds to anticipate being subject to AA/LTA charge (as applicable), any sums paid to you as cash payments in accordance with this policy may be deducted from your salary or any other sums owed to you by the Trust if determined appropriate and reasonable in the circumstances. Vulnerability to AA charge will be judged with regard to the possibility of large Pension Input Amounts in future years through, for example, incremental progression.
- 10.6. If you are interested in taking advantage of this policy, you should complete the Separate Cash Payment Application Form (Appendix 1) and submit this to the HR Department, along with the relevant evidence detailed above.
- 10.7. A panel including HR and Finance representative will review all applications and decide whether to approve or decline the requests, based on the evidence provided.
- 10.8. In some cases, there will need to be a meeting with you before making a decision.
- 10.9. The Trust accepts no responsibility for changes to pension benefits or arrangements not being made in sufficient time to avoid the impact of the AA or LTA (as applicable).

- 10.10. If you choose to opt out prior to confirmation of a decision being made this will not mean a Separate Cash Payment is more likely, nor will it mean any back pay is paid when a request is subsequently accepted.
- 10.11. If your request is accepted, or where the Trust proposes an alternative to the arrangements you requested, we will write to you with details of the new arrangements and the date on which these will commence. This will normally be with effect from the start of the month following your application. This agreement will be for the period up to 31st March 2023.
- 10.12. The Separate Cash Payment will apply to your current role only. If you apply for or otherwise change roles, then the continuation of the Separate Cash Payment will be at the absolute discretion of the Trust, although not unreasonably withheld.
- 10.13. If your request is refused, reasons for refusal will be provided in writing, and you may appeal to the Director of Workforce and Innovation in the case of factual inaccuracy. Acceptance of requests shall not be unreasonably withheld. Where a request is refused, you will not be able to make another request to change your pension arrangements by means of this Policy for 12 months, unless there has been a change of circumstances in terms of how the AA or the LTA (as applicable) affects you. You still have the right to opt-out of the NHS Scheme or discuss alternative options.

11. Automatic Enrolment

- 11.1. If you opt out of the NHS Pension Scheme the Trust will be under an obligation to automatically enrol you into a qualifying pension scheme in the future (unless you have LTA protection or are not eligible for automatic enrolment). You will need to arrange with the Trust's Pension Manager to opt out of membership of the qualifying pension scheme before contributions are paid to ensure that further pension benefits do not start to accrue. If you choose to remain within that qualifying pension scheme, any Separate Cash Payment would be reviewed and stopped or adjusted to take into account the employer contributions being paid on your behalf.

12. Training

- 12.1. Support will be given to staff involved in the implementation of this policy. However, no advice can be given regarding any personal decisions.

13. Making a false or misleading declaration

- 13.1. Please be aware that making a false or deliberately misleading declaration could be a disciplinary matter for an employee.

14. Monitoring

- 14.1. A report can be produced six monthly to monitor the demand, financial impact and in line with any legislative or national changes. This will be reviewed through the Trust Executive Committee.

15. References

- 15.1. NHS Employers: Lifetime Allowance and Annual Allowance Guidance
- 15.2. NHS Employers: Pension tax guidance for employers. Local measures to support staff and service delivery during the 2019/20 financial year (published September 2019)
- 15.3. DHSC Consultation Document: NHS Pension Scheme: Pension Flexibility (published 11 September 2019)

Appendix 1 – Separate Cash Payment Application Form

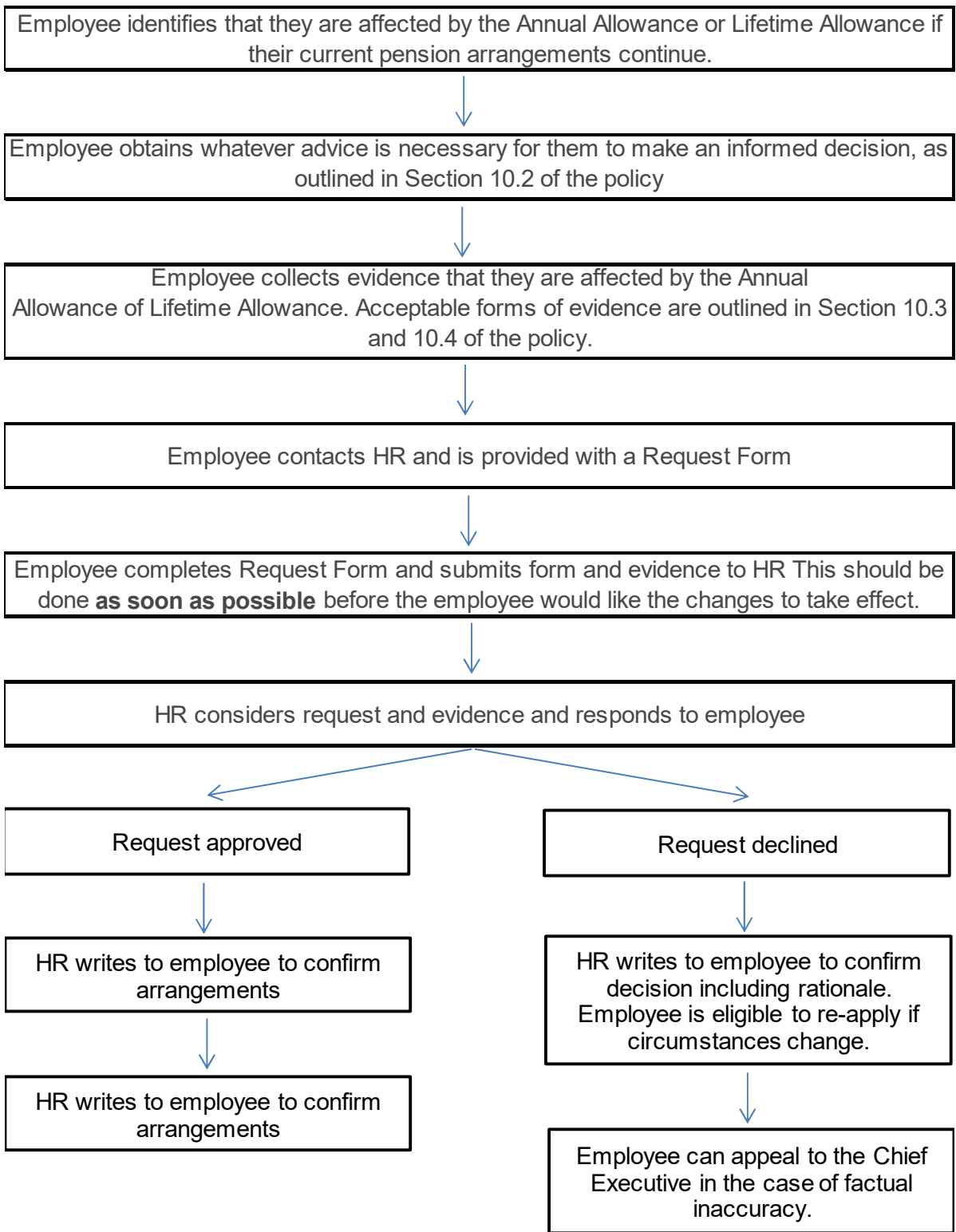
| Employee Details |
|---|
| Assignment No. |
| Forename |
| Surname |
| Job Role |
| NHS Pension Scheme membership reference |
| Proposed opt out date of the NHS Pension Scheme |
| <p>I confirm that:</p> <ul style="list-style-type: none">• I have read and understood the Pension Contribution Alternative Award Policy.• I am affected (or about to be affected) by the AA or LTA if my current pension arrangements continue and have provided evidence of this (as per section 10.3 and 10.4 of the policy).• I have obtained whatever advice is necessary to allow me to make an informed decision in relation to this application and have provided evidence of this (as per section 7.1.2 of the policy).• I am aware of the current Public Sector Consultation to remedy the discrimination found in the transitional arrangements to the 2015 pension schemes and still wish to proceed with this application. <p>I understand that:</p> <ul style="list-style-type: none">– The policy and the Separate Cash Payment do not form part of my contract of employment.– The Trust may amend or remove this policy and payment at its sole and absolute discretion.– The Separate Cash Payment does not form part of my base salary and is not included in the calculation of any overtime, bonus, long-term incentive plan, or other benefit entitlements that I may have.– Payments will be subject to deduction for income tax and national insurance contributions.– The Trust accepts no liability or responsibility for the consequences of any changes to my pension benefits or arrangements, or any consequences of no changes being made. <p>Disclaimer:</p> <p><i>In making this request I acknowledge that neither the Trust or any of its representatives has sought to advise me or influence my decision in any way and I can confirm that I have taken independent financial advice in respect of the option I am requesting under this form. I acknowledge that the financial consequences of my decision may be worse than choosing to remain in the Pension Scheme. I confirm that I indemnify and hold harmless the Trust in respect of all and any consequences of my making this decision. In signing this form, I confirm that I understand and agree to the terms of this disclaimer.</i></p> |
| Signed |
| Name |
| Date |

Appendix 2 – Checklist for Employee Applying

To make a request under this policy you must provide the following. If all these aspects are not included your application will be rejected:

1. Separate Cash Payment Application Form (Appendix 1)
2. Evidence that you are affected by, or about to be affected by, the AA or LTA if you were to remain in the NHS pension scheme. For example, evidence from NHS Business Services (and any other pension provider) confirming annual increase in your NHS pension benefits over AA, evidence of additional earnings if affected by taper or independent financial advice.
3. Evidence that you have received independent financial advice or as a minimum, used the NHS Ready Reckoner tool.

Appendix 3 – Application Process for Separate Cash Payment



Appendix 3 – Equality Impact Assessment (EIA) Form

This section must be completed at the development stage i.e., before ratification or approval. For further support please refer to the EIA Guidance on the Equality and Diversity section of the Intranet.

Part 1

1. Person(s) Responsible for Assessment:  2. Contact Number: 
 3. Department(s): HR 4. Date of Assessment: 30 October 2019 - reviewed November 2020

5. Name of the policy/procedure being assessed: Pension Contribution Alternative Reward Scheme Policy

6. Is the policy new or existing?

New Existing

7. Who will be affected by the policy (please tick all that apply)?

Staff Patients Visitors Public

8. How will these groups/key stakeholders be consulted with?

Via various committees including Staff Partnership Committee, Local Negotiating Committee and Business Performance Committee

9. What is the main purpose of the policy?

This Policy is being introduced to try and reduce the adverse effect the current pension tax limits are having on the Trust's (and wider NHS') ability to safely manage patient care. The current pension tax limits have resulted in many Consultants withdrawing from additional activity, some requesting to reduce their PA's and some choosing to retire early to avoid huge tax bills. This is consequently resulting in significantly reduced level of clinical capacity, as well as staff engagement and morale, and a growth in waiting lists. In addition, the pension tax rules are seeing more senior managers also being affected. This is having a negative financial impact directly on these individuals but may also affect the future ability to recruit and retrain staff within these roles. It is hoped this Policy will help persuade senior staff to continue to work and provide services to the Trust and patients, as opposed to reducing hours and/or retiring by supporting those individuals affected by AA and LTA pensions' tax.

10. What are the benefits of the policy and how will these be measured?

This Policy aims to provide an optional alternative to pension contribution for those employees who can demonstrate that they are impacted by the pension tax thresholds and have decided to opt out of the pension scheme as a direct result. It is hoped the benefit of which will be to maintain the employment and engagement of individuals affected by AA and/or LTA and therefore continued to be able to deliver safe and timely patient care and continue to attract and retain staff in these roles.

The policy will be measured on a six-monthly basis via a report to the Trust Executive Committee reviewing demand, financial impact and any legislative or national changes.

11. Is the policy associated with any other policies, procedures, guidelines, projects, or services?

This Policy links into other work around LTA and AA pension tax implications affecting high earners.

12. What is the potential for discrimination or disproportionate treatment of any of the protected characteristics:

| Protected Characteristic | Positive Impact (benefit) | Negative (disadvantage or potential disadvantage) | No Impact | Reasons to support your decision and evidence sought | Mitigation/adjustments already put in place | | | | | | | | | | | | | | | | | | | | | |
|------------------------------|---------------------------|---|-----------|---|---|--------|------|-----------------|--------|--------|-------------------|--------|--------|-------------------|--------|--------|------------------------|--------|--------|------------|--------|--------|------------------------------|--------|--------|--|
| Sex | | <p>Initial analysis indicates that the application of the policy could disproportionately benefit men due to the current pay gender gap (including CEA awards) and proportion of men in full-time Consultant positions and those in Band 8d and above positions.</p> <p>It follows that any discrimination challenge would have to be mounted on the basis that the policy constituted indirect discrimination contrary to section 19 of the Equality Act 2010.</p> | | <table border="1"> <thead> <tr> <th></th> <th>Female</th> <th>Male</th> </tr> </thead> <tbody> <tr> <td>ALL AFC AND VSM</td> <td>77.25%</td> <td>22.75%</td> </tr> <tr> <td>Band 8c and below</td> <td>82.53%</td> <td>17.47%</td> </tr> <tr> <td>Band 8d and above</td> <td>35.76%</td> <td>64.24%</td> </tr> <tr> <td>ALL MEDICAL AND DENTAL</td> <td>29.86%</td> <td>70.14%</td> </tr> <tr> <td>Consultant</td> <td>28.30%</td> <td>71.70%</td> </tr> <tr> <td>All other Medical and Dental</td> <td>34.21%</td> <td>65.79%</td> </tr> </tbody> </table> | | Female | Male | ALL AFC AND VSM | 77.25% | 22.75% | Band 8c and below | 82.53% | 17.47% | Band 8d and above | 35.76% | 64.24% | ALL MEDICAL AND DENTAL | 29.86% | 70.14% | Consultant | 28.30% | 71.70% | All other Medical and Dental | 34.21% | 65.79% | <p>This policy is available equally to all employees, irrespective of age and gender (providing they meet the criteria detailed above.</p> <p>It is understood that a female employee who was not facing the tax consequences of the AA or the LTA would still be entitled to leave the NHS pension fund but would not qualify under the Policy and thus would not obtain the benefit of the employer's contribution paid to her in cash as an addition to their salary. However, it is believed that this Policy is a proportionate means of achieving a legitimate aim and therefore does not constitute discrimination. Namely, it is being introduced to try to persuade senior staff to continue to work and provide their services to NHS patients as opposed to reducing their hours and/or retiring, which is having a direct impact on patient care. The "efficient planning of the departure and recruitment of staff" and "facilitating the participation of older workers in the workforce" have both been recognized as legitimate aims by the European Court previously.</p> |
| | Female | Male | | | | | | | | | | | | | | | | | | | | | | | | |
| ALL AFC AND VSM | 77.25% | 22.75% | | | | | | | | | | | | | | | | | | | | | | | | |
| Band 8c and below | 82.53% | 17.47% | | | | | | | | | | | | | | | | | | | | | | | | |
| Band 8d and above | 35.76% | 64.24% | | | | | | | | | | | | | | | | | | | | | | | | |
| ALL MEDICAL AND DENTAL | 29.86% | 70.14% | | | | | | | | | | | | | | | | | | | | | | | | |
| Consultant | 28.30% | 71.70% | | | | | | | | | | | | | | | | | | | | | | | | |
| All other Medical and Dental | 34.21% | 65.79% | | | | | | | | | | | | | | | | | | | | | | | | |

| Age | | Initial analysis also suggested that a higher proportion of older employees will meet the qualifying conditions. | | <table border="1"> <thead> <tr> <th></th> <th>All AfC and VS M</th> <th>Band 8c and below</th> <th>Band 8d and above</th> <th>All M&D</th> <th>Consultant</th> <th>All other M&D</th> </tr> </thead> <tbody> <tr> <td><=20</td> <td>0.20 %</td> <td>0.23%</td> <td>0.00 %</td> <td>0.00 %</td> <td>0.00 %</td> <td>0.00%</td> </tr> <tr> <td>21-25</td> <td>5.74 %</td> <td>6.47%</td> <td>0.00 %</td> <td>0.00 %</td> <td>0.00 %</td> <td>0.00%</td> </tr> <tr> <td>26-30</td> <td>12.30 %</td> <td>13.39 %</td> <td>3.64 %</td> <td>4.17 %</td> <td>0.00 %</td> <td>15.79%</td> </tr> <tr> <td>31-35</td> <td>15.92 %</td> <td>16.40 %</td> <td>12.12 %</td> <td>13.89 %</td> <td>7.55 %</td> <td>31.58%</td> </tr> <tr> <td>36-40</td> <td>12.84 %</td> <td>12.63 %</td> <td>14.55 %</td> <td>14.58 %</td> <td>9.43 %</td> <td>28.95%</td> </tr> <tr> <td>41-45</td> <td>11.48 %</td> <td>10.70 %</td> <td>17.58 %</td> <td>18.75 %</td> <td>19.81 %</td> <td>15.79%</td> </tr> <tr> <td>46-50</td> <td>12.16 %</td> <td>11.09 %</td> <td>20.61 %</td> <td>20.83 %</td> <td>28.30 %</td> <td>0.00%</td> </tr> <tr> <td>51-55</td> <td>11.20 %</td> <td>10.55 %</td> <td>16.36 %</td> <td>15.97 %</td> <td>19.81 %</td> <td>5.26%</td> </tr> <tr> <td>56-60</td> <td>10.86 %</td> <td>11.09 %</td> <td>9.09 %</td> <td>7.64 %</td> <td>9.43 %</td> <td>2.63%</td> </tr> <tr> <td>61-65</td> <td>6.22 %</td> <td>6.47%</td> <td>4.24 %</td> <td>2.78 %</td> <td>3.77 %</td> <td>0.00%</td> </tr> <tr> <td>66-70</td> <td>0.89 %</td> <td>0.77%</td> <td>1.82 %</td> <td>1.39 %</td> <td>1.89 %</td> <td>0.00%</td> </tr> <tr> <td>>=71 Years</td> <td>0.20 %</td> <td>0.23%</td> <td>0.00 %</td> <td>0.00 %</td> <td>0.00 %</td> <td>0.00%</td> </tr> </tbody> </table> | | All AfC and VS M | Band 8c and below | Band 8d and above | All M&D | Consultant | All other M&D | <=20 | 0.20 % | 0.23% | 0.00 % | 0.00 % | 0.00 % | 0.00% | 21-25 | 5.74 % | 6.47% | 0.00 % | 0.00 % | 0.00 % | 0.00% | 26-30 | 12.30 % | 13.39 % | 3.64 % | 4.17 % | 0.00 % | 15.79% | 31-35 | 15.92 % | 16.40 % | 12.12 % | 13.89 % | 7.55 % | 31.58% | 36-40 | 12.84 % | 12.63 % | 14.55 % | 14.58 % | 9.43 % | 28.95% | 41-45 | 11.48 % | 10.70 % | 17.58 % | 18.75 % | 19.81 % | 15.79% | 46-50 | 12.16 % | 11.09 % | 20.61 % | 20.83 % | 28.30 % | 0.00% | 51-55 | 11.20 % | 10.55 % | 16.36 % | 15.97 % | 19.81 % | 5.26% | 56-60 | 10.86 % | 11.09 % | 9.09 % | 7.64 % | 9.43 % | 2.63% | 61-65 | 6.22 % | 6.47% | 4.24 % | 2.78 % | 3.77 % | 0.00% | 66-70 | 0.89 % | 0.77% | 1.82 % | 1.39 % | 1.89 % | 0.00% | >=71 Years | 0.20 % | 0.23% | 0.00 % | 0.00 % | 0.00 % | 0.00% | The impact on age and sex is going to be similar so all detail above for age also applies for sex. |
|--------------------|------------------|--|--------------------|--|------------|------------------|-------------------|-------------------|---------|------------|---------------|------|--------|-------|--------|--------|--------|-------|-------|--------|-------|--------|--------|--------|-------|-------|---------|---------|--------|--------|--------|--------|-------|---------|---------|---------|---------|--------|--------|-------|---------|---------|---------|---------|--------|--------|-------|---------|---------|---------|---------|---------|--------|-------|---------|---------|---------|---------|---------|-------|-------|---------|---------|---------|---------|---------|-------|-------|---------|---------|--------|--------|--------|-------|-------|--------|-------|--------|--------|--------|-------|-------|--------|-------|--------|--------|--------|-------|------------|--------|-------|--------|--------|--------|-------|--|
| | All AfC and VS M | Band 8c and below | Band 8d and above | All M&D | Consultant | All other M&D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <=20 | 0.20 % | 0.23% | 0.00 % | 0.00 % | 0.00 % | 0.00% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 21-25 | 5.74 % | 6.47% | 0.00 % | 0.00 % | 0.00 % | 0.00% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26-30 | 12.30 % | 13.39 % | 3.64 % | 4.17 % | 0.00 % | 15.79% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 31-35 | 15.92 % | 16.40 % | 12.12 % | 13.89 % | 7.55 % | 31.58% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 36-40 | 12.84 % | 12.63 % | 14.55 % | 14.58 % | 9.43 % | 28.95% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 41-45 | 11.48 % | 10.70 % | 17.58 % | 18.75 % | 19.81 % | 15.79% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 46-50 | 12.16 % | 11.09 % | 20.61 % | 20.83 % | 28.30 % | 0.00% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 51-55 | 11.20 % | 10.55 % | 16.36 % | 15.97 % | 19.81 % | 5.26% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 56-60 | 10.86 % | 11.09 % | 9.09 % | 7.64 % | 9.43 % | 2.63% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 61-65 | 6.22 % | 6.47% | 4.24 % | 2.78 % | 3.77 % | 0.00% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 66-70 | 0.89 % | 0.77% | 1.82 % | 1.39 % | 1.89 % | 0.00% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| >=71 Years | 0.20 % | 0.23% | 0.00 % | 0.00 % | 0.00 % | 0.00% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Race | | | No impact foreseen | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Religion or Belief | | | No impact foreseen | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Disability | | Proportionately fewer employees with a disability are likely to be affected by the tax liability and need to consider the impact on their pension and therefore this policy | | <table border="1"> <thead> <tr> <th></th> <th>No</th> <th>Not Declared</th> <th>Yes</th> </tr> </thead> <tbody> <tr> <td>ALL AFC AND PERSONAL SALARY STAFF</td> <td>77.19 %</td> <td>19.88 %</td> <td>2.94 %</td> </tr> <tr> <td>Band 8c and below</td> <td>76.98 %</td> <td>20.02 %</td> <td>3.00 %</td> </tr> <tr> <td>Band 8d and above</td> <td>78.79 %</td> <td>18.79 %</td> <td>2.42 %</td> </tr> <tr> <td>ALL MEDICAL AND DENTAL</td> <td>78.47 %</td> <td>20.14 %</td> <td>1.39 %</td> </tr> <tr> <td>Consultant</td> <td>71.70 %</td> <td>26.42 %</td> <td>1.89 %</td> </tr> <tr> <td>All other Medical and Dental</td> <td>97.37 %</td> <td>2.63%</td> <td>0.00 %</td> </tr> </tbody> </table> | | No | Not Declared | Yes | ALL AFC AND PERSONAL SALARY STAFF | 77.19 % | 19.88 % | 2.94 % | Band 8c and below | 76.98 % | 20.02 % | 3.00 % | Band 8d and above | 78.79 % | 18.79 % | 2.42 % | ALL MEDICAL AND DENTAL | 78.47 % | 20.14 % | 1.39 % | Consultant | 71.70 % | 26.42 % | 1.89 % | All other Medical and Dental | 97.37 % | 2.63% | 0.00 % | This policy is available equally to all employees, irrespective of disability status. Mitigation as per age and sex above. |
|---|---------|---|--------------------|--|--|----|--------------|-----|-----------------------------------|---------|---------|--------|-------------------|---------|---------|--------|-------------------|---------|---------|--------|------------------------|---------|---------|--------|------------|---------|---------|--------|------------------------------|---------|-------|--------|--|
| | No | Not Declared | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ALL AFC AND PERSONAL SALARY STAFF | 77.19 % | 19.88 % | 2.94 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Band 8c and below | 76.98 % | 20.02 % | 3.00 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Band 8d and above | 78.79 % | 18.79 % | 2.42 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ALL MEDICAL AND DENTAL | 78.47 % | 20.14 % | 1.39 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Consultant | 71.70 % | 26.42 % | 1.89 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| All other Medical and Dental | 97.37 % | 2.63% | 0.00 % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sexual Orientation | | | No impact foreseen | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pregnancy/ maternity | | | No impact foreseen | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gender Reassignment | | | No impact foreseen | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Marriage & Civil Partnership | | | No impact foreseen | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>If you have identified no negative impact for all please explain how you reached that decision and provide reference to any evidence (e.g., reviews undertaken, surveys, feedback, patient data etc.) N/A</p> <p>13. Does the policy raise any issues in relation to Human Rights as set out in the Human Rights Act 1998?</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| No | | | |
|---|----------------|------------|---------------|
| Action | Lead | Timescales | Review Date |
| Continue to monitor demand and impact as set out in Section 13. | Executive Team | Ongoing | 31 March 2022 |
| | | | |

Declaration

I am satisfied this document/activity has been satisfactorily equality impact assessed and the outcome is:

No major change needed – EIA has not identified any potential for discrimination/adverse impact, or where it has this can be mitigated & all opportunities to promote equality have been taken – YES

Adjust the policy – EIA has identified a need amend the policy to remove barriers or to better promote equality
You must ensure the policy has been amended before it can be ratified.

Adverse impact but continue with policy – EIA has identified an adverse impact, but it is felt the policy cannot be amended.
You must complete Part 2 of the EIA before this policy can be ratified.

Stop and remove the policy – EIA has shown actual or potential unlawful discrimination and the policy has been removed

Name: [REDACTED] Date: 20 November 2020

Signed: [REDACTED]

Appendix 3 – Policy approval checklist

The _____ Policy is presented to the _____ Committee/Group for Approval.

In order for this policy to be approved, the reviewing group must confirm in table 1 below that the following criteria is included within the policy. Any policy which does not meet these criterion should not be submitted to an approving group/committee, the policy author must be asked to make the necessary changes prior to resubmission.

Policy review stage

Table 1

| The reviewing group should ensure the following has been undertaken: | Approved? |
|--|------------------|
| The author has consulted relevant people as necessary including relevant service users and stakeholders. | |
| The objectives and reasons for developing the documents are clearly stated in the minutes and have been considered by the reviewing group. | |
| Duties and responsibilities are clearly defined and can be fulfilled within the relevant divisions and teams. | |
| The policy fits within the wider organisational context and does not duplicate other documents. | |
| An Equality Impact Assessment has been completed and approved by the HR Team. | |
| A Training Needs Analysis has been undertaken (as applicable) and T&D have been consulted and support the implementation | |
| The document clearly details how compliance will be monitored, by who and how often. | |
| The timescale for reviewing the policy has been set and are realistic. | |
| The reviewing group has signed off that the policy has met the requirements above. | |

| | |
|-------------------------------------|--------------|
| Reviewing group chairs name: | Date: |
|-------------------------------------|--------------|

Policy approval stage

| | |
|--|--------------|
| <input type="checkbox"/> The approving committee/group approves this policy. | |
| <input type="checkbox"/> The approving committee/group does not approve the policy. | |
| Actions to be taken by the policy author: | |
| | |
| Approving committee/group chairs name: | Date: |

| | | | | |
|--|--|--|--|--|
| | | | | |
|--|--|--|--|--|

Translation Service

This information can be translated on request or if preferred an interpreter can be arranged. For additional information regarding these services please contact The Walton centre on [REDACTED]

Gellir gofyn am gael cyfieithiad o'r deunydd hwn neu gellir trefnu cyfieithydd ar y pryd os yw hynny'n well gennych. I wybod rhagor am y gwasanaethau hyn cysylltwch â chanolfan Walton ar [REDACTED].

هذه المعلومات يمكن أن تُترجم عند الطلب أو إذا فضّل المترجم يمكن أن يُرتَّب للمعلومة الإضافية بخصوص هذه الخدمات من فضلك اتّصل بالمركز ولتوّن على [REDACTED]

تەم زانیاریە دەکریت وەرگیردیت کاتیک که داواکریت یان ئەگەر بەباش زاندرە دەکریت وەرگیرتک نامادە بکریت (پیک بخریت) ، بۆ زانیاری زیاتر دەبارەى تەم خزمەتگوزاریانە تکایە پەيوەندی بکە بە Walton Centre بە ژمارە تەلەفۆنی [REDACTED]

一经要求，可对此信息进行翻译，或者如果愿意的话，可以安排口译员。如需这些服务的额外信息，请联络Walton中心，电话是：[REDACTED]。