

Title:	Gender Reassignment Support in the Workplace Policy
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Owner:	Chief Officer
Author	Corporate Services Manager
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Consultation Process	
Ratified and approved by:	AQuA March 2015 Governing Body April 2015 Governing Body December 2017
Distribution:	All staff and GP members of the CCG.
Compliance:	Mandatory for all permanent and temporary employees of Rotherham CCG.
Equality & Diversity Statement:	In applying this policy, the Organisation will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristic.

Gender Reassignment support in the workplace policy

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1. Introduction and The Law

It is the organisation's intention that all staff, volunteers, applicants and members of the public considering undergoing, undergoing or who have undergone gender reassignment will experience respect and dignity as employees or potential employees or whilst undertaking roles in the organisation for example as volunteers or visitors.

It is also the intention of the organisation that managers have good information and guidance on gender reassignment and on the implications for people considering or undergoing this process and that NHS Rotherham CCG (the CCG) is committed to ensuring that transgender people are treated with respect and that it does not discriminate unlawfully. This commitment is an important aspect of its overall commitment to providing equal opportunities in employment.

This policy is intended to assist the organisation to put this commitment into practice and to help the organisation, transgender people and other employees to deal with any practical issues that may arise. Compliance with this policy should also ensure that employees do not commit unlawful discrimination.

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. The organisation has a separate Equality and Diversity policy that deals with these areas.

2. Scope

The policy is CCG wide and applies to all people applying for employment and employed by the CCG including those working in the CCG under honorary contracts and as contractors or volunteers. It is intended to apply to anyone within this group who is considering, is undergoing or who has undergone gender reassignment.

The policy applies to people who cross dress when, as part of the process of reassigning their sex, or is driven by their gender identity to cross-dress. This policy does not apply to people who cross dress who are not in the process of reassigning their sex.

3. Definitions

3.1 Gender Dysphoria

Gender dysphoria describes people who experience significant dysphoria (discontent) with the sex they were assigned at birth.

3.2 The Terms 'Trans' and 'Transgender'

The Equality and Human Rights Commission note that... 'the terms 'trans people' and 'transgender people' are both often used as umbrella terms for people whose gender identity and / or gender expression differs from their birth sex, including transgender people (those who intend to undergo, are undergoing or have undergone a process of gender reassignment to live permanently in their acquired gender), transvestite/cross dressing people (those who wear clothing traditionally associated with the other gender either occasionally or more regularly), androgyne / polygender people (those who have non-binary gender identities and do not identify

as male or female), and others who define as gender variant.

4. Purpose

The CCG is committed to equality of opportunity, preventing discrimination or harassment and promoting positive relations between all people employed in the organisation. It is the organisation's intention that all staff, volunteers, applicants and members of the public considering undergoing, undergoing or who have undergone gender reassignment will experience respect and dignity as employees or potential employees or whilst undertaking roles in the organisation in a range of other circumstances.

The purpose of this policy is to:-

- Set out how the CCG will address these aims.
- Set out how the CCG will address gender reassignment from an employment perspective ensuring practice is in line with legal requirements and good practice guidance.
- Set out how the CCG will ensure that individuals considering or undergoing gender reassignment or who have transitioned are treated with fairness and supported in recruitment employment and career development.
- Set out CCG Policy on applying appropriate procedures in recruitment.
- Set out CCG Policy on applying appropriate procedures and support processes when employees or volunteers are considering, undergoing or have undergone gender reassignment.
- Set out how the CCG will ensure that relevant members of staff have sufficient information, guidance and support so that they can provide sensitive and supportive management to people who have informed them that they are considering undergoing or are undergoing gender reassignment.
- Set out the action that will be taken by the CCG to ensure that people who have undergone gender reassignment are treated with respect and their legal rights are maintained.

The policy is supported by specific **Procedures and Guidance**.

5. Duties

All staff should be aware of the policy as it applies to them as individual members of staff or volunteers.

All staff with leadership / managerial responsibilities must be aware of this policy and its related procedures and guidance and ensure that it is applied in their area of responsibility.

Specialist staff for example in areas such as HR, workplace wellbeing etc. should have a good working knowledge of the Policy and related procedures and guidance.

The HR Business Partner and Corporate Services Manager are responsible for ensuring the policy is up to date.

6. Process and Procedure

Staff Considering Undergoing Gender Reassignment

This section applies to staff employed by the CCG irrespective of the type of contract.

A member of staff who is considering undergoing gender reassignment may wish to initially speak with Occupational Health Counselling Service. Staff may self-refer to workplace counselling. Workplace wellbeing will ensure that staff are made aware of this Policy and related procedures and support.

A member of staff considering undergoing gender reassignment is advised to initially approach their line manager or the HR Business Partner. The line manager or the HR Business Partner should ensure that the employee is provided with a copy of this policy, and related procedures and support.

A member of staff considering undertaking gender reassignment may not proceed or may not plan to undergo gender reassignment imminently.

The line manager should agree with the member of staff what, if any, support will be helpful on an on-going basis.

The line manager should ensure that if a person has raised the issue of gender reassignment with them that any record made or transfer of information is made only with the specific agreement of the employee.

Staff intending or undergoing gender reassignment

If the member of staff decides to undergo gender reassignment, they have the option to start the procedure set out in Appendix A.

The procedure in Appendix A sets out what should take place to support an employee considering undergoing gender reassignment.

Staff Undergoing Gender Reassignment

This section applies to employees, irrespective of the type of employment contract, undergoing gender reassignment.

People undergoing gender reassignment are usually required by medical protocols to 'live in role' for up to two years. They may be prescribed hormone therapy or may choose to undergo surgical procedures. However, not all people who undergo gender reassignment will wish to undergo surgical procedures. A person is legally protected even if they never seek medical treatment.

Absence from work due to gender reassignment must be treated in the same way as absence due to illness and take account of the CCG Sickness Absence policy. The manager should discuss with the member of staff what type of appointments or time off they will require associated with gender reassignment. On the production of an appointment card/letter employees will be granted reasonable paid time off to attend hospital appointments under the terms of the CCG's Annual and Special Policy.

Appendix A sets out a procedure to be followed to support someone undergoing gender reassignment.

The CCG will maintain up to date information about support services available to a person undergoing gender reassignment and provide this information through the CCG intranet site – or should be signposted to this information.

Recruitment and New Employees

Employment recruitment procedures and practice will include provisions for ensuring that people are not discriminated on the basis of gender reassignment.

New and current employees requiring DBS checks who are undergoing gender reassignment will be able to use the DBS specific procedure. This involves contacting the DBS directly.

The CCG staff does not need information about a member of staff's gender history and should not ask about this during DBS checking.

DBS internal procedures ensure that relevant checks are made. Where a conviction or (in Enhanced Disclosure cases) other relevant information has been recorded in a previous name, this will be revealed on the disclosure and as such details of any previous identity may become apparent.

See appendix E - DBS check procedure.

Work Permits

Staff who are working in the CCG on a work permit or student visa are asked to comply with any work permit/visa regulations which may relate specifically to name change or gender reassignment in order that the work permit/visa continues to be valid.

References

References for someone moving to a new job must be in the name which will be used in the new job and not disclose a former name.

If a transgender person has to disclose a previous identity in order for references from past employers to be obtained strict confidentiality and respect for dignity should be applied and this information kept secure.

Occupational Requirements

The Equality Act 2010 has replicated exceptions for 'occupational requirements' that were in previous equalities legislation. The Equality Act 2010 makes it clear that any 'occupational requirements' for a role must *'pursue a legitimate aim' and 'the burden of showing that the exception applies rests on those seeking to rely on it'*.

When advertising roles the CCG/Yorkshire and Humber Commissioning Support policy and procedure on advertising posts which have Occupational Requirements must be referred to.

When a person is considering undergoing or undergone gender reassignment it is essential that any concerns a line manager may have regarding the role of the transgender person are discussed with the person as part of the procedures described in Appendix A. If agreement cannot be reached then advice should be taken from HR to agree if all or any part of the person's role is subject to an

occupational requirement.

Gender Recognition Certificates (GRC)

This section applies to new recruits irrespective of the type of contract and to staff who have undergone gender reassignment.

The Gender Recognition Act 2004 provides that where a person holds a gender recognition certificate (GRC) they must be treated according to their acquired gender.

Anyone who has a GRC must be treated for all purposes as having their acquired gender.

Transgender people must not be routinely asked to produce a GRC. Staff undergoing gender reassignment may choose to apply for a GRC but they should not be required to do this.

People who have a GRC will be issued with a new birth certificate. This is confirmation of their legal gender.

Confidentiality

The CCG policy on confidentiality will apply, however the following should be particularly noted.

Members of staff may gain information about a person's gender history in the course of their work. This information must be kept confidential

If this information needs to be passed on then the specific permission of the person it relates to must be obtained.

If the person has a GRC and this information is passed on without gaining the person permission, the person passing the information on will be committing an offence.

National Insurance

Staff who change their name will need to inform the local social security office, providing the appropriate certificates and will pay NI contributions on the basis of their affirmed gender according to the GRC.

Pension

A transgender person who receives a full recognition certificate will be treated according to their affirmed gender for state pension purposes. Transgender people who do not obtain a full gender recognition certificate retain their full pension rights in accordance with the sex that is recorded on their birth certificate. In terms of pension provision, it is good practice for employees to be treated as having their birth gender up to the point of transition (i.e. when they start to live fully in the acquired gender) and their acquired gender from the point of transition. This would apply for example in calculating funds transfers between pension plans.

Professional Registration

Staff who are professionally registered are advised to contact their professional bodies to find out whether there are any specific requirements in terms of name

changes etc. If the employer has to keep evidence of professional status or qualifications, he or she should discuss with the member of staff how to retain such evidence on file so as not to compromise or breach disclosure of protected information.

7. Dissemination, Storage and Archiving

The policy will be available on the CCG intranet.

8. Training and other Resource Implications for this Policy

A briefing will be given via e-mail to all staff to make them aware of the policy. Reference will be made to the policy in relevant training such as recruitment.

9. Audit, Monitoring and Review

The policy will not be in regular use so it is anticipated that once the policy has been used for the first time feedback will be obtained from staff and managers regarding the policy.

The policy will be updated to take account of guidance issued on gender reassignment. The policy will be reviewed on a cyclical basis every three years.

10. Implementation Plan

Action / Task	Responsible Person	Deadline	Progress update
Agree policy place on intranet and publicise within CCG.	Equality and Diversity Manager and Assistant Chief Officer	01/10/2014	1 st draft completed and with the CCG for review.
Policy reviewed in cyclical basis	Corporate Services Manager and Assistant Chief Officer	01/08/17	Policy reviewed

11. Links to Other Policies

- Equality and Diversity Policy
- Acceptable Standards of Behaviour (incorporating Dignity at Work)
- Managing Sickness Absence
- Recruitment and Selection Policy and Procedure
- Annual and Special Leave Policy

Undergoing Gender Reassignment Procedure

1. Planning

People are different and each person considering and undergoing gender reassignment will have different preferences and priorities. The following procedures are intended to provide a framework to support this process but they may be modified to meet individual needs.

2. Informing colleagues service users and carers and contacts

- 2.1. There is no requirement and there should be no obligation to inform colleagues, clients or the public that a person is undertaking gender reassignment.
- 2.2. Where case work is being undertaken or a member of staff has a long term caring relationship it may be considered appropriate to have a discussion with the service user if the relationship with that individual was established prior to their change of gender and is to continue. How to manage this should be discussed with the transitioning person.
- 2.3. Any inappropriate release of information resulting in the member of staff being identified against their stated wish, whether internally or externally, may be regarded as gross misconduct and subject to appropriate disciplinary action. It is therefore important to have a specific discussion at an early stage about who will be informed, at what stage and how.
- 2.4. It is recommended that the transitioning person takes the lead in informing others but they may prefer that this is undertaken by the manager or a HR representative.
- 2.5. It is important the timing of disclosure is agreed as part of the planning.
- 2.6. The manager will ensure that general information about gender change and any specific details about the current transition are made available to staff or the person.
- 2.7. At the point of public change in gender, it is common for people to take annual leave and then return in their new name and gender role. This may be a useful opportunity with the persons consent to brief staff ready for their return.

3. Record keeping

- 3.1. At the point of transition all public documents, public references (such as telephone directories, e-mail accounts, circulation lists, rotas, Electronic Staff Records) and employment details need to be amended to reflect the acquired gender of the person. See Section 2 for practical details.
- 3.2. Where documents have been seen and copies taken at the point of starting employment (such as a birth certificate) every effort should be made to replace those with equivalent documents in the new name and gender. This will prevent any breach of confidentiality.
- 3.3. In some instances, it may be necessary to retain records relating to an individual's identity at birth, for example, for pension or insurance purposes.
- 3.4. Once a GRC has been obtained these must be replaced with the new birth certificate details.

3.5. Access to records showing the change of name and any other details associated with the individual's status (such as records of absence for medical treatment) must be restricted to staff who need the information to do their work.

Meetings Guide and Checklists

		Date completed
Initial Meeting	<p><u>Suggested Agenda</u></p> <ol style="list-style-type: none"> 1) Agree who will initially be informed and or involved in supporting the employee. 2) Provide employee with details of the policy and CCG procedure. 3) Agree a date for a second meeting – this should take place as soon as possible. 4) What support would be helpful – agree how this can be met. 	
Planning Meeting 1	<p><u>Suggested Agenda</u></p> <ol style="list-style-type: none"> 1) Agree outline timescales including support/progress meeting timetable. 2) Agree who should/needs to be told when and how. 3) Does the person wish to stay in their current role during transition or be redeployed if this is an option? 4) Are there any occupational requirements of the current or proposed role (NB these will be limited and must be objectively justified by the organisation)? 5) Can adjustments be made so that the person does not undertake these aspects of the role during transition? 6) Where a role requires on going contact with individual patients/service users discuss communication with these patients. 	
Planning Meeting 2	<p><u>Suggested Agenda</u></p> <ol style="list-style-type: none"> 1) Does the person wish to inform colleagues, external organisations and contacts personally, or should this be done on their behalf? 2) Agree how the tasks identified in task list 1 below will be completed (who when etc.) 3) When will use of chosen gender facilities begin. 4) How will negative reactions be managed 5) Agree how to respond to any media interest 6) Does any information need to be provided to colleagues 7) Agree final timetable for when key actions will take place. 8) Discuss any concerns of the transitioning person 9) Discuss any questions the line manager may have. 	
Progress Meeting 1	<p><u>Suggested Agenda</u></p> <ol style="list-style-type: none"> 1) Review Progress 2) Check list of tasks 1 completed 3) Review/revise timetable 	

Progress Meetings	<p>To take place in line with planning identified above</p> <p><u>Suggested Agenda</u></p> <ol style="list-style-type: none"> 1) Review Progress 2) Review/revise timetable 	
Final meeting	<p>This should take place at a stage when the transitioning person feels that support should finish or alternative on-going support should be agreed and all tasks have been completed.</p>	

Practical Procedures and Considerations

1. Electronic Staff Record (ESR)

This is the system used in the NHS to keep staff records.

Option 1 – preferred name – a member of staff can change their preferred name on the system without providing any supporting information, so someone whose name is John Smith could indicate that they wish to be known as Joanna Smith. If someone's preferred name is changed on the system any official information linked to ESR records will still record the person's name as Joanna Smith in this case.

To action this Request to Vary a Contract form needs to be completed and returned to the Central HR Workforce Team.

Option 2 - Initiating a full change of name. Any member of staff can change their name but the CCG policy is that this must be supported by some formal proof of name change (for example a marriage certificate). For people undergoing gender reassignment the requested name change should be supported by a 'statutory declaration' of name change or a gender recognition certificate.

A name change can be facilitated by the person completing a Request to Vary a Contract electronic form which their line manager will then authorise. This should then be sent to the Central HR Workforce Team along with the scanned in copy of the 'statutory declaration' confirming this legal change.

2. Email log in etc.

The IT department should be contacted to facilitate name changes on e-mail and any security or other log in systems.

3. National Insurance

Staff who change their name will need to inform the local social security office, providing the appropriate certificates and will pay NI contributions on the basis of their affirmed gender according to the GRC.

4. Pension

A transgender person who receives a full recognition certificate will be treated according to their affirmed gender for state pension purposes. Transgender people who do not obtain a full gender recognition certificate retain their full pension rights in accordance with the sex that is recorded on their birth certificate. In terms of pension provision, it is good practice for employees to be treated as having their birth gender up to the point of transition (i.e. when they start to live fully in the acquired gender) and their acquired gender from the point of transition. This would apply for example in calculating funds transfers between pension plans.

5. Professional Registration

Staff who are professionally registered are advised to contact their professional bodies to find out whether there are any specific requirements in terms of name changes etc. If the employer has to keep evidence of professional status or qualifications, he or she should discuss with the member of staff how to retain such evidence on file so as not to compromise or breach disclosure of protected information.

Task List

Task	Process	Who Will Complete			Completed
		Staff Member	Manager	Other	
Change name on ESR	Complete Request to Vary a Contract Form – submit to Central HR Workforce Team.	√	√	YHCS HR Team will action on ESR upon receipt of form.	
Change e-mail address	Contact IT directly to request change to email	√	√	IT Team will action on receipt of request.	
Change name on IT systems	Contact IT directly to request change to email	√	√	IT Team will action on receipt of request.	
Advise Professional Body (as per that bodies policy)	Staff member contacts relevant professional organisation.	√	n/a	n/a	
Change authorised signature mandate	CCG Finance to agree change and inform YHCS.	√	√	CCG Finance Team to action change.	
Change Payroll	Will be actioned via Request to Vary a Contract instruction to Central HR Workforce Team as above.	√	√	YHCS HR Team will action on ESR upon receipt of form.	
Order new Uniforms	Staff Member/Manager	√	√	n/a	
Inform National Insurance Office	Staff Member to inform the office directly	√	n/a	n/a	
Pensions	Staff Member to inform the office directly	√	n/a	n/a	
OTHER – to be agreed at planning meetings					

Advice on DBS Check Procedure

A specific procedure is available for people who have undergone gender reassignment. This involves them contacting the DBS directly.

DBS offer a confidential checking process for transgender applicants. This process is for transgender applicants who do not wish to reveal details of their previous identity to the person who asked them to complete an application form for a DBS certificate. Telephone 0151 676 1452 to discuss this matter in confidence or email sensitive@dbs.gsi.gov.uk.

A brief summary of the process is:

- Transgender people applying for a DBS disclosure should first ring the above number or email the above address to clarify anything they are not sure about and to ensure that the DBS know they will be using the special provisions.
- They should then complete the form or E-DBS form presented by their employer in the normal way, except that they need not complete details (or supply forms of evidence) that would expose their gender history to their employer.
- If they wish to leave out details that could 'out' them, then they should photocopy the form ensuring they have a clear record of the application serial number or make a note of the serial number if using e-DBS.
- The applicant should then immediately contact the DBS on one of the numbers above and notify them of the application number.
- The special security section of the DBS in Liverpool then have the means to intercept the application forwarded by the employer. They will ask the applicant to supply the information needed to replace that which was omitted. This is then married up so that a rigorous criminal records check can be carried out in the same way as for any other applicant.
- Disclosures sent to the employee and their employer will not reveal the applicants former identity unless they have an offence or caution that has been recorded in that name in police records. In this case there is no way of avoiding the disclosure of that former identity to the employer.
- DBS check information obtained should be treated in line with the CCG policy on DBS checks, data protection and confidentiality.

Equality Impact Assessment

Title of policy or service:	Gender Reassignment Support in the Workplace Policy	
Name and role of officer/s completing the assessment:	Alison Hague, Corporate Services Manager	
Date of assessment:	1 st August 2017	
Type of EIA completed:	Initial EIA 'Screening' <input checked="" type="checkbox"/> or 'Full' EIA process <input type="checkbox"/>	<i>(select one option - see page 4 for guidance)</i>

1. Outline	
<p>Give a brief summary of your policy or service</p> <ul style="list-style-type: none"> Aims Objectives Links to other policies, including partners, national or regional 	<p>The Gender Reassignment Policy aims to provide an appropriate framework within NHS Rotherham CCG to enable managers to ensure employees who are considering or have undergone a gender reassignment process are fully supported in the workplace.</p> <p>It is the organisation's intention that all staff, volunteers, applicants and members of the public considering undergoing, undergoing or who have under gone gender reassignment will experience respect and dignity as employees or potential employees or whilst undertaking roles in the organisation for example as volunteers.</p> <p>This policy has been developed to ensure the organisation meets its legislative requirements in relation to gender reassignment under the provision of the Equality Act 2010, specifically 'the act provides protection for transsexual people. A transsexual person is someone who proposes to, starts or has completed a process to change his or her gender. The act no longer requires a person to be under medical supervision to be protected, so a woman who decides to live as a man, but does not undergo any medical procedure would be covered. It is discrimination to treat transsexual people less favourably for being absent from work because they propose to undergo, are undergoing or have undergone gender reassignment than they would be treated if they were absent for being ill or injured.'</p>

Identifying impact:

- **Positive Impact:** will actively promote or improve equality of opportunity;
- **Neutral Impact:** where there are no notable consequences for any group;
- **Negative Impact:** negative or adverse impact causes disadvantage or exclusion. If such an impact is identified, the EIA should ensure, that as far as Possible, it is justified, eliminated, minimised or counter balanced by other measures. This may result in a 'full' EIA process.

2. Gathering of Information

This is the core of the analysis; what information do you have that might *impact on protected groups, with consideration of the General Equality Duty.*

(Please complete each area)	What key impact have you identified?			For impact identified (either positive and or negative) give details below:	
	Positive Impact	Neutral impact	Negative impact	How does this impact and what action, if any, do you need to take to address these issues?	What difference will this make?
Human rights	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Carers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Religion or belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<p>Most employers are aware of the need to show a positive approach to transgender people and other groups with 'protected characteristics'. An accepting environment in which diversity is celebrated ensures that valuable staff are recruited and retained. Yet at present 40% (1) of the people who would like to transition feel unable to do so in the work environment, and are therefore working under great stress and unlikely to reach their potential. Providing a welcoming environment, in which valuable staff are recruited and retained benefits everybody, not just the groups specifically targeted.</p> <p>The Equality Act 2010 protect transgender people, and the development of this policy represents NHS Rotherham CCG's commitment to ensuring the benefits and requirements of this law are clearly understood and followed within the organisation, and that staff who may wish to undergo a gender reassignment process are aware they can do so with the assurance that their employer has a clear and supportive process in place.</p>
Pregnancy and	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

maternity					
Marriage and civil partnership (only eliminating discrimination)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Other relevant groups	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
HR Policies only: Part or Fixed term staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

IMPORTANT NOTE: If any of the above results in '**negative**' impact, a 'full' EIA which covers a more in depth analysis on areas/groups impacted must be considered and may need to be carried out.

Having detailed the actions you need to take please transfer them to onto the action plan below.

3. Action plan				
Issues/impact identified	Actions required	How will you measure impact/progress	Timescale	Officer responsible
This is a new policy for the CCG and a developing area of legislation, it is important to ensure all staff are aware of the framework that is in place within this policy to support staff and managers.	<p>Communication of policy at All Staff Meeting (ASM) on 22nd February for feedback and comments.</p> <p>Policy to go through CCG ratification process for authorisation.</p>	The measure will be when an individual access the policy	Ongoing	<p>Elaine Barnes/Peter Smith</p> <p>Alison Hague/Ruth</p>

Policy reviewed in line with cyclinical process	Policy to go through CCG ratification process for authorisation. Communication of policy at All Staff Meeting.	The measure will be when an individual access the policy.	Ongoing	Nutbrown
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4. Monitoring, Review and Publication

When will the proposal be reviewed and by whom?	Lead / Reviewing Officer:	Alison Hague	Date of next Review:	Every 2 years.
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Signature:	
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