

Recruitment and Remuneration of Associates and Subject Specialists Policy

Policy reference – HR025

SUMMARY	This policy sets out guidance in the engagement and ongoing management for Associate and Subject Specialists. It also sets out clear processes and procedures in ensuring that all clinical decisions are made with the best clinical intelligence and to provide safe and effective services within the financial resources available.
AUTHOR	Human Resources and Primary Care and Quality
VERSION	4
EFFECTIVE DATE	December 2020
APPLIES TO	This policy applies to those individuals who are not directly employed and provide services to the CCG as Associates and Subject Specialists.
APPROVAL BODY	CCG Remuneration and Nomination Committee
REVIEW DATE	December 2023

THIS POLICY HAS BEEN SUBJECT TO AN EQUALITY IMPACT ASSESSMENT

VERSION CONTROL SHEET

Version	Date	Author	Status/ Approval Body	Comments/Circulation
1.0	07.11.2013	Corporate and Governance Manager	Final	Approved by Remuneration Committee and circulated to staff and public.
1.1	31.07.2015	Corporate and Governance Manager	Draft	Circulated to SMT, Service Improvement Manager and HR. Proposed amendments to update and widen to non CCG member practices.
1.2	01.10.2015	Corporate and Governance Manager and HR Manager	Draft	Updated with comments including removing tri-partite agreement option, section on pensionable pay in line with KPMG advice.
2.0	01.10.2015	Corporate and Governance Manager and HR Manager	Final	Approved by Remuneration Committee and circulated to staff and public.
2.1	18.01.2018	Head of Corporate Affairs and Governance/ Head of Primary Care Quality and Improvement and HR & OD Manager	Draft	Revised to take account of findings of the Associates review and IR35 requirements

2.2	22.01.2018	Head of Corporate Affairs and Governance	Draft	Revised – taking account of Remuneration Committee amendments by Alan Brook and John Mallalieu
2.3	23.03.2018	Head of Corporate Affairs and Governance	Draft	Incorporated amendments from John Mallalieu.
3.0	28.03.2018	Head of Corporate Affairs and Governance	Final	Approved by Remuneration Committee electronically and circulated to staff and public.
3.1	06.11.2020	HR Business Partner and Primary Care and Quality Lead	Draft	Proposed amendments made and circulated to the Primary Care and Quality lead for comment. Overall amendments agreed with some minor additions added.
3.2	16.11.2020	HR Business Partner and Equality and Diversity Manager	Draft	Policy with a full equality impact assessment circulated to the Equality and Diversity Manager for review. Amendments following review incorporated into the policy.
3.3	17.11.2020	HR Business Partner and Local Counter Fraud Specialist	Draft	Policy circulated to the Local Counter Fraud Specialist for review. Amendments following review incorporated into the policy.

3.4	24.11.2020	HR Business Partner	Draft	Policy circulated to members of SMT for comment and agreement.
3.4	25.11.2020	HR Business Partner	Draft	Policy circulated to the Remuneration and Nomination Committee in line with the electronic process for comment and approval.
4.0	31.12.2020	HR Business Partner	Final	Approved by Remuneration and Nomination Committee in line with the electronic process for comment and approval.

Contents

Table of Contents

1. Introduction.....	6
2. Purpose	6
3. Responsibility	7
3.2 Lead Manager.....	7
3.3 Governing Body Sponsor.....	8
3.4 Senior Management Team	9
3.5 Associates and Subject Specialists	10
3.6 Human Resources	11
4. General Points.....	11
5. Equality Statement	11
6. Accountability	11
7. Implementing and Monitoring	12
8. Who is eligible?	12
9. Process for identifying and appointing Associates and Subject Specialists	12
10. Principles for remunerating individuals and practices.....	14
11. Payment method and terms of engagement.....	15
12. Monitoring the performance, utilisation and retention of Associates and Subject Specialists.....	16
13. Managing conflicts of interest.....	17
Appendix 1 - Generic role description for Associates or Subject Specialists	18
Appendix 2 - Expression of Interest Form.....	21
Appendix 3 - Equality Impact Assessment.....	26

1. Introduction

- 1.1 One of the real benefits that CCGs bring to commissioning is their ability to harness a greater breadth and depth of clinical and lay engagement. This places CCGs in a much stronger position to commission services, care and support that meet the needs of the local population. Individuals who work within NHS Calderdale CCG's member practices bring a wide range of specialist expertise, are interested in developing services in particular specialist areas and/or are keen to develop their commissioning skills. The CCG has introduced the role of an 'Associate' in order to provide opportunities for these individuals to play a key part in supporting the CCG's commissioning priorities.
- 1.2 The CCG would also like to draw on the expertise of others known as (Subject Specialists) outside member practices who may also bring real benefit to the CCG in terms of their knowledge and skills. A Subject Specialist can be a Clinical or Lay person.
- 1.3 The role of the Associate as set out in NHS Calderdale CCG's Constitution is to provide additional clinical or lay input into specified priority areas as identified by the wider CCG or Governing Body.
- 1.4 The intention is that the Associates and Subject Specialists provide support on time limited projects to achieve defined outcomes and will be sponsored by an appropriate member of the Governing Body and a CCG senior manager. On occasion there may also be a need to recruit and retain an Associate or Subject Specialist over a longer period of time to provide specialist input and capacity in a particular defined area – such as cancer services, finance or contracting.

2. Purpose

- 2.1 This policy applies to those engaged in a role which involves giving clinical and non-clinical leadership and advice to the CCG. Individuals appointed to Associates and Subject Specialists roles will receive clear, strong and impartial guidance to enable them to carry out their responsibilities to a high standard.

2.2 Associates and Subject Specialists roles will have a Contract for Service which includes a Service and Roles Attributes document with clear role expectations and an agreed period of tenure, which can be adapted for any relevant speciality or time limited project.

2.3 The aim of the policy is:-

- Provide a set of guiding principles around the recruitment and selection of Associates and Subject Specialists;
- Agree remuneration and governance arrangements for Associates and Subject Specialists;
- Ensure there is a clear process in place that enables payments to be made to Associates and Subject Specialists for work undertaken and in line with IR35 rules and within service budget allocation;
- To fulfil the strategic objectives of NHS Calderdale CCG.

3. Responsibility

3.1 Good working relations are vital for the CCG to operate successfully and provide services. There is a joint responsibility for management and staff to accept the responsibility of working together on issues in good faith and with the shared intention of facilitating good working relations.

3.2 Lead Manager

The key responsibilities for lead managers include the following:

- To work with the Governing Body Sponsor to clearly identify and agree the specific responsibilities for the role together with the outputs and outcomes expected in the role specification and its associated form. The core roles and responsibilities are set out in the standard role description attached at Appendix one.
- To liaise with the local HR team for advice and guidance on the process of Associate and Subject Specialist recruitment.

- Working with the Governing Body Sponsor, being responsible for overseeing the performance and outputs of the Associate and Subject Specialist.
- Ensuring that there are arrangements in place for meeting with the individual to review progress; identify any issues requiring solutions and provide support as required.
- To follow the Payroll processes in relation to changes to the agreed remuneration, hours and termination of contract.
- Ensure that newly engaged Associates and Subject Specialists receive an appropriate local induction.
- Ensure that newly engaged Associates and Subject Specialists undertake any identified statutory mandatory training specific to the role.
- Ensure that Associates and Subject Specialists are provided with a clear work plan that reflects the CCG strategic objectives and are offered training to meet their identified continuous personal and professional development needs.
- Ensure one to one meetings are agreed and held on a regular basis and work plans will be reviewed at these meetings.
- Ensure that the appointment to the Associate or Subject Specialist role does not result in any conflicts of interest arising.

3.3 Governing Body Sponsor

Each application for an Associate and Subject Specialist role should be supported by the designated Governing Body Member, who will act as sponsor for the role. The role of the Governing Body sponsor is to:

- Ensure that the proposed role is in line with the CCG's strategic objectives.
- Ensure that the Associate/Subject Specialist is achieving the required outcomes/outputs.
- Ensure that the individual works with, and is informed by, the views of, the wider CCG clinical membership.
- Individual presents the findings of any work to the practice commissioning leads and practice managers group.

- Ensure that the individual operates as a leader in representing the CCG within their area of engagement, as agreed with the lead manager and Governing Body sponsor.
- Guide the work of, and provide any support to the individual including the identification of any training needs.

3.4 Senior Management Team

It is the responsibility of the Senior Management Team (SMT) to:

- Review the completed form for the proposed Associate or Subject Specialist role to ensure that:
 - The proposed role is supported by the lead manager and designated Governing Body member;
 - There is a need for the role within the CCG;
 - That the role being proposed supports the delivery of the CCG's statutory, regulatory duties and/or strategic objectives;
 - There is no other suitable option such as the function being commissioned and/or delivered by another provider;
 - That there is no duplication in role being carried out.
- Ensure a management overview of all the Associate and Subject Specialist activity across the CCG.
- Ensure that the performance and value for money of Associates and Subject Specialists is being monitored.
- Ensure that the appointment to the Associate or Subject Specialist role does not result in any conflicts of interest arising and that any declared conflicts of interest are managed by the organisation in line with the Conflicts of Interest Policy.

3.5 Associates and Subject Specialists

It is the responsibility of the Associates and Subject Specialists to ensure that they:

- Fulfil the specific responsibilities of the role. This includes liaison with the wider membership as appropriate for the remit of the tasks being sought.
- Ensure that they are compliant with the CCG's Working Time Regulations and Secondary Employment Policy and Procedures¹ and with those of their substantive organisation, where relevant.
- Liaise with the local HR team to complete the relevant pre-engagement checks.
- To complete all statutory and mandatory training as required by the CCG. The Associate or Subject Specialist must report any non-attendance or non-compliance of training activity and state the reason to their lead manager.
- Comply with the requirements of the induction process and objective setting process which includes completion of the relevant documentation and providing any supporting evidence as required.
- Making requests for development in line with the CCG's strategic direction and priorities.
- Feedback and share relevant learning points or present work and learning undertaken within the limits of any confidentiality provisions.
- Attend regular one to one meetings agreed by the lead manager and also discuss work plans.
- To declare any potential conflicts of interest as per the CCG's Policy on Managing Conflicts of Interest as soon as a potential conflict becomes apparent.

¹ The CCG's Working Time Regulations and Secondary Employment Policy and Procedures sets out the requirement that staff, agency workers and contractors inform the CCG if they are employed or engaged in secondary employment or consultancy work.

3.6 Human Resources

The key responsibilities for Human Resources are:-

- To liaise with the individual in relation to completing the relevant pre-engagement checks.
- To prepare a Contract for Service and liaise with the Recruitment team to set up the individual on Payroll for payments.
- To notify the Head of Primary Care Quality and Improvement and the Head of Finance of any changes to the remuneration rates approved by the Remuneration and Nomination Committee.
- Advice and support is provided to staff on matters on statutory mandatory training and access requirements.

4. General Points

- 4.1 Confidentiality will be maintained in all aspects of recruitment and remuneration and records will be stored and processed in line with Data Protection legislation and the Common Law Duty of Confidence.

5. Equality Statement

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

6. Accountability

- 6.1 The Accountable Officer is accountable for this policy.

7. Implementing and Monitoring

- 7.1 The Remuneration and Nomination Committee is responsible for the formal approval of this policy. Following approval, the policy will be disseminated to staff via internal communication methods and available through the staff intranet.
- 7.2 The policy and procedure will be reviewed periodically by the HR Team in conjunction with the Primary Care and Quality lead. Where review is necessary due to legislative change and/or best practice, this will happen sooner.

8. Who is eligible?

- 8.1 Associates are drawn from those members of the CCG's constituent practices that have expressed an interest in becoming a clinical or lay associate.
- 8.2 The Subject Specialist can be drawn from outside the CCG member practices.
- 8.3 Any Associate or Subject Specialist should be able to demonstrate the skills, knowledge and experience as set out in the role description.

9. Process for identifying and appointing Associates and Subject Specialists

- 9.1 Where the need for an Associate or Subject Specialist has been identified, the relevant CCG lead manager in conjunction with the Governing Body lead as appropriate for that priority area should complete the role description as attached at Appendix one and the Establishment Control Form (ECF) and agree this with the budget holder.
- 9.2 The completed ECF form for the proposed Associate or Subject Specialist role will be taken to the Senior Management Team meeting to ensure:
- That there is no duplication in role being carried out
 - There is a management overview of all the Associate and Subject Specialist activity across the CCG.

- 9.3 Once agreed, the role will be circulated to the CCG member practices and/or through other communications mechanisms such as through the practice leads' meetings or by email as appropriate. At the same time, the role for Subject Specialists can be advertised more widely to people working outside general practice following CCG's recruitment process in order to generate a greater level of interest. However priority should be given to individuals expressing an interest from the member practices.
- 9.4 Individuals expressing an interest in the Associates or Subject Specialist role will be required to complete an Expression of Interest form (appendix 2) and return this to HR. Anonymised applications will be considered by an appointed panel identified by the CCG or lead manager. Under our commitment to the Disability Confident Scheme, all individuals who meet the essential criteria and indicated that they have a disability will be automatically shortlisted.
- 9.5 Any interested candidates will be invited for an interview about the role and responsibilities involved. This will provide the CCG with the opportunity to check whether the candidate can bring the relevant skills and experience as set out in the role description. Appropriate panel members will be identified by the relevant CCG staff and the lead manager with overall management responsibility to co-ordinate the interview procedure with the attendee/candidates. The interview panel should have a minimum of 3 people on the panel (one of which should have CCG Recruitment and Selection Training) and/or one with clinical expertise where the recruitment involves recruiting someone with a clinical background.
- 9.6 The outcome of this process will be fed back to the wider CCG and member practices and other appropriate mechanisms. The appointed individual will also receive a formal notification of their appointment in writing from the lead manager responsible. Those individuals not appointed to the position will be notified of the decision and reasons given for the decision by the relevant lead manager.

- 9.7 The successful candidate will be contacted by the CCG's HR team² who will undertake all relevant workers checks in accordance with the NHS employment check standards as well as the pre appointment checks including right to work in the UK, GP registration
- 9.8 A copy of the role description (setting out the requirements of the role, time commitment, remuneration and arrangements for reviewing progress) will need to be agreed and signed by the individual appointed to carry out the role.
- 9.9 A copy will be forwarded to Primary Care Team and the HR team for monitoring purposes, including to ensure that the CCG remains compliant with regulatory and NHS best practice on the use of external consultants.

10. Principles for remunerating individuals and practices

- 10.1 The Remuneration and Nomination Committee has delegated authority to consider and make recommendations to the Governing Body on the remuneration rates and terms of service for Associates and Subject Specialists. In doing this, the Remuneration and Nomination Committee will be guided by a set of principles which seek to ensure transparency and value for money when considering appropriate remuneration and terms of service.

These principles are:

- The individual should not be disadvantaged in terms of remuneration.
- The CCG is buying additional capacity and specialist expertise in order to help deliver the strategic direction and priorities of the CCG.
- The remuneration is focused on the outputs and outcomes achieved and how the work has contributed to the delivery of the strategic direction and priorities of the CCG.

² The CCG uses a third party provider to undertake its Workforce and Organisational Development function. Therefore, personal human resources information is shared with North of England Commissioning Support Unit (the CCG's Data Processor) for recruitment, HR administration purposes and to comply with the obligations regarding the keeping of records.

- Ensure that if the role is a duplicate of a role already in place, we need to be able to demonstrate that the additional capacity is needed to enable the outcomes for the work to be achieved.
- These roles can also contribute to the development of the individual CCG member in addition to the succession planning agenda of the CCG.
- Prioritise CCG resources and work effectively within the resources available.
- The role represents value for money and the CCG only pays once for the time involved.

10.2 The Remuneration and Nomination Committee has responsibility for determining the appropriate rate for Associates and Subject Specialists. The indicative remuneration rates are available on request from a member of the HR team.

10.3 Any rate paid should aim to comply with the principles set out in paragraph 10.1 above, the determinations of the Remuneration and Nomination Committee, and should be agreed with the designated lead manager and budget holder.

10.4 This remuneration includes back fill for the host member practice/organisation. It is not expected that Associates or Subject Specialists will claim travel expenses from their usual place of work to the CCG headquarters. Any other expenses that need to be incurred as part of the role should be agreed with the designated lead manager in advance.

11. Payment method and terms of engagement

11.1 The individual will be engaged under a Contract for Service and be contracted to provide an agreed amount of hours a week or month and will submit time sheets on a monthly basis to the lead manager (if hours vary month on month). The Contract for Services will outline:

- Role title(s)
- No of sessions per week (a session is 4 hours)
- No of hours per month
- The fee per session/per hour
- The role will be paid via Payroll in line with IR35 rules.
- End of tenure date

11.2 Payment will be made for this work through the Payroll provider directly into the individual's personal bank account. Tax and National Insurance contributions will be deducted by the Payroll team.

11.3 If the individual is classed as an Officer in the pension scheme then any payments made by the CCG will be considered pensionable. Deductions and contributions will be made through Payroll.

12. Monitoring the performance, utilisation and retention of Associates and Subject Specialists

12.1 The CCG is accountable for the appropriate use of tax payers' money and as such will have clear governance arrangements in place for:

- Ensuring transparency in the process of identifying and appointing, and the retention of Associates or Subject Specialists.
- Ensuring that the outputs/outcomes identified in the role description are met as part of an appropriate performance management process.
- Ensuring a transparent process for agreeing the remuneration of Associates.
- Monitoring the remuneration made.

12.2 A copy of the role description setting out the expected outputs and outcomes should be reviewed regularly by the Governing Body Sponsor and Lead Manager for the role, to ensure that sufficient progress has been made against them.

12.3 A record of all Associates or Subject Specialists, the duration of agreement, predicted remuneration and payments made against this will be kept by the HR team.

13. Managing conflicts of interest

- 13.1 All individuals will be expected to comply with the CCG's Constitution, including abiding by the CCG's Policy on Managing Conflicts of Interest.
- 13.2 The CCG will maintain a register of Associates' and Subject Specialists' interests in line with good governance practice, openness and transparency. The CCG's registers of interests can be found on the CCG's website.
- 13.3 In situations where the most suitable Associate is someone from the Governing Body sponsor's practice, they will need to find an alternative Governing Body Sponsor in order to ensure that there is no conflict of interest.
- 13.4 Where there is a real or potential conflict of interest between the most suitable Associate or Subject Specialist and a Governing Body member or lead manager, an alternative sponsor should be found.

Appendix 1 - Generic role description for Associates or Subject Specialists

Associate/Subject Specialist

[Generic] Role Description and Person Specification

Accountable to: [Insert name and role of CCG Governing Body lead]

Responsible to: [Insert name and role of CCG Lead Manager]

Time Commitment:

Remuneration:

1. Summary of Role

1.1 The purpose of the role is to bring additional [clinical or lay] input into specified priority areas as identified by the wider CCG or Governing Body.

1.2 The Associate/Subject Specialist will [delete as appropriate]:

- provide support on a time limited project to achieve defined outcomes
- or**
- be retained over a longer period of time to provide specialist input and capacity into [Insert area]

2. General Duties and Responsibilities

- To be the [Insert] Associate/Subject Specialist for [Insert specific area].
- To keep up to date and have a good knowledge of service developments nationally, regionally and locally within [Insert specific area].
- To keep the Lead Senior Manager and the Governing Body Sponsor updated on progress and to provide early warning of any concerns, issues or risks within their portfolio area that might need resolution.
- Bring [insert] specialist expertise to the development and monitoring of services.

- Continuously ensure that the views of the wider CCG membership are taken on board, including reflecting differences in views, within their portfolio.
- To contribute to the general development and learning of the CCG in the Associate's/Subject Specialist's specialised area.
- To attend CCG Governing Body or Committees/meetings as agreed between the Associate/Subject Specialist, Lead Senior Manager and Governing Body Sponsor.
- Work to affect change to the commissioning processes by taking on a leadership role in representing the CCG at local and/or regional meetings as required in connection with [Insert specific area].
- To meet on a regular basis with the Governing Body Sponsor as appropriate and the Lead Senior Manager to agree objectives, discuss progress and monitor delivery of outcomes.

3. Specific Duties and Responsibilities

3.1 To be responsible for delivering:

[insert]

3.2 The Associate or Subject Specialist will also take a lead in representing NHS Calderdale Clinical Commissioning Group (CCG) in the specific areas as set out below. [Insert]

4. The Associate or Subject Specialist will be expected to -

- Be able to provide evidence of current registration with the relevant professional bodies.
- Represent the interests and the vision and values of the CCG at internal meetings and externally with partners.
- Abide by NHS Calderdale CCG's Constitution, including compliance with the Nolan principles on standards in public life, the CCG's Standards of Business Conduct and the Policy on Managing Conflicts of Interest.
- Undertake specific statutory mandatory training and objective setting.

4. Skills, Knowledge and Experience – person specification

4.1 The individual will be expected to have the following skills, knowledge and experience
[Insert]

Appendix 2 - Expression of Interest Form

1. Post

Job Title: _____

Department: _____

CCG Name: _____

2. Personal Details

Title: _____

Name: _____

Address: _____

Telephone Number: _____

Email Address: _____

Name in which you are registered with a professional body (if applicable): _____

3. Personal Information (current role)

Employer name: _____

Job title: _____

Start and end date: _____

Salary: _____

Reason for leaving (if applicable): _____

Brief description of your duties and responsibilities: _____

Previous Role(s)

Employer name: _____

Job title: _____

Start and end date: _____

Pay band or salary: _____

Brief description of your duties and responsibilities: _____

4. Education, Qualifications and Professional Registrations/Memberships

- Type of Qualification
- Grade
- Year obtained

5. Supporting Statement

This section is for you to give specific information in support of your application and should include evidence of how you meet all of the relevant criteria for this role as detailed in role description and person specification.

(NB: Please include any additional career history in this section if you believe it is relevant to the post that you are expressing an interest in).

6. References

Please provide the names and full contact details of the people who have agreed to supply references. Please note that all reference requests will be followed up and verified by the recruiting employer. Referees may be approached prior to interview, unless you indicate otherwise below.

Type of reference: • Employer • Educational • Personal

Title and name:

Relationship:

Employer name and address:

Telephone:

Email:

Can the referee be contacted prior to interview? Yes or No

7. Equality Act 2010

Ethnic origin: Asian or Asian British

- Bangladeshi
- Indian
- Pakistani
- Any other Asian background

Black or Black British

- African
- Caribbean
- Any other Black background

Mixed

- White & Asian
- White & Black African
- White & Black Caribbean
- Any other mixed background

White

- British
- Irish
- Any other White background

Other Ethnic Group

- Chinese
- Any other ethnic group
- I do not wish to disclose this

Religious belief:

- Atheism
- Buddhism
- Christianity
- Hinduism

- Islam
- Jainism
- Judaism
- Sikhism
- Other
- I do not wish to disclose this

Sexual orientation:

- Heterosexual or Straight
- Gay or Lesbian
- Bisexual
- Other sexual orientation not listed
- Undecided
- Do not wish to disclose

According to the definition of disability do you consider yourself to have a disability? (Further information regarding the [definition of disability can be found here](#))

Reasonable adjustments will be made available should you be invited to interview.

Do you consider yourself disabled in any way?

- Yes
- No
- Do not wish to disclose

If yes, please provide details?

If you have a disability, do you wish to be considered under the guaranteed interview scheme if you meet the minimum criteria as specified in the person specification?

- Yes
- No

Appendix 3 - Equality Impact Assessment

Title of policy: Recruitment and Remuneration of Associates and Subject Specialists Policy

Names and roles of people completing the assessment:

Tazeem Hanif – HR Business Partner

Sarah Mackenzie-Cooper – Equality and Diversity Manager

Date assessment started - 13.11.2020 completed - 16.11.2020

Give a brief summary of the policy: This policy sets out guidance in the engagement and ongoing management for Associate and Subject Specialists.

What outcomes do you want to achieve: To enable the engagement and ongoing management support to Associates and Subject Specialists.

2. Analysis of impact			
This is the core of the assessment, using the information above detail the actual or likely impact on protected groups, with consideration of the general duty to; eliminate unlawful discrimination; advance equality of opportunity; foster good relations			
	Are there any likely impacts? Are any groups going to be affected differently? Please describe.	Are these negative or positive?	What action will be taken to address any negative impacts or enhance positive ones?
Age	Interview panels may have explicit or unconscious bias about people who are, or are perceived to be, of a certain age (younger or older).	Positive	The policy states that interview panels will consist of a minimum of at least three of whom one must have undertaken the CCG's Recruitment and Selection Training. This should address

			discrimination and unconscious bias regarding applicants from protected groups.
Carers	No		
Disability	<p>Yes, nationally disabled people are much less likely to be employed than non-disabled people.</p> <p>Interview panels may have explicit or unconscious bias about people who are, or are perceived to have a physical, sensory, learning, mental health impairment, disability or long-term health condition.</p>	Positive	<p>The CCG operates a guaranteed interview scheme and the policy describes the grounds for taking positive action. The Policy ensures applicants can request reasonable adjustments during the recruitment and selection process.</p> <p>The policy states that interview panels will consist of a minimum of at least three people of whom one must have undertaken the CCG's Recruitment and Selection Training. This should address discrimination and unconscious bias regarding applicants from protected groups.</p>
Sex	Yes, interview panels may have explicit or unconscious bias about people based on their sex.	Positive	The policy states that interview panels will consist of a minimum of at least three people of whom one must have undertaken the CCG's Recruitment and Selection

			Training. This should address discrimination and unconscious bias regarding applicants from protected groups.
Race	Yes, BME employees and job applicants experience significant inequalities across the NHS. They are under-represented and less likely to be appointed once shortlisted and report poorer experience at work. There is potential for inequality arising when appointing to a vacant post without advertising in order to replicate the staff profile currently in place. Interview panels may have explicit or unconscious bias about people who are, or are perceived to be from certain ethnic groups.	Positive	<p>The CCG Recruitment and Selection Policy is designed to support a fair, transparent and equitable recruitment and selection process and sets out the grounds for taking positive action.</p> <p>The policy states that interview panels will consist of a minimum of at least three people of whom one must have undertaken the CCG's Recruitment and Selection Training. This should address discrimination and unconscious bias regarding applicants from protected groups.</p>
Religion or belief	Yes, Interview panels may have explicit or unconscious bias about people who are, or are perceived to be, of a particular (or no) religion or belief.	Positive	The policy states that interview panels will consist of a minimum of at least three people of whom one must have undertaken the CCG's Recruitment and Selection Training. This should address discrimination and

			unconscious bias regarding applicants from protected groups.
Sexual orientation	Yes, interview panels may have explicit or unconscious bias about people who are, or are perceived to be, of a particular sexual orientation.	Positive	The policy sets out the grounds for taking positive action and states that interview panels will consist of a minimum of at least three people of whom one must have undertaken the CCG's Recruitment and Selection Training. This should address discrimination and unconscious bias regarding applicants from protected groups.
Gender reassignment	Yes, interview panels may have explicit or unconscious bias about people who are, or are perceived to be, of a particular gender identity, undergoing gender reassignment or in transition.	Positive	The policy states that interview panels will consist of a minimum of at least three people of whom one must have undertaken the CCG's Recruitment and Selection Training. This should address discrimination and unconscious bias regarding applicants from protected groups.
Pregnancy and maternity	Yes interview panels may have explicit or	Positive	The policy states that interview panels will consist

	unconscious bias about females who are, or are perceived to be, are, or are likely to be pregnant or have children.		of a minimum of at least three people of whom one must have undertaken the CCG's Recruitment and Selection Training. This should address discrimination and unconscious bias regarding applicants from protected groups.
Marriage and civil partnership	No		
Other relevant group	No		

If any negative/positive impacts were identified are they valid, legal and/or justifiable? Please detail.	<p>The CCG has an external and internal complaints process for candidates who wish to raise a complaint about the fairness of the CCG recruitment and selection process. The policy is acceptable to all employees and adheres to the NHS Litigation Authority Standards, statutory requirements and best practice.</p> <p>The policy provides a clear and equitable process for all candidates and prospective employees.</p>
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4. Monitoring, Review and Publication			
How will you review/monitor the impact and effectiveness of your actions	<p>Training and support is provided to lead managers to ensure they follow sound recruitment and selection processes.</p> <p>Statutory mandatory training and appraisal compliance is monitored by HR and SMT to ensure compliance.</p>		
Lead Officer	Tazeem Hanif – HR Business Partner	Review date:	December 2023

5. Sign off		
Lead Officer	Sarah Mackenzie-Cooper – Equality and Diversity Manager	
	Date approved:	16.11.2020