<table>
<thead>
<tr>
<th>Reference Number:</th>
<th>123</th>
</tr>
</thead>
<tbody>
<tr>
<td>Author &amp; Title:</td>
<td>Gayle Williams, HR Manager</td>
</tr>
<tr>
<td>Responsible Directorate:</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Review Date:</td>
<td>11 March 2016</td>
</tr>
</tbody>
</table>
| Ratified by (committee): | Lynn Vaughan  
Director of Human Resources |
| Date Ratified:      | 11 March 2013 |
| Version:            | 4.1 |

**Related Policies**

- Managing Health & Sickness Policy
- Managing Conduct Policy
- Appraisal Policy
- Appeal Policy
- Maintaining High Professional Standards in the Modern NHS for Doctors and Dentists (Department of Health publication).
Index:

1. Introduction __________________________________________________ 3
2. Purpose _____________________________________________________ 3
3. Duties _______________________________________________________ 4
4. Informal Performance Management ______________________________ 5
  4.1 Induction ____________________________________________________ 5
  4.2 Appraisal Process ____________________________________________ 5
  4.3 Initial Performance Management Meeting ________________________ 6
  4.4 Outcome of Initial Performance Management Meeting ____________ 6
5. Formal Performance Management Meeting _________________________ 7
  5.1 Stage One Meeting ____________________________________________ 7
  5.2 Outcome of the Formal Stage One Meeting ________________________ 8
  5.3 Final Stage Two Meeting ________________________________________ 8
  5.4 Outcome of Final Stage Two Meeting ____________________________ 9
  5.5 Down Grading _______________________________________________ 9
  5.6 Dismissal ____________________________________________________ 10
  5.7 Appeal _____________________________________________________ 10
  5.8 Interpretation, Variation and Termination ________________________ 10
6. Review _____________________________________________________ 10
7. References __________________________________________________ 10
8. Equality Impact Assessment ____________________________________ 11
9. Training _____________________________________________________ 12
10. Monitoring Compliance with the Policy ___________________________ 12
Appendix 1: Managing Poor Performance Procedure Flowchart _________ 13
Document Control Information ______________________________________ 13
  Ratification Assurance Statement ________________________________ 14
  Consultation Schedule __________________________________________ 15
  Equality Impact: (A) Assessment Screening ________________________ 16

Amendment History

<table>
<thead>
<tr>
<th>Issue</th>
<th>Status</th>
<th>Date</th>
<th>Reason for Change</th>
<th>Authorised</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Approved</td>
<td>June 2011</td>
<td>Planned Review</td>
<td>Management Board</td>
</tr>
<tr>
<td>4</td>
<td>Approved</td>
<td>18 March 2013</td>
<td>Planned Review and new formatting applied</td>
<td>Lynn Vaughan, Director of Human Resources</td>
</tr>
<tr>
<td>4.1</td>
<td></td>
<td>28 March 2013</td>
<td>Fourth paragraph under heading 4.2: Appraisal Process</td>
<td></td>
</tr>
</tbody>
</table>
1. Introduction

This procedure applies to the performance of all employees of the Trust except for medical and dental staff. Maintaining High Professional Standards in Modern NHS for doctors and dentists must be followed for this staff group alongside the Procedures for the Prevention of Harm and Professional Conduct and Competence for Medical Dental Staff (and any updates to that Procedure in accordance with Health Service Circular 2003/012 and any future guidance).

2. Purpose

Managers have responsibilities for the careful selection and induction of new members of staff, for ensuring that all employees are aware of the standards required of them in terms of work performance and for ensuring they are adequately trained for the jobs they are employed to perform. Managers are also responsible for evaluating learning opportunities with the members of their team, so that any deficiency or omissions identified may be corrected.

Employees have a responsibility to achieve and maintain the standards that have been outlined to them, to co-operate with their managers in identifying development needs and to act on them.

Employees undergoing a formal work-related training programme would not normally have any performance issues dealt with under this policy. There may, however, be circumstances in which an approach which mirrors this policy would need to be adopted.

Performance is assessed by reference to the skill, aptitude and knowledge of the employee in regard to the job they are employed to perform. This procedure is designed to assist where poor performance indicates a lack of ability or skill and to provide an environment in which such issues can be addressed constructively in the interests of all parties.

Consideration should be given to involving expert or professional advisers where jobs incorporate highly technical aspects or elements which are not familiar to the manager.

This policy does not cover poor performance due to ill health nor does it cover failure to make use of abilities through lack of motivation/unwillingness to carry out duties or negligence. The Trust has other procedures for such circumstances:

Where poor performance is considered to be due to unwillingness to carry out duties properly, rather than inability to do so, it is appropriate to follow the Managing Conduct Policy and Procedure.

Where poor performance is due to ill health, the Managing Health and Sickness Policy and Procedure should be applied.

Where the circumstances of a situation suggest a combination of factors such as conduct and poor performance, the principal reasons for action should be selected and the appropriate procedure used. The use of this poor performance procedure does not preclude the use of another procedure if it becomes appropriate.

In handling issues of performance under this policy, the informal and formal stages will normally be followed sequentially. However, there may be circumstances where the issue is
sufficiently serious to necessitate going straight to the formal stage one performance advisory meeting. This will only be done with Human Resources advice.

3. Duties

Employee
- Employees are expected to act in accordance with the Trust Code of Expectations at all times.
- Employees are responsible for co-operating in the performance procedure and should make every effort to attend any meetings arranged by management.
- Employees are responsible for arranging their own trade union representation or support throughout the performance procedure.

Investigating Manager
- Performance cases should be dealt with without any undue delay on the part of the manager.
- The investigating manager must view the case with an open mind and come to a fair and justifiable conclusion after a full investigation.
- Where it is decided that a case is to be referred to a performance hearing the manager must prepare a thorough management case outlining their investigation for consideration by the hearing panel.

Hearing Manager/Panel Members
- The hearing manager and panel members must consider the management case and the staff side case fairly during the hearing and come to a fair and justifiable decision as to the outcome of the performance hearing.
- The hearing panel will consist of a manager with dismissal rights, an HR representative and where appropriate a third member may sit as an advisor to the panel. The third member will be registered with the relevant professional body of the staff member whose case is being heard; i.e. in the case of a conduct regarding a nurse, a registered nurse would sit on the panel.
- The hearing manager must write to confirm the outcome of the hearing to the employee and investigating team within 5 days of the date of the hearing.
- If the outcome of a grievance is appealed the manager must provide the appeal panel with a statement of case 7 days in advance of the meeting.

Human Resources
- The Human Resources department is responsible for the creation and maintenance of records of performance cases within the Trust in line with best practice for information governance.
- To support, where necessary, managers through the formal performance procedure, including the appeal stage.
- The Human Resources department is responsible for the review and maintenance of the Managing Performance policy through agreed forums within the Trust.

Trade Unions
- To represent employees through the performance procedure where they are fully paid up members of that trade union or professional body.
- To ensure that all representatives have attended mandatory grievance and disciplinary training with their relevant trade union or professional body.
- To make every reasonable attempt to attend meetings at the scheduled time to support employees.
4. Informal Performance Management

4.1 Induction

All new starters in the Trust should receive an appropriate induction to the Trust, through the Trust Induction programme followed by a robust local induction to their department and their role.

The induction programme should be approved and agreed by both parties, reviewed regularly, and placed on the personal file.

When the new starter has completed their induction their manager should meet with them to establish standards of performance, skills and knowledge for their role and specific objectives. This meeting should take place within the first six weeks of commencement of the role, and the objectives should be documented and agreed with a copy on file.

Managers should try to make standards and objectives as “SMART” (Specific, Measurable, Appropriate, Realistic, Time Bound) as possible. With the implementation of Agenda of Change, standards should be linked to, or include “Knowledge and Skills Framework” competencies.

4.2 Appraisal Process

Managers will ensure that the appraisal process is followed for all staff and used to review performance and the achievement of agreed objectives.

An appraisal should form a fundamental part of the normal management process. It should provide a focused two-way communication with opportunity for reflection and feedback where the individual can be helped to work more effectively and used as a means of helping staff to plan their future working lives (as set out in the Appraisal policy).

Managers and staff should ensure they meet their roles and responsibilities of the appraisal, as explained in the Trust Appraisal policy, including the provision of training and support from managers. Staff should be given regular feedback on their performance and feedback should not be limited to the appraisal. Managers should give their staff regular specific and constructive feedback as soon as possible on both positive and less than satisfactory performance.

Where issues have been raised with regards to an employee’s performance consideration should be given as to whether progression to the next pay point is appropriate whilst proactive steps are taken to address those concerns in line with this policy.
4.3 Initial Performance Management Meeting

Managers should always be monitoring the performance of all their members of staff.

Where the performance of an employee is deemed to be inadequate, the manager should meet with the employee informally and set out in a clear and understandable way where and how the performance falls short of the required standard, and what that standard is. The Manager may also ask the employee for his or her views on a programme of future support or training. This meeting should be held in as positive and supportive an environment as possible. It is not necessary for a member of the HR team or an employee representative to be present at this initial meeting.

The employee should be given every opportunity to ask for clarification of the standards expected and to bring to the manager’s attention any issues which may have affected his or her performance, including work and personal circumstances. This may also help the manager in assessing whether advice is required from Occupational Health or whether the employee should be reminded about the availability of the Trusts employee assistance programme. The employee may also like to discuss any learning needs.

The manager should ascertain from the employee’s comments whether he or she accepts that there is a problem and assess the importance of any mitigating circumstances.

Having assessed the situation, the manager should discuss and seek the agreement of the employee to an action plan to achieve the improvements in performance that are expected. This would consist of:

- A clear statement of the standards to be achieved
- A realistic time scale for those improvements (usually between four and 12 weeks)
- Details of any support or training
- Provision for regular review meetings
- Details of how performance will be measured.

The manager should indicate to the employee that a failure to meet the required standards within the period set may mean that formal action will need to be taken in the future. The review period set under the initial informal stage may be shortened if serious problems arise during it.

4.4 Outcome of Initial Performance Management Meeting

The meeting and action plan should be confirmed in a performance managing letter to the employee within five working days of the meeting.

Following the meeting, it is important that the manager keeps the employee up to date with his or her progress in line with the programme of regular review meetings in the action plan.
If the employee adequately meets the required standards within the period set, the manager should meet with the employee to confirm that this is the case and confirm the meeting in writing. No further action will be taken, although the employee’s performance will continue to be monitored in the usual way.

The records of the initial performance managing meeting should normally be retained on an employee’s file for 12 months once his or her performance has been confirmed as having returned to the required standard.

5. Formal Performance Management Meeting

5.1 Stage One Meeting

Where an employee is failing to perform to an acceptable standard in their post after having been given initial performance counselling and support, a meeting will be arranged with the employee by his or her relevant line manager within 21 calendar days. The employee will be given at least five working days notice of the meeting. The written confirmation of the meeting must include:

- That they have reached the first formal stage of the Managing Poor Performance Policy.
- clear details of the shortfall in performance;
- all necessary supporting documentation;
- details of any informal discussion to this point
- the right of representation by an accredited trade union or professional association representative or a friend who is an employee of the Trust and who is not directly related to the employee

The employee should take all reasonable steps to attend the meeting.

The approach at this meeting will be supportive and the purpose of this meeting will be to discuss and agree the:

- areas in which the employee’s performance is unsatisfactory;
- required performance improvement, and how this will be measured;
- action plan for addressing the performance issues with an agreed timescale for improvement;
- review date;
- The potential consequences of failing to meet the agreed performance level must also be clearly explained to the employee.

The employee should be given every opportunity to ask for clarification of the standards expected and to bring to the manager’s attention any issues which may have affected his or her performance, including work and personal circumstances. This may also help the manager in assessing whether advice is required from Occupational Health or whether the employee should be reminded about the availability of the Trusts employee assistance programme. The employee may also like to discuss any training needs. If the employee makes a complaint about the application of the procedure or
another related matter, the manager should consider whether the procedure should be suspended whilst the complaint is investigated.

The manager may like to discuss any options for redeployment with the employee at this stage.

The manager should review the original action plan and amend it if necessary. A new time scale for the achievement of the required standards should be set, which allows sufficient time to meet the standard, but it should not be unduly prolonged. This would usually be between four and twelve weeks, depending upon the circumstances.

5.2 Outcome of the Formal Stage One Meeting

The meeting and action plan should be confirmed in a formal stage one outcome letter to the employee within five working days of the meeting and the employee should be advised that a failure to meet and maintain the required standards within the agreed time scale may mean that the formal stage two of the procedure may be initiated, at which a decision on their continuing in their current post will be taken. The decision at the final stage two meeting could include downgrading to a lower band of post elsewhere in the Trust or dismissal on grounds of capability.

Following the meeting, it is important that the manager keeps the employee up to date with his or her progress in line with the programme of regular review meetings in the action plan.

If the employee adequately meets the required standards within the period set, the manager should meet with the employee to confirm that this is the case. They should confirm in writing that provided the standards continue to be met within the next year following the meeting, that no further action will be taken and the employee’s performance will continue to be monitored in the usual way. If however there is a reduction in the agreed standards during the next year, the manager will recommence the managing poor performance process at the formal stage one.

The records of the formal stage one meeting should normally be retained on an employee’s file for twelve months once his or her performance has been confirmed as having returned to the required standard.

5.3 Final Stage Two Meeting

If despite all the measures outlined above, it becomes evident to the manager that the required standards are failing to be met and are unlikely to be met within the time scale set, then it may be necessary to use the final formal stage. A meeting must be convened by a manager with the authority to dismiss within 21 calendar days. The employee will be given at least five working days notice of the meeting. The written confirmation of the meeting must include:

- that they have reached the final stage of the Managing Poor Performance Policy.
- clear details of the shortfall in performance.
• all necessary supporting documentation.
• details of any informal discussion to this point.
• the right of representation by an accredited trade union or professional association representative or a friend who is an employee of the Trust and who is not directly related to the employee.

The employee should take all reasonable steps to attend the meeting.

The meeting will be chaired by the manager with the authority to dismiss, who will normally be supported by a senior member of the HR team. The employee’s line manager will normally also attend this meeting and will normally be supported by a member of the HR team.

At this meeting the member of staff’s manager will feedback to the chair of the meeting and to the employee and their representative the areas where the employee has failed to achieve the acceptable level of performance as set out in the agreed standards and/or objectives. The employee and their representative will have the opportunity to ask questions and/or present their own evidence in relation to their performance. If the employee makes a complaint about the application of the procedure or another related matter, the chair of the meeting should consider whether the procedure should be suspended whilst the complaint is investigated.

5.4 Outcome of Final Stage Two Meeting

Having heard all of the evidence on the employee’s performance, the chair of the meeting with support and advice from the senior member of the HR team, will decide on whether the employee’s performance adequately meets the required standards, or whether the performance is below a minimum acceptable standard.

If the chair concludes that the employee’s performance adequately meets the required standard, the chair will confirm to the manager and the employee that this is the case. The chair should confirm in writing that provided the standards continue to be met within the next year following the meeting, that no further action will be taken and the employee’s performance will continue to be monitored by the employee’s manager in the usual way. If however there is a reduction in the agreed standards during the next year, the manager will recommence the managing poor performance process at the formal stage one.

If the chair concludes that employee’s performance is below a minimum acceptable standard they will go through the options set out below with the employee and their representative.

5.5 Down Grading

Downgrading options for the employee may be considered as an alternative to dismissal on grounds of capability (performance) if an appropriate post is available. Normally this will be to a lower banded post in the department or Trust, in which it is identified that the employee will be able to perform effectively.
Where the employee refuses down-grading, or if an appropriate post is not available, the manager with the authority to dismiss will have no other alternative but to dismiss the employee with notice.

Where an employee is downgraded in line with this policy the changes to terms and conditions will be a permanent change. There will not be any protection of pay for any employee redeployed through this policy. They will receive the appropriate salary for the grade of the job which is available to them.

5.6 Dismissal

If the employee refuses down-grading, or if an appropriate post is not available, the employee’s contract will be terminated with appropriate notice on the grounds of capability (performance).

5.7 Appeal

An employee dismissed under with the Trust’s Managing Performance Policy has a right to appeal against that decision in accordance with the Trust’s Appeal Policy.

5.8 Interpretation, Variation and Termination

Any questions as to the interpretation of this policy shall be referred to the relevant member of the HR team. Where further advice is required this should be referred to the Director of HR.

Management and Staff Side will jointly review the collective performance and effectiveness of this policy and procedure at appropriate intervals. There shall be no variation to this policy except by joint agreement through the Trust Consultation and Negotiation Committee.

6. Review

This policy will be in effect for three years, unless otherwise stated. Prior to the second anniversary of the policy the author will be asked to review it and make any necessary changes prior to further ratification.

7. References

ACAS code of practice, Disciplinary and Grievance Procedures – www.acas.org.uk

Agenda for Change Terms and Conditions Handbook

Maintaining High Professional Standards in Modern NHS for doctors and dentists – NHS Employers website; www.nhsemployers.org.uk
8. Equality Impact Assessment

An Equality Impact Assessment has been carried out on the content of this policy.
9. Training

Staff will receive advice and information regarding the effective management of performance from a number of sources

- Trust Policies
- Line Manager
- HR Team
- Other communication methods (e.g. team brief, team meetings)

Staff should refer to the staff development pages available on the intranet, to identify what training in relation to managing performance is available.

10. Monitoring Compliance with the Policy

The implementation of and compliance of this policy will be monitored using the following key performance indicators:

- Line Managers have received training on the contents of this policy within the last 24 months;
- Those featuring on Employee Relation Reports are being actively managed and there is documentary evidence of this;
- Disciplinary outcomes have been fair and in line with policy and have not been successfully challenged by the employee.

Monitoring will be performed by HR Business Partners, in conjunction with Divisional Managers. Although Employee Relation Activity rates will be monitored on a monthly basis, formal monitoring of the implementation of the policy will occur quarterly.

The results of the formal monitoring process will be published in the divisional performance review documentation, which in turn will be shared with Management Board.

Should the monitoring uncover any shortfalls in the implementation of the policy, the divisional manager and HR will work with the relevant departmental manager to draw up an action plan for improvement. This action plan may include:

- Additional training for the line manager;
- A risk assessment within the area of work;
- A review of departmental management processes;
- A review of the number of individuals within the department responsible for Employee Relations processes.

An organisational report on the results of the monitoring exercise will be produced annually by the HR department, which will capture any themes and reasons for non-compliance and make recommendations to the organisational on whether any cross divisional steps can be taken to make improvement.
Appendix 1: Managing Poor Performance Procedure

Flowchart

Robust induction programme
(Trust and local)
Setting Standards & Objectives
Appraisal / Feedback

Initial Performance counselling meeting
Resetting of clear & specific objectives and action points.
Details of any support or training
Review period of 4 – 12 weeks.
Performance counselling outcome letter given to employee within five working days
Regular review meetings take place.

Standards Met
No further action will be taken - confirmed in writing
Employee’s performance monitored as usual
Records of the initial performance counselling meeting retained on employee file for 12 months

Standards Not Met

Formal Stage One Meeting
Resetting of clear & specific objectives and action points.
Details of any support or training
Review period of 4 – 12 weeks.
Formal Stage one outcome letter given to employee within five working days.
Regular review meetings take place.

Standards Met
No further action will be taken - confirmed in writing
Employee’s performance monitored as usual
Records of the formal stage one meeting retained on employee file for 12 months
If reduction in agreed standards during the next 12 months, the process can start again at the formal stage one

Standards Not Met

Final Formal Meeting
Chaired by a manager with the authority to dismiss.
The employee’s manager will also attend and will feedback to the chair the area’s where the employee has failed to achieve agreed standards.
Employee and/or representative have opportunity to present evidence
Chair will decide whether employee’s performance is below an acceptable level.

Standards Met
No further action will be taken - confirmed in writing
Employee’s performance monitored as usual
Records of the formal stage one meeting retained on employee file for 12 months
If reduction in agreed standards during the next 12 months, the process can start again at the formal stage one

Standards Not Met

Right of Appeal
Employee can appeal against dismissal in accordance with the Trusts Appeal policy

Downgrading options may be considered if an appropriate post is available (normally to a more junior post)
If employee refuses down-grading, or if an appropriate post is not available, the manager with the authority to dismiss will have no option but to dismiss the employee with appropriate notice on the grounds of capability.
Ratification Assurance Statement

Dear Lynn

Please review the following information to support the ratification of the below named document.

Name of document: Managing Performance Policy (Reference 123)
Name of author: Gayle Williams
Job Title: HR Manager

I, the above named author confirm that:

- The Policy presented for ratification meets all legislative, best practice and other guidance issued and known to me at the time of development of the Policy;
- I am not aware of any omissions to the Policy, and I will bring to the attention of the Executive Director any information which may affect the validity of the Policy presented as soon as this becomes known;
- The Policy meets the requirements as outlined in the document entitled Trust-wide Policy for the Development and Management of Policies (v4.0);
- The Policy meets the requirements of the NHSLA Risk Management Standards to achieve as a minimum level 2 compliance, where applicable;
- I have undertaken appropriate and thorough consultation on this Policy and I have documented the names of those individuals who responded as part of the consultation within the document. I have also fed back to responders to the consultation on the changes made to the Policy following consultation;
- I will send the Policy and signed ratification checklist to the Policy Coordinator for publication at my earliest opportunity following ratification;
- I will keep this Policy under review and ensure that it is reviewed prior to the review date.

Signature of Author: ___________________________ Date: ___________________________

Name of Person Ratifying this policy: Lynn Vaughan
Job Title: Director of Human Resources
Signature: ___________________________ Date: 11 March 2013

To the person approving this policy:
Please ensure this page has been completed correctly, then print, sign and post this page only to: The Policy Coordinator, John Apley Building.
The whole policy must be sent electronically to: ruh-tr.policies@nhs.net
### Consultation Schedule

<table>
<thead>
<tr>
<th>Name and Title of Individual</th>
<th>Date Consulted</th>
</tr>
</thead>
<tbody>
<tr>
<td>HR Department</td>
<td>1st February 2010</td>
</tr>
<tr>
<td><strong>Reviewed</strong></td>
<td></td>
</tr>
<tr>
<td>HR Operational Team</td>
<td>08 October 2012</td>
</tr>
<tr>
<td>Staff side representatives</td>
<td>08 October 2012</td>
</tr>
<tr>
<td>Speciality Managers</td>
<td>08 October 2012</td>
</tr>
<tr>
<td>Matrons and Ward Managers</td>
<td>08 October 2012</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of Committee</th>
<th>Date of Committee</th>
</tr>
</thead>
<tbody>
<tr>
<td>TCNC Policy Sub Group</td>
<td>19th May 2010</td>
</tr>
<tr>
<td>TCNC</td>
<td>11th June 2010</td>
</tr>
<tr>
<td>Management Board</td>
<td>21st June 2010</td>
</tr>
<tr>
<td><strong>Reviewed</strong></td>
<td></td>
</tr>
<tr>
<td>TCNC Policy Sub-Group</td>
<td>29th November 2012</td>
</tr>
</tbody>
</table>
**Equality Impact: (A) Assessment Screening**

To be completed when submitted to the appropriate Executive Director for consideration and approval.

**Person responsible for the assessment:**
Name: Gayle Williams  
Job Title: HR Manager

<table>
<thead>
<tr>
<th>Does the document/guidance affect one group less or more favourably than another on the basis of:</th>
<th>Yes/No</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>Ethnic origins (including gypsies and travellers)</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>Nationality</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>Gender (including gender reassignment)</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>Culture</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>Religion or belief</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>Sexual orientation</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>Age</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>Disability (learning disabilities, physical disability, sensory impairment and mental health problems)</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>Is there any evidence that some groups are affected differently?</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>If you have identified potential discrimination, are there any valid exceptions, legal and/or justifiable?</td>
<td>☐ Yes ☒ No</td>
<td>N/A</td>
</tr>
<tr>
<td>Is the impact of the document/guidance likely to be negative?</td>
<td>☐ Yes ☒ No</td>
<td></td>
</tr>
<tr>
<td>If so, can the impact be avoided?</td>
<td>☐ Yes ☒ No</td>
<td>N/A</td>
</tr>
<tr>
<td>What alternative is there to achieving the document/guidance without the impact?</td>
<td>☐ Yes ☒ No</td>
<td>N/A</td>
</tr>
<tr>
<td>Can we reduce the impact by taking different action?</td>
<td>☐ Yes ☒ No</td>
<td>N/A</td>
</tr>
</tbody>
</table>

If you answered **NO** to all the above questions, the assessment is now complete, and no further action is required.

If you answered **YES** to any of the above please complete the

**Equality Impact: (B) Full Analysis**