



West Hampshire
Clinical Commissioning Group

SALARY OVER AND UNDER PAYMENTS POLICY

Version 3

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Links to other policies:	Local Anti-Fraud, Bribery and Corruption Policy CCG Conduct, Performance, Grievance and Absence Management Policy: Disciplinary Procedure
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For action by:	All West Hampshire CCG Employees
Policy statement:	The CCG in partnership with SBS has a responsibility to ensure that employees are paid correctly, but on occasions overpayments and underpayments occur for a variety of reasons. When this happens the CCG will either recover the overpayment or make a payment in line with this policy.
Responsibility for dissemination to new staff:	Line Managers
Mechanisms for dissemination:	The policy will be promoted on issue / on amendment via the staff newsletter and published on the CCG website.
Training implications:	All employees of West Hampshire CCG will be made aware of this policy at induction.
Resource implications:	There are no resource implications.
Further details and additional copies available from:	https://westhampshireccg.nhs.uk/document-tag/hr-policies/
Equality analysis completed?	Yes
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Approved By:	Policy Sub Group, via Chair's Action
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1	18.12.14	17 & 18	Clarification of CSU and CCG finance team roles	31.12.14
2	May 2018	Throughout	Complete Review	May 2018
3				
4				
5				

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Include details of when the document was last reviewed:

Version Number	Review Date	Reviewer	Ratification Process	Notes
2	18.12.14	Associate Director of Finance: Financial Accounting and Reporting	Policy Sub Group 12.1.15 and Corporate Governance Committee 20.1.15	
3	May 2018	SCW CSU HR Manager	Policy Sub Group and Board (May 2018)	Complete review / amendments throughout

SALARY OVER AND UNDER PAYMENTS POLICY

SUMMARY OF KEY POINTS TO NOTE

The CCG in partnership with Shared Business Services (SBS) has a responsibility to ensure that employees are paid correctly, but on occasions overpayments and underpayments occur for a variety of reasons. When this happens the CCG will either recover the overpayment or make a payment in line with this policy. The key points to note are as follows:

- Employees have a responsibility to check and review their payslip for accuracy and to advise their manager and payroll department when the payment is different to the expected contracted payment
- If an overpayment is considered to have been brought about fraudulently then the matter will be reported to the CCG's local counter fraud specialist for an investigation to be carried out under the CCG's Local Anti-Fraud, Bribery and Corruption Policy. Disciplinary action may also be taken in accordance with the CCG Conduct, Performance, Grievance and Sickness Absence Policy.
- An overpayment will be recovered in the next pay period or over a maximum of three months. If this payment relates to more than 50% of the gross monthly payment or causes financial hardship there is the possibility for the employee to negotiate a repayment period with the CSU payroll lead, the CCG chief finance officer, CCG associate director of finance or CCG finance manager – financial accounting and reporting.
- The individual will be expected to complete a statement of means to support a request for extended repayment terms over three months before any decision is made.
- If it is agreed to extend the period of the overpayment recovery beyond three months, any agreement will be in the form of a loan.
- Where an employee has been overpaid and they terminate their employment before the completion of the agreed recovery, the balance of the overpayment will be taken from the final payment.
- If an employee has received less than 75% of their basic pay, a financial hardship payment may be made, for which appropriate authorisation will be sought from the chief finance officer before the payment is made. At the end of the next payment interval the arrears will be made and the financial hardship payment will be recovered.
- Hardship payments will not be considered for non-payment of expenses or unsocial hours payments.

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SALARY OVER AND UNDER PAYMENTS POLICY

1. INTRODUCTION AND PURPOSE

- 1.1 The CCG in partnership with Shared Business Services (SBS) has a responsibility to ensure that employees are paid correctly, but on occasions overpayments and underpayments occur for a variety of reasons. When this happens the CCG will either recover the overpayment or make a payment in line with this policy.
- 1.2 Employees have a responsibility to check and review their payslip for accuracy and to advise their manager and payroll department when the payment is different to the expected contracted payment.
- 1.3 If an overpayment is considered to have been brought about fraudulently then the matter will be reported to the CCG's local counter fraud specialist (LCFS) for an investigation to be carried out under the CCG's local anti-fraud, bribery and corruption policy.
- 1.4 This policy outlines the process that will be followed when a member of staff receives an incorrect salary or expense payment, including payment to third parties such as child care vouchers.
- 1.5 The purpose of the document is to ensure that:
 - a) overpayments and underpayments are identified and either recovered or paid in a timely manner; and
 - b) a transparent, fair and consistent approach is followed when an incorrect salary payment is made.

2. SCOPE AND DEFINITIONS

2.1 Scope

- 2.1.1 This document applies to all staff employed within, or ex-employees of West Hampshire CCG (CCG) and relates to payments made via the payroll.
- 2.1.2 For the purposes of this policy, a salary overpayment or underpayment covers any payment made through the payroll to an employee.
- 2.1.3 Section 14 of the Employment Rights Act outlines an employer's right to recover a salary overpayment without the prior written agreement of the individual, if it is to recover an overpayment of wages or expenses.
- 2.1.4 The Theft Act 1968 indicates that although an individual may not set out to obtain additional salary intentionally, by keeping it and treating it as their own (i.e. spending it) they may be guilty of theft.

2.2 Definitions

The following definitions are used within the policy:

2.2.1 **Error types;** are the ways in which an employee can be incorrectly paid. They may include, but are not restricted to:

- an overpayment of salary
- an underpayment of salary
- an incorrect travel or non-travel expense
- a duplication of payment, and
- a deduction made in error.

2.2.2 **Overpayments;** are where an employee, or ex-employee is paid an amount in excess of their contractual entitlement. The likely causes of an overpayment include, but are not restricted to:

- A termination notification not being completed, received or actioned within the agreed deadlines
- Late or lack of notification of sickness absence
- Staff not returning from maternity leave
- An error being made
- A late change notification
- Incorrect salary banding.

2.2.3 **Salary/wages adjustment;** are amendments made to pay, to recover monies overpaid in the current or previous month only.

2.2.4 **Debt;** is an unrecovered overpayment made to an ex-employee.

2.2.5 **Underpayments;** are where an individual has received less pay than contractually due. The likely causes of an underpayment include, but are not restricted to:

- a variation to contract notification being submitted or actioned after the payroll cut off date
- a change of contract being notified late
- an incorrect salary banding
- a late submission of expense claims, excess hours, enhancements, overtime

2.2.6 **ESR;** Electronic Staff Records system

2.2.7 **Basic Pay;** is an individual's contractual pay before any additions are added, for example due to unsocial hours working, regular user additions, travel and subsistence

2.2.8 **Third party payments;** means a salary sacrifice or car parking deduction made to a third party provider.

3. PROCESS

3.1 Notification of overpayments and underpayments

3.1.1 Payment errors can be identified in several ways:

- The employee upon receipt of their salary identifies that an error has occurred
- A member of the HR team may identify that an error has occurred
- A member of the payroll team may identify that an error has occurred
- The budget manager identifies an incorrect value on the budget statements
- Management accountants may identify inconsistencies on the system
- The line manager identifies that an error has occurred.

3.1.2 If an individual fails to report an overpayment which they should have been aware of through for example, a check of their payslip, disciplinary action and referral to the LCFS may be taken. The LCFS will decide whether to carry out an investigation, which could result in criminal proceedings being taken against the individual.

3.1.3 When an error in payment has been identified, action should be taken as quickly as possible by payroll, to rectify the error and ESR updated accordingly.

3.1.4 Discrepancies in pay relating to the underpayment or overpayment of expenses or unsocial hours must be logged with the HRinput team who will investigate and seek to provide a resolution. Contact details are email scwcsu.hrinput@nhs.net, telephone 0300 123 6220 option 3.

3.1.5 Any queries relating to salary payments not mentioned in section 2.2 should be logged with the HRinput team.

3.1.6 Where an employee has received no pay or less than 75% of their basic pay (basic pay excludes enhancements or other additions), the query will be given a high priority 1 status and payroll will respond within one working day. Calls relating to overpayments will also receive priority 1 status and will be responded to within one working day.

3.1.7 All other calls will be given a priority 2 status and responded to within three working days.

3.2 Process for resolving overpayment errors (not third party payments)

- 3.2.1 Once any relevant changes has been input onto the ESR system, a retrospective report is generated, which identifies the reason for the overpayment. The pay assistant will calculate the amount of the payment error. Once the error has been verified as correct the pay adjustment process or overpayment process will begin.
- 3.2.3 If the error has occurred over a one or two month period, and in the circumstances the individual should have been aware of the overpayment, the adjustment will be made automatically the following month.
- 3.2.4 Where a payment error has been made, the payroll team will write to the individual advising how the error has occurred and outline the repayment plan. Recovery will in the first instance be made at the next pay interval. In all cases recovery will be sought as required by the Public Accounts Committee.
- 3.2.5 If at any time, an individual would like to make a repayment before the next pay period or before the full calculation of the overpayment has been made, then they should contact the CCG's finance team to facilitate this. The payroll team should make the employee aware of this as an option.
- 3.2.6 Where an employee is unable to repay the full amount at the next pay interval, the overpayments team can agree a repayment for a period of **up to** three months.
- 3.2.7 Where the amount of recovery exceeds 50% of the gross monthly pay or causes financial hardship, there is the possibility for the employee to negotiate a repayment period with the payroll lead and the CCG chief finance officer, CCG associate director of finance or CCG finance manager that is acceptable to all parties. The payroll clerk will contact the individual to confirm the recovery plan.
- 3.2.8 The individual will be expected to complete a statement of means (Appendix 1) to support a request for extended repayment terms over three months before any decision is made. On receipt of this form an interview may be arranged between a member of the HR team and the individual to discuss the overpayment and why the repayment cannot be made within three months. The individual has the right to be accompanied by a staff side representative or workplace colleague.
- 3.2.9 Failure to attend this meeting without good cause will mean that a decision will be made on the basis of the information available at the time. In these circumstances a decision will be notified in writing within five working days.

- 3.2.10 If it is agreed to extend the period of the overpayment recovery beyond three months, any agreement will be in the form of a loan. The individual will be asked to sign the form shown in Appendix 2.
- 3.2.11 Where a significant salary overpayment occurs over more than one month and the employee has not advised the Payroll or HR department, consideration will be given as to whether it is appropriate to alert the LCFS in order to conduct a criminal investigation.
- 3.2.12 This would not automatically result in a person being charged with a criminal offence and if, during the course of an investigation, evidence indicates that the case would not be suitable for criminal charges, the investigation would be closed and the overpayment recovery process continued.
- 3.2.13 A “without prejudice clause” will be included in all overpayment letters which states, “This does not affect any other action, including proceedings in a criminal court which may be taken in this case”. This clause is to ensure that criminal action is not precluded and may be considered at any stage of the investigation.
- 3.2.14 Any overpayment which is more than £5,000 once calculated will in accordance with the HM Revenue and Customs (HMRC) be treated as a beneficial interest free loan. This means that if the amount outstanding for the whole year is more than £5,000 (in any tax year) then the amount will be recorded on the P11D which is sent to HMRC at the end of the tax year and the official interest rate specified by HMRC may need to be charged.

3.3 Bank or Locum Workers

- 3.3.1 Due to the nature of the contract under which bank and locum workers are employed, work cannot be guaranteed. Consequently if an overpayment occurs it will not normally be possible to set up an overpayment recovery via the payroll. In these circumstances the pay assistant will calculate the net overpayment. They will write to the individual to explain the circumstance of the error and if no response is received within 14 days the matter will be referred to the finance team so that an invoice can be raised and the debt recovery process begins. Where the worker is still engaged the monies will be taken from any due payment.

3.4 Leavers

3.4.1 Where an employee has been overpaid and they terminate their employment before the completion of the agreed recovery, the balance of the overpayment will be taken from the final payment. If the overpayment is greater than the final salary payment, immediate payment will become due prior to leaving the CCG. If no payment is made before leaving the CCG and no contact is made within 14 days of leaving, the matter will be referred to the finance team so that an invoice can be raised for the balance, and the debt recovery process can begin.

3.5 Ex-employees

3.5.1 When a payment error is identified for an employee who has already left the organisation, the pay assistant will calculate the net amount of the overpayment. Payroll will write to the ex-employee to explain the circumstance of the error and refer the matter to the finance team so that an invoice can be raised and debt recovery commenced.

3.5.2 If an ex-employee has been overpaid for more than two pay periods after leaving the CCG employment and has not alerted either payroll or the HR team to the overpayment then this will be referred to the LCFS for investigation. The LCFS investigation will progress independently of the payroll recovery process.

3.5.3 If the ex-employee is unable to repay an overpayment immediately then the debtor team may agree a repayment period of up to three months by standing order only. Repayments over a period of more than three months must be agreed with the chief finance officer or nominated deputy and a statement of means (Appendix 1) will need to be completed to support a request for extended payment terms.

3.5.4 In the event that a repayment plan cannot be agreed or the debtor reneges on a repayment plan, recovery may be pursued through a debt collection agency and the courts.

3.6 Process for resolving third party payment errors

3.6.1 When a deduction due to a third party, for example in respect of child care vouchers, lease car, fees direct payments, the bicycle scheme, or car parking, has not been made, or has been deducted at an incorrect rate, either the HR or payroll team will contact the individual in the first instance to arrange for the additional amount to be deducted in the next pay period. If it is not possible to reach agreement the matter will be referred to the finance team with a request for an invoice to be raised.

3.6.2 Individuals should be aware that when an invoice has been raised, statements will continue to be issued each month until the debt is cleared, even if a recovery plan has been agreed and is being met.

3.7 Incorrect payments of Tax and National Insurance Contributions

3.7.1 The HMRC notifies the CCG of any underpayments of tax and national insurance contributions automatically via the Government Gateway. When the notification is received it is input into ESR by automatic data transfer and the adjustment is made in the next pay interval. The CCG has no discretion on these recoveries. Any queries must be addressed to HMRC directly.

3.8 Underpayments

3.8.1 Individuals should report underpayments of salary in the same way as stated in paragraphs 3.1.3 and 3.1.4, so that the relevant team can take any appropriate action.

3.8.2 If the employee has received less than 75% of their basic pay, see definition given in paragraph 3.1.6, a financial hardship payment may be made. Where appropriate authorisation will be sought from the CCG chief finance officer before the payment is made. At the end of the next payment interval the arrears will be made and the financial hardship payment will be recovered.

3.8.3 If the underpayment is due to some other reason, then the payment will be made at the end of the next payment period. Hardship payments will not be considered for non payment of expenses or unsocial hours payments.

3.9 Escalation Process

3.9.1 If an employee does not receive a response from the payroll HRinput team within the timescales specified in paragraphs 3.1.6 and 3.1.7 the employee should in the first instance approach their manager, who will in turn make contact with the SCW CSU pay lead team. They will try to resolve the issue, but if this is not possible they will escalate the matter to the CCG chief finance officer for review and escalation at the monthly contract management meetings if appropriate.

3.10 Complaints

3.10.1 Any questions or complaints regarding the application of this policy should be sent to the finance manager – financial accounting and reporting at West Hampshire CCG, Omega House, 112 Southampton Road, Eastleigh, Hants.

4. ROLES AND RESPONSIBILITIES

4.1 Employees are expected to:

- accurately complete travel and claim forms in a timely manner

- ensure the current tax code issued by HM Revenue and Customs is being used for the calculation of their salary
- ensure they understand their salary entitlement
- check their payslip every pay period to ensure that it appears accurate; and matches the payment received within their bank/ building society account
- raise pay anomalies with their manager and payroll using the payroll escalation process set out in paragraph 3.9.1
- where pay anomaly enquiries do not receive an adequate response from the payroll team within seven days, or the agreed timescale then the matter should be escalated to the individual's line manager
- remain aware of their position and obligations under this policy for the resolution of overpayments of salary.

4.2 **Budget/ Line Manager's** have responsibility for ensuring this policy is fairly and consistently applied by those staff they manage. They are, furthermore responsible for ensuring:

- changes in employee contracts, including hours, bands, terminations and individual elements are forwarded to the Human Resource (HR input) team in a timely manner (by close of business on the second working day of each month). Failure to comply may mean a delay in change causing potential payment errors
- new starters: all documents will be required the last working day of the month. Any start dates after the 19th of the month will not be guaranteed to be paid in the first month of service. For best practice ensure start dates are set to the 1st of the month
- timesheets and unsocial hours forms are checked for accuracy prior to forwarding to the payroll team before the relevant cut-off date
- employees are notified in writing of the changes to their contractual terms
- the monthly budget statement is checked for accuracy and any pay errors are notified to the finance manager – financial accounting and reporting, and the HR team
- where an employee has had an unauthorised or inaccurate payroll deduction, which has not received a timely response to their enquiry from the payroll team, the matter should be raised with the HR team.

4.3 **SBS Payroll** will ensure:

- that information received by the relevant cut-off date is input into ESR in an accurate and timely manner within the agreed roles and responsibilities for the CCG

- that robust checking processes are in place to identify and reduce over and underpayments
- any payment errors are identified and the employee advised in a timely manner
- they follow this policy in resolving payment errors; and
- that any underpayment or overpayment trends are identified and escalated with the CCG chief finance officer (CFO) in a timely manner .

4.4 The **HRinput team** will:

- publish payroll cut off dates on the HR portal
- ensure that changes received are input into the ESR system in a timely, accurate manner within agreed timescales subject to payroll cut off deadlines
- inform CCG finance team as soon as reasonably practicable where termination or changes of assignment forms have been received late and therefore may incur over or under payments
- ensure employees expectations are managed when discussing over or under payments
- ensure that guidance on the completion of salary and travel forms are available to staff and line managers via the HR Portal.

4.5 The **Commissioning Support Unit Finance team** are responsible for:

- raising invoices under this policy
- monitoring the recovery of all overpayments via the salary overpayment control account
- providing any information required by debt collection agencies or courts as appropriate in order that they may take relevant action
- advising the CCG chief finance officer of any issues that need to be addressed via the payroll contract
- sharing the overpayment report from SBS payroll team with the CCG and
- ensure that overpayments processed through SBS Payroll are recorded correctly in the CCGs ledger.

4.6 The **CCG Finance team** are responsible for:

- escalating overpayments to other agencies as appropriate
- updating the CCG Audit and Risk Committee of progress in a timely manner

- where any over/underpayments have not been made through SBS payroll, to make appropriate entries into the CCGs ledger until such a time as the over/underpayment is processed correctly through the payroll system.

4.7 The **CCG Chief Finance Officer** is responsible for ensuring that:

- they authorise payments chargeable to the CCG before they are made to individuals; and
- any overpayment or underpayment trends are addressed and where appropriate procedures are escalated and amended.

4.8 **Local Counter Fraud Service (LCFS)** are responsible for

- investigating any significant overpayments or any instances where fraud or theft is suspected.

5. TRAINING

5.1 Specific training for this policy is not required. However, line managers will ensure that all staff are made aware of this policy by the usual dissemination routes; also that all their respective staff members are conversant with the format and contents of payslips. Those managers with budgetary responsibility must ensure they are familiar with the CCG's standing financial instructions.

6. EQUAL ANALYSIS

6.1 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, 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.

6.2 In line with CCG policy, an equality analysis has been completed. It is understood that no employee will receive less favourable treatment on the grounds of disability, age, sex, race, religion or belief, gender reassignment, pregnancy or maternity, marriage or civil partnership, working patterns or trade union membership or non-membership in relation to the application of this policy. The equality analysis is included in Appendix 3.

7. SUCCESS CRITERIA / MONITORING THE EFFECTIVENESS OF THE POLICY

- 7.1 The effectiveness of this policy will be monitored by the HR team to ensure the correct procedures have been followed and timescales met. Any learning points and trends will be identified by the HR business partners who will make recommendations to the HR director about changes which need to be made.

8. POLICY REVIEW

This policy may be reviewed at any time at the request of either staff side or the CCG but will be reviewed automatically in the event of new legislation or guidance emerging or every three years.

9. REFERENCES AND LINKS TO OTHER DOCUMENTS

- 9.1 The following apply to this policy:

- Employment Rights Act 1996
- Theft Act 1968
- Standing Financial Instructions
- Reservation of Powers to the Board of Directors and Delegation of Powers
- Local Anti-Fraud, Bribery and Corruption Policy
- CCG Conduct, Performance, Grievance and Absence Management Policy: Disciplinary Procedure

Statement of Means Form

To be completed by staff wishing to repay their overpayment over a period longer than nine months.

Employee Details			
Q1.	Employee's Full Name		
Q2.	a) Assignment Number		b) Cost Centre
Q3.	Contact Email		
Q4.	Line Manager		

Income	
Net pay (take home pay)	
Any other income:	
Total Income:	£

Outgoings	
Accommodation, loans and utility bills per month	
Rent. Mortgage or lodgings	
County court orders and other fines	
Loan repayments	
Credit card repayments	
Council tax	
Food	
Utility bills (gas, water, electricity, etc)	
Telephone (inc. mobile)	
Other	
Travel expenses	
Vehicle fuel	
Vehicle insurance and tax	
Vehicle loan	
Catalogues	
Television subscription (licence, satellite, etc.)	
Other (specify)	
Travel and regular bills	
Clothing	
Insurance	
Child maintenance	

Nursery fees (excluding those included in any salary sacrifice)	
Total Outgoings:	

Employee Signature		
I confirm that the information I have given above is true and complete. I understand that if I give false information, disciplinary or other action may be taken against me.		
Q5.	Signature	
Q6.	Date	Click here to enter a date.

This form should be completed and returned with a completed Overpayment Loan form (Appendix 2) to:

Finance team, West Hampshire CCG, Omega House, 112 Southampton Road, Eastleigh, Hants.

Appendix 2 Overpayment Loan Form

This form is to be completed in the exceptional circumstances an overpayment loan form is proposed or granted

Surname:	
First name:	
Assignment number:	
Department shown on payslip:	
Telephone number:	
Email address:	
Period of overpayment:	
Amount of overpayment:	
Gross/Net	
Maximum number of instalments:	
Number of instalments:	
Instalment amount:	
Date of first instalment:	
Agreed amount to be loaned:	£
Relevant Rate of interest to be charged:	

Individual declaration

I agree to repay the amount loaned of £..... by(number) monthly deductions from my salary of £.....commencing on The final deduction will be made on, and I agree that any balance will be recovered in full from my final pay (or any arrears subsequently due to me) should I leave the CCG's employment for any reason before the full repayment has been made. Should my final salary payment (or the amount of any arrears subsequently due) not be sufficient to cover any balance outstanding, I agree to repay the balance to the CCG within 14 days of departure.

I understand that if the amount loaned is more than the HM Revenue and Customs annual limit for the whole tax year, I may be liable to pay interest as specified by the HM Revenue and Customs requirements (paragraph 3.2.15 of the policy on the treatment of Overpayments & Underpayments).

Signed:

Dated:

Please note: In disputed cases the Overpayment Loan form does not have to be signed by the employee.

*This form should be completed and returned with a completed Assessment of Needs form (Appendix 1) to:
HR team, Omega House, 112 Southampton Road, Eastleigh, Hampshire, SO50 5PB*

Authorised: Dated:
CCG nominated representative)

Equality impact assessment

Title of policy, project or proposal:
Salary Over and Under Payments Policy

Name of lead manager:	Chief Officer
Directorate:	Corporate

What are the intended outcomes of this policy, project or proposal?
The CCG in partnership with Shared Business Services has a responsibility to ensure that employees are paid correctly, but on occasions overpayments and underpayments occur for a variety of reasons. When this happens the CCG will either recover the overpayment or make a payment in line with this policy.

Evidence
<p>Who will be affected by the policy, project or proposal? Identify whether patients, carers, communities, CCG employees, and/ or NHS staff are affected. CCG employees</p>
<p>Age Consider and detail (including the source of any evidence) the impact on people across the age ranges. No impact</p>
<p>Disability Consider and detail (including the source of any evidence) the impact on people with different kinds of disability (this might include attitudinal, physical and social barriers). Certain medical conditions are automatically classed as being a disability – for example, cancer, HIV infection, multiple sclerosis. No impact</p> <p>Dementia Given the CCGs commitment to commissioning ‘Dementia Friendly’ services, consider and detail any impact on people with dementia. No impact</p>
<p>Gender reassignment (including transgender) Consider and detail (including the source of any evidence) the impact on transgender people. Issues to consider may include same sex/ mixed sex accommodation, ensuring privacy of personal information, attitude of staff and other patients. No impact</p>

Marriage and civil partnership

Note: This protected characteristic is only relevant to the need to eliminate discrimination within employment. Where relevant, consider and detail (including the source of any evidence) the impact on people who are married or in a civil partnership (for example, working arrangements, part-time working, infant caring responsibilities).

Not applicable

Pregnancy and maternity

Consider and detail (including the source of any evidence) the impact on women during pregnancy and for up to 26 weeks after giving birth, including as a result of breastfeeding.

No impact

Race

Consider and detail (including the source of any evidence) the impact on groups of people defined by their colour, nationality (including citizenship), ethnic or national origins. Given the demography of west Hampshire this will include Roma gypsies, travellers, people from Eastern Europe, Nepalese and other South East Asian communities. Impact may relate to language barriers, different cultural practices and individual's experience of health systems in other countries.

No impact

Religion or belief

Consider and detail (including the source of any evidence) the impact on people with different religions, beliefs or no belief. May be particularly relevant when service involves intimate physical examination, belief prohibited medical procedures, dietary requirements and fasting, and practices around birth and death.

No impact

Sex (gender)

Consider and detail (including the source of any evidence) the impact on men and women (this may include different patterns of disease for each gender, different access rates).

No impact

Sexual orientation

Consider and detail (including the source of any evidence) the impact on people who are attracted towards their own sex, the opposite sex or to both sexes (lesbian, gay, heterosexual and bisexual people).

No impact

Carers

Consider and detail (including the source of any evidence) the impact on people with caring responsibilities. This must include people who care for disabled relatives or friends (as they are protected by discrimination by association law), but you should also consider parent/ guardian(s) of children under 18 years. Carers are more likely to have health problems related to stress and muscular-skeletal issues, they may have to work part-time or certain shift-patterns, or face barriers to accessing services.

No impact

Serving Armed Forces personnel, their families and veterans

The needs of these groups should be considered specifically. The CCG has a responsibility to commission all secondary and community services required by Armed Forces' families where registered with NHS GP Practices, and services for veterans and reservists when not mobilised (this includes bespoke services for veterans, such as mental health services).

No impact

Other identified groups

Consider and detail (including the source of any evidence) the impact on any other identified groups. Given the demography of west Hampshire this should include impact of:

- Poverty
- Living in rural areas
- Resident status (migrants and asylum seekers).

If recovery of an overpayment will cause financial hardship, it may be possible for the employee to negotiate a repayment period with the CSU Payroll Lead and the CCG Chief Finance Officer, CCG Associate Director of Finance or CCG Finance Manager – Financial Accounting and Reporting that is acceptable to all parties.

Involvement and consultation

For each engagement activity, briefly outline who was involved, how and when they were engaged, and the key outputs

How have you involved stakeholders with an interest in protected characteristics in gathering evidence or testing the evidence available?

Not applicable

How have you involved/ will you involve stakeholders in testing the policy, project or proposals?

The CCG Staff Forum were asked to comment on the proposed amendments to the policy. Their feedback was incorporated within the amended policy.

Equality statement

Considering the evidence and engagement activity you listed above, please summarise the findings of the impact of your policy, project or proposal. Consider whether the evidence shows potential for differential impact, if so state whether adverse or positive and for which groups.

Impact summary (statutory considerations)

Age	Positive	Neutral	Negative
Disability	Positive	Neutral	Negative
Sexual orientation	Positive	Neutral	Negative
Race	Positive	Neutral	Negative
Religion or belief	Positive	Neutral	Negative
Gender reassignment	Positive	Neutral	Negative
Sex	Positive	Neutral	Negative
Marriage and civil partnership	Positive	Neutral	Negative
Pregnancy and maternity	Positive	Neutral	Negative

Action planning for improvement, and to address health inequalities and discrimination

Please give an outline of the key actions based on any gaps, challenges and opportunities you have identified. Include here any general action to address specific equality issues and data gaps that need to be addressed through consultation or further research.

Action	Person responsible	By date
For the policy to be amended to ensure consideration is given to extending repayment periods if financial hardship may arise.	Policy Author	Completed as part of development of the policy.

For your records

Person who carried out this assessment: **Governance Manager**

Date assessment completed: **4 May 2018**

Date to review actions:

Responsible Director: **Chief Officer**

Date assessment was approved: