

Equality Impact Assessment Template – Policy, function or strategy

This document should be completed when a new policy, function or strategy is introduced or when a substantive change to an existing policy, function or strategy is recommended.

1. Policy, function or strategy		
a.	Name/description of the policy, function or strategy ¹	Policy on the recovery of the overpayment of wages and deductions from salaries
b.	Responsible organisation(s)/Lead Service	Organisational Development (OD), Policy and Communications Service
c.	Lead Officer	Morna Rae, Head of OD, Policy and Communications
d.	Date of Impact Assessment	07/08/2024
e.	Partners/other Services involved in the development of the policy, function or strategy	Trade Unions, Managers, Human Resources (HR) professionals
f.	Is the policy, function or strategy?	<input type="checkbox"/> New
		<input checked="" type="checkbox"/> Reviewed/Revised
g.	What is the purpose of the policy, function or strategy (include details of any new legislation which prompted the introduction of the policy, function or strategy or the substantive change to the policy, function or strategy)?	The purpose of the Policy is to set out the procedures Inverclyde Council will follow to recover overpayments of wages and other deductions from salaries. It aims to ensure that these processes are conducted fairly, transparently, and in compliance with relevant employment legislation, such as The Employment Rights Act 1996.
h.	What are the intended outcomes of the policy, function or strategy?	The intended outcomes are to recover any overpayments in a manner that is legally compliant and fair to employees, to minimise financial risk to the Council, and to ensure that

¹ Please attach details of the policy, function or strategy to this Template

		employees are fully aware of their obligations and the procedures involved in wage recovery.	
i.	Geographical area (Inverclyde-wide or a specific location)	Inverclyde-wide	
j.	Which parts of the Equality Duty will the policy, function or strategy impact on?	<input type="checkbox"/>	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
		<input type="checkbox"/>	Advance equality of opportunity between people of different groups
		<input type="checkbox"/>	Foster good relations between people from different groups
k.	Will those who may be directly or indirectly affected by the policy, function or strategy be involved in its development?	Yes, stakeholders including HR professionals, management, and Trade Unions have been consulted during the development of the Policy.	

2. Does the policy, function or strategy impact on:		
	Yes	No
a. Protected Characteristics under The Equality Act 2010: Age; Care experienced; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion and Belief; Sex; Sexual Orientation (see Section 3)		X
b. Reducing inequalities of outcome caused by socio-economic disadvantage – Fairer Scotland Duty ² (see Section 6)		X

² [Fairer Scotland Duty: guidance for public bodies](#)

c. Inverclyde Alliance Partnership Plan 2023/33 ³ (see Section 7)		X
d. Council Plan 2023/28 ⁴ (see Section 8)	X	
3. If 'Yes' is selected for any part of Section 2, please populate the other relevant Sections of this Template.		
4. If 'No' is selected for <u>every part</u> of Section 2, please state the reasons for this.		
<p>Please sign below and email a copy of this Template to Karen Barclay, Corporate Policy and Performance Officer:</p> <p><u>karen.barclay@inverclyde.gov.uk.</u></p>		
Signature:		Date:

<p>3. Impact – Protected Characteristics</p> <p>Which of the Protected Characteristics will the policy, function or strategy have an impact upon?</p>	
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³ [Inverclyde Alliance Partnership Plan 2023/33](#)

⁴ [Council Plan 2023/28](#)

	Impact					
Protected Characteristic	Positive		Neutral	Negative		Reasons/Comments
	High	Low		High	Low	
Age			X			
Care experienced			X			
Disability			X			
Gender Reassignment			X			
Marriage and Civil Partnership			X			
Pregnancy and Maternity			X			
Race			X			
Religion and Belief			X			
Sex			X			
Sexual Orientation			X			
Other groups to consider						
• Carers			X			
• The Armed Forces Covenant Duty			X			

4. Which parts of the Equality Duty will the policy, function or strategy have an impact upon?

Classification: Official

<input type="checkbox"/>	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
<input type="checkbox"/>	Advance equality of opportunity between people from different groups
<input type="checkbox"/>	Foster good relations between people from different groups

5. Impact – Groups	
From the information you have highlighted above, describe the positive and negative impacts and the groups affected under The Equality Act 2010.	
<div>Positive impact + (Describe groups affected.)</div>	<div>Negative impact - (Describe groups affected.)</div>

6. Impact – Fairer Scotland Duty

What impact will the policy, function or strategy have on reducing inequalities of outcome caused by socio-economic disadvantage?

Positive impact +	Neutral impact =	Negative impact -
	=	
Briefly describe how the policy, function or strategy will impact on reducing inequalities of outcome.		

The impact of the Policy in terms of reducing inequalities of outcome caused by socio-economic disadvantage is expected to be neutral. However, where, having been notified of the proposed repayment arrangements, an employee submits that those arrangements may cause them hardship, the payment terms can be reviewed by the Payroll Team Leader.

7. Impact – Inverclyde Alliance Partnership Plan 2023/33

Which Themes from the Inverclyde Alliance Partnership Plan 2023/33 will the policy, function or strategy impact on?

<input type="checkbox"/>	Theme 1: Empowered people <ul style="list-style-type: none">• Communities can have their voices heard, and influence the places and services that affect them• Gaps in outcomes linked to poverty are reduced
<input type="checkbox"/>	Theme 2: Working people <ul style="list-style-type: none">• More people will be in sustained employment, with fair pay and conditions• Poverty related gaps are addressed, so young people can have the skills for learning, life and work• Businesses are supported and encouraged to reduce their carbon footprint and develop green jobs
<input type="checkbox"/>	Theme 3: Healthy people and places <ul style="list-style-type: none">• People live longer and healthier lives• Supportive systems are in place to prevent alcohol and drug misuse• Our natural capital is looked after, and we are effectively adapting and mitigating the effects of climate change
<input type="checkbox"/>	Theme 4: A supportive place <ul style="list-style-type: none">• Vulnerable adults and children are protected and supported, ensuring they can live safely and independently• We recognise where people are affected by trauma, and respond in ways that prevent further harm and support recovery• Public protection and community safety are improved through targeting our resources to reduce the risk of offending and harm
<input type="checkbox"/>	Theme 5: A thriving place <ul style="list-style-type: none">• Growth in our working age population by encouraging people to stay here, and attracting new people to settle here• Development of strong community-based services that respond to local need• Homes are energy efficient and fuel poverty is reduced• Increased use of active travel and sustainable transport options• Easy access to attractive and safe public spaces, and high-quality arts and cultural opportunities

Briefly describe how the policy, function or strategy will impact on the Inverclyde Alliance Partnership Plan 2023/22 Themes.	

8. Impact – Council Plan 2023/28

Which Themes from the Council Plan 2023/28 will the policy, function or strategy impact on?

<input type="checkbox"/>	Theme 1: People <ul style="list-style-type: none">• Our young people have the best start in life through high quality support and education• Gaps in outcomes linked to poverty are reduced• People are supported to improve their health and wellbeing• More people will be in employment, with fair pay and conditions• Our most vulnerable families and residents are safeguarded and supported
<input type="checkbox"/>	Theme 2: Place <ul style="list-style-type: none">• Communities are thriving, growing and sustainable• Our strategic housing function is robust• Our economy and skills base are developed• We have a sufficient supply of business premises• Our natural environment is protected
<input checked="" type="checkbox"/>	Theme 3: Performance <ul style="list-style-type: none">• High quality and innovative services are provided, giving value for money• Our employees are supported and developed

Briefly describe how the policy, function or strategy will impact on the Council Plan 2023/28 Themes.	
<p><u>Theme 3:</u> The Policy aligns with this Theme of the Council Plan 2023/28 by ensuring that financial management processes within the Council are both robust and transparent. By providing clear guidelines for the recovery of overpayments, the Policy helps to maintain financial integrity and accountability within the organisation. This contributes to the overall efficiency and effectiveness of the Council's operations, ensuring that public funds are managed responsibly.</p>	

Moreover, by handling overpayments fairly and sensitively, the Policy supports the well-being and financial stability of employees, which in turn enhances staff morale and productivity. A fair and transparent approach to wage recovery also fosters trust and confidence in the Council's management, supporting the delivery of high-quality services and value for money for the Inverclyde community. This approach aligns with the Council's commitment to maintaining high standards of performance and service delivery.

9. Evidence

What evidence do you have to help identify any potential impacts of the policy, function or strategy?

Note: Evidence could include information from consultations, surveys, the Citizens' Panel, focus groups, interviews, projects, user feedback, complaints, Officers' knowledge and experience, equalities monitoring data, publications, research, reports, and local and national groups.

Evidence	Details
Consultation/engagement (including any carried out while developing the policy, function or strategy)	Consultation took place with Trade Unions, HR professionals, and managers, which evidenced that the Policy is fair and can be implemented equally.
Research	Legal review of compliance with The Employment Rights Act 1996 and best practice guidance. Comparative analysis with policies from other Councils, guidelines from the Advisory, Conciliation and Arbitration Service, and research from the Chartered Institute of Personnel and Development. This analysis highlighted that Inverclyde Council's Policy is in line with best practice.
Officers' knowledge and experience (including feedback from frontline staff)	The Policy has been reviewed/revised by Payroll and HR Advisors who have the relevant expertise and knowledge.
Equalities monitoring data	Monitoring of wage recovery cases for any differential impact, which may impact on future cases.

User feedback (including complaints)	
Stakeholders	
Other	
Are there information gaps and, if so, what are these?	

10. Consequences of Analysis

What steps will you take in response to the findings of your analysis? Please select at least one of the following and provide a brief explanation.

a.	Continue development with no changes	<input checked="" type="checkbox"/>	Based on the research and the feedback, the Policy provides a clear and transparent framework for overpayment recovery. It is for this reason there is no need to implement any changes – other than the routine changes through operational adaptability.
b.	Continue development with minor alterations	<input type="checkbox"/>	
c.	Continue development with major changes	<input type="checkbox"/>	
d.	Discontinue development and consider alternatives (where relevant)	<input type="checkbox"/>	

<p>How will the effect of the policy, function or strategy be monitored following implementation?</p> <p>The effect of the Policy will be monitored through regular reviews of wage recovery cases, feedback from stakeholders, and analysis of equalities monitoring data.</p>
<p>When is the policy, function or strategy due to be implemented?</p> <p>Following approval by the Policy and Resources Committee at its meeting on 17 September 2024.</p>
<p>When will the policy, function or strategy be reviewed?</p> <p>The Policy will be reviewed in 2029, or sooner if legislative changes necessitate.</p>
<p>What resources are available for the implementation of the policy, function or strategy? Have these resources changed?</p> <p>Resources include HR and Payroll personnel, as well as communication tools to ensure all employees are informed about the Policy.</p>

<p>11. Please use the space below to detail any other matters arising from the Equality Impact Assessment process, including what action could be taken to mitigate the impact of the policy, function or strategy.</p>
<p>Where appropriate, the Policy should be read in conjunction with other relevant documentation such as the Council's Conditions of Service Handbook, Disciplinary Policy (as appropriate), and The Written Statement of Terms and Conditions of Employment for Inverclyde Council employees.</p>

Details of the Person(s) who completed the Assessment:	
Name:	Steven Spencer
Position:	HR Advisor
Date:	09/08/2024
Authorised by:	
Name:	Ruth Binks
Position:	Corporate Director - Education, Communities and Organisational Development
Date:	14/04/2025

Please send a copy of the completed Template to Karen Barclay, Corporate Policy and Performance Officer at karen.barclay@inverclyde.gov.uk.