



# Buckinghamshire & Milton Keynes Fire Authority

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**Meeting and date:** Fire Authority, 14 February 2024

**Report title:** Pay Policy Principles and Statement 2024/25

**Lead Member:** Councillor Shade Adoh, Lead Member - People, Equality and Diversity and Assurance

**Report sponsor:** Mark Hemming, Director of Finance and Assets

**Author and contact:** Faye Mansfield; HR Advisory and Development Manager

**Action:** Decision

**Recommendations:**

The Pay Policy Principles and Statement as set out in Appendix one, as the statutory Pay Policy Statement for 2024/25, is approved for publication.

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**Executive summary:**

The Authority is required to approve the Pay Policy Principles and Statement before the end of March immediately preceding the financial year to which it relates.

It is proposed the attached draft (Appendix one) be the Authority's revised Pay Policy Principles and Statement for 2024/25. It is based on the Authority's current approved Pay Policy Principles and Statement for 2023/24. Amendments have been made to the annually updated data, and the section on employee merit award payment setting scheme and process has been removed as a non-statutory aspect of the Statement. The opportunity for merit award payments continues and a review of the process will be undertaken.

The Pay Policy Principles and Statement will continue to support and enhance a range of employment opportunities. This will continue to be utilised on a voluntary basis across some roles and functions to offer a more resilient, enhanced and flexible resource, focused on meeting demand and offering the very best service to the public.

Within the last six Pay Policy Principles and Statement cover reports, a note was made to the introduction of a public sector exit payment cap termination payment for high earners.

Since the Restriction of Public Sector Exit Payment (Revocation) Regulations 2021 (the Revocation Regulations), the Government continues to discuss exit payments and the importance of delivering value for the taxpayer. HM Treasury released consultation on Public Sector Exit Payments during 2022, to seek views on proposed

guidance and processes prescribing additional reporting requirements for two exit payment processes. The Government's intention is to allow for increased scrutiny and assurance of exit decisions to reduce the use of large exit payments in the public sector, thereby improving consistency and accountability of decision making.

The government has yet to publish its response to the consultation (which closed October 2022) and there is no confirmed date for when new administrative controls relating to public sector exit payments will take effect. The Authority will continue to wait details of any Regulation changes and implementation dates.

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### **Financial implications:**

There are no direct financial implications arising from the Pay Policy Principles and Statement. Any financial impact of subsequent decisions will be factored into the Medium-Term Financial Planning process and scrutinised and challenged by Members. Any in-year impacts will be considered and reported through the budget monitoring process and any resource re-allocation will be subject to the usual virement approvals and limits as set out in the Financial Regulations.

### **Risk management:**

The Fire Authority is required to adopt and publish an annual Pay Policy Principles and Statement.

Developing and maintaining good employee morale is key to instilling loyalty and maintaining a productive workplace. By being fair, transparent and accountable in what employees are paid for and why, and being consistent, systematic and clear in applying reward practices for all employees, the Authority is living its values and showing best practices with its reward and recognition needs.

### **Legal implications:**

Section 38 of the Localism Act 2011 places a requirement on the Authority to prepare annually, a Statement setting out the Authority's policies on the remuneration of its Chief Officers, the remuneration of its lowest paid employees and the relationship between the remuneration of its Chief Officers and the remuneration of its employees who are not Chief Officers. Chief Officers are the most senior Officers of the Authority. Authorities are required to state the definition of lowest paid employees they have adopted in the Statement and explain the reasons for adopting that particular definition. The Statement may also set out the Authority's policies relating to other terms and conditions applying to its Senior Officers. In preparing this Statement, the Authority must have regard to any guidance issued or approved by the Secretary of State.

The 2024/25 Pay Policy Principles and Statement must be approved by the full Fire Authority before 31 March 2024. Approval cannot be delegated to any committee, sub-committee, or officers.

The Pay Policy Principles and Statement may be amended by the full Fire Authority during the financial year to which it applies.

Section 41 of the Localism Act 2011 requires the Authority to comply with its Pay Policy Principles and Statement for the relevant financial year when making a determination that relates to the remuneration, or other terms and conditions of a senior officer of the Authority.

The Pay Policy Principles and Statement must include the Authority's policies in relation to senior pay on:

- a) the level and elements of remuneration
- b) remuneration on recruitment
- c) increases and additions to remuneration
- d) the use of performance related pay
- e) the use of bonuses
- f) the approach to payment on their ceasing to be employed by the Authority, and
- g) the publication of and access to information relating to remuneration

The statutory guidance gives discretion as to whether the Authority wishes to mirror these headings in its Pay Policy Principles and Statement in respect of its other employees.

**Privacy and security implications:**

The purpose of the Pay Policy Principles and Statement is to provide transparency with regards to the Authority's approach to setting the pay of its employees.

**Duty to collaborate:**

All Authorities are required to have a Pay Policy Principles and Statement. At this time our Thames Valley partners have separate Statements, however an aligned approach may be appropriate in the future, particularly to support collaborative working, sharing of resources and working across boundaries.

**Health and safety implications:**

There are no health and safety implications arising from this report.

**Environmental implications:**

There are no environmental implications arising from this report.

**Equality, diversity, and inclusion implications**

An Equality Impact Assessment has been completed as part of the update. There are no identified adverse impacts on any protected characteristics.

Any pay decisions will be subject to the demands of equal pay processes.

The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 and approved by Parliament in 2016 and came into force in 2017. The obligation under the Regulations requires prescribed gender pay gap information to be published within ‘the period of 12 months beginning with the data snapshot date’ (Regulation 2(2)). The snapshot data for public sector employers is 31 March each year.

The intention of the Regulation is to highlight differences in pay between male and female employees, therefore showing greater transparency within the workplace, and encourage employers to consider what more can be done to close any pay gaps. The Authority will continue to work on closing the Gender Pay Gap and a separate report will be presented to the Executive Committee in March 2024.

### **Consultation and communication**

Adoption of the annual Pay Policy Principles and Statement ensures statutory compliance. However, as the legislation permits in-year changes there is scope for the Authority to revisit certain elements to reflect the needs of the Service and any relevant reform outcomes from a national perspective.

Adherence to the Pay Policy Principles and Statement is controlled via strict establishment and pay change approval process controls and annual reporting. In addition, reports are submitted on key reward areas as appropriate.

Following approval of the Pay Policy Principles and Statement, communication will be via the normal policy publication and amendment process. This will include engagement with members of the Joint Consultation Forum.

### **Background papers:**

BMKFA Pay Policy Principles and Statement 2023/24:

<http://bucksfire.gov.uk/authority/pay-policy-statement/>

The Localism Act 2011:

<http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

Openness and accountability in local pay: guidance. Published 2012:

<https://www.gov.uk/government/publications/openness-and-accountability-in-local-pay-guidance>

Openness and accountability in local pay: supplementary guidance. Published 2013:

<https://www.gov.uk/government/publications/openness-and-accountability-in-local-pay-supplementary-guidance>

<b>Appendix</b>	<b>Title</b>	<b>Protective Marking</b>
1	Pay Policy Principles and Statement 2024/25	



## **BMKFA Pay Policy Principles and Statement 2024/25**

### **1.0 Introduction**

The Pay Policy Statement (the 'Statement') sets out Buckinghamshire & Milton Keynes Fire Authority's (the Authority) approach to pay in accordance with the requirements of Section 38 of the Localism Act 2011. The purpose of the Statement is to provide transparency with regards to the Authority's approach to setting the pay of its employees by identifying:

- the method by which salaries of all employees are determined
- the details and level of remuneration of its most senior employees, i.e. Chief Officers, as defined by the relevant legislation

Following approval of the Fire Authority, the Statement will be effective from 1 April 2024. It will be subject to an annual approval and in accordance with any new or proposed legislation to ensure it remains relevant and effective.

As detailed within the Authority's Reward and Recognition policy, and the Statement of Principles, the Authority aims to:

- Be fair, transparent and accountable in what employees are paid for and why, and to be consistent, systematic and clear in applying reward practices for all employees
- Adhere to affordability; ensuring all decisions on pay represents value for money for the taxpayer
- Reward and recognise employees for their knowledge, skills and contribution in the roles they are performing
- Adopt practices which will focus on enabling the recruitment, engagement and retention of the right calibre of people at all levels to deliver its corporate priorities
- Provide effective financial management of the total pay bill in order to inform all of its reward practices and approaches in making the most effective use of resources
- Have appropriate mechanisms in place to review terms and conditions of service
- Meet legislative requirements; ensuring remuneration practices comply with all legal obligations

### **2.0 Accountability and decision making**

Decisions on pay policies will be taken by elected members - those who are directly accountable to local communities. All democratically accountable



members will have input into how decisions on pay are made and there will be openness about the policies that determine those decisions.

The annual Statements and any amendments will be considered by a meeting of the Fire Authority and will not be delegated to any sub-committee. All decisions on pay and reward for Chief Officers must comply with the current Statement.

### **3.0 Transparency**

On an annual basis, the approved Statement will be published on the external website.

Although there is no requirement to use the Statement to publish specific numerical data on pay and reward, consideration will be given to how the information within the Statement fits with data on pay and reward published separately.

This includes data required to be published under the Local Government Transparency Code 2015 and Annual Statement of Accounts.

### **4.0 Legislation**

In applying the Statement, the Authority will work to eliminate any elements which may, directly or indirectly, discriminate unfairly on the grounds of sex, race, colour, nationality, ethnic or national origin, age, marital status, having dependents, sexual orientation, gender reassignment, religion or belief, trade union activity, disability or any other factors.

Part-time employees will receive the same pay and remuneration as full-time employees undertaking the same role on a pro-rata basis.

Under the Equality Act 2010, it is unlawful for an employer to discriminate between men and women in terms of their pay and conditions where they are in the same employment and are doing the same or similar work, work rated as equivalent, or work of equal value. Undertaking an equal pay audit demonstrates the Authority's commitment as an employer to remove unfair pay practices. The last equal pay audit was undertaken in 2020, and no areas of concern were identified as a result of this audit.

The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 that came into effect in 2017 requires public sector organisations with 250 or more employees to carry out gender pay gap reporting. In accordance with the Regulations, the Authority is required to annually publish six pieces of prescribed data about the pay and bonuses of male and female workers



within the Authority. On an annual basis the Authority publishes a Gender Pay Gap report, containing information relating to pay inequalities in line with gender pay gap reporting requirements.

## **5.0 Responsibility and scale**

The Authority is directly responsible for an establishment budget of £26,973,790, and for a budgeted establishment of 126.08 full-time equivalent (FTEs) for Support Services employees, 300 FTE Wholetime employees and 96 FTE On-Call employees (details as at December 2023).

## **6.0 Determining levels of pay**

The Authority recognises its employees are a vital factor in the efficient and effective operation of the Service. In this respect the Authority is committed to ensuring employees are valued and rewarded for their contribution to the Authority.

The Authority is committed to establishing the right working arrangements and conditions of employment for all its employees, and understands the benefits of the employment package in promoting and encouraging employee engagement, which in turn improves organisational performance.

The Authority is committed to effectively supporting day to day service delivery, transforming the Authority into a value for money, outcome driven and high performing organisation through, amongst other interventions, appropriate reward and recognition mechanisms.

The Authority is committed to ensuring its reward and recognition practices are conducted in a fair, open and transparent manner that is effective, efficient and responsive, promoting good practice with all its reward and recognition needs.

## **7.0 Pay structure**

The pay structure reflects the different roles, duties and responsibilities undertaken by employees within the Authority. This is reflected in pay differentials between different employee groups and between employees within the same employee group. The pay bands established are based on nationally applied role maps (Operational employees) or graded bands established through role profiles (Support Services employees).



## **Operational roles**

For the majority of Operational roles, appointments are offered under the National Joint Council for Local Authority Fire and Rescue Services Scheme of Conditions of Service (known as the Grey Book) and any other local terms and conditions, which the Authority may, from time to time, adopt in relation to the appointment, save where such provisions are amended by a contract of employment.

Any National pay award is as agreed through the National Joint Council (NJC) and notified to Fire Authorities. The last pay award was agreed as five per cent, effective 01 July 2023.

The pay framework was reviewed in 2003 following a rank-to-role exercise in line with National Guidance, with the grades for each role determined by a consistent job evaluation process. Where appropriate, National role maps are used to determine responsibilities and accountabilities within roles.

For Grey Book employees, rates of pay are set out in circulars issued by the NJC and entitlements are governed by Part B of the Grey Book. However, the Authority recognises new employees may be employed on terms and conditions outside of the Grey Book. This includes the operation of the 'Bank System'.

The Authority also recognises employees in existing Firefighter roles may want to agree rates of pay outside of the Grey Book for the protection of services and provision of enhanced resilience, including agreement to not participate in industrial action.

In addition, and in line with retention and succession planning, the Authority does agree enhanced remuneration outside of the Grey Book for specific roles, such as Area Commanders, Group Commanders and Station Commanders.

## **Support Services roles**

Appointments for Support Services roles are determined in accordance with local terms and conditions of Buckinghamshire & Milton Keynes Fire Authority Scheme of Conditions of Service for Support Services employees and any other local terms and conditions, which the Authority may, from time to time, adopt in relation to appointments, save where such provisions are amended by a contract of employment.

Any pay award is locally agreed by the Strategic Management Board (SMB). The last pay award was agreed as five per cent, effective 01 July 2023.

For Support Services employees, the pay structure takes the form of pay scales, which was reviewed in 2014 to two pay points; development and





competent. This is with the exception of employees in post prior to September 2014, who retain three-point scales (until they move posts or are subject to regrading) and those employed within Fleet Management and Driving Training Centre.

The grades for Support Services roles are determined using an analytical job evaluation process, that systematically ranks each role objectively and fairly. This job evaluation system (Korn Ferry (Hay) Methodology) is a recognised best practice non-discriminatory method of ranking roles against a pre-determined scale.

## **Senior Manager roles**

Appointments for a limited number of Senior Managers are offered under the National Joint Council for Brigade Managers of Local Authority Fire and Rescue Services (known as the Gold Book) as adopted locally and as amended or supplemented by agreement between the Chief Fire Officer/Chief Executive and the employee, or in the case of the Chief Fire Officer/Chief Executive, or equivalent, between the Fire Authority and the employee. Employment is also subject to other terms and conditions of service as determined by the Authority from time to time.

This group of Senior Managers consists of:

- Chief Fire Officer/CE
- Chief Operating Officer/DCFO
- Director of Finance and Assets
- Director of Legal and Governance
- Head of Prevention, Response and Resilience
- Head of Protection, Assurance and Development

There is a twin-track approach for determining levels of pay for Gold Book roles. At National level, the NJC annually reviews the level of pay increase applicable to these roles covered by the National Agreement. Any increases agreed by the NJC are communicated to Fire Authorities via circulars. Decisions about pay and remuneration are taken by the Fire Authority, who will review salary levels on an annual basis.

For 2023 a pay award was locally agreed by the Fire Authority. The last pay award was agreed as five per cent, effective 01 January 2023.

For Gold Book roles, pay arrangements are locally determined and the level of pay fixed and designed to cover the full range and scope of the role.



## **8.0 Remuneration on Appointment**

Remuneration will be based on the evaluated rate for the role, either nationally or locally set.

Base salary is one of a number of components of the employment package and by no means the only factor that influences the Authority's ability to recruit and retain employees.

New employees will usually be appointed to the minimum pay level for the relevant grade (trainee or development rate), unless relevant supporting experience can be identified and appropriately evidenced.

All new Gold Book appointments are subject to Fire Authority approval. The Fire Authority will be offered the opportunity to vote before salary packages (£100,000 plus) are offered in respect of a new appointment. For this purpose, salary packages should include salary, fees or allowances routinely payable to the appointee and any benefits in kind to which the Officer is entitled as a result of their employment.

## **9.0 Pay Progression**

For Operational roles, rates of pay are determined by the role the employee is undertaking, and whether the employee is in the 'Trainee', 'Development' or 'Competent' stage of that role. The time it will take an employee to demonstrate competence will depend on the specific requirements of the employee, accessibility to assessments and the opportunities available. Employees can move between roles through successfully completing a promotion assessment process.

For Support Services roles, progression through the pay grade will be based on evidenced performance, and at least six months in post, attaining training and qualifications associated with the role, and the maximum grade for the post not being exceeded. Progression may be withheld if performance is not to the required standard. Employees can move between roles through completing a promotion assessment process.

For SMB members, progression through the pay grade will be based on evidenced performance, and at least six months in post. Any increase or additions to remuneration will require approval of the appropriate committee of the Authority.



## 10. Other allowances and payments

**Allowances:** There are a number of allowances paid to employees, where specific circumstances require this and where it can be justified. These allowances are in accordance with National agreement or have been locally set in order to meet the demands of service delivery.

**Market rate supplement:** The Authority recognises the pay structure and job evaluation process does not normally consider factors such as market pay rates relating to specific roles or fluctuating demand for skills in the market place. Whilst the use of market rate supplements will not be the norm, there may be occasions where the Authority is unable to attract candidates to specific roles due to the fluctuations in the local labour market. In addition, existing employees may leave, citing the reason of being offered the 'market rate' for the role. When this occurs consideration may be given to awarding a market rate supplement in addition to the approved job evaluated grade for the role. Any payment will be time limited and reviewed annually.

**Expenses:** The Authority recognises employees may incur reasonable expenses whilst undertaking their role and will ensure employees are not financially disadvantaged or advantaged because of genuine business expenses. Unless a prior arrangement is in place, employees will be responsible for the payment of expenses incurred and will be reimbursed in accordance with the Authority's procedures relating to expenses.

**Car lease schemes:** Some employees participate in lease car arrangements, either as an essential car user, lease car user, or via a provided car scheme. The criteria are dependent on the requirements of the role or in accordance with terms and conditions of employment.

**Relocation expenses:** Upon appointment, where relocation expenses are incurred, the Authority may reimburse the individual in accordance with the Authority's Relocation Expenses Scheme. Members of the Fire Authority will determine the specific application in respect of a SMB appointment and SMB will determine the application of the scheme to all other appointments. The scheme is applied at the discretion of the Authority and normally only applies to external appointees.

**Additional Responsibility Allowance (ARA):** These payments are used to reward increased responsibilities and duties beyond the normal remit of the role for specific periods, for example to cover managed vacancies for short to medium term periods, enabling successful change management with minimal risk. These payments apply to employees on Grey Book terms and conditions.

**Honorarium payments:** These can be given to Support Services employees when they are asked to undertake part of the duties at a higher graded post or



duties outside the scope of their post, which is particularly onerous. Where the payment relates to an employee undertaking a proportion of the duties of a higher graded post, the calculation of the payment will normally link to the pay scale of the duties of the higher graded post being undertaken. For duties outside the scope of the employee's role, the amount of the payment will be determined by estimating the relative worth of the task in comparison to the employee's substantive grade. These payments are for Support Services employees.

An ARA or Honorarium payment requires approval via a business case.

For SMB members, any increase or additions to remuneration will require approval of the appropriate committee of the Authority.

**Performance payment/merit award:** One-off performance payments/merit awards may be considered linked to evidenced and scrutinised delivery of performance management objectives.

**Pension Schemes:** The Authority operates two pension schemes:

- 2015 Firefighters Pension Scheme
- 2014 Local Government Pension Scheme

Subject to meeting the qualifying conditions, employees have a right to belong to a pension scheme. All new employees will be automatically entered into the relevant occupational pension scheme as defined by their terms and conditions of employment. Qualifying employees will be automatically re-enrolled every three years during their employment if they have opted out of the scheme.

The Authority makes an employer contribution to the Firefighters Pension Scheme of 28.8 per cent of pensionable pay (2015 Scheme), and 17.4 per cent of pensionable pay (LGPS Scheme).

The employee contributes of between 11 per cent and 14.5 per cent of pensionable pay (2015 Scheme) and 5.5 per cent and 12.5 per cent of pensionable pay (LGPS Scheme).

The Authority is obliged to publish its adopted pension discretions for the Firefighters' Pension Schemes and Local Government Pension Scheme, and the Authority's current policies in respect of discretionary payments are detailed on the external [website](#).



## 11. Pay Multiple

The pay multiple is the ratio between the highest paid salary and the median (average) salary of the Authority's workforce. The average salary level is defined as the total of all regular payments made to an individual.

The definition of lowest paid employees are those who are paid at rates maintained in line with the National Living Wage and the lowest rate will be that applicable for workers aged 23 and over.

As at 01 December 2023:

- The lowest paid salary is £20,103 (FTE)
- The highest paid salary is £172,701 (FTE)
- The median salary is £36,226 (FTE)

The Authority's pay multiple: the ratio between the highest paid employee and the median average salary figure for all employees in the Authority.

Pay multiple between the highest salary and lowest salary is 8.59:1 (this essentially means the lowest salary goes into the highest salary 8.59 times).

Pay multiple between the highest salary and median salary is 4.77:1 (this essentially means the median salary goes into the highest salary 4.77 times).

Year	Highest pay : Lowest pay	Highest pay : Median pay
2024/25	8.59:1	4.77:1
2023/24	8.39:1	4.77:1
2022/23	8.94:1	4.77:1
2021/22	9:1	4.77:1
2020/21	9.37:1	4.77:1
2019/20	9.64:1	4.77:1
2018/19	9.86:1	4.77:1
2017/18	10.17:1	4.77:1
2016/17	10.71:1	4.72:1
2015/16	11.04:1	4.77:1
2014/15	11.5:1	4.87:1
2013/14	11.72:1	4.9:1
2012/13	12.7:1	5.0:1

It is the intention that salary multiples do not reach the 1:20 ratio referred to in the Hutton Report.



## **12. Payment on termination of employment**

There may be a number of circumstances where early retirement or voluntary redundancy payments may be paid to employees on ceasing to hold office. This can relate to individual circumstances, for example ill health, or can be the result of organisational change or in the interests of the efficiency of the Authority.

In the event of any redundancies, redundancy payments will be calculated in accordance with statutory requirements as modified by the Authority's agreed policies and in accordance with any extant statutory guidance.

The Authority does not make payments to senior staff members in addition to entitlements under its redundancy procedure who leave, other than to those who are leaving for the purposes of improved efficiency.

Where other severance payments are appropriate, such payments will be approved by the Director of Legal and Governance and the Director of Finance and Assets and will be subject to a settlement agreement and in accordance with any extant statutory guidance.

## **13. Re-employment and Pension Abatement**

This applies where an individual retires from the Authority, draws their pension benefits and is subsequently re-employed into the same or other role within the Authority.

The Authority will consider re-employment of retired employees in accordance with the relevant pension scheme regulations and governance arrangements. There is no automatic right to be re-employed. The decision will be strictly based on organisational need and will normally follow an open and fair selection process.

The Fire and Rescue National Framework for England, published in May 2018, stated that Fire Authorities must not re-appoint principal fire officers (at Brigade Manager or Area Manager level or those with comparable responsibilities to those roles) after their retirement to their previous or similar role, save for in exceptional circumstances when such a decision is necessary in the interest of public safety. Any such appointment must be transparent, justifiable and time limited, with the reason for the decision published and the pension abated until the contract ends. Such a decision will be subject to prior approval at a meeting of the Fire Authority in open session.

Where an employee has taken their pension benefits (either as a former employee or employee from another public section organisation), and is then re-employed, an abatement check will be undertaken. Pension will be adjusted so



the combination of pension and new salary does not exceed the individual's salary at the time of their retirement.

There is no age limit on abatement, and this continues for the full period of re-employment. When the re-employment ends, the pension will be reinstated to the full amount.

The Authority operates a flexible retirement process for employees in the Local Government Pension Scheme. This allows an employee to take their pension benefits and remain employed on reduced hours or at a lower grade without abatement of pension. This complies with the provisions of the Local Government Pension Scheme.

## 14. Equality Impact Assessment (EIA)

An Equality Impact Assessment should be included to identify any issues which may result in a group being disadvantaged by the process.

To complete the table, tick ✓ the likely impact. If an EIA action plan is necessary, this can be downloaded from the intranet.

Assessment of impact on groups in **bold** is a legal requirement. Assessment of impacts on groups in *italics* is not a legal requirement, however it will help to ensure that your activity does not have unintended consequences.

Protected characteristic	Positive	Negative	Neutral	Rationale for decision ( <i>use action plan if necessary</i> )
<b>Individuals of different ages</b>			✓	No specific impacts identified
<b>Disabled individuals</b>			✓	No specific impacts identified
<b>Individuals transitioning from one gender to another</b>			✓	No specific impacts identified
<b>Individuals who are married or in civil partnerships</b>			✓	No specific impacts identified
<b>Pregnancy, maternity and new parents</b>			✓	No specific impacts identified
<b>Individuals of different race</b>			✓	No specific impacts identified
<b>Individuals of different religions or beliefs</b>			✓	No specific impacts identified



<b>Individual's gender identity</b>			✓	Pay and gender addressed via the annual Gender Pay Gap Report
<b>Individual's sexual orientation</b>			✓	No specific impacts identified
<i>Individuals living in different family circumstances</i>			✓	No specific impacts identified
<i>Individuals in different social circumstances</i>			✓	No specific impacts identified
<i>Different employee groups</i>			✓	No specific impacts identified
<i>Other</i>				No specific impacts identified

### Data Protection Impact Assessment (DPIA) screening questions

If the document includes any personally identifiable information (PII) a Data Protection Impact Assessment (DPIA) will be required. This should be discussed with the Data Protection Officer and the DPIA file location referenced at this point in your document.

Where no PII is involved it should be stated at this point in your document.

The Data Protection Officer holds the master copies of all completed DPIA in N:Common/Information Assets/DPIAs.

The DPIA needs to be reviewed periodically to ensure that any PII is adequately considered.

The DPIA template and guidance can be found [here](#).