CABINET

3 MARCH 2026

KEY DECISION: NO

COUNCILLOR GAYNOR AUSTIN
FINANCE & RESOURCES
PORTFOLIO HOLDER

REPORT NO. PEO2603

NEW ENGAGEMENT OF AGENCY WORKERS AND CONSULTANTS POLICY AND PROCEDURE

SUMMARY AND RECOMMENDATIONS:

This report seeks Cabinet's approval for the implementation of the new Engagement of Agency Workers and Consultants Policy and Procedure.

This policy and procedure includes process stage notifications, compliance and authorisation requirements for the engagement of agency workers and consultants working at the Council.

It is recommended that Cabinet approve the proposed Engagement of Agency Workers and Consultants Policy and Procedure as set out at Appendix 1 of the report.

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1. INTRODUCTION

1.1 The Council's use of agency workers and external consultants plays an important role in maintaining service delivery, providing access to specialist expertise, and supporting workforce flexibility. However, to ensure these engagements are consistent, transparent and compliant with organisational and legislative requirements, a formal policy and procedure is required.

2. BACKGROUND

2.1 The Southern Internal Audit Partnership (SIAP) conducted a review of the use of agency staff and produced an audit report which included the observation that there were no formal policies or procedures in place for governing the engagement or use of agency staff.

2.2 In response to the audit a policy and procedure for engaging a temporary worker (agency and consultants) has been created and this management action has been agreed by SIAP as an acceptable response to the audit findings.

3. POLICY PURPOSE

3.1 The purpose of this policy is to ensure that managers have clear procedures to follow and that they understand their responsibilities in the process so that the Council meets the legislative requirements and compliance together with organisational needs.

3.2 This policy also seeks value for money by ensuring that the use of agency workers and consultants is appropriate, time limited and monitored.

4. ENGAGEMENT OF AGENCY WORKERS AND CONSULTANTS POLICY AND PROCEDURE

4.1 This new policy and procedure outlines the roles and responsibilities for the Senior Leadership Team (SLT), Managers, Finance, the People Team, IT Services, Procurement and Legal Services (where applicable).

4.2 A digital system (with notification alerts) will be implemented to include the policy process workflows for authorisation for the stages required before the temporary worker starts at the Council. These stages include the following:

- SLT must authorise the request and budget spend for the engagement of an agency worker or consultant.
- Finance will be notified of the approved budget spend to be included in the budget forecasts and for processing invoices.
- IT Services are notified so that can provide relevant access to equipment and system applications
- The People Team are notified as they need to:
  - Keep a centralised record of engagements as a summary of each hire to ensure all processes have been completed
  - Raise individual files for each hire to save all documentation and information as and when it may be required
  - Complete Right to Work checks
  - Complete and send a Status Determination Statement for Off Payroll (IR35) confirming who is responsible for Tax and National Insurance payments
  - Ensure records are kept within the retention guidelines
  - Add new starters to the Learning Management System (LMS) and assign all mandatory learning required
    - Ongoing monitoring of mandatory training and follow up where required
- Procurement are notified so that they can ensure the necessary procurement processes have been followed.
- Legal are notified so that they can check contracts or prepare a contract where necessary.

4.3 All current and future Hiring Managers will receive mandatory training and guidance regarding this new policy and procedure.

Alternative Options

4.4 The introduction of this formal policy and procedure is in response to the SIAP audit observation and agreed management action. Although we could take a view to implement a less robust option that is not considered appropriate given the audit and the views of the Audit and Governance committee.

Consultation

4.5 This new policy and procedure has been shared with SLT and Unison for comment. Any response received from Unison will be reported to the Cabinet meeting.

5 IMPLICATIONS

Risks

5.1 The Council could choose to not approve the Engagement of Agency Workers and Consultants Policy and Procedure but this would present a risk of not complying with the management action which has been by agreed by SIAP.

Legal implications

5.2 Should the Council not implement the Engagement of Agency Workers and Consultants Policy and Procedure, this would present the risk of the Council not complying with its legal requirements including those relating to having the right to work, taxation and application of the correct worker status, which also translate into adverse financial and reputational risk for the Council.

Financial Implications

5.3 There are no direct budgetary implications to implement this policy. The strengthened governance does improve the financial and legal governance through compliance and oversight that minimises unbudgeted costs that can result from getting these processes wrong.

Resource Implications

5.4 There are no resource implications associated with this policy and procedure.

Equalities Impact Implications

5.5 An equality impact check found that this policy and procedures would have a positive or neutral impact on people with protected characteristics. Therefore, a full assessment is not required.

Other

5.6   There are no other implications associated with this policy.

6.   CONCLUSIONS

The implementation of the new Engagement of Agency Workers and Consultants Policy and Procedure will provide a consistent process for hiring managers to follow which will strengthen governance, accountability and meet legal and financial obligations.

Appendices

1   Engagement of Agency Workers and Consultants Policy and Procedure
2   Equality Impact Assessment Screening Tool

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Engagement of Agency Workers and Consultants Policy and Procedure

January 2026

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Engaging Agency Workers and Consultants Policy and Procedure

1 Introduction

It is recognised that there may be occasions where the engagement of an Agency Worker or Consultant **(referred to as external resource in this policy)** may be required to support tasks or projects within Rushmoor Borough Council (RBC).

Taking the step of engaging an external resource involves careful consideration as to the aim of the engagement, the length of engagement, the cost of this service, whether there are more efficient resource opportunities and the budget to fulfill an engagement of this nature.

External resources will only be engaged where it has been established that the required skills, capacity, or expertise are not available within the existing workforce. Before pursuing the use of an Agency Worker or Consultant, managers must explore all internal resourcing options, including offering additional hours to part-time employees, considering secondment opportunities, reviewing the potential for fixed-term contracts, and assessing whether the work could support an apprenticeship. Only when these avenues have been fully considered and found unsuitable or unavailable should the engagement of external resource be progressed.

2 Purpose and Objectives

The aim of this policy is to ensure that managers have clear procedures to follow and that they understand their responsibilities in the process so RBC meet legislative requirements and compliance as well as organisational needs.

When a Service requires the assistance of an external resource there are processes the manager and other teams in the organisation need to follow to reduce any potential risks. It is recognised that an external resource may be required urgently. Examples include long-term sickness absence, short-term specialist support or deadlines for tasks that are at risk due to other unscheduled factors. There could be cost implications for the organisation for such events as these, so the process to engage an external resource must be timely. For this reason, it is vital that communication and processes are clear between relevant services to assist with onboarding the external resource.

3 Definitions

The table below details the different types of external resource.

External resource	Description

Agency	An Agency is an organisation that facilitates the hiring process by sourcing, screening and presenting qualified candidates.
Consultant	A consultant is a person who provides professional or expert advice in a particular field to either an organisation or individual. Despite the broad definition that can be subsumed under the term consultant, there are in essence three characteristics that distinguish a consultant from other professions: 1. A consultant provides expertise that a client lacks or support that a client is unable to fulfill. In return for their professional services, the consultant charges a fee. 2. A consultant operates independently from the client, implying that, from the respective consultant, there is no conflict of interest between the client's issue and the services. 3. A consultant operates in a professional manner, which ranges from having the right qualifications to ensuring high quality service delivery and a solid internal operation. They may work within the scope of IR35 or outside scope. It is crucial the determination of who is responsible for paying HMRC tax and NI, the consultant or organisation. The completion of the HMRC CEST Tool is imperative.
Contractor (included as there can sometimes be confusion with the term contractor and consultant)	A contractor in the UK is typically a self-employed professional who works through their own limited company, providing specialised services to clients on a project or temporary basis. Understanding who is a contractor involves recognising they handle their own tax affairs, National Insurance contributions, and must comply with IR35 legislation while managing company registration and accounting. They may also have a team of workers who may substitute others working on a project within an organisation.

4   Roles and Responsibilities

4.1 The manager is responsible for ensuring the processes in this policy and procedure are followed and understand the risks associated with non-compliance. These risks include financial, reputation and failure to meet government legal requirements.

4.2 Prior to sourcing any external resource, the manager must have received authorisation from the Senior Leadership Team (SLT), by completing and submitting an **Approval to Recruit form,** for the budget spend.

4.3 Appendix i shows a workflow for managers to follow which includes links to processes to further assist with ensuring compliance. There is a link within the workflow for a manager to complete a form that will automatically notify and provide each relevant service lead with the information they require to enable them to authorise each stage of the process:

- **Finance** are notified of the approved budget spend to be included in the budget forecasts and can process invoices when they are submitted. Budget codes and purchase order numbers would have already been allocated. A purchase order must be raised for the value of the spend.
- **IT Services** are notified so they can provide relevant access to equipment and system applications.
- **People Team** are notified as they need to:
  - keep a centralised record of engagements as a summary of each hire to ensure all processes have been completed
  - raise individual files for each hire to save all documentation and information as and when it may be required.
  - complete Right to Work checks for the workers
  - complete and send a Status Determination Statement for Off Payroll (IR35) confirming who is responsible for Tax and National Insurance payments
  - ensure records are kept within retention guidelines.
  - add new starters to the Learning Management System (LMS) and assign all mandatory learning required
    - Ongoing monitoring of mandatory training and follow up where required
- **Procurement** are notified so they can ensure necessary procurement processes have been followed as detailed in **Contract Standing Orders document** and record details accordingly to ensure procurement regulations are followed.
- **Legal** will check contracts or prepare a contract where necessary. All contracts should include a clause stating that the final invoice will not be paid until all RBC equipment has been safely returned.

4.4 In addition to the processes in the workflow, the manager is also responsible for the following:
  a) Giving full consideration of what the requirements of the external resource are, including the time required to complete the tasks/projects.
  b) Having considered point a) above, reflect and review as to whether this can be achieved in any other way which may be more efficient and/or effective.
  c) Consider the qualifications, specialisms, knowledge and experience needed to fulfill what has been determined in point a) above.

d) When shortlisting and interviewing candidates for the work required, ensure suitable questions are asked to confirm that any candidate hired has the abilities to deliver what has been determined in point a) above.

e) Managers have a duty of care to all staff whether they are employed by RBC or through an external resource, there should be no difference.

f) Invest time when an external resource starts with RBC from day one. Clearly define the task/projects to be completed and the timescale for completion. Make sure they have all the tools they need and know where to seek assistance to help them complete their tasks.

g) Meet with the external resource on day two to check if they need any assistance and confirm they have all they require to continue with the work. It is important to ask and address any problems they may have encountered so far. Notes of the meeting should be made including actions discussed, who is responsible for moving the actions forward and by when. The notes can be bullet points or more comprehensive, but they should be shared with the external resource after this and each meeting moving forward.

h) Meet with the external resource again at the end of week one. This is to check if they have all they require and address any possible problems they may have encountered.

i) Regular meetings should be made after week one, which should ideally be bi-weekly for approximately six weeks and thereafter, if the manager is satisfied with the work delivered to date and progress made to ensure deadlines are or will be met, meetings could be monthly. Monthly meetings should be the minimum a manager has with the external resource but the decision on whether it should be more frequent must be made by the manager to ensure that work is satisfactorily completed.

j) The contract may be charged by the hour or by the day, either way it is the manager's responsibility to carefully check and sign off timesheets in a timely manner. Ensure hours do not exceed those agreed in the contract. **Timesheets should accompany all invoices produced.**

k) Managers should update their Line Manager or Head of Service on the progress of the work that an external resource is delivering. Any concerns should be raised as soon as they are identified as any delay could be costly and deadlines may be at risk.

l) Extensions to any contract should be avoided where possible but if required then this should be considered a minimum of 6 weeks prior to the end date of the contract. Managers must follow the workflow by firstly completing the **Approval to Recruit form** to obtain SLT approval then continuing with the workflow as instructed.

m) If the contract ends as expected then all services in point 4.4 must be notified and the **Leavers form** completed.

n) It is the manager's responsibility to ensure that all RBC equipment is returned on the last day of the contract. **The final invoice from the external resource will not be paid until all items are returned in good order.**

5 Policy workflow

5.1 The policy workflow is available on the People Portal, and a copy is provided at **Appendix i**. This workflow must be followed for all engagements of an external resource as detailed in this policy. The process must also be followed when extending external resource contracts and/or engagement periods.

5.2 It is important to note that a manager completing the workflow will be notifying the services detailed in points 4.4 above. However, the manager engaging the external resource should still communicate with services to ensure all is on track for the proposed start date and that the services have all the necessary information to allow them to meet the date. Delays in appointment could be costly so communication remains important and it is the manager's responsibility to commence these conversations then follow through with any further actions.

6 Legal implications

6.1 HMRC Off Payroll Working (IR35) - Payment of HMRC tax and National Insurance needs to be paid for external workers the same as for employees. Who is responsible for paying it needs to be clearly defined in contracts and the issue of Statement of Determination where applicable. Guidance on Off Payroll Working is detailed in links on the Managers Workflow (see **Appendix i** and is available on the People Portal). It is important that RBC complies with HMRC instructions as HMRC can complete spot checks and deliver hefty fines if RBC is found to not be adhering to this legislation. The People Team will issue a Statement of Determination but only once the manager has completed the HMRC CEST tool.

6.2 Right to Work - The right to work in the UK is a legal requirement for anyone seeking employment. The People Team must follow checks for externally sourced workers the same as if they were going to be directly employed by RBC.

6.3 Contract Standing Orders (CSO)- The Local Government Act 1972 section 135 requires Public Bodies to have standing orders for how they enter into contracts. These Contract Standing Orders ("Rules"), which form part of Rushmoor Borough Council's Constitution, set out how the Council will deliver against this obligation. At section 1.6 of Rushmoor BC CSO, roles and responsibilities are detailed within the organization. At section 1.6.2 the responsibilities for the contracting officers is

listed. It is important that managers understand their responsibilities and approach Procurement for guidance where necessary.

6.4 Public Sector Compliance - Public sector compliance involves ensuring that government organisations follow established laws and regulations that govern their operations. This compliance is crucial for maintaining public trust, protecting public resources, and avoiding legal and financial penalties. It encompasses a wide range of requirements, including financial regulations, data protection laws, environmental regulations, and health and safety standards.

6.5 Agency Workers Regulations 2010 - Agency Workers are entitled from day one to workers employment rights and should be treated equally to a comparable worker with access to facilities and have the ability to view any job advertisements. After 12 weeks of continuous engagement with an organisation they are entitled to more workers' employment rights. These include equal pay and annual leave.   It is important that managers consult with the People Team when the Agency Workers Regulation (AWR) is presented for completion as failure to comply can lead to equal treatment breaches and possible tribunal claims, financial penalties, and reputational harm.

7   Financial Implications

7.1 Agency workers and Consultants can be an expensive resource to use albeit it is recognised that there are situations which warrant such an appointment.

7.2 It is crucial that managers are efficient with the use of these resources. Managers need to monitor the work closely to ensure the work is completed to the standard RBC requires and within the timescales provided. Section 4.5 outlines expectations of what a manager should prepare to do when they have external resource, and they should never underestimate how much of their time they should invest.

7.3 Requests for the extension of the external resource must include clear reasons as to why the original timescales and budget were not sufficient and again full consideration should be given as to whether there are alternative options.

Impact assessment (IA) record

[Please refer to the Governance navigator for further information on IAs]

Data Privacy IA required?	(Yes/No)	
Equalities IA required?	(Yes/No)	
Climate Change IA required?	(Yes/No)	
Document control information		
Title	Engagement of Agency Workers and Consultants	
Topic/Service	People Team	
Version	1.0	
Next review date		
Last reviewed by	Belinda Tam	
Last reviewed date		
Approving authority	Cabinet	
Approval date		

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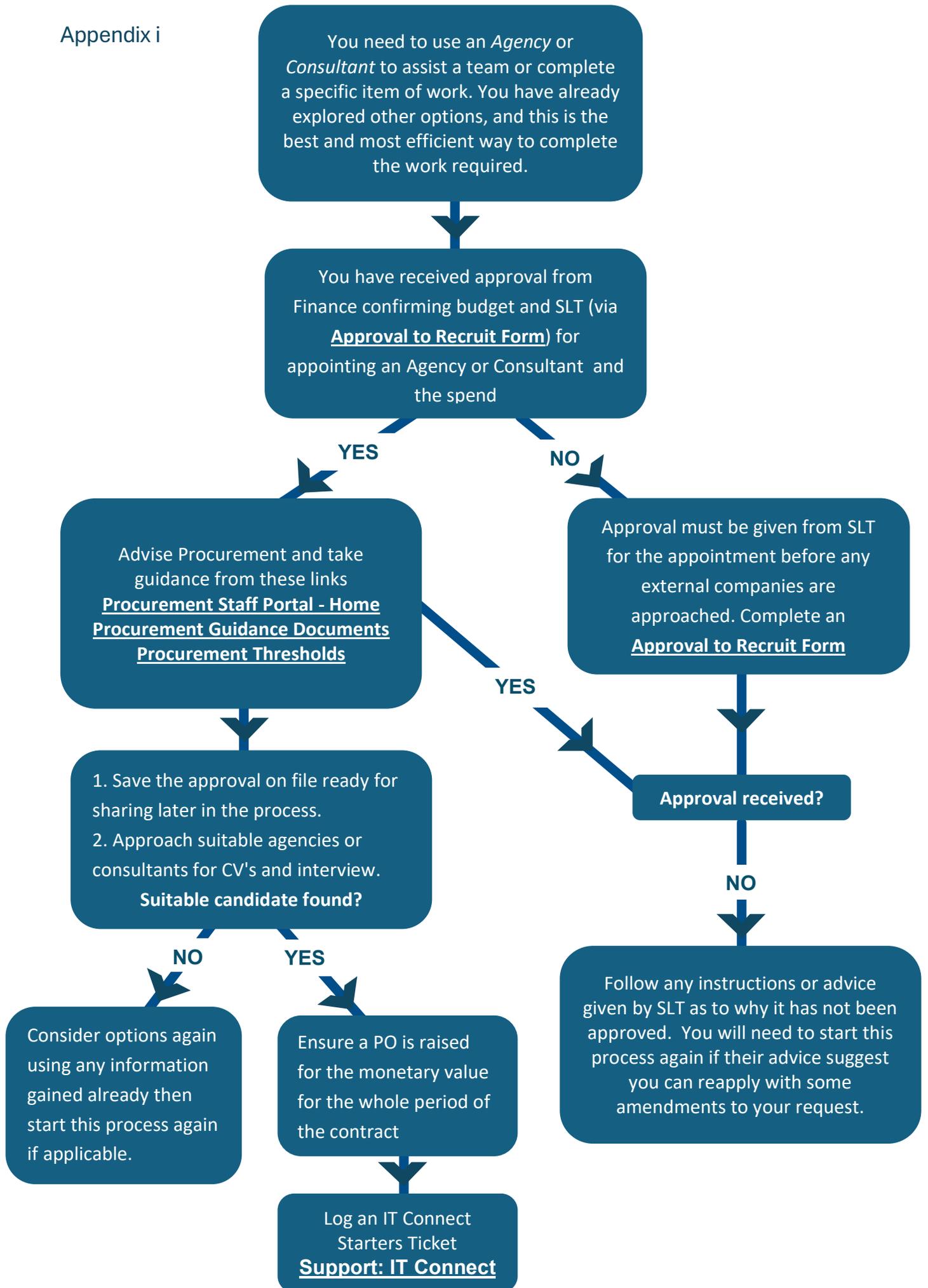Farnborough Road,
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Appendix i

You need to use an *Agency* or *Consultant* to assist a team or complete a specific item of work. You have already explored other options, and this is the best and most efficient way to complete the work required.

You have received approval from Finance confirming budget and SLT (via **Approval to Recruit Form**) for appointing an Agency or Consultant and the spend

YES

NO

Advise Procurement and take guidance from these links
Procurement Staff Portal - Home
Procurement Guidance Documents
Procurement Thresholds

Approval must be given from SLT for the appointment before any external companies are approached. Complete an **Approval to Recruit Form**

YES

1. Save the approval on file ready for sharing later in the process.
2. Approach suitable agencies or consultants for CV's and interview.
Suitable candidate found?

Approval received?

NO

NO

YES

Consider options again using any information gained already then start this process again if applicable.

Ensure a PO is raised for the monetary value for the whole period of the contract

Follow any instructions or advice given by SLT as to why it has not been approved. You will need to start this process again if their advice suggest you can reapply with some amendments to your request.

Log an IT Connect Starters Ticket
Support: IT Connect

You must now check to see if the successful candidate is inside or outside IR35 for tax and NI payments. Go to **IR35 Checking Process** for guidance.

Ensure you complete the HMRC CEST for IR35 determination if applicable

Check employment status for tax - GOV.UK

Complete this Agency/Consultant Appointment Form which will notify the People Team, ICT, Finance and Legal (if appropriate) of the appointment for them to prepare and complete their processes.

Is the successful candidate from an Agency or a Consultant?

Consultant

Agency

Advise Legal of the appointment and liaise with them so they can either prepare a contract or review contract supplied

Completion of the Agency/Consultant Appointment form will automatically advise the People Team of the appointment and enable them to complete their processes.
No laptop or ICT access will be given until the People Team have completed their checks

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No laptop or ICT access will be given until the People Team have completed their checks

Equality Impact Assessment: Screening Tool

Name of Project	Engaging Agency Workers and Consultants
Reference number (if applicable)	
Service Area	People Team
Date screening completed	21/01/26
Screening author name	Belinda Tam
Policy Team sign off	Martin Iyawe
Authorising Director/Head of Service name	Karen Edwards

1. Please provide a summary of the proposal

What are the aims / objectives of this proposal?

The aim of this proposal is to introduce a clear, consistent and compliant policy and procedure for the engagement of agency workers and consultants across the Council. The policy is intended to strengthen governance and oversight when external resources are required, ensuring that decisions are properly authorised, risks are managed, and legal and financial obligations are met.

The objectives are to provide recruiting managers with a clear workflow to follow when engaging external resources, improve coordination between key services (People, Finance, Procurement, IT and Legal), and ensure compliance with relevant legislation including IR35, Right to Work requirements, Agency Workers Regulations and Contract Standing Orders.

The policy also seeks to promote transparency, accountability and value for money by ensuring that the use of agency workers and consultants is appropriate, time limited and monitored, while supporting managers to engage external expertise efficiently where operational needs require it.

Will this deliver any savings?

There are no direct savings identified with this apart from clear, and where possible, automated processes which should make the process more efficient for management and services.

What benefits or change will we see from this proposal?

See above response.

Which key groups of people or areas of the borough are involved?

This is an internal RBC process and procedure and will not have a direct effect on people or areas of the borough.

2. Who will the proposal impact? Please indicate Yes or No

Group of people	Impacted?
Residents	No
Businesses	No
Visitors to Rushmoor	No
Voluntary or community groups	No
Council staff	Yes
Trade unions	No
Other public sector Organisations	No
Others	Please specify: Yes: Agency workers and consultants engaged by the Council

3. What impact will this change have on staff? Please complete where relevant:

Please outline in brief:

Who will be impacted? For example, which services, teams, or buildings?

This impacts recruiting managers who are seeking assistance from an agency or consultancy. As a consequence of this the following services should receive clear information when an agency worker or consultant is appointed:

- Finance
- Procurement
- IT
- People Team
- Legal

How many staff members?

There is no direct impact to any staff member, just clear information from the recruiting manager at the point an agency or consultant is offered the engagement.

What will the impact be? (e.g., changes to structure, staffing levels, responsibilities, relocation, or new working methods)

The new process will enable increased compliance and responsibility when engaging agency workers and consultants.

4. What consultation or engagement will you be leading (with residents, staff, or other stakeholders) as part of this project?

There is no formal engagement with anyone. We have been working with relevant services noted above to ensure processes proposed meet their requirements.

5. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

Direct and indirect impacts

When completing this table, please consider both **direct and indirect impacts**, see helpful guidance.

Direct discrimination occurs when someone is treated less favourably than another person because of a **protected characteristic**. This includes:
- **Actual possession** of a protected characteristic.
- **Perceived possession** of a protected characteristic (discrimination by perception).
- **Association** with someone who has a protected characteristic (discrimination by association).

A valid comparison must show that someone without the protected characteristic would have been treated better in similar circumstances. It can still be direct discrimination even if the person treating you unfairly shares the same characteristic.

Note: Age discrimination may be lawful if it can be objectively justified. For other protected characteristics, direct discrimination is unlawful regardless of intent or justification.

Indirect discrimination happens when a **policy, rule, or practice** applies to everyone but puts people with a protected characteristic at a **particular disadvantage**. It occurs when:

- A policy is applied equally to all.
- It disadvantages a group sharing a protected characteristic.
- You are personally disadvantaged by it.
- The organisation cannot justify the policy as a proportionate means of achieving a legitimate aim.

If the policy can be objectively justified, it is not considered indirect discrimination.

For example: Closing public toilets may be an example of indirect discrimination, as it affects everyone but disproportionately disadvantages women, due to toilet frequency, alternative options and safety/hygiene factors.

Likely impact

For the groups identified earlier, tick the likely impact (both direct and indirect) on people with protected characteristics (e.g., age, disability, race, etc.):
- **Neutral:** No impact.

- **Positive:** Benefits people with protected characteristics.
- **Negative:** Harms people with protected characteristics.
- **Not Sure:** It's unclear how this affects people with protected characteristics, or more information is needed.

Rate the negative impact as **low**, **medium**, or **high**. Also, consider whether the proposal may be seen as controversial or negative by some groups. See the guidance for help.

Protected characteristic - Age

(for example, young people under 25, older people over 65)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
	Yes	Choose an item.		This policy sets out internal processes for managers when engaging agency workers or consultants and does not affect access to work, pay, terms or conditions based on age

Protected characteristic – Disability

(include people with physical disabilities, people with learning disabilities, blind and partially sighted people, Deaf or hard of hearing people, neurodiverse people. This also includes carers.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
	Yes	Choose an item.		The policy does not change reasonable adjustments, access needs or support arrangements and applies equally to all individuals.

Protected characteristic - Gender reassignment and identity

(Include people who identify across the trans* umbrella, not only those who have undergone gender reassignment surgery. This is inclusive of girls and or/women, men and/or boys, non-binary and genderfluid people and people who are transitioning) *Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
	Yes	Choose an item.		The policy is procedural only and does not affect dignity at work, access to roles or treatment based on gender identity.

Protected characteristic - Marriage and Civil Partnership

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
	Yes	Choose an item.		There is no impact on employment terms or treatment related to marriage or civil partnership status.

Protected characteristic – Pregnancy and Maternity

(Include people who are pregnant in or returning to the workplace after pregnancy. Could also include working parents.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
	Yes	Choose an item.		The policy does not alter maternity rights, leave arrangements or protections and has no disproportionate impact.

Protected characteristic – Race or ethnicity

(include on the basis of colour, nationality, citizenship, ethnic or national origins)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
	Yes	Choose an item.		The policy applies consistently to all individuals and does not affect recruitment, treatment or access based on race or ethnicity.

Protected characteristic – Religion or belief

(include no faith)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
	Yes	Choose an item.		There is no impact on religious observance, belief, or non-belief as the policy only relates to internal approval and compliance processes.

Protected characteristic - Sex

(Under the Equality Act 2010 and following the 2025 Supreme Court ruling on 15 April 20205, a person's legal sex is defined as their biological sex as recorded at birth. Trans individuals are still protected from discrimination under the characteristic of gender reassignment.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
	Yes	Choose an item.		The policy does not affect pay, terms, access to work or treatment based on sex.

Protected characteristic - Sexual Orientation

(Include people from across the LGBTQ+ umbrella, for example, people who identify as lesbian, gay, bisexual, pansexual or asexual.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
	Yes	Choose an item.		The policy does not affect access to work or treatment related to sexual orientation.

Protected characteristic - Other

(e.g. people on low incomes, people living in poverty, looked after children, people with care experience, people who are homeless, people with mental health problems, people who are prison leavers, people affected by menopause, people affected by menstruation and/or period poverty)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) *Consider both direct and indirect impacts when completing this table*
Yes or No	Yes or No	Choose an item.	Yes or No	**Neutral:** No impact.

6. Screening Decision

Outcome	Yes or No
Neutral or Positive – no full EIA needed*.	Yes
Negative – Low Impact – full EIA at the service director's discretion*.	No
Negative – Medium or High Impact – must complete a full EIA.	No
Is a full EIA required? Service decision:	No

Is a full EIA required? [Policy Team] sign off recommendation:	No
Flag for DPIA (will include engagement that collects personal data). [Policy Team]:	No
Flag for ethics (high risk / will involve engagement with vulnerable residents):	No