



 <p data-bbox="363 210 464 353"><b>GIG</b> CYMRU <b>NHS</b> WALES</p> <p data-bbox="491 210 708 353">Iechyd Cyhoeddus Cymru Public Health Wales</p>	<p data-bbox="1114 232 1385 268"><b>Name of Meeting</b></p> <p data-bbox="903 271 1385 338">Audit and Corporate Governance Committee</p> <p data-bbox="1129 342 1385 378"><b>Date of Meeting</b></p> <p data-bbox="1150 380 1385 416">14 January 2025</p> <p data-bbox="1177 418 1385 454"><b>Agenda item:</b></p> <p data-bbox="1337 456 1385 492">5.4.</p>
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## Policy / Procedure Approval Report

### Section 1 - Policy / Procedure Information

<b>Policy / Procedure Title</b>	<b>Procedure for the Recovery of Overpayments – Salary &amp; Expenses</b>
<b>Policy Lead</b>	<b>Jane Matthews, Head of Financial Reporting and Control</b>
<b>Lead Executive</b>	<b>Huw George, Deputy Chief Executive/Executive Director of Operations and Finance</b>
<b>PHW / All Wales?</b>	<b>All Wales</b>
<b>Date of last Review</b>	<b>N/A – new all Wales procedure</b>
<b>Is the current policy / procedure within review date?</b>	<b>No</b>
<b>Approving Body /Group</b>	<b>Audit and Corporate Governance Committee</b>
<b>Version Number</b>	<b>1.0</b>

### Section 2: Recommendation

That the Audit and Committee

- **Consider** the new procedure, Appendix 1) and the Equalities Impact Assessment (Appendix 1a
- **Note** that Leadership Team have endorsed the policy for approval by Audit and Corporate Governance Committee.
- **Approve** the revised Policy



**Section 3 – Details of the Review:**

**Background:**

**Reason for review**

This Procedure has been written to bring a unified approach in how an overpayments should be handled across NHS Wales. This All-Wales procedure will replace any existing local processes to ensure consistency by NHS Wales Shared Services Partnership Payroll Services and NHS Wales Organisations upon the identification of an overpayment.

An overpayment is defined as any monies incorrectly paid to a current or former employee or worker through the payroll system.

**Description/Assessment**

It is recognised that overpayments are not usually the fault of the employee or worker, and this procedure seeks to support those who have been overpaid to have the overpayment recovered in a fair and reasonable manner.

Overpayments primarily arise from a “mistake of fact” (where a payment was inconsistent with the facts e.g. due to clerical, computer input or procedural error). NHS Wales Organisations have a legal right to recover any overpayments which have arisen from a mistake of fact.

NHS Wales Organisations must pursue the recovery of all overpayments regardless of fault. NHS overpayments come out of public funds and therefore NHS Wales Organisations have an obligation to recover them although this must be done in a fair and reasonable way.

This procedure aims to standardise the recovery of overpayments to ensure consistency across NHS Wales. It also aims to ensure all overpayments are recovered efficiently and as quickly as possible without imposing hardship and to ensure that employees, ex-employees, workers and ex-workers are treated fairly and consistently without any needless stress or worry.

**Consultation**



Has this Policy / Procedure been through the appropriate 28 day consultation process?	Yes
Date range of consultation:	21/11/2024 - 19/12/2024
Please provide details of any feedback received and outline what changes if any were made to the document as a result:	No feedback received. No changes.
(Add detail)	
Had this policy / procedure been considered by any other groups?	Yes
If so, please provide detail of any comments / feedback or amendments made to the documents as a result of this	<p>The procedure has been developed by a task and finish group consisting of members of Finance Teams from across NHS Wales and including Counter Fraud. During the process, feedback was also sought from Workforce Directors, Directors of Finance, Trade Union representatives and the procedure was approved at Shared Services Partnership Committee in July 2024.</p> <p>Key points on amendments made to draft version following feedback include:</p> <ul style="list-style-type: none"> <li>• The wording has been amended to reflect a more compassionate tone for both the procedure and the letters – there is more recognition of affordability and negotiation of repayment plans and has been included following workforce and TU comments on tone and hardship.</li> <li>• The wording of the counter fraud criteria has been slightly amended and whilst the assessment takes place at the start of the identification of an overpayment (as depicted in the flow chart), the detail of this is included later in the procedure wording.</li> <li>• The automatic recovery of overpayments under 30% where an overpayment has occurred due to a late submission of information within the last month has</li> </ul>



	<p>been included with a potential phased repayment over 3 months (TU thoughts were that it was acceptable that a maximum of 10% of salary can be recovered automatically, hence the 30% over 3 months which then reduces the volume of invoices that will need to be raised and managed through finance which was a concern for some Organisations).</p> <ul style="list-style-type: none"> <li>The agreement of extended repayment terms/dispute resolutions has been amended to include Workforce Directors and/or Directors of Finance and nominated deputies in recognition of the fact that this falls under different remits in different Organisations.</li> </ul>
(Add detail)	
<b>Section 4: Impact Assessments</b>	
<b>Equality and Health Impact Assessment</b>	An Equality and Health Impact Assessment has been completed and is included as an appendix to this paper. No issues were identified in the assessment.
<b>Welsh Language Impact</b>	The procedure has already been translated into Welsh by NHS Wales Shared Services Partnership and shared with the Trust. This will be available on the internet following approval.
<b>Risk and Assurance</b>	This procedure will help ensure overpayments can be recovered in a fair and consistent manner and that where criteria is met, overpayments will be assessed by Counter Fraud Services.
<b>Health and Care Standards</b>	This Policy supports and/or takes into account the <u>Health and Care Standards for NHS Wales Quality Themes</u>
	Governance, Leadership and Accountability
	Theme 7 - Staff and Resources
	Choose an item.
<b>Financial implications</b>	There is no increase in expenditure associated with this procedure being adopted. The procedure will support the application of a fair and consistent process to recover overpayments made from public funds.



<b>People implications</b>	The recovery of overpayments outlined in this procedure is consistent with the current Public Health Wales internal procedure. Therefore, there is no potential impact on workforce or staff survey plans as a result of this new procedure being adopted.
<b>Socio Economic Duty</b>	There are no implications to the duty.

## 5 - Implementation

Please complete the table below for this section, include any relevant actions required for implementation of this policy / procedure:

- How it will be implemented - If it requires resource, training or there are changes to current practice an implementation plan (template available on policy webpages) will be required to accompany the document giving clear timelines.
- If resources are required these should have been agreed prior to presentation to the Committee/Group.
- Info re any barriers to implementation and associated risk – explain how this will be mitigated.

<b>Implementation plan (with timescales)</b>		
Next steps	Timescale	Responsible officer(s)
Approval through Audit and Corporate Governance Committee	14 January 2025	Jane Matthews
Publishing of Policy on PHW internet and Finance SharePoint pages	31 January 2025	Jane Matthews
Promotion of document via Business & Planning Leads Group and via Finance Business Partner network to all Directorates/Divisions	7 February 2025	Jane Matthews and Finance Business Partners, Finance Division
Intranet story to raise awareness of the procedure and roles and responsibilities	7 February 2025	Jane Matthews

## 6. Dissemination

The primary source for dissemination of this procedure within the organisation will be via the internet site following communication via Business & Planning Leads Group and Finance Business Partner Networks. An intranet story will also be produced to raise awareness of the procedure.



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Iechyd Cyhoeddus  
Cymru  
Public Health  
Wales

**Reference Number:** xxxx  
**Version Number:** 1.0  
**Date of next review:** October 2027

## PROCEDURE FOR THE RECOVERY OF OVERPAYMENTS – SALARY & EXPENSES

### Policy Statement

This Procedure has been written to bring a unified approach in how an overpayment should be handled across NHS Wales. This All-Wales procedure will replace any existing local processes to ensure consistency by NHS Wales Shared Services Partnership Payroll Services and NHS Wales Organisations upon the identification of an overpayment.

An overpayment is defined as any monies incorrectly paid to a current or former employee or worker through the payroll system.

This procedure aims to standardise the recovery of overpayments to ensure consistency across NHS Wales.

The objectives of this procedure are to ensure:

- An equitable process for the recovery of overpayments while allowing the personal financial circumstances of those who have been overpaid to be considered.
- The recovery of the overpayment should be affordable and sustainable.
- The responsibilities of those who may be involved in the process are made clear.
- The potential reasons for overpayments are explained.
- The reduction in the frequency of overpayments through using information found in this procedure to educate and improve.

### Supporting Procedures and Written Control Documents

Other written control documents which have been identified to have interdependencies with this procedure and should therefore be read in conjunction with, include;

- [Standing Financial Instructions](#)

#### Impact Assessments

An Equality, Welsh Language and Health Impact Assessment has been completed and can be viewed on the policy webpages.

#### Approved by

Audit and Corporate Governance Committee

#### Approval Date

TBC

<b>Review Date</b>	October 2027
<b>Date of Publication:</b>	TBC
<b>Group with authority to approve supporting procedures</b>	Audit and Corporate Governance Committee
<b>Accountable Executive Director/Director</b>	Huw George, Deputy Chief Executive/Executive Director of Operations and Finance
<b>Author</b>	NHS Wales Shared Services Partnership (NWSSP)

**Disclaimer**

**If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the [Board Business Unit](#).**

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<b>Summary of reviews/amendments</b>				
<b>Version number</b>	<b>Date of Review</b>	<b>Date of Approval</b>	<b>Date published</b>	<b>Summary of Amendments</b>





## Template Equality & Health Impact Assessment for

### *Procedure for the Recovery of Overpayments – Salary & Expenses (All Wales)*

#### Part 1

Please answer all questions:-

<b>1.</b>	For service change, provide the title of the Project Outline Document or Business Case and Reference Number	Procedure for the Recovery of Overpayments – Salary & Expenses (All Wales)
<b>2.</b>	Name of Clinical Board / Corporate Directorate and title of lead member of staff, including contact details	Operations and Finance Directorate Jane Matthews, Head of Financial Reporting and Control Email: Jane.Matthews3@wales.nhs.uk
<b>3.</b>	Objectives of procedure	<p>The objectives of this procedure are to ensure:</p> <ul style="list-style-type: none"> <li>• An equitable process for the recovery of overpayments while allowing the personal financial circumstances of those who have been overpaid to be considered.</li> <li>• The recovery of the overpayment should be affordable and sustainable.</li> <li>• The responsibilities of those who may be involved in the process are made clear.</li> <li>• The potential reasons for overpayments are explained.</li> <li>• The reduction in the frequency of overpayments through using information found in this procedure to educate and improve.</li> </ul>
<b>4.</b>	Evidence and background information considered. For example	

<ul style="list-style-type: none"> <li>• population data</li> <li>• staff and service users data, as applicable</li> <li>• needs assessment</li> <li>• engagement and involvement findings</li> <li>• research</li> <li>• good practice guidelines</li> <li>• participant knowledge</li> <li>• list of stakeholders and how stakeholders have engaged in the development stages</li> <li>• comments from those involved in the designing and development stages</li> </ul> <p>Population pyramids are available from Public Health Wales Observatory and the 'Shaping Our Future Wellbeing' Strategy provides an overview of health need.</p>	<p>Most NHS organisations in Wales will already have a Procedure for the Recovery of Overpayments. This Procedure has been written to bring a unified approach in how an overpayment should be handled across NHS Wales. This All-Wales procedure will replace any existing local processes to ensure consistency by NHS Wales Shared Services Partnership Payroll Services and NHS Wales Organisations upon the identification of an overpayment.</p> <p>The procedure has been developed by an NHS Wales Finance working group and has gone through a number of interactions following consultation and feedback from workforce colleagues and Trade Unions. The procedure was approved at the July 2024 Shared Services Partnership Committee.</p>
<p><b>5.</b> Who will be affected by the policy</p> <p>Consider staff as well as the population that the project/change may affect to different degrees.</p>	<p>The procedure will affect the following groups of staff who either incur an overpayment or support the process to recovery overpayments:</p> <ul style="list-style-type: none"> <li>• Staff who are overpaid salary or expenses</li> <li>• NWSSP Payroll Services</li> <li>• Line managers of staff who are overpaid salary or expenses</li> <li>• People &amp; Organisational Development Directorate</li> <li>• Finance Division</li> <li>• Local Counter Fraud Team</li> </ul>

## Part 2- Equality and Welsh language

### 6. EQIA / How will the strategy, policy, plan, procedure and/or service impact on people?

Questions in this section relate to the impact on people on the basis of their 'protected characteristics'.

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
<b>6.1 Age</b> For most purposes, the main categories are: <ul style="list-style-type: none"> <li>• under 18;</li> <li>• between 18 and 65; and</li> <li>• over 65</li> </ul>	The procedure is applicable to all staff.	None required	
<b>6.2 Persons with a disability as defined in the Equality Act 2010</b> Those with physical impairments, learning disability, sensory loss or impairment, mental health conditions, long-term	The procedure is applicable to all staff.  Whilst the contents of the procedure does not have a negative impact on persons with a disability, as with all written control	Public Health Wales does have provision for the production of documents that are accessible to persons with disabilities. Large print, Braille or audio versions could be provided on request.	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
medical conditions such as diabetes	<p>documents there may be a negative impact due to the format of the control document that is available. Documents are published on the intranet in pdf format.</p> <p>Visual impairment – not all accessibility software accepts pdf format and therefore an alternative format may be required.</p> <p><u>Learning disability</u> - The documents may also not be understood by those who have difficulty deciphering or reading the written word, for example, dyslexia. Therefore,</p>	<p>Members of the Finance Division are available to provide advice and assistance in applying the procedure.</p>	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
	further explanation and support may be required.		
<b>6.3 People of different genders:</b> Consider men, women, people undergoing gender reassignment  <b>NB</b> Gender-reassignment is anyone who proposes to, starts, is going through or who has completed a process to change his or her gender with or without going through any medical procedures. Sometimes referred to as Trans or Transgender	The procedure is applicable to all staff.	None required	
<b>6.4 People who are married or who have a civil partner.</b>	The procedure is applicable to all staff.	None required	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
<b>6.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding.</b>	The procedure is applicable to all staff.	None required	
<b>6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers</b>	The procedure is applicable to all staff.	None required	
<b>6.7 People with a religion or belief or with no religion or belief.</b>	The procedure is applicable to all staff.	None required	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
The term 'religion' includes a religious or philosophical belief			
<b>6.8 People who are attracted to other people of:</b> <ul style="list-style-type: none"> <li>• the opposite sex (heterosexual);</li> <li>• the same sex (lesbian or gay);</li> <li>• both sexes (bisexual)</li> </ul>	The procedure is applicable to all staff.	None required	
<b>6.9 People according to their income related group:</b> Consider people on low income, economically inactive, unemployed/workless, people who are unable to work due to ill-health	The procedure is applicable to all staff.	None required	
<b>6.10 People according to where they live:</b>	The policy is applicable to all staff.	None required	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
Consider people living in areas known to exhibit poor economic and/or health indicators, people unable to access services and facilities			
<b>6.11 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service</b>	N/A	N/A	
<b>6.12 Welsh Language</b>			
<b>There are 2 key considerations to be made during the development of a policy, project, programme, service to ensure there are no adverse effects and/or a positive or increased positive effect on:</b> (please note these will continue to be reviewed to ensure Public Health Wales fulfils their duties to comply with one or more standards outlined within the Welsh Language Standards (No 7) Regulations 2018)			
<b>Opportunities for persons to use the Welsh language</b>	This All-Wales Procedure is available in English and Welsh.	This All-Wales Procedure is available in English and Welsh.	



<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
	Both Welsh and English versions will be published at the same time.	Both Welsh and English versions will be published at the same time.	
<b>Treating the Welsh language no less favourably than the English language</b>	As above	As above	

### **Part 3 – Health**

Questions in this section relate to the impact on the health and wellbeing outcomes of the population **and** specific population groups who could be more impacted than others by a policy/project/proposal.

The part of the assessment identifies;

- which specific groups in the population could be impacted more (inequalities)
- what those potential impacts could be across the wider determinants of health framework?
- Potential gaps, opportunities to maximise positive H&WB outcomes
- Recommendations/mitigation to be considered by the decision makers

#### **7. Identification of specific population groups**

Use the WHIASU Population Groups checklist as a reference to identify the population groups who could be more impacted than others by a policy/project/proposal. The check list can be found on the PHW Integrated EqHIA guidance pages (requires link to PHW Intranet pages for additional information and resources)

The groups listed have been identified as more susceptible to poorer health and wellbeing outcomes (health inequalities) and therefore it is important to consider them in a HIA assessment. In a HIA, the groups identified, as more sensitive to potential impacts will depend on the characteristics of the local population, the context, and the nature of the proposal itself.

7.1 Groups identified	Rational/explanation
None identified	N/A

**Assessment**

Complete the wider determinants framework table below providing rational/evidence where appropriate:

1. Consider how the proposal could impact on the population and specific population groups identified above (positive/negative) for each of the wider determinants (the bullets under each determinant are there as a guide)
2. Record any unintended consequences (negative impacts) and/or gaps identified
3. Record any positive impacts or missed opportunities to maximise positive health and wellbeing outcomes
4. identify and record mitigation/recommendations where appropriate

**Please note** you may find that not all determinants are relevant to the project/plan however recording N/A is not acceptable a rational or evidence should be explained/referenced

Wider determinant for consideration	Positive impacts or additional opportunities	Unintended consequences or gaps	Population groups affected	Mitigation/recommendations
<b>7.2 Lifestyles</b> <ul style="list-style-type: none"> <li>• Diet/nutrition/breastfeeding</li> <li>• Physical activity</li> </ul>	The procedure is an internal document	N/A		

<ul style="list-style-type: none"> <li>• Use of alcohol, cigarettes, e-cigarettes</li> <li>• Use of substances, non-prescribed drugs, abuse of prescription medication</li> <li>• Social media use</li> <li>• Sexual activity</li> <li>• Risk-taking activity i.e. gambling, addictive behaviour</li> </ul>	<p>intended to provide guidance to staff. Therefore, it does not have an impact on the health and wellbeing of the population or addressing inequalities in health.</p>			
<p><b>7.3 Social and community influences on health</b></p> <ul style="list-style-type: none"> <li>• Adverse childhood experiences</li> <li>• Citizen power and influence</li> <li>• Community cohesion, identity, local pride</li> <li>• Community resilience</li> <li>• Domestic violence</li> <li>• Family relationships</li> <li>• Language, cultural and spirituality</li> <li>• Neighbourliness</li> <li>• Social exclusion i.e. homelessness</li> <li>• Parenting and infant attachment</li> <li>• Peer pressure</li> <li>• Racism</li> <li>• Sense of belonging</li> <li>• Social isolation/loneliness</li> <li>• Social capital/support/networks</li> <li>• Third sector &amp; volunteering</li> </ul>	<p>As above</p>	<p>As above</p>		
<p><b>7.4 Mental Wellbeing</b></p> <ul style="list-style-type: none"> <li>• Does this proposal support sense of control?</li> </ul>	<p>As above</p>	<p>As above</p>		

<ul style="list-style-type: none"> <li>• Does it enable participation in community and economic life?</li> <li>• Does it impact on emotional wellbeing and resilience?</li> </ul>				
<b>7.5 Living/ environmental conditions affecting health</b> <ul style="list-style-type: none"> <li>• Air quality</li> <li>• Attractiveness/access/availability/quality of area, green and blue space, natural space.</li> <li>• Health &amp; safety, community, individual, public/private space</li> <li>• Housing, quality/tenure/indoor environment</li> <li>• Light/noise/odours, pollution</li> <li>• Quality &amp; safety of play areas (formal/informal)</li> <li>• Road safety</li> <li>• Urban/rural built &amp; natural environment</li> <li>• Waste and recycling</li> <li>• Water quality</li> </ul>	As above	As above		
<b>7.6 Economic conditions affecting health</b> <ul style="list-style-type: none"> <li>• Unemployment</li> <li>• Income, poverty (incl. food and fuel)</li> <li>• Economic inactivity</li> <li>• Personal and household debt</li> <li>• Type of employment i.e. permanent/temp, full/part time</li> <li>• Workplace conditions i.e. environment culture, H&amp;S</li> </ul>	As above	As above		
<b>7.7 Access and quality of services</b> <ul style="list-style-type: none"> <li>• Careers advice</li> <li>• Education and training</li> <li>• Information technology, internet access, digital services</li> <li>• Leisure services</li> <li>• Medical and health services</li> </ul>	As above	As above		

<ul style="list-style-type: none"> <li>• Other caring services i.e. social care; Third Sector, youth services, child care</li> <li>• Public amenities i.e. village halls, libraries, community hub</li> <li>• Shops and commercial services</li> <li>• Transport including parking, public transport, active travel</li> </ul>				
<p><b>7.8 Macro-economic, environmental and sustainability factors</b></p> <ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Climate change/carbon reduction/flooding/heatwave</li> <li>• Cost of living i.e. food, rent, transport and house prices</li> <li>• Economic development including trade</li> <li>• Government policies i.e. Sustainable Development principle (integration; collaboration; involvement; long term thinking; and prevention)</li> <li>• Gross Domestic Product</li> <li>• Regeneration</li> </ul>	As above	As above		

**Stage 3**

**Summary of key findings and actions Please answer question 8.1 following the completion of the EHIA and complete the action plan**

Key findings: Impacts/gaps/opportunities	Actions (what is needed and who needs to do) to address the identified mitigation and recommendations	Lead		
The contents of the procedure has no disproportionate impact on the grounds of race, gender, disability, age, sexual orientation, religious belief or Welsh language.				

The procedure is applicable to all members of staff equally and has been developed to ensure an equitable process for the recovery of overpayments.

The Impact Assessment has found that, by introducing the revised policy, there may be a negative impact on individuals due to:

**Persons with a disability as defined in the Equality Act 2010**

Whilst the contents of the policy does not have a negative impact on persons with a disability, as with all written control documents there may be a negative impact due to the format of the control document that is available. Documents are published on the intranet in pdf format.

Visual impairment – not all accessibility software accepts pdf format and therefore an alternative format may be required.

Learning disability - The documents may also not be understood by those who have difficulty deciphering or reading the written word, for example, dyslexia. Therefore, further explanation and support may be required.

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**Alternatively, if appropriate, please explain the steps taken to consult with and consider the differential impact of the changes on the various protected characteristic groups (part 2) or any specific identified population groups (part 3).**