



**PWYLLGOR DIWYLLIANT, POBL A DATBLYGU SEFYDLIADOL
PEOPLE, ORGANISATIONAL DEVELOPMENT & CULTURE COMMITTEE**

DYDDIAD Y CYFARFOD: DATE OF MEETING:	19 August 2025
TEITL YR ADRODDIAD: TITLE OF REPORT:	Workforce & Organisational Development Policies
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Lisa Gostling, Executive Director of Workforce & Organisational Development and Deputy Chief Executive Officer
SWYDDOG ADRODD: REPORTING OFFICER:	Heather Hinkin, Assistant Director of People Management

Pwrpas yr Adroddiad (dewiswch fel yn addas)

Purpose of the Report (select as appropriate)

Ar Gyfer Penderfyniad/For Decision

ADRODDIAD SCAA

SBAR REPORT

Sefyllfa / Situation

The report provides the required assurance that the Written Control Documentation (WCD) Policy (policy number 190) has been adhered to in the development of the documents which are in line with legislation/regulations, the available evidence base and are put forward for approval and implementation within the Health Board.

In line with Hywel Dda University Health Board's (HDdUHB's) written control documentation process, the Committee is asked to note or approve the recommendations in relation to the below:-

- Local policies
- All Wales policies and updates
- Policies not yet presented for approval
- Policies to be removed
- Documents for information

Cefndir / Background

It is imperative that HDdUHB has up to date and accurate written control documentation in order to comply with relevant legislation and to minimise any associated risks. In addition, All Wales documents, which require adoption and or action on the part of individual Health Boards are brought to this Committee for consideration/assurance.

Details regarding each policy (including the changes made) are outlined below:-

Local Policy - for approval

299 - Re-Registration Policy (Appendix 1a/b)

- Corporate Nursing requested changes were made to the Appendix of the policy to:-
 - reflect the natural order to consider when a registration lapses or is suspended.
 - change the language to standardise terminology for nurses – this did not result in any substantive changes to the appendix or the process/practice.

- Removal of “formal” from the statement on investigations so it is more generic and appropriate in all circumstances
- Removal of the sentence relating to pension contributions as this is no longer relevant. The Pensions Team have confirmed this is correct.
- At Staff Partnership Forum on 16 July 2025, our trade union colleagues asked for this Appendix to reference both lapsed and suspended registrations as the same principles could apply. Nursing colleagues have accepted this change.
- This Appendix was submitted to the Senior Nursing Management Team in August 2025 and the further changes have been supported.
- The Appendix did not require global consultation as the changes made were minor.
- The Equality Impact Assessment (EQIA) was updated and is attached.
- A full review of the policy will be undertaken next year as per the policy schedule.

All Wales policy for approval and update

Committee is asked to adopt the following All Wales document: -

- All Wales Procedure for the Recovery of Overpayments (new) (Appendix 2a/b)
- Local Equality Impact Assessment

This policy was received by the Health Board in December 2024 and was discussed by the Staff Partnership Forum initially in its meeting on 3 December 2024. The Staff Partnership Forum wished to make further enquiries on the status of the policy as it had followed a different route to other All Wales policies. The Staff Partnership Forum agreed for its onward consideration to People Committee for adoption at its meeting on 16 July 2025.

A copy of the updated All-Wales policy schedule from NHS Employers was received on 27 June 2025 and is attached as Appendix 3 for information.

Policies not yet presented for consideration

Committee has requested an update each meeting on those policies that are not on track and for a brief explanation to be provided. A request for extension of a number of local policies together with rationale is therefore outlined below. Please note the list is longer than usual due to the change in the Committee cycle from two months to quarterly.

Medicines Management	558/787 - Medication Errors	Policy has been to Quality, Safety and Experience Committee (QSEC) and to the local and Health Board Staff Partnership Forums and LNC. It also required approval by the Medicines Management Operational Group (MMOG) prior to submission to People Committee. Medicines Management Operational Group (MMOG) requested some further actions be taken and these were due to be considered at its May meeting. No further update has been received.	30.11.25
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Recruitment with All Wales Policy Review Group	121 - Relocation Expenses	We are still waiting for the approved version of the All-Wales policy following the consultation on the final draft. It is therefore more prudent to extend rather than review our local policy at this time as we understand this is now imminent for release.	30.11.25
Learning & Development	1103 - Performance Management Policy	Due for review by 20 October 2025 and will be ready for the next Committee to consider on 4 November.	7.11.25
Operational Workforce	158 – Redeployment Policy	Due for review by 20 October 2025 and will be ready for the next Committee to consider on 4 November.	7.11.25
Operational Workforce	438 – Shared Parental Leave	At consultation stage. Will be ready for the next Committee to consider on 4 November.	7.11.25
Operational Workforce	713 – Honorary Contracts	Due for review by 20 October 2025 and will be ready for the next Committee to consider on 4 November.	7.11.25

Policies for removal

As a result of the new All Wales Procedure for the Recovery of Overpayments being submitted for adoption, there is no ongoing requirement for the Health Board to retain the following local policy.

- 002 – Underpayments and Overpayments of Salary Policy

Documents for Information

Frequently Asked Questions (FAQs) - Underpayments of Salary (Appendix 4)

- The All-Wales Procedure for the Recovery of Overpayments does not deal with underpayments whereas our local policy did. The Frequently Asked Questions (FAQs) have been attached for information so we can continue to provide information to staff on how underpayments are resolved. These FAQs are already available on Sharepoint for staff as downloadable content.

Asesiad / Assessment

The local policy Appendix has been shared with the Local Partnership Forums and Staff Partnership Forum for comment. Documents that apply to Medical and Dental colleagues have been shared with the Local Negotiating Committee (LNC) for information.

A screening Equality Impact Assessment (EqIA) has been developed or updated as required on advice from the Corporate Policy Office.

Six policies require extension due to their review dates being prior to the next meeting.

One policy will be removed from our local policy suite due to its replacement (new) All Wales Procedure and some local FAQs have been produced to support understanding of the underpayments process.

Following approval of the recommendations contained below, all documents will be uploaded/updated on the intranet site and will replace current versions.

Argymhelliad / Recommendation

The People, Organisational Development & Culture Committee is requested to:

- **RECEIVE** assurance that the above local policy has been reviewed in line with Policy 190.
- **APPROVE** the revised Appendix 7 of the Re-Registration Policy
- **EXTEND** the six local policies in accordance with the dates provided.
- **ADOPT** the All-Wales Procedure for the Recovery of Overpayments.
- **REMOVE** the local policy on Underpayments and Overpayments of Salary Policy.
- **NOTE** the addition of FAQs on underpayments to the Sharepoint page on policies.

Amcanion: (rhaid cwblhau)	
Objectives: (must be completed)	
Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	3.13 Approve workforce and organisational development policies and plans within the scope of the Committee.
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	N/A
Parthau Ansawdd: Domains of Quality Quality and Engagement Act (sharepoint.com)	2. Timely 3. Effective 4. Efficient 6. Person-Centred
Galluogwyr Ansawdd: Enablers of Quality: Quality and Engagement Act (sharepoint.com)	2. Culture and valuing people
Amcanion Strategol y BIP: UHB Strategic Objectives:	Not Applicable
Amcanion Cynllunio Planning Objectives	1 Workforce Stabilisation
Amcanion Llesiant BIP: UHB Well-being Objectives: Hyperlink to HDdUHB Well-being Objectives Annual Report 2021-2022	5. Offer a diverse range of employment opportunities which support people to fulfill their potential

**Gwybodaeth Ychwanegol:
Further Information:**

Ar sail tystiolaeth: Evidence Base:	Legislation, national policy, terms and conditions
Rhestr Termau: Glossary of Terms:	Included in the report
Partïon / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Diwylliant, Pobl a Datblygu Sefydliadol: Parties / Committees consulted prior to People, Organisational Development & Culture Committee:	Local and Staff Partnership Forums LNC (as appropriate) Global consultation as required

Effaith: (rhaid cwblhau) Impact: (must be completed)	
Ariannol / Gwerth am Arian: Financial / Service:	N/A
Ansawdd / Gofal Claf: Quality / Patient Care:	Staff accessing written control documentation which is out of date, no longer relevant or contradicts current guidance.
Gweithlu: Workforce:	The policies apply to all staff unless stated otherwise in each policy.
Risg: Risk:	The presence of written control documentation on the intranet, outside of the Policies, Procedures and other Written Control Documentation intranet webpage, may result in staff accessing documents which are out of date, no longer relevant, or contradicting current guidance.
Cyfreithiol: Legal:	It is essential that the UHB has up to date policies and procedures in place which comply with legislation as a minimum standard.
Enw Da: Reputational:	N/A
Gyfrinachedd: Privacy:	N/A
Cydraddoldeb: Equality:	Updated or new EQIA are attached as required.

Registration and Re-Registration of Health Professionals Policy

Policy information

Policy number: 299

Classification: Employment

Supersedes: Previous Versions

Version number: 6.0

Date of Equality Impact Assessment: 27/04/2023

Approval information

Approved by: People, Organisational Development and Culture Committee (PODCC)

Date of approval:

Date made active:

Review date: 19/06/2026

Summary of document:

The purpose of this policy is to make explicit the responsibilities of Health Board employees in relation to the regulatory re-registration process whilst employed within this Health Board.

Scope:

This policy applies to all staff who are required to register, and to maintain that registration, with a statutory regulatory body to enable them to practise in a registered professional role. The All Wales Contract of employment also states that staff required to be registered to carry out their duties must maintain their registration.

To be read in conjunction with:

[201 - Disciplinary Policy](#) – opens in a new tab

Patient information:

Include links to [Patient Information Library](#)

Owning group:

Workforce & OD Team

Executive Director job title:

Director of Workforce and Organisational Development

Reviews and updates:

1.0 – New Policy – 27.07.2012

2.0 – Amended in line with the revalidation proves – 29.07.2016

3.0 – Revised – 18.05.2020

4.0 – Amendment to section 7.4 midwives – 24.05.2018

5.0 – Full Review – 19.06.2023

6.0 – update to the annex 7 re-registration (terminology)

Keywords

Re-Registration, Revalidation, Registration

Glossary of terms

GMC - General Medical Council

ESR - Electronic staff record

DCP - Dental care professional

GDC - General Dental Council

PIN - Personal identification number

HIW - Healthcare Inspectorate Wales

HPC / HCPC- Health and Care Professions Council

PSA – Professional Standards Authority

WCD – Written Control Documents

GPhC – General Pharmaceutical Council

BPS – The British Psychological Society

GOC – General Optical Council

SCW – Social Care Wales

NMC – Nursing Midwifery Council

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Introduction

The main purpose of the regulators is to protect the public. They do this by holding registers of individuals who meet their standards of education, training, professional skills, behaviour and health. Scrutiny and oversight of the nine regulators is provided by the Professional Standards Authority (PSA).

The act of registration confers on individual registrants the legal right to use their protected title. Registration is a contractual requirement for employment within the Health Board as one of the professions listed in [Appendix 1](#).

From the point of initial registration, each registrant is subject to the appropriate professional Codes of Conduct and standards as set by the regulator.

If a practitioners registration lapses, they are not in a position to continue to practice using the protected title.

Appointing officers are responsible for checking that a person's registration allows them to be employed in a particular role before they start work, and that they maintain appropriate registration to practise.

Policy statement

This policy sets out the requirements of the employer and the registrants in maintaining their professional registration.

Scope

This policy applies to all staff who are required to register, and to maintain that registration, with a statutory regulatory body to enable them to practise in a registered professional role.

The All Wales Contract of employment also states that staff required to be registered to carry out their duties must maintain their registration. This policy includes bank staff.

Aim

The aim of this document is to ensure all health care professionals are registered and maintain their professional registration.

The principles of this policy will apply to all staff groups and will be revised as necessary.

Objectives

The aim of this document will be achieved by the following objectives:

- Ensuring all practitioners are aware of their obligation to maintain their professional registration.

Policy

Allied Health Professionals

The Health and Care Professions Council currently regulates 15 professions detailed in [Appendix 1](#). Each registrant is required to renew their registration every two years with The Health and Care Professions Council (HCPC).

It should be noted that the HCPC register interfaces directly with the Electronic Staff Register (ESR) for the NHS.

Medical Staff

All doctors are required to register with the General Medical Council (GMC) by payment of fee and also an Annual Retention Fee to remain on the GMC's Register of Medical Practitioners.

All doctors must hold a licence to practise and in addition demonstrate that their registration is appropriate to the type of post or practice they will be undertaking.

It should be noted that the GMC register interfaces directly with the Electronic Staff Register (ESR) for the NHS.

There are four types of registration:

- **Provisional Registration**

Provisional registration with a licence allows newly qualified doctors to undertake clinical training needed for full registration. A doctor who is provisionally registered is entitled to work only in Foundation Year 1 (F1) posts in hospitals or institutions that are approved for the purpose of F1 service. The fee paid for provisional registration is for a two year period.

- **Full Registration**

Full registration is required with a licence to practise for unsupervised medical practice in the NHS or private practice in the UK. Doctors who have undertaken a satisfactory period of experience under provisional registration may apply for full registration. An Annual Retention Fee is paid.

- **Specialist Registration**

All doctors working towards a consultant post (other than a locum appointment) in a medical or surgical specialty in the NHS are legally required to be included on the Specialist Register. All doctors will need to hold full registration and to pay an Annual Retention Fee.

- **GP Registration**

All doctors working in General Practice are required to be on the GP Register. All General Medical Practitioners are required to hold full registration and to pay an Annual Retention Fee.

Dentists & Dental Care Professionals

A Dentist or Dental Care Professional (DCP) is required to be registered with the General Dental Council (GDC). Registration with the GDC is to be renewed on an annual basis. An Annual Retention Fee is required.

It should be noted that the DCP register interfaces directly with the Electronic Staff Register (ESR) for the NHS. For roles defined as Dental Care Professionals refer to [Appendix 3](#).

Opticians

Registration with the General Optical Council (GOC) is required and must be renewed annually with the re-registration submitted by the deadline of 15 March each year. An Annual Retention Fee is required.

Pharmacists and Pharmacy Technicians

Registration is required with the General Pharmaceutical Council (GPC) and must be renewed annually.

The Professional Registration is on a rolling basis dependent on the date of initial registration. Pharmacy Technicians are also now required to be registered.

It should be noted that the GPC register interfaces directly with the Electronic Staff Register (ESR) for the NHS.

Social Workers

Registration with the Care Council for Wales (CCW) is required and must be renewed on a 3 yearly basis, with an Annual Retention Fee being payable.

Registered Nurses, Midwives and Specialist Community Public Health Nurses

In order to maintain their status as a registered nurse or midwife every three years, all nurses, midwives and Specialist Community Public Health Nurses (SCPHN) are required to register with the Nursing and Midwifery Council (NMC). This requires payment of a renewal fee every year and revalidation every 3 years to maintain their professional status.

Requirements for revalidation are found : <https://www.nmc.org.uk/revalidation/requirements> (opens in a new tab)

It should be noted that the NMC register interfaces directly with the Electronic Staff Register (ESR) for the NHS.

Other Professionally registered staff

Registration with other professional bodies such as Accountancy bodies, Chartered institute of personnel and development, other non-statutory health bodies etc. are to be renewed on an annual basis. An Annual Retention Fee is required. Refer to [appendix 2](#) for a list of non-statutory regulatory bodies.

All Agency Staff

When a request is placed for agency staff, the relevant agency will be asked to verify the regulatory body registration of the individual who will be undertaking the duties.

All Staff Groups Working under contract with the Health Board

Any registered staff contracted to provide a service on behalf of the Health Board, must be registered. Third party contracts (e.g. GP Co-ops).

In addition, as part of the contract the Health Board holds with an Independent Contractor, the contractor will be required to demonstrate that they have a robust system in place in order to verify the regulatory body registration of each individual they employ providing a service on behalf of the Health Board. The Contractor will be expected to verify the validity of the registration of all professionals they employ (both permanently and as locums etc) both at the time of initial employment and at the time when periodic re-registration is due.

Working Placements and Trainees

Any qualified professional staff attending the Health Board to participate in specific work placements or participate in training will be required to be registered with the appropriate regulatory body.

The host employer of the professional is required to verify that the individual is registered with the appropriate regulatory body prior to commencement of their work placement or training.

Where there is a need to train and declare a fitness to return to the register following a period of un-registration e.g. following a career break; the employer may need to provide a period of supervised activity to facilitate the return to the register.

The manager of the relevant department will be responsible for ensuring that any qualified professional has the appropriate valid registration.

Honorary Contract Holders (All Staff Groups)

Any professional staff holding an Honorary Contract with the Health Board will be required to be registered with the appropriate regulatory body.

The host employer of the professional staff member will be required to verify the regulatory registration of the individual prior to commencement of their duties. In addition, the host employer will be asked to provide the Health Board with the registration details of all professional staff, to be offered an honorary contract.

The manager of the relevant department will be responsible for ensuring that any qualified professional has the appropriate valid registration.

Responsibilities

Chief Executive

As Accountable Officer, the Chief Executive has overall responsibility for ensuring the health board has appropriate written control documents (WCDs) in place. These WCDs must comply with legislation, meet mandatory requirements, and provide services that are safe, evidenced-based and sustainable.

Nominated Director – Director of Workforce & Organisational Development, Director of Nursing, Quality and Patient experience, Director of Therapies and Health Science, Director of Primary, Community and Long-term Care and the Medical Director/Deputy CEO.

To ensure that the appropriate process and resources for reminding staff and managers of their duty to maintain their professional registration are in place.

Senior Management

To ensure that the appropriate process and resources for reminding staff and managers of their duty to maintain their professional registration are in place.

Department, service, or ward management

Workforce & OD – Monitoring of valid pins within ESR is undertaken by the Workforce Intelligence /ESR team. Refer to [Appendix 5](#) for details of the monitoring process.

All Managers - Regularly check ESR notifications to see if staff are due to reregister or revalidate.

If staff are off sick or on maternity leave on discussing the return date to work, ensure their registration/ revalidation date is current and has not expired during their time off.

Ensure all staff on ESR/roster have up to date registrations.

If staff have lapsed their registration or failed to revalidate, manage this with advice from Workforce and Organisational development, the responsible office or the medical director's department.

The manager of the relevant department will be responsible for ensuring that any qualified professional has the appropriate valid registration.

All Staff

If a registered staff member is at risk of lapsing from the professional register, they should seek advice /support from their manager, the responsible officer, the medical director and Workforce Advisor at the earliest opportunity prior to their registration lapsing.

Should an employee request an extension, they should inform their manager or medical revalidation team as soon as possible.

Individual registrants are responsible for ensuring their own continued competence and professional development in order to fulfil their statutory obligations and meet the requirements of post registration education and practice. It is the responsibility of each registrant to ensure that their registration remains current at all times.

If a registrant discovers that they have allowed their registration to lapse, they must **immediately** advise their manager of the position and contact the appropriate regulatory body. It is essential that all registrants are aware of the consequences of allowing their registration to lapse. Refer to [Appendix 7](#).

Registrants must inform BOTH the Health Board AND their Regulatory Body of any change of details to ensure the databases held by both organisations are both current and consistent.

The registrant must at the earliest opportunity inform their manager, or for medical staff the medical director of any "pending" situations/investigations/reports/criminal investigations/ convictions and cautions: This is a contractual requirement of employees of the Health Board. In addition, the registrant must inform their regulatory body of any issues that could impact on their registration status. Such notification does not in itself jeopardise the registrant's right to practise as a Registered Health Professional. Failure to do so however, could result in disciplinary action in line with the Health Board's disciplinary policy/investigation by the regulatory body, if it was considered that there was a deliberate attempt to conceal the facts or mislead the Health Board or regulatory body.

References

HCPC: [The Health and Care Professions Council \(HCPC\) | \(hcpc-uk.org\)](http://www.hcpc-uk.org)

NMC: [The Nursing & Midwifery Council - The Nursing and Midwifery Council \(nmc.org.uk\)](http://www.nmc.org.uk)

GMC [Home - GMC \(gmc-uk.org\)](http://www.gmc-uk.org)

GPhC: [Registers | General Pharmaceutical Council \(pharmacyregulation.org\)](http://www.pharmacyregulation.org)

GDC: [General Dental Council \(gdc-uk.org\)](http://www.gdc-uk.org)

SCW: [Social Care Wales | Home - Social Care Wales](http://www.socialcarewales.gov.uk)

GOC: [Home | GeneralOpticalCouncil](http://www.goc.gov.uk)

Appendix 1 – Regulatory Bodies & Professionals

<u>Regulatory Body</u>	<u>Profession</u>
General Medical Council	Doctors
Nursing & Midwifery Council	Nurses
	Midwives
	Specialist Community Public health Nurses
General Dental Council	Dentists
	Dental Care Professionals
General Pharmaceutical Council	Pharmacists
	Pharmacy Technicians
General Optical Council	Opticians
	Optometrists
Care Council Wales	Social Workers in Wales
Health and Care Professional Council	Radiographers
	Physiotherapists
	Dieticians
	Occupational Therapists
	Podiatrists
	Clinical Scientists
	Speech & Language Therapists
	Biomedical Scientists
	Art, Music & Drama Therapists
	Orthoptists
	Operating Department Practitioners
	Prosthetists & Orthotists
	Practitioner Psychologists
	Hearing aid dispensers
Paramedics	

Appendix 2 – Non-Statutory Registers

<u>Regulatory Body</u>	<u>Profession</u>
The Academy of Healthcare Science	
British Association of Play Therapists	Play Therapy
Association of Chartered Certified Accountants (ACCA)	Accountants
Chartered Institute of Management Accountants (CIMA)	
Chartered Institute of Public Finance and Accountancy (CIPFA)	
Institute of Chartered Accountants in England and Wales (ICAEW)	
The Chartered Institute of Personnel and Development (CIPD)	HR & People Development
United Kingdom Council for Psychotherapy UKCP	Psychotherapists
British Association of Cognitive and Behavioural Psychotherapists (BACP)	Cognitive Behavioural Therapists (CBT therapists)
British Association of Counselling and Psychotherapy (BACP)	Counsellors

Appendix 3 – Professions with Protected Titles

<u>Profession</u>	<u>Roles</u>
Dental Care Professionals	Clinical Dental Technicians
	Dental Nurses
	Dental Hygienists
	Dental Technicians
	Dental Therapists
	Orthodontic Therapists
Radiographers	Radiographer
	Diagnostic radiographer
	Therapeutic radiographer
Physiotherapists	Physiotherapist
	Physical therapist
Podiatrists	Chiropodist
	Podiatrist
Speech & Language Therapists	Speech and language therapist
	Speech therapist
Art, Music & Drama Therapists	Art psychotherapist
	Art therapist
	Dramatherapist
	Music therapist
Practitioner Psychologists	Practitioner psychologist
	Registered psychologist
	Clinical psychologist
	Counselling psychologist
	Educational psychologist
	Forensic psychologist
	Health psychologist
	Occupational psychologist
Sport and exercise psychologist	

Appendix 4 – Professions with specific renewal periods

<u>Profession</u>	<u>Renewal Period</u>
Radiographers	1 March to 28 February
Physiotherapists	1 May to 30 April
Dieticians	1 July to 30 June
Occupational Therapists	1 November to 31 October
Podiatrists	1 August to 31 July
Clinical Scientists	1 October to 30 September
Speech & Language Therapists	1 October to 30 September
Biomedical Scientists	1 December to 30 November
Art, Music & Drama Therapists	1 June to 31 May
Orthoptists	1 September to 31 August
Operating Department Practitioners	1 October to 30 November
Prosthetists & Orthotists	1 October to 30 September
Practitioner Psychologists	1 November to 31 October
Hearing aid dispensers	1 August to 31 July
Paramedics	1 September to 31 August
Dentist	1 January to 31 December
Dental Care Professionals	1 August to 31 July

Please note other renewal periods will be on a rolling basis dependant on initial registration date.

Appendix 5 – Monitoring all registration numbers / Personal identification number (PINs) in ESR

Workforce Intelligence/ ESR will run the NHS Professional Registrations report on a monthly basis



Identify any lapsed/expired registrations and email details to appropriate parties e.g central corporate function or heads of service



Where there is no interface for a professional body into ESR; the ESR team will help to guide the employee to enter their own registration through Employee Self Service where there has been a previous entry. For new entries, this needs to be entered centrally through ESRs core system.

Appendix 6 – Notifications

ESR System notifications:

Notifications will be sent to all employees with professional registrations noted in ESR and their supervisors (as per ESR hierarchy).

Registration Expiry Notifications (Renewal Notifications) are sent 25 days prior to the expiry date

Revalidation notifications will be sent at the following intervals

- 365 days prior to the Revalidation Date (1 Year)
- 183 days prior to the Revalidation Date (6 Months)
- 122 days prior to the Revalidation Date (4 Months)
- Where the Revalidation Date has been added or updated and the new date is less than (current system date + 122 days)

Allocate Rostering System notifications:

No Notification sent from the system to users; however, roster managers can identify employees about to expire, or if they have expired under expiring items on the homepage of the roster.



Appendix 7 – Lapsed/Suspended Registrations

In cases of lapsed/suspended registration for ALL STAFF GROUPS the individual **will not** be permitted to continue to practise in a role for which registration is a requirement until their registration is renewed and has been confirmed via an electronic check. During this interim period, the following options are available to the manager until such time as the individual's registration is renewed. **The manager can also seek advice from the operational workforce team and the professional leads at any point:**

- Move the staff member from the date of the lapsed registration to alternative duties which do not require the individual to be registered.
- An emergency application for taking accrued leave (paid at pay band at which it was accrued) and/or unpaid leave may be made by the staff member.
- If any activity has been carried out by a member of staff who has temporarily lapsed their registration and for which registration is a requirement, the line manager will undertake a risk assessment of the decisions made for that period and report the findings to their senior manager.
- If the regulatory body makes it known that the time taken to reinstate the registrant is of a timescale which will cause significant service disruption then in this instance advice should be sought from the local Workforce Department.

The manager must notify the relevant Workforce Manager and Professional Head/Lead, of the lapsed registration at the time it is identified.

Depending on the initial assessment into the circumstances of the lapsed registration, a formal investigation in accordance with the All Wales Disciplinary Policy (HDUHB Policy 201) may be required. This is particularly so when cases of recurrent lapses in registration occur. The investigation of each incident of lapsed registration should address all issues outlined in [Appendix 4](#) and this together with the subsequent action, should be documented on the Datix Form relating to the event.

Individual health care professionals may be liable for prosecution for claiming to be registered when they are not as this could be considered to be a criminal offence and as such may be reported to the Police and / or Counter Fraud.

Equality Impact Assessment (EqIA) Screening Template

When to complete an EqIA Screening

An EqIA Screening Template must be completed when reviewing, changing and developing procedures/ proposals/ projects/ policies. This is a first step and is used to consider whether there are any negative impacts that may arise.

Purpose of an EqIA Screening Template

The purpose of this short exercise is to ensure that you have shown appropriate due regard when considering the impact for people with protected characteristics in your decision making. The screening process is designed to help you consider the circumstances and to inform evidence-based decisions.

If the proposal is of a significant nature and it is apparent from the outset that a full EqIA will be required, then it is not necessary to complete this Screening Template, you can proceed to complete the full [EqIA](#).

If no negative impacts are identified following completion of the EqIA screening then it is not necessary to undertake a full EqIA however, the decision and justification must be clearly recorded in this document.

On completion of the Screening Template:

- Ensure that all the white boxes within the screening are completed.
- Ensure that the Procedure/ Project/ Proposal/ Policy owner has signed and dated the Screening Template.
- Send a copy of the completed template along with the related policy or project proposal to Inclusion.hdd@wales.nhs.uk for the Diversity & Inclusion Team to review.
- Each Screening Template will be reviewed by the Diversity & Inclusion Team and feedback will be provided to the Procedure/ Project/ Proposal/ Policy owner. This may include recommendations for further action to inform robust decision-making.

Support

For further support please visit the [EqIA Sharepoint](#) or contact:

Email: Inclusion.hdd@wales.nhs.uk

Tel: 01554 899055

Director and Directorate	Lisa Gostling, Workforce & OD
Service Area	Workforce and OD

Title of Procedure, Project, Proposal, Policy being screened:	Policy for the registration and re-registration of health Professionals
--	---

Description of the Procedure/ Project/ Proposal/ Policy being screened (including key aims and objectives)

The aim of this policy is to ensure all health care professionals are registered and maintain their professional registration.

The principles of this policy will apply to all staff groups and will be revised as necessary.

This will be achieved by the following objective;

- Ensuring all practitioners are aware of their obligation to maintain their professional registration.

Evidence considered (including staff and population data, relevant research, expert and community knowledge etc.)

No negatives have arisen since the original EqIA was completed.

The policy applies to all staff directly employed or agency, staff working under contract with the Health Board, Work Placements and Trainees, Honorary Contract holders who are required to register and to maintain that registration with a statutory regulatory body to enable them to practise in a registered professional role.

A search of similar policies in other UHBs and Trusts did not indicate any likely potential negative impact.

No complaints in relation to equality, diversity or human rights have been received following implementation of the initial policy or following amendments undertaken in June 2023.

Assess which protected characteristics will potentially be affected by the proposal in the table below (please ✓ the relevant box to confirm positive, negative or no impact).

If at any point a negative impact has been identified (actual or potential), you do not need to proceed with the completion of this form, as a full EqlA must be undertaken: [Equality Impact Assessments \(EqlAs\) \(sharepoint.com\)](https://sharepoint.com)

Age				
Is it likely to affect older and younger people in different ways or affect one age group and not another?				
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Disability				
Is it likely to affect those with a physical disability, learning disability, sensory loss or impairment, mental health conditions, long-term medical conditions such as diabetes?				
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Gender Reassignment				
Is it likely to affect those who either:				
<ul style="list-style-type: none"> • Have undergone, intend to undergo or are currently undergoing gender reassignment. • Do not intend to undergo medical treatment but wish to live in a different gender from their gender at birth 				
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Marriage / Civil Partnership				
Under the Equality Act, the characteristic of Marriage and Civil Partnerships is only protected in the workplace/ employment.				
Is it likely to affect those who are married or in a Civil Partnership? This means someone who is legally married or in a civil partnership.				
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Pregnancy and Maternity				
Is it likely to affect those who are pregnant or have recently had a baby? Maternity covers the period of 26 weeks after having a baby, whether or not they are on Maternity Leave.				
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Race / Ethnicity				

Is it likely to affect people of a different race, nationality, colour, culture or ethnic origin including non-English / Welsh speakers, Gypsies/Travellers, asylum seekers and migrant workers?				
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Religion or Belief				
Is it likely to affect people who have a religion or belief? The term 'religion' includes a religious or philosophical belief.				
Positive Impact	<input checked="" type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Sex				
Is it likely to affect people who are mostly male or female. Where it applies to both equally does it affect one differently to the other?				
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Sexual Orientation				
Whether a person's sexual attraction is towards their own sex, the opposite sex or either.				
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Armed Forces Community				
Consider whether this impacts on members of the Armed Forces and their families, whose health needs may be impacted long after they have left the Armed Forces and returned to civilian life. Also consider their unique experiences when accessing and using day-to-day public and private services compared to the general population. It could be through 'unfamiliarity with civilian life, or frequent moves around the country and the subsequent difficulties in maintaining support networks, for example, members of the Armed Forces can find accessing such goods and services challenging.'				
For a comprehensive guide to the Armed Forces Covenant Duty and supporting resource please see: Armed-Forces-Covenant-duty-statutory-guidance				
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
Justification of impact identified: This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.				
Socio Economic Duty				
Consider those on low income, economically inactive, unemployed or unable to work due to ill-health. Also consider people living in areas known to exhibit poor economic and/or				

health indicators and individuals who are unable to access services and facilities. Food / fuel poverty and personal or household debt should also be considered.

For a comprehensive guide to the Socio-Economic Duty in Wales and supporting resources please see:
[more-equal-wales-socio-economic-duty](#)

Positive Impact		Negative Impact		No Impact	✓
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Justification of impact identified:
 This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.

Welsh Language
 Is it likely to impact on opportunities for people to use the Welsh language? The Welsh language should be treated no less favourably than the English language.

Positive Impact		Negative Impact		No Impact	✓
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Justification of impact identified:
 This policy sets out the requirements of the employer and the registrants in maintaining their professional registration. It will not impact any persons with a protected characteristic differently to others.

If a negative impact has been identified, you are not required to complete this form as a full EqlA must be undertaken. A full EqlA template and guidance can be found on the following link: [Equality Impact Assessments \(EqlAs\) \(sharepoint.com\)](#)

Screening Completed by:	Name	Michelle James
	Title	Head of Resourcing & Utilisation
	Contact details	Michelle.James@wales.nhs.uk
	Date	24 th July 2025
Screening Authorised by: (Directorate level owner of the procedures/ proposals/ projects/ policy)	Name	Heather Hinkin
	Title	Assistant Director People Management
	Contact details	Heather.Hinkin@wales.nhs.uk
	Date	24 th July 2025
Guidance has been provided by Diversity & Inclusion Team:	Name	Kylie Daniels
	Title	Senior Diversity and inclusion Officer
	Contact details	Kylie.Daniels@wales.nhs.uk
	Date	28/07/2025
Diversity and Inclusion Team additional Comments:		

Please note: The D&I team will save a copy of the completed form for reference. If any changes are made after the date of review, it is the directorate’s responsibility to update the EqlA and inform the D&I team.

PROCEDURE FOR THE RECOVERY OF OVERPAYMENTS – Salary & Expenses

Procedure Status: FINAL APPROVED
Procedure Issued: September 2024
Implementation Date: October 2024
Review Date: October 2027

Procedure for the Recovery of Overpayments

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Appendix A - Roles & Responsibilities

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1. Introduction

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.

2. Procedure Statement

Everyone involved in the application of the procedure will be treated with respect and dignity throughout the process.

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.

Consideration will be given to individual needs and financial circumstances.

3. Aims

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.

4. Equality

NHS Wales aims to provide a safe environment free from discrimination and a place where all individuals are treated fairly, with dignity and appropriately to their need. It is recognised that equality impacts on all aspects of day-to-day operations and all policies and procedures have an Equality Integrated Impact Assessment (EqIIA) undertaken and Welsh Language Impact Assessment undertaken.

We will ensure that we deliver this procedure in line with the requirements of the Welsh Language Standards, specifically:

- Making our service available in Welsh that is equal to the English language service that we provide by:
 - Providing Welsh language correspondence to staff through the medium of Welsh without staff having to request this.
 - Provide any communication about this procedure through the medium of Welsh without staff having to request communications from us through the medium of Welsh.
 - Provide a telephone service through the medium of Welsh that is equivalent and equal to the English language service that we provide.
 - Make available all documents and forms in relation to this procedure and its delivery available through the medium of Welsh without hesitation or delay.
 - Ensure that information about this procedure is available on our intranet pages and webpages are available to NHS Staff.
 - Any social media posts relating to this procedure will be made available through the medium of Welsh at the same time as English medium posts are available.

5. Objectives

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 - Appendix A.
- The potential reasons for overpayments are explained - Appendix B.
- The reduction in the frequency of overpayments through using information found in this procedure to educate and improve.

6. Scope

This procedure will apply to employees, ex-employees, workers and ex-workers of NHS Wales Organisations and covers both manual and electronic systems utilised across NHS Wales.

Where NHS Organisations have rolled out Manager Self-Service (MSS) in the Electronic Staff Record (ESR), the Line Manager should utilise MSS to update employees' assignments. If MSS is not fully rolled out, information should be communicated to Payroll Services using the forms/Staff Movement Advice (SMA) available under Useful Documents through the Organisations page on the link below.

This link also details Payroll Services contact information: [Payroll Services \(sharepoint.com\)](#)

7. Overpayment Recovery Process

Automatic Recovery

There may be circumstances where an overpayment could be automatically recovered from future salary payments.

This will only happen if the following applies:

- The overpayment was a result of late notification of changes i.e. a change of hours, termination of employment, sickness, pension or other absence **and**
- The change or termination of employment should have been actioned less than one month before notification was received by Payroll Services **and**
- The deduction will not amount to more than a 30% reduction in gross monthly pay.

If all these criteria are met, the overpaid salary will automatically be recovered over a maximum 3-month period. Gross monthly pay overpayments of 0-10% will be recovered over 1 month, 10-20% over 2 months and 20-30% over 3 months.

If an automatic deduction is to happen, Payroll Services will inform the individual before pay day by sending an **Adjustment to Salary Letter** (Appendix C). The letter will detail the intended recovery values per month. This is intended to provide an affordable and sustainable recovery option. Tools to help you work out what is affordable can be found at Appendix D.

If the proposed overpayment recovery timescale is not affordable, NWSSP Payroll Services can be contacted via the contact information provided on the letter. If recovery cannot be agreed over the 3-month period, the overpayment will be referred to the All Wales Overpayments Team to progress the standard recovery procedure outlined below.

If the individual terminates their employment before the overpayment is repaid in full, payroll will contact the individual with a view to recovering the outstanding amount from the final salary.

Standard Recovery

Where an overpayment is a larger sum of money and/or has occurred over a longer time period, so the criteria for automatic recovery are not met, the standard recovery process will be as follows.

This is also set out in a flow chart at Appendix E.

1. Payroll Services will send **Overpayment Letter 1** (Appendix F) to the individual who has been overpaid as soon as they are made aware of a potential overpayment. The letter will provide notice that a potential overpayment has occurred, detail the reason for the suspected overpayment and the period it relates to (if known). It will reference the follow up letter (**Overpayment Letter 2** – Appendix G) that will be sent with the detailed overpayment calculation once confirmed.
2. Payroll Services will send an email with an attached letter to the individuals Line Manager informing them of the potential overpayment (Appendix H). This may include an MS Forms link to provide details or reasons for why and how the overpayment may have occurred and a video link explaining how to reduce overpayments in future.

3. Once the overpayment has been calculated, Payroll Services will issue **Overpayment Letter 2** to the individual and their Line Manager detailing the overpayment calculation (Appendix G). The Finance Department from their Organisation will be copied into this letter.

(a) Where the individual remains in post within the Organisation:

Overpayment Letter 2 will show the calculation of the overpayment and the full value. The letter will explain that the overpayment will need to be recovered in full and the ways this can be done.

We aim to recover any overpayments over the same time frame as the overpayment occurred e.g. if you were overpaid for 3 months, this should be recovered over 3 months. There is also the option to repay the overpayment as a lump sum or to discuss the arrangement of a more affordable monthly recovery option.

Any requests to recover the overpayment in excess of 12 months will need to be agreed by the Director of Finance and/or Director of Workforce/People for that Organisation or their nominated deputies. Any requests will be reviewed with consideration of how and when the overpayment occurred and the individual's financial circumstances.

There can also be the consideration of alternative options such as undertaking additional hours to pay back the sums owed.

Overpayment recoveries should be made via salary unless you choose to repay in full separately or agree to set up a standing order.

Overpayment Letter 2 will mention that an invoice will be sent shortly, and this will include information on who you can contact to agree the recovery of the overpayment.

The Finance Department for your Organisation will receive a copy of this letter so that the invoice can be sent. They will note that you are a current employee or worker who may have recoveries made via salary deductions.

A copy of the salary deduction request proforma is included in Appendix I to be completed if requested.

Tools to help you work out what is affordable can be found at Appendix D.

(b) Where the individual is no longer working for the Organisation:

Overpayment Letter 2 will show the calculation of the overpayment and the full value. The letter will explain that the overpayment will need to be recovered in full and the ways this can be done.

The letter will mention that an invoice will be sent shortly, and this will include information on who you can contact to agree the recovery of the overpayment.

The Finance Department for your Organisation will receive a copy of this letter so that the invoice can be sent. As the individual is no longer an employee or worker for the Organisation, recovery via salary is not possible so payments can be made by Standing Order, Bank Transfer, Cheque or Debit/Credit Card (where Organisations have this facility).

We aim to recover any overpayments over the same time frame as the overpayment occurred e.g. if you were overpaid for 3 months, this should be recovered over 3 months. There is also the

option to repay the overpayment as a lump sum or to discuss the arrangement of a more affordable monthly recovery option.

Longer recovery periods **may** be possible but will need to be agreed by the Director of Finance and/or Director of Workforce/People for that Organisation or their nominated deputies.

Tools to help you work out what is affordable can be found at Appendix D.

The Finance Department reserves the right to progress debt collection procedures through a debt collection agency once local Organisation procedures and attempts to collect the outstanding debt have been exhausted.

Counter Fraud

There may be occasions where an overpayment needs to be assessed by Counter Fraud Services.

An initial high-level assessment by Counter Fraud Services will be requested only if **all three** of the criteria below are met which indicate there may be evidence to suggest fraud may have occurred:

1. The individual has not notified the Organisation/Line Manager/Payroll Services of the overpayment; **and**
2. The overpayment has occurred for more than 3 months; **and**
3. The overpayment value is estimated at more than £5,000

If all three criteria are met, Payroll Services will send a notification to the relevant Local Counter Fraud team using the review form in Appendix J.

Local Counter Fraud teams will make an initial assessment and advise within 5 working days if an investigation is required, or if the overpayment recovery can continue with the usual recovery procedure. If no response is received from the Local Counter Fraud team within 5 working days, Payroll Services will request final confirmation to continue with recovery of the overpayment in line with this procedure and as shown in Appendix E.

Any overpayments under initial assessment by Local Counter Fraud teams are included under the Counter Fraud section of the overpayments dashboard. Senior Workforce/People and Finance colleagues within Organisations have access to this dashboard to monitor assessments being undertaken.

If Counter Fraud Services identify that further investigation is required, the overpayment recovery will be placed on hold by Payroll Services until further advice is received from the Local Counter Fraud team.

Prior to further investigations commencing, the Local Counter Fraud team will follow local Organisation procedure for informing the Director of Workforce/People and/or Director of Finance of the details of the case to be investigated. This may include obtaining any agreement to further investigation if required locally by Organisations. In the event of any local disagreement on the correct course of action, the Local Counter Fraud team will seek advice from the national NHS Counter Fraud Service Wales.

To ensure any potential criminal investigations are not compromised, it is important that no contact is made with the individual who has been overpaid until the Local Counter Fraud team has confirmed they do not need to investigate the matter further.

8. Dispute Resolution

Where an individual refuses to consent to the recovery of the overpayment and where discussions have been exhausted, the overpayment should be referred to the Director of Workforce/People and/or Director of Finance or their nominated deputies for the Organisation with the aim of reaching an agreement for the recovery of the overpayment, taking into account the individual's personal circumstances.

A meeting should be arranged between the individual who has been overpaid and the Director of Workforce/People and/or Director of Finance or their deputies. The individual has the right to be accompanied by either a Trade Union representative or a workplace colleague.

Members of the Finance team or Payroll Services along with the Line Manager or Budget Holder may also be requested to attend this meeting where it would be helpful. The proposed outcome of the meeting may require approval by the Director of Finance or other authorised budget holder if they are not present at the meeting.

Where an individual feels they have been treated unfairly, they are encouraged to use the Respect and Resolution policy. No further action should be taken on recovery during any dispute resolution process including a complaint under the Respect and Resolution process.

If you have left NHS Wales employment and have been unable to reach an agreement, you may be able to get support through:

[Acas | Making working life better for everyone in Britain](#) or
[Work - Home \(citizensadvice.org.uk\)](http://citizensadvice.org.uk)

Or your Trade Union if you are still a member (if you pay through your salary, you can switch to Direct Debit to maintain membership).

It is important to remember that there is a legal right for NHS Organisations to recover any overpayment. NHS Organisations reserve the right to engage a debt collection agency should it be required.

9. Training and Awareness

NHS Organisations should make employees or workers and managers aware of this procedure on commencement. A copy of the procedure should be available on the NHS Organisation's Intranet Site and referenced in any induction and/or new manager training.

Overpayments can be minimised if everyone does their part. Managers can ask for guidance on how to ensure prompt and accurate updates of employment information including new starters, changes, terminations, and employee or worker absence should they require.

Delayed submission of payroll documentation or Manager Self-Service updates can cause significant inconvenience and anxiety for staff and unnecessary additional administration for

NWSSP Payroll Services. It can also lead to complexities for those affected in respect of tax and universal credit issues.

The roles and responsibilities of all parties detailed in this procedure are outlined in Appendix A.

10. Information Governance

Any personal data utilised within the application of this procedure will be processed in accordance with the relevant UK General Data Protection (UK GDPR) and records management strategic frameworks and policies.

APPENDIX A

Key responsibilities in respect of the overpayments process can be summarised as:

NHS Wales Shared Services Partnership Payroll Services will: -

- Pay staff correctly and on time in accordance with employee/worker data held on ESR at the point of payrolls being run.
- Make an itemised payslip available to the employee/worker. This will be an electronic payslip where MyESR (Employee Self Service) is in use.
- Inform relevant staff regarding cut-off dates for submission of Electronic Paperwork for example starters, changes, terminations, and variable pay data [Payroll Services \(sharepoint.com\)](#).
- Correct identified errors.
- Undertake an assessment of overpayments against the criteria to establish if a review by Local Counter Fraud Services is required
- Rectify any identified overpayment in line with this procedure for the recovery of overpayments of salary. This will include writing to the employees/ex-employees/workers/ex-workers, providing them with a detailed explanation of the overpayment.
- Inform the Line Manager that an overpayment has occurred and issue a MS Forms link for them to complete an overpayment report, which will request detail on why the overpayment has occurred and what remedial action has been taken to prevent future reoccurrence.
- Maintain a register of overpayments to share monthly/bi-monthly with nominated representatives from each Organisation. NWSSP will inform the NHS Organisation of overpayments, the reasons for them and if there is a recurrence of the manager not complying with processes and procedures relating to employee/worker data.
- Review the register of overpayments with NHS Organisations in the regular Payroll Customer Relationship Manager meetings
- Liaise with local trade union representatives where appropriate.
- Deduct monies from the employees'/workers salary in line with the agreed recovery period where appropriate.
- Upon termination, deduct any outstanding overpayments, overtaken annual leave, including salary sacrifice arrangements from the final salary where possible.
- Deal with overpayment matters with compassion and understanding, noting that in the vast majority of cases the employee/worker is not at fault
- For a limited time after termination of employment, ensure ex-employees/ex-workers have access to their payslips, P60s and P45s via a Leavers Dashboard.

- Liaise with HMRC and/or NHS Pensions if an overpayment is likely to affect tax or pension.
- Implement this procedure through the medium of Welsh in line with the Welsh Language Standards.

Employee/Ex-employee/Worker/Ex-worker Responsibility:-

Employees/Ex-employees/Workers/Ex-workers must:

- Verify basic pay, contracted hours and other regular payments included in their payslip to ensure they are in line with their contract.
- Where applicable, and possible, verify variable hours are correct on e-roster systems before rosters are finalised.
- Raise any payslip queries with their Line Manager in the first instance. This may be in respect of incorrect contracted salary, hours, regular payments, incorrect receipt of variable hours or receipt of any unexpected monies.
- Seek clarification from Payroll Services if their Line Manager cannot resolve any queries on their payslip.
- Immediately inform Payroll Services if an overpayment is identified so that recovery can begin. Any employee, ex-employee, worker or ex-worker that knowingly or willingly fails to advise Payroll Services of an overpayment may be subject to referral to the Local Counter Fraud team and if necessary the Police.
- Agree terms of recovery and ensure full recovery of any overpayments.
- Be aware of payroll cut-off dates to know when to reasonably expect payment of travel, subsistence claims, shifts on e-roster systems or variable pay elements.
- Submit expense claims and additional hours worked claims for payment within 3 months. Please note that any claims older than 3 months will not be processed for payment unless circumstances prevented the submission of the claim in time.
- Ensure the NHS Organisation is aware of any change of address and contact details to be updated via MyESR (Employee Self Service).
- Access support and advice from trade union representatives where applicable.

Line Managers:

Line Managers must notify Payroll Services of any pay impacting changes as soon as they become aware of them and their responsibilities include:

- To complete the employee change notifications and submit to Payroll Services prior to employees/workers commencing new position/hours/base.
- To complete the employee termination process at the point of the employees/workers resignation.
- For employees/workers accessing NHS Pension - in line with NHS Organisations Retirement Policy a termination form must be completed a minimum of 4 months prior to termination.
- To resolve any initial queries received from employees/workers regarding variable hours paid in month or receipt of unexpected payments, advising them they must report any suspected overpayments to Payroll Services without delay.
- To open and close employee/worker sickness absence on their ESR record at the point of notification.
- To notify Payroll Services of any unpaid leave.
- To submit authorised notification of Maternity/Paternity/Adoption/Career Break. Application forms for payment under these policies must be completed and submitted to Payroll Services prior to the date the employee/worker commences the period of leave.
- To verify an employee's/worker's contract details via Manager Self Service and monthly budgets and advise Payroll Services immediately where an employee's/worker's contractual details are incorrect.
- To ensure the employee/worker rotas (where applicable) are correct in accordance with E-roster systems. Discrepancies should immediately be brought to the attention to Organisational E-Systems Teams.
- To ensure payroll workbooks (where applicable) are completed accurately in accordance with the employees/workers working pattern.
- Support individuals who have received an overpayment.

The Workforce/People Department will: -

- Act as a link between NWSSP Payroll Services, the Line Manager, the Finance team and the employee/worker where required.
- Ensure that managers are aware of their requirements to submit payroll data including employee/worker change notifications, termination notifications and e-rostering data in line with published payroll submission deadlines.

- Ensure that managers are aware of the potential for overpayments and their requirement to see that such instances are kept to a minimum.
- Ensure that managers are aware of the Recovery of Overpayments Procedure through the inclusion on induction and Manager training programmes.
- Review overpayment data on a regular basis to identify key themes and any areas where overpayments are a regular occurrence bringing it to the attention of the respective Managers to escalate.
- In conjunction with Senior Finance staff, review and jointly agree any hardship applications with regard to extended recovery periods.
- Ensure individuals who are subject to the overpayment process are treated fairly and compassionately.

Finance/Accounts Receivable Teams will: -

- Be responsible for issuing invoices to individuals to recover overpayments.
- Agree recovery terms in line with this procedure.
- Progress debt collection procedures where recovery of overpayments is not forthcoming.

Local Counter Fraud Teams will: -

- Undertake an initial assessment of any overpayments referred to them by NWSSP Payroll Services that meet the three referral criteria
- Respond to any referrals within 5 working days and confirm to Payroll Services whether normal recovery proceedings can commence or if further investigation is required.

APPENDIX B

Reasons for Overpayments

It is important that all information relating to appointments, changes and terminations are completed promptly and accurately by the Line Manager. Notifications/Staff Movement Advice (SMA) must be submitted to NWSSP Payroll Services or updated on ESR via Manager Self-Serve (MSS) immediately after they have been agreed.

Please note that:

- Employees or workers will continue to be paid according to the details held in ESR until Payroll Services are instructed to do otherwise (i.e. via change form or termination form)
- For changes to be reflected in the next monthly salary, any changes must be notified to Payroll Services by the last day of the current month (i.e. changes to be reflected in the April salary must be notified to Payroll Services by 31st March).
- monthly salary payments cover the period to the end of the month and not only up to the pay date.
- If an employee or worker self-declares an overpayment of salary, with their agreement in writing, Payroll Services will look to suspend the relevant overpaid element of their pay to prevent any further overpayments occurring while the issue is investigated and relevant documentation is requested.

Prevention of an overpayment occurring is paramount.

NHS Wales Organisations must ensure that managers are adhering to policies and procedures that minimise the potential for overpayments.

The most frequent reasons for overpayments are: -

- Late Termination Notification – A termination form, Staff Movement Advice or update via Manager Self-Serve must be actioned as soon as it is known that an employee or worker is leaving their post, i.e. at the point of resignation, end of contract or on dismissal. Consideration must be given to whether the employee or worker has taken the correct amount of annual leave. If they have taken more leave than they have accrued, they can either work additional hours to repay the time, or they can repay the money. If they are owed annual leave, they may be able to take the leave off the notice period or can be paid instead if required. It is important that the termination form is submitted to NWSSP Payroll Services as swiftly as possible in case a deduction needs to be made from the final salary payment.
- Late and inaccurate update of employee or worker contractual hours – as soon as the new hours are agreed, the information should be passed on via Manager Self-Serve or an employee change form. This should be prior to the date that the employee or worker begins working the new hours.
- Late and inaccurate update of an employee or worker absence (sickness, maternity, unpaid leave etc) – absences should be reported via ESR Manager Self-Serve or submission of forms to payroll as soon as possible and monitored for the duration.

Managers must ensure that the absence is closed as soon as the individual reports as fit for work.

Payroll Services will (on behalf of NHS Organisations) pay 'average sick pay' based on open sickness absence periods. If the absence is not closed, this may lead to inaccuracies.

- Late or inaccurate reporting of enhancements, overtime, on call, start date, salary, banding etc – the manager or supervisor should submit information, changes or variable pay promptly and with enough time for it to be processed by Payroll Services.
- System errors - while these errors do not happen often, once a system error is discovered, action should be taken as soon as possible in order to minimise incorrect payments. These can include ESR, E-roster and E-Expenses.

Where NHS Organisations have rolled out Manager Self-Service (MSS) in the Electronic Staff Record (ESR), the Line Manager should utilise MSS to update employees' assignments. If MSS is not fully rolled out, information should be communicated to Payroll Services using the forms/Staff Movement Advice (SMA) available under Useful Documents through the Organisations page on the link below.

This link also details Payroll Services contact information: [Payroll Services \(sharepoint.com\)](#)

NWSSP Payroll Services will endeavour to keep errors to a minimum, however human error can occur due to inaccurate calculation or misinterpretation of information.



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WALES

Partneriaeth
Cydwasaethau
Shared Services
Partnership

Gwasanaethau Cyflogaeth yn is-adran o fewn Partneriaeth Cydwasaethau GIG Cymru
Employment Services is a division of the NHS Wales Shared Services Partnership

APPENDIX C – ADJUSTMENT TO SALARY LETTER

**NWSSP All Wales Overpayment Team
NWSSP Payroll Services
4th Floor
Companies House
Crown Way
Cardiff
CF14 3UB**

Private and Confidential

Name
Address 1
Address 2
Address 3
Post Code

Our Ref: JEC/Assignment number
Tel: 02921 500100

Email: NWSSP.AllWalesoverpayments@wales.nhs.uk

Date:

RE: Overpayment of Salary

Dear

We are writing to let you know that we have discovered an overpayment of your salary and/or expenses.

The amount overpaid is **£XXX** and occurred due to the late submission of information to NWSSP Payroll Services relating to a change to your pay that should have been made within the last month.

The All-Wales Procedure for the Recovery of Overpayments classes such an overpayment as an 'Adjustment to Salary' and allows the automatic recovery of overpayments of up to 30% of salary, with 0-10% recoverable in one month, 10-20% over two months and 20-30% over three months. Your overpayment was **X%** of your salary so will be recovered over **X** months.

If you would like further details of the overpayment or feel the planned automatic recovery is not affordable, please contact us on 02921 500100 quoting the reference number above. The team is happy to help and support both employees and managers.

If you would like more information on how the recovery of overpayments are handled, please read the All-Wales Procedure for the Recovery of Overpayments which can be found on the NWSSP Payroll Services sharepoint site link [Payroll Services \(sharepoint.com\)](#)

Yours sincerely,

Insert OP Team Leader Name
All Wales Overpayment Team
NWSSP Employment Services

APPENDIX D – INCOME & EXPENDITURE TEMPLATE



Income%20and%20
Expenditure%20Sum

[Tools and calculators | MoneyHelper](#)

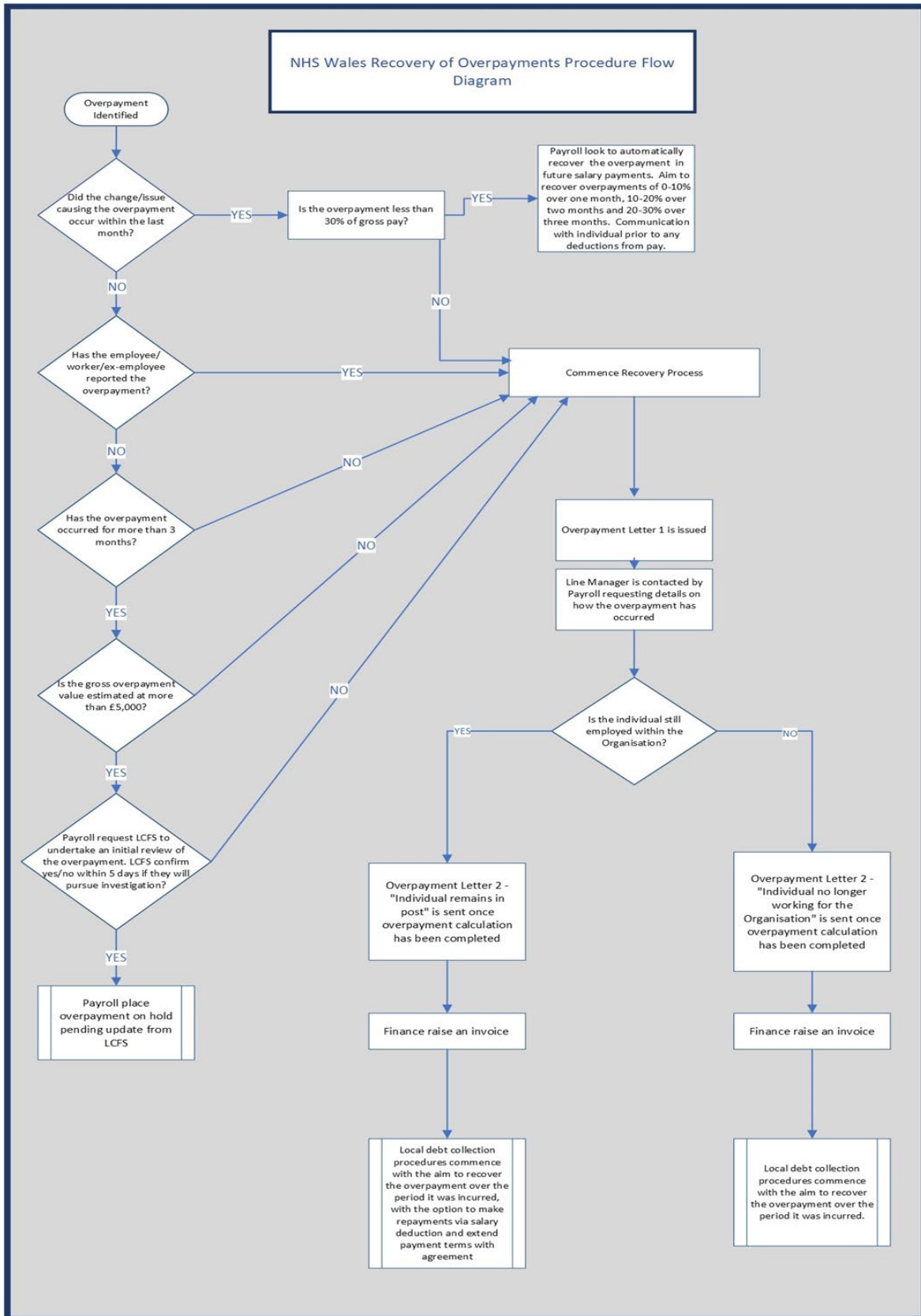
If you find yourself in financial hardship, there may be help or debt advice available from your Trade Union.

You can also check if you may be eligible for any benefits here:

[Tackling Financial Insecurity Together | Turn2us](#)

Debt advice from reputable sources [Get free debt advice - GOV.UK \(www.gov.uk\)](#)

APPENDIX E – OVERPAYMENTS PROCESS DIAGRAM





APPENDIX F – OVERPAYMENT LETTER 1

**NWSSP All Wales Overpayment Team
NWSSP Payroll Services
4th Floor
Companies House
Crown Way
Cardiff
CF14 3UB**

Private and Confidential

Name
Address 1
Address 2
Address 3
Post Code

Our Ref: JEC/Assignment number
Tel: 029 21 500055

Email: NWSSP.AllWalesoverpayments@wales.nhs.uk

Date:

RE: Notification of Potential Overpayment of Salary

Dear

We are writing to let you know that we have discovered a potential error that may have resulted in an overpayment of your salary and/or expenses.

The potential error was a result of *****Insert reason here*****.

The payroll team are currently looking into this and will be in touch soon to confirm the overpayment, show a detailed calculation of the amount and give details of how this can be recovered.

We have also contacted your manager to advise them of the potential overpayment so they may provide any additional information which could help clarify the overpayment calculation.

You do not need to do anything at this time, but should you want to contact the **Overpayments team you can reach them on 02921 500055 quoting the reference number above [JEC/Assignment]**. The team is happy to help and support both employees and managers.

Please be aware, until the calculations are complete NWSSP Payroll Services will not be able to provide you with any overpayment figures, therefore, please allow time for these to be completed before contacting us.

If you would like more information on how the recovery of overpayments are handled, please read the All-Wales Procedure for the Recovery of Overpayments which can be found on the NWSSP Payroll Services sharepoint site link [Payroll Services \(sharepoint.com\)](https://www.sharepoint.com). You can access support and advice from Trade Union representatives where applicable.

Yours sincerely,

Insert OP Team Leader Name
All Wales Overpayment Team
NWSSP Employment Services



NWSSP Payroll Services
4th Floor
Companies House
Crown Way
Cardiff
CF14 3UB

Private and Confidential

APPENDIX G - OVERPAYMENT LETTER 2

Individual remains in post

Our Ref: JEC/Assignment
Department: NWSSP Payroll Services for All Wales Overpayments
Tel: 029 21 500055

Email: NWSSP.AllWalesoverpayments@wales.nhs.uk

Date:

RE: Overpayment of Salary

Dear

Following on from our previous letter dated ** [insert date] ** we can now give more details of your overpayment. Please accept our sincere apologies for this overpayment and any upset or inconvenience it may cause you.

The overpayment is calculated as follows: -

Period of Overpayment:	
Reason for Overpayment:	
Gross Overpayment:	£
Less	
Pension:	£
PAYE:	£
National Insurance Contributions:	£
Student Loan:	£
Net Overpayment Due:	£

An invoice will be sent to you directly from your previous organisation's Finance Department so they can begin to recover this overpayment.

Contact details of the Finance Department will be shown on the invoice should you have any queries on how to make payment. As you are no longer employed by your previous Organisation the options to repay will be either by bank transfer, standing order, cheque or debit/credit card if the facility is available within the Organisation.

You can arrange an affordable monthly recovery option or choose to repay the amount in full in one payment. Ideally, the recovery of the overpayment should occur over the same time period in which the overpayment occurred. Should you wish to discuss a different recovery time frame please contact the Finance Department.

If you have any queries in relation to the calculation of the overpayment please do not hesitate to contact the NWSSP All Wales Overpayments Team by emailing NWSSP.AllWalesOverpayments@wales.nhs.uk, or contact them on **02921 500055 quoting the reference number above [JEC/assignment number]**. The team are happy to help and support both employees and managers.

We do understand that overpayments are regrettable and may cause anxiety, so we aim to answer all queries swiftly to minimise any upset or distress.



NWSSP Payroll Services
4th Floor
Companies House
Crown Way
Cardiff
CF14 3UB

Individual no longer working for the Organisation

Private and Confidential

Our Ref: JEC/Assignment
Department: NWSSP Payroll Services for All Wales Overpayments
Tel: 029 21 500055
Email: NWSSP.AllWalesoverpayments@wales.nhs.uk

Date:

RE: Overpayment of Salary

Dear

Following on from our previous letter dated ** [insert date] ** we can now give more details of your overpayment.

Please accept our sincere apologies for this overpayment and any upset or inconvenience it may cause you.

The overpayment is calculated as follows: -

Period of Overpayment:	
Reason for Overpayment:	
Gross Overpayment:	£
Less	
Pension:	£
PAYE:	£
National Insurance Contributions:	£
Student Loan:	£
Net Overpayment Due:	£

An invoice will be sent to you directly from your organisation’s Finance Department so they can begin to recover this overpayment. Contact details for the Finance Department will be shown on the invoice should you have any queries. As you are still employed by your Organisation recovery of the overpayment is possible through monthly salary deductions.

You can arrange an affordable monthly recovery option or choose to repay the amount in full in one payment. Ideally, the recovery of the overpayment should occur over the same time period in which the overpayment occurred. Should you wish to discuss a different recovery time frame please contact the Finance Department.

If you have any queries in relation to the calculation of the overpayment please do not hesitate to contact the NWSSP All Wales Overpayments Team by emailing NWSSP.AllWalesOverpayments@wales.nhs.uk, or contact them on **02921 500055 quoting the reference number above [JEC/assignment number]**. The team are happy to help and support both employees and managers.

We do understand that overpayments are regrettable and may cause anxiety, so we aim to answer all queries swiftly to minimise any upset or distress.

Recovery of overpayments will be made in line with the All-Wales Procedure for the Recovery of Overpayments which can be found on the NWSSP Payroll Services sharepoint site: [Payroll Services \(sharepoint.com\)](http://Payroll Services (sharepoint.com)). The Procedure also includes a budgeting tool to help you work out what you can afford to pay at Appendix H. You can also access support and advice from Trade Union representatives where applicable.

Yours sincerely

Insert OP Team Leader Name
All Wales Overpayment Team
NWSSP Employment Services



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Cydwasaethau
Shared Services
Partnership

Gwasanaethau Cyflogaeth yn is-adran o fewn Partneriaeth Cydwasaethau GIG Cymru
Employment Services is a division of the NHS Wales Shared Services Partnership

NWSSP Payroll Services
4th Floor
Companies House
Crown Way
Cardiff
CF14 3UB

Recovery of overpayments will be made in line with the All-Wales Procedure for the Recovery of Overpayments, a copy of which can be provided if requested.

The Procedure also includes a budgeting tool to help you work out what you can afford to pay at Appendix H. You can also access support and advice from Trade Union representatives where applicable.

Yours sincerely

Insert OP Team Leader Name
All Wales Overpayment Team
NWSSP Employment Services



NWSSP Payroll Services for All Wales Overpayments
4th Floor
Companies House
Crown Way
Cardiff
CF14 3UB

APPENDIX H – LINE MANAGER LETTER

Private and Confidential

Our Ref: JEC/Assignment
Number
Department: NWSSP Payroll Services for All Wales Overpayments
Tel: 029 21 500055
Email: NWSSP.AllWalesOverpayments@wales.nhs.uk

Date:

RE: Overpayment of Salary

Dear Manager

We are writing to let you know that a potential overpayment of salary has occurred for a member of staff that you line manage.

Details of the potential overpayment of salary are noted below:

Employee Name:

Assignment Number:

Period of Overpayment:

Reason for Overpayment:

Next Steps...

Once the overpayment has been verified and processed in ESR, both you and the employee will receive a further letter which will confirm the overpayment and show a detailed calculation of the amount. It may take up to 14 days from the date of this letter.

The employee will then be issued with an invoice from your Organisation's Finance Team with instructions on how recovery of the overpayment can be made.

As the manager of the individual who has been overpaid, please could you discuss the overpayment with them and ensure they understand the need to repay the overpaid funds and that all overpayments are recoverable regardless of fault.

The employee will need to be made aware that if they do not repay the overpayment, the Organisation has the right to engage a debt collection agency or take legal action in order to recover the debt.

Please be supportive of your employee and draw their attention to the tools at Appendix D of the Procedure mentioned below if they need help to work out what is affordable.

For full details of how the overpayment will be treated, please refer to the All-Wales Procedure for the Recovery of Overpayments which can be found on the NWSSP Payroll Services SharePoint site: [Payroll Services \(sharepoint.com\)](#)

You will also be sent an Overpayment notification form to complete electronically. The information gathered will support your Organisation to monitor overpayments, understand how they occurred and what measures have been put in place to avoid future overpayments.

If there are any questions about the overpayment, please contact the **Overpayments Team on 02921 500055 quoting the reference number above [JEC/assignment]**. The team are there to help and support employees and managers.

Yours sincerely

Insert OP Team Leader Name
All Wales Overpayment Team
NWSSP Employment Services

APPENDIX I – SALARY OVERPAYMENT DEDUCTION

Deduction direct from Salary Payment – Authorisation Form

Name:	
Assignment Number:	
Health Board/Trust/SHA:	
Department:	

I authorise NHS Wales Shared Services Partnership Payroll Services to deduct the sum of £ _____ direct from my Salary each month.

I understand that this will be deducted as a Net payment and that this deduction will continue until the overpayment £ _____ has been repaid in full.

I give my full consent for this deduction.

If my employment comes to an end, I agree that I will contact the Finance department to discuss options to either recover the outstanding balance of the overpayment from my final pay or agree how payment of the outstanding balance will be made.

Signed _____

Print Name _____ Date: _____

Once completed, please email to [Organisations to insert their accounts receivable teams email].

Finance Teams to note recovery of the overpayment is being made in instalments via salary deduction and then forward this deduction authorisation form to NWSSP.AllWalesOverpayments@wales.nhs.uk for Payroll services to action

APPENDIX J – COUNTER FRAUD INITIAL ASSESSMENT - INFORMATION REQUIRED

Individuals Name		
Pay Group / Pay Number		
NHS Organisation		
Job Title		
Pay Grade / Hours	Grade	Hours
Full/Time Part time		
Workplace / Location		
Value of Overpayment <small>Please attach O/P Breakdown</small>	Gross	Net
Period of Overpayment	Date From	Date to
Reason for overpayment		
Dept / Manager contact name and details		
Payroll Services Contact details		
Salary Overpayment contact details		
Please confirm what checks have been made to verify whether the individual has contacted Payroll Services		Checks made by: Date:
FURTHER DETAILS OF INDIVIDUAL:		
Address		
Date of Birth		
NI Number		
Bank A/C details		
Form Completed by:	Date:	
Please add any further details which may assist the Local Counter Fraud Team with their review: Please do not contact individuals without consulting your Local Counter Fraud Service team. Please report any further contact to or from the individual to the Local Counter Fraud team immediately.		

Equality Impact Assessment (EqIA) Screening Template

When to complete an EqIA Screening

An EqIA Screening Template must be completed when reviewing, changing and developing procedures/ proposals/ projects/ policies. This is a first step and is used to consider whether there are any negative impacts that may arise.

Purpose of an EqIA Screening Template

The purpose of this short exercise is to ensure that you have shown appropriate due regard when considering the impact for people with protected characteristics in your decision making. The screening process is designed to help you consider the circumstances and to inform evidence-based decisions.

If the proposal is of a significant nature and it is apparent from the outset that a full EqIA will be required, then it is not necessary to complete this Screening Template, you can proceed to complete the full [EqIA](#).

If no negative impacts are identified following completion of the EqIA screening then it is not necessary to undertake a full EqIA however, the decision and justification must be clearly recorded in this document.

On completion of the Screening Template:

- Ensure that all the white boxes within the screening are completed.
- Ensure that the Procedure/ Project/ Proposal/ Policy owner has signed and dated the Screening Template.
- Send a copy of the completed template along with the related policy or project proposal to Inclusion.hdd@wales.nhs.uk for the Diversity & Inclusion Team to review.
- Each Screening Template will be reviewed by the Diversity & Inclusion Team and feedback will be provided to the Procedure/ Project/ Proposal/ Policy owner. This may include recommendations for further action to inform robust decision-making.

Support

For further support please visit the [EqIA Sharepoint](#) or contact:

Email: Inclusion.hdd@wales.nhs.uk

Tel: 01554 899055

Director and Directorate	Workforce & OD
Service Area	People Management

Title of Procedure, Project, Proposal, Policy being screened:	Revision of the Procedure for the Recovery of Overpayments.
--	---

Description of the Procedure/ Project/ Proposal/ Policy being screened (including key aims and objectives)

A new procedure has been introduced on an All Wales basis to bring together a unified approach in how an overpayment should be handled across NHS Wales. This All-Wales procedure replaces local Health Board processes to ensure consistency by NHS Wales Shared Services Partnership Payroll Services and NHS Wales Organisations upon the identification of an overpayment. 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 and workers are treated fairly and consistently without any needless stress or worry.

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.

Evidence considered (including staff and population data, relevant research, expert and community knowledge etc.)

Evidence considered includes knowledge of the current policy and procedure and an understanding of the overpayments that occur and the feedback received regarding the impacts on staff.

An EqIA has been undertaken on an All Wales basis and evidence from this has been included within this assessment.

Assess which protected characteristics will potentially be affected by the proposal in the table below (please ✓ the relevant box to confirm positive, negative or no impact).

If at any point a negative impact has been identified (actual or potential), you do not need to proceed with the completion of this form, as a full EqlA must be undertaken: [Equality Impact Assessments \(EqlAs\) \(sharepoint.com\)](http://sharepoint.com)

Age					
Is it likely to affect older and younger people in different ways or affect one age group and not another?					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to age.					
Disability					
Is it likely to affect those with a physical disability, learning disability, sensory loss or impairment, mental health conditions, long-term medical conditions such as diabetes?					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to disability.					
Gender Reassignment					
Is it likely to affect those who either:					
<ul style="list-style-type: none"> • Have undergone, intend to undergo or are currently undergoing gender reassignment. • Do not intend to undergo medical treatment but wish to live in a different gender from their gender at birth 					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to gender reassignment					
Marriage / Civil Partnership					
Under the Equality Act, the characteristic of Marriage and Civil Partnerships is only protected in the workplace/ employment. Is it likely to affect those who are married or in a Civil Partnership? This means someone who is legally married or in a civil partnership.					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to marriage/civil partnership					
Pregnancy and Maternity					
Is it likely to affect those who are pregnant or have recently had a baby? Maternity covers the period of 26 weeks after having a baby, whether or not they are on Maternity Leave.					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to pregnancy or maternity					
Race / Ethnicity					

Is it likely to affect people of a different race, nationality, colour, culture or ethnic origin including non-English / Welsh speakers, Gypsies/Travellers, asylum seekers and migrant workers?					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to race/ethnicity					
Religion or Belief					
Is it likely to affect people who have a religion or belief? The term 'religion' includes a religious or philosophical belief.					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to religion or belief					
Sex					
Is it likely to affect people who are mostly male or female. Where it applies to both equally does it affect one differently to the other?					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to sex					
Sexual Orientation					
Whether a person's sexual attraction is towards their own sex, the opposite sex or either.					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to sexual orientation					
Armed Forces Community					
Consider whether this impacts on members of the Armed Forces and their families, whose health needs may be impacted long after they have left the Armed Forces and returned to civilian life. Also consider their unique experiences when accessing and using day-to-day public and private services compared to the general population. It could be through 'unfamiliarity with civilian life, or frequent moves around the country and the subsequent difficulties in maintaining support networks, for example, members of the Armed Forces can find accessing such goods and services challenging.'					
For a comprehensive guide to the Armed Forces Covenant Duty and supporting resource please see: Armed-Forces-Covenant-duty-statutory-guidance					
Positive Impact	<input type="checkbox"/>	Negative Impact	<input type="checkbox"/>	No Impact	X
Justification of impact identified: This procedure is applicable to all employees, ex-employees and workers of NHS Wales, there it is not envisaged that there will be an impact due to being a member of the Armed Forces Community					
Socio Economic Duty					
Consider those on low income, economically inactive, unemployed or unable to work due to ill-health. Also consider people living in areas known to exhibit poor economic and/or health indicators and individuals who are unable to access services and facilities. Food / fuel poverty and personal or household debt should also be considered.					

For a comprehensive guide to the Socio-Economic Duty in Wales and supporting resources please see: more-equal-wales-socio-economic-duty			
Positive Impact	X	Negative Impact	No Impact
Justification of impact identified: It is envisaged that this procedure will have a positive impact in relation to the socio-economic duty as the procedure includes options for more affordable, sustainable payments to recover any overpayments with extended time scales taking into account individuals' personal circumstances.			
Welsh Language Is it likely to impact on opportunities for people to use the Welsh language? The Welsh language should be treated no less favourably than the English language.			
Positive Impact	X	Negative Impact	No Impact
Justification of impact identified: The policy will be available in the Welsh language and if a member of staff wishes to engage in discussions regarding an overpayment through the medium of Welsh this will be welcomed.			

If a negative impact has been identified, you are not required to complete this form as a full EqlA must be undertaken. A full EqlA template and guidance can be found on the following link: [Equality Impact Assessments \(EqlAs\) \(sharepoint.com\)](#)

Screening Completed by:	Name	Rebecca Noyce
	Title	Assistant Head of Workforce
	Contact details	Rebecca.noyce@wales.nhs.uk
	Date	03/12/2024
Screening Authorised by: (Directorate level owner of the procedures/ proposals/ projects/ policy)	Name	Heather Hinkin
	Title	Assistant Director of People Management
	Contact details	Heather.hinkin@wales.nhs.uk
	Date	3.12.2024
Guidance has been provided by Diversity & Inclusion Team:	Name	Eiddan Harries
	Title	Diversity and Inclusion Manager
	Contact details	Eiddan.harries@wales.nhs.uk
	Date	29.07.2025
Diversity and Inclusion Team additional Comments:		

Please note: The D&I team will save a copy of the completed form for reference. If any changes are made after the date of review, it is the directorate's responsibility to update the EqlA and inform the D&I team.

Date:-	Jun-25 Name of All Wales Policy	Last Issue Date
	Disciplinary	Mar-17
	Organisational Change	Mar-17
	Capability	Jun-18
	Managing Attendance at Work	Oct-18
	Menopause	Dec-18
	Respect and Resolution	Jul-24
	Employment Break Scheme	Jan-20
	Reserve Forces Training and Mobilisation	Mar-20
	Procedure for NHS Staff to Raise Concerns	Sep-23
	Pay Progression	Jan-20
	Special Leave	Dec-20
	Recruitment and Retention Payment Protocol	Dec-20
	Secondment	Jul-21
	Flexible Working	Jan-24
	Pregnancy Loss Support	Sep-24
	Flexible Pensions	Oct-24
	Job Evaluation	Dec-24
	Upholding Professional Standards in Wales	Oct-15

At its meeting held on 8 June 2023, the Welsh Partnership Forum Business Committee, agreed to a r

The core element of this approach is to move away from using a review date as a prompt for review
All Wales W&OD policies remain extant until replaced by an updated version approved by the Welsh
NHS Wales Employers will issue this schedule on a quarterly basis as confirmation of policies remain

*Extant - legal term derived from Latin for still in existence/still live

Original Planned Review Date	Currently Under Review	Current Position
Mar-20	Yes	Remains Extant*
Mar-20	No	Remains Extant*
Jun-21	Yes	Remains Extant*
Dec-21	Yes	Remains Extant*
Dec-21	No	Remains Extant*
N/A	No	Remains Extant*
Jan-23	No	Remains Extant*
Apr-23	No	Remains Extant*
May-23	Yes	Remains Extant*
Oct-23	No	Remains Extant*
Jan-24	No	Remains Extant*
Apr-24	No	Remains Extant*
Jul-24	No	Remains Extant*
N/A	No	Extant*
N/A	No	Extant*
N/A	No	Extant*
N/A	No	Extant*
Oct-18	No	Remains Extant*

revised approach to the review of All Wales policies and procedures.

of an existing policy, to recognise key prompts for review and to provide an option for a transaction Partnership Forum.

ing extant to provide clarity and support organisations from a governance and assurance perspective

ial review where changes/updates to an existing policy are more administrative than material.

Frequently Asked Questions - Underpayments of Salary

1. Why does an underpayment of salary occur?

An underpayment can occur when an employee/worker, or an ex-employee/worker, is underpaid what they are due under their contractual or statutory entitlement. Normally underpayments arise as the result of either an 'error of calculation', which results in too little, no payment being made, or as the result of incorrect, insufficient or late notification of a change to the individual's circumstances or contract of employment.

2. Will I be paid correctly once an underpayment has been identified?

Yes, where an underpayment has occurred the Health Board has a duty to ensure that the underpayment is rectified as soon as reasonably practicable to avoid any financial detriment or hardship for the individual.

3. When will I receive the underpayment?

Normally, the underpayment will be rectified in the next pay run unless the underpayment is for a bank worker.

Bank workers may receive the underpayment in the supplementary payroll on the last working day of each month, via an emergency payment or in the next pay run.

For employees, where an underpayment is a significant percentage of their normal salary and the underpayment was not as a result of their own action or inaction, the employee can request (via their manager) payment via the supplementary pay run. The manager will then consider the merits of the request in conjunction with a member of their local Workforce Team. The Senior Workforce Manager will advise payroll of any supplementary payments to be made.

4. How can I help reduce the number of underpayments that occur?

Every individual has a responsibility for checking their payslip in a timely manner and advising their manager or Payroll in writing or via email/telephone if they have been underpaid by any amount.

- Managers have a responsibility to process any pay impacting changes in a timely manner and before the payroll closes each month. Managers must also email details of an underpayment to Payroll within 24 hours of notification or identification of an underpayment.

5. Will I be compensated for any bank charges incurred as a result of the underpayment?

The Health Board will consider compensating individuals where they can demonstrate they have incurred costs such as bank charges directly caused by the underpayment being attributable to the employer. Evidence of such charges will need to be emailed to the manager before a decision can be taken to recompense an individual for charges incurred. Any charges recompensed will be paid in the next pay run.

6. Who do I contact about an underpayment in my pay?

Where an underpayment is identified, you must contact your manager in the first instance. Where the underpayment has been agreed, the manager must inform Payroll within 48 hours so that payment can be made. Payment will be made in the next available pay run.

7. I no longer work for the Health Board, who do I contact about an underpayment in my pay?

Where an underpayment is identified, the ex-employee/worker must contact their former manager in the first instance. Where the underpayment has been agreed, the manager must inform Payroll within 48 hours so that payment can be made. Where the supplementary payroll has already been run and the P45 issued, payment will be made in the next available pay run. HMRC will be notified electronically once the payment has been made so that an adjustment to taxable pay can be made at source.