

BRISTOL CITY COUNCIL
HUMAN RESOURCES COMMITTEE
For Information
8th July 2010

Report of: Strategic Director: Resources

Title: Equal Pay Audit

Ward: Citywide

Officer Presenting Report: Karen Stephens / Deborah Davinson,
HR Advisers

Contact Telephone Number: (0117) 92 22165 & (0117) 35 21319

RECOMMENDATION

The Committee is asked to endorse the contents of this report.

Summary

To inform this Committee of the results of the Council's Second Equal Pay Audit which was conducted during 2007/2008.

Pay differences between men and women were not found to be significantly different for the majority of the workforce. Some areas of the Council/Schools have been identified in the audit as requiring further work, as set out in the accompanying Executive Summary (Appendix a).

1. Policy

The City Council is committed to the principle of equal pay by its Integrated Equalities Policy and Equal Pay Policy.

Although it is not a legal requirement to undertake an Equal Pay Audit, the Code of Practice on Equal Pay published by the Equality Human Rights Commission in 2003 recommends "equal pay

reviews as the most appropriate method of ensuring that a pay system delivers equal pay free from sex bias." An audit should compare the pay of men and women doing equal work, identify any equal pay gaps and eliminate gaps that cannot be satisfactorily explained on grounds other than sex.

2. Consultation

2.1 Internal

An equal pay audit was conducted by consultation group which was set up to conduct the Audit. This consisted of management, HR and trade union representatives. The final report was shared with the trade unions on 18th June 2010.

2.2 External

The audit was based upon advice and guidance from the EOC and CRE. Examples and audits by other authorities were also considered.

3. Context

3.1 The first Equal Pay Audit was undertaken by Bristol City Council the period; 1st April 2004 – 31st March 2005. This provided some of the base line data that was used for this Audit which considered:-

- school teachers' pay and conditions;
- factorised pay;
- pay protection;
- single status pay against the equality strands which are; age, gender, disability, ethnicity, religion and belief and sexual orientation; and
- comparing baseline data from the inaugural audit against this audit to see if there were any differences.

3.2 The Council already has a number of policies and systems to support equal pay and which contribute to minimising the gender pay gap. These include alignment to an agreed national grading structure, consistent incremental progression practices, underpinned by an effective (Single Status) Job Evaluation (JE) Scheme. The Single Status JE scheme applies to the majority of City Council employees and is designed to be free of sex bias. In addition to this, the City Council have a number policies and initiatives which promote and support fair and equal treatment such as the Work-Life Balance policy, Equal Pay & Pay policy, the Working Arrangements policy, staff development programme

and Recruitment and Selection Policy. Part time employees receive the same hourly rate of pay as full time employees.

4. Key findings and recommendations

- 4.1 Further to the first Equal Pay Audit, a further Audit was undertaken based upon 2007/2008 data, for the purposes of reviewing this data against elements of baseline data and adding some additional information, for example, in relation to teachers. Completing the audit was a significant undertaking requiring exceptional amounts of data analysis and research. The report was finalised during Autumn 2009 and publication has been delayed as a consequence of changes in personnel following the re-organisation of the Council's HR function.
- 4.2 The 2007/2008 Audit included all employees covered by Single Status and Teaching pay scales. It covered all equalities strands in addition to gender.
- 4.3 The Executive summary is attached (Appendix a) together with the Equalities Impact Assessment (Appendix b). The full Equal Pay Audit will be published on the council's website.
- 4.4 The Executive Summary details the main findings, conclusions and recommendations of the Audit. The key finding of the Audit was that the pay difference between men and women was not found to be significantly different for the majority of the workforce. There were some areas affecting distinctive work groups where the findings were found to be statistically significant ie. pay difference in excess of 5% when considering **all** of the equalities strands. They were as follows;
 - 16-24 year olds were found to earn less than other age groups in some single status grades.
 - 50-64 and 65+ year olds were found to earn more than other age groups in some single status grades.
 - A variety of systems of factorised pay across council directorates which leads to disparities between men and women and vice versa in some areas.
 - Female teaching staff in schools earn less than their male counterparts in the (TLR2) Teaching & Learning Responsibility 2 payments, Deputy Heads and Assistant Heads.
- 4.5 The Audit also found that women were less likely to be displaced and receive pay protection than men.
- 4.6 In view of the above findings a number of recommendations have been made. They are:-

- To further analyse data where it was found to be statistically significant.
 - To put in place a uniform factorisation system applicable to all City Council employees, except school based employees
 - To undertake an audit of non-BG graded posts within BCC
 - To ascertain if, within career graded posts, males and females are progressed equally.
 - To undertake further pay audits as per the Equality Act 2010.
 - Governing bodies will be asked to consider the findings of this report; review reasons/causes of differences, and where reasonably practical, put in place measures to mitigate/eliminate these differences.
- 4.7 The recommendations from the Audit will be taken forward as part of the HR service delivery plan with milestones for action being published in due course, and will be included in Directorate Annual workforce Plans 2010/11 (as required).
- 4.8 Separate arrangements will be made in relation to recommendations submitted to locally managed schools as above.

5. Other Options Considered

Not Applicable.

6. Risk Assessment

There is a risk that Equal Pay Claims could be lodged as a consequence of some of the findings in the Audit. However, claims can only be brought on the grounds of gender inequality. As long as the council put in place measures to address the recommendations in the Audit the prospects of successful equal pay claims is considered to be low.

7. Equalities Impact Assessment

A copy of the Equalities Impact Assessment was undertaken as part of this exercise and is attached as Appendix b.

Legal and Resource Implications

Legal:

This Report highlights the outcome of the Council's Equal Pay Audit. The Equality and Human Rights Commission identifies an equal pay audit as the most effective way of establishing whether an organisation is providing equal pay and rewarding employees fairly in practice.

Any differences in pay between men and women who carry out equal work should be capable of being objectively justified. Where any such inequality in pay has been identified, an action plan should be put in place to address the problem.

(Advice from Husinara Jones on behalf of the Head of Legal Services).

Financial:

(a) Revenue

There are no Financial implications arising from this report. Any implications arising from future work relating to the audit recommendations will be assessed at the appropriate time.

(Advice from Stephen Skinner, Finance Business Partner : Resources, Transformation & Deputy Chief Executive)

(b) Capital Not applicable.

Land: Not applicable.

Personnel: As set out in this report.

Appendices:

Appendix a - Executive Summary

Appendix b - Equalities Impact Assessment

**LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985
Background Papers:**

None.

Bristol City Council Equal Pay Audit 2007/08

EXECUTIVE SUMMARY

An Equal Pay Audit was undertaken of pay data within Bristol City Council using data from the 2007 / 08 financial year.

The audit looked at;

- teachers' pay and conditions
- factorised pay
- pay protection
- single status pay against equality strands
- comparing the inaugural audit (baseline data) against findings from the 2nd equal pay audit to determine significant differences

Excluded from this Audit were employees who were **not** covered by single status or teaching pay scales.

Findings

According to the Equality and Human Rights Commission (EHRC) guidelines any difference in pay between men and women in excess of 5% is significant. Although BCC pay differences between men and women are below this 5% 'significance' value in most cases, a number of gender / pay differences were identified in;

- ❖ Factorised pay in CSS and CYPS HQ
- ❖ Data by minority groups (within specified grade ranges)
- ❖ Teachers basic pay, including Head Teachers, Deputy Heads and Assistant Heads
- ❖ Teaching allowances

The current Workforce of Bristol City Council has a composition of;

	Male	Female	Disabled	BME	LGB	16-24	65+
Employees as a % of non-teaching workforce	27.20%	72.80%	5.49%	6.88%	2.94%	3.56%	1.92

	Male	Female	Disabled	BME	LGB	16-24	65+
Teaching staff	23.32%	76.63%	1.9%	2.07%	2.61%	4%	1.39%
Representation in the local community (2001 census)	53.81	46.19	7.07	6.70 11.1%*	N/A	17.28%	1.37%

(as of December 2008 HR Diversity Statistics)

** = according to Office of national statistics, estimated figures.*

Note Teaching staff data from March 2009 – %s are recorded as a % of Total

Considering the diversity of BCC workforce, it is important the Bristol City Council ensures all equality groups receive equal pay for work of equal value.

Comparisons against the first equal pay audit

An audit of a sample number of Single Status grades was undertaken for both full and part time average hourly basic pay differences between men and women. All differences were found to be less than 5%, so statistically insignificant according to the EHRC guidelines.

Average rate of pay for equality groups

Age There are two equality groups within age – those who are aged 16– 24 and those who are 50+ (although for analysis purposes the categories are 16–24, 50–64 and 65+).

16 – 24 age category – the analysis shows that this age group earns significantly less than other age groups at BG8 upwards. One likely reason for this is that young employees are more likely to have a short length of service with BCC and therefore will not have progressed through the pay bands, which commonly have differences in the region of 10% between the top and bottom of the pay scale.

50 – 64 age category – The analysis revealed in all cases (apart from BG13–14) full time employees aged 50–64 earn more than the other age groups working full time. There are differences in excess of 5% and they are within BG grades 8 to 12 inclusive and BG18+. The differences for part time employees are less than 5% for all BG grades.

65+ age category – the analysis revealed the differences in basic hourly rate of pay for full time employees between grades BG1 – 9 is less than 5%. However, between grades BG10 – BG14, they earn in excess of 5% more than other age groups, the biggest percentage difference is 10.76% at BG10–12. For part-time employees all differences found were less than 5%, so not statistically significant.

Disability

Full time disabled employees with the exception of BG15 – 17 earn more than non disabled employees within their respective grade category, but all differences are less than 5%. At BG18+, disabled employees earn 22.65% more than non disabled employees of the same group. However, it is worth noting that within this grade, data sets are relatively small. Any differences in part time disabled employees average hourly rate of pay was found to be less than 5%.

BME

Depending upon the BG grade, full time BME employees earn either more or less than non BME employees. However the differences are significantly below 5%. An exception occurs at BG18+, where BME employees earn 13.3% less than non-BME employees. However, it is worth to note that within this grade, data sets are relatively small.

All part time BME employees earn less than non BME employees. At BG15–17, the difference is significant at 6.64%. There are no BME employees at BG18+.

LGB

Depending upon the BG grade, full time LGB employees earn either more or less than non LGB employees. However the differences are significantly below 5%. An exception occurs at BG18+, where LGB employees earn 15.64% less than non-LGB employees. However, it is worth to note that within this grade, data sets are relatively small.

For part time LGB employees the only statistically significant figure is at BG8–BG9, whereby LGB employees earn 5.24% more than non-LGB employees within the same pay band. There are no LGB employees at BG15+.

Religion

For full time employees there were no significant differences in the average hourly rate of pay between religions/faiths. For part time employees the only significant difference was found at BG15–17, where it was found other religion/faiths earn

11.63% more than those declaring as Christian.

Teaching staff

Complexities in the pay arrangements for teaching staff have created challenges for effective data analysis. Some of the data sets used were extremely small and care should be taken when interpreting the data within the main body of the report. Analysis by the minority groups was not possible again due to small data sets. However, the main differences were found in the TLR payments and payments for Head Teachers and Deputy Head Teachers. Further research into these pay elements has been recommended.

Pay Protection

Pay protection is applied to employees who face a reduction in their remuneration through managing change processes. Section 7 of this report provides details of the analysis of pay protection which was undertaken.

Whilst women occupy approximately 73% of posts within BCC, they represented just under 56% of pay protected posts. ie, based on their representation within the workforce women are disproportionately less likely to be in receipt of pay protection than men.

At the time of undertaking this audit 348 posts had pay protection applied to them. Of these, 181 were held by women and 167 were held by men.

In summary, the difference between the average pay protection for males and females was found to be insignificant at 1.043% – with women receiving a slightly higher average level of pay protection.

Factorised Pay

For the purposes of this audit, support staff employed by the Governing body of schools and nursery staff were excluded from the analysis of factorised pay because of a new national agreement for support staff in schools being introduced, anticipated September 2010.

682 staff records across the Directorates were analysed for factorised pay comparison. It was found that whilst there are a large number of individual factors in use throughout BCC, most staff are on one of about 10 main factor calculations which are used.

A significant difference in pay was found for part time female employees in CYPS on factorised pay, who earned on average 9% less than their male part time colleagues on factorised pay. Furthermore, full time female employees in CSS in receipt of factorised pay earn on average 36.86% more than their male full time colleagues on factorised pay. The analysis is detailed in section 7G and appendix 20.

CONCLUSION

Having analysed the above, significant pay differences (in excess of 5%) were found for the following groups, where there were more than 10 individuals in the data set. Please note, further analysis will be required to determine why there are pay differences.

- 16–24 year olds were found to earn less than other age groups in some single status grades.
- 50–64 and 65+ year olds were found to earn more than other age groups in some single status grades.
- Part time female employees in CYPS who are in receipt of factorised pay, earned on average 9% less than their male part time colleagues on factorised pay. Full time female employees in CSS who are in receipt of factorised pay earn on average 36.86% more than their male full time colleagues on factorised pay
- Female teaching staff earn less than their male counterparts in the TLR 2 payments, Deputy Heads and Assistant Heads, however further analysis is required to determine why.

There follows a summary by category who earn 5% more or less than their opposite gender.

Category	Status and grade	% difference	Numbers in data set
Age – 16–24	F/T BG8–9	6.3% less	86 16–24 yr olds 1600 other age
Age – 16–24	F/T BG10–12	15.33% less	13 16–24 yr olds 1785 other age
Age – 16–24	P/T BG8–9	6.32% less	99 16–24 yr olds 1798 other age

Age - 50-64	F/T BG8-9	9.01% more	511 50-64 yr olds 1175 other age
Age - 50-64	F/T BG10-12	7.78% more	557 50-64 yr olds 1241 other age
Teachers - TLR 2 payment	F/T	5.16% female less	152 males on TLR 2 411 females on TLR 2
Deputy Heads	F/T	6.94% female less	43 male deputy heads 102 female deputy heads
Assistant Heads	F/T	5.67% female less	46 male assistant heads 58 female assistant heads

Further research is suggested into pay differences amongst teaching staff.

All other categories that were analysed and can be found in the main body of the report were found to have pay differences of less than 5%.

Pay and grading within schools is determined by respective governing bodies, who may adopt varied approaches and practices. Governing bodies will be recommended to consider the outcomes of this review to determine differences and to construct a plan to counter these differences.

RECOMMENDATIONS

- To further analyse data where it was found to be statistically significant.
- To put in place a uniform factorisation system applicable to all City Council employees, (except school based employees).
- To undertake an audit of non-BG graded posts within BCC
- To ascertain if, within career graded posts, males and females are progressed equally.
- To undertake further pay audits as per the [Equality Act 2010](#)

- Governing bodies will be recommended to consider the findings of this report; review reasons/causes of differences, and where reasonably practical put in place measures to mitigate/eliminate these differences.

9.0 EQUALITIES IMPACT ASSESSMENT

Equalities Impact Assessment Worksheet for Equal pay audit

Identify the aims of the policy/service/function and how it is implemented

1.1 Is this an existing or a new policy / function?

Answer

- This is the second Equal Pay Audit undertaken by The City Council. An initial audit was undertaken during the 2005/06 financial year using 2004/05 data from Workforce and Payroll. It was agreed that a further Equal Pay Audit be undertaken during the 2008/09 financial year with a completion date of March 2009

Action

- Audit to be undertaken within agreed scope and findings to be reported according to the Project Initiation Document (PID)

1.2 What is the aim, objective or purpose of the policy/ service/ function?

Answer

- To determine whether BCC meets EHRC recognised criteria for equal pay.

Action

- Audit teachers pay
- Audit factorised pay within the council, except for schools
- Audit pay protection within the council
- Analyse data in relation to ethnicity, disability and LGB – subject to available data – across the workforce
- To compare the 2008/09 audit against the inaugural audit (baseline data) to determine and differences
- Further analyse tied accommodation emoluments

1.3 What outcomes do you want to achieve with this policy / function and for whom?

Answer

For the organisation:

- To protect the organisation from equal pay claims
- To test the implementation of the pay policy to ascertain any differential impact on specific groups of employees
- To satisfy the objectives of the Pay and equal pay policies both centrally and for schools and teaching staff
- To generate an action plan as necessary to address any issues arising from the audit

For employees

- To strive to ensure that employees receive equal pay for work of equal value
- To strive to ensure that certain groups of employees are not directly or indirectly discriminated against

Action

For the organisation

- Specific actions will arise out of the findings of the audit. These may include further and more detailed research into specific pay bands or work groups and policy review

For employees

- Organisational actions– as above– will impact on employees.
- Depending on findings, some employee groups may wish to propose actions

1.4 Who is the policy/function being aimed at / who are the main stakeholders?

Answer

- Project Board,
- People Performance Board,
- Corporate Equalities,
- HR managers,
- Assistant HR managers,
- Trade Unions,
- Self Organised Groups

Action

- Regular updates via meetings with Project Board
- Updates with Project Manager – Andrew Stephens
- The final report will be available to all employees via the intranet

1.5 Who defines or defined the policy / function? How much room for manoeuvre is there?

Answer

- The project is defined via the Project Initiation Document and Terms of Reference which were agreed by the Project Board

Action

- Revisions / amendments to be made to the PID and / or Terms of Reference via consultation with the Project Board if required. PID has been amended on several occasions between the end of November 2006 and mid September 2008, based on revisions to the project scope

1.6 Who implements the policy function? Is it possible for bias/prejudice to creep into the process?

Answer

- The Pay Policy (adopted 26 July 2007 and correct as at April 2008), is authorised and owned by the Corporate Development HR Team.
- The Council's Pay Strategy has been established via the Council's Corporate Plan, the HR Strategy, Workforce Plan and Equal Pay Policy. The City Council supports the principles of national and local collective agreements on determining the remuneration of its employees. This reduces the likelihood of bias and prejudice.
- A separate model pay policy exists for locally managed schools and centrally employed or unattached teachers. This is dated 2007 and is the responsibility of a committee of the Governing Body
- The Equal Pay Policy is authorised and owned by the Equalities and Social Inclusion team.

Action

- In line with a commitment for a review every two years, the Equal Pay Policy should be reviewed in 2009 following publication and agreement of the findings and actions arising of the second equal pay audit

1.7 How do these outcomes (see 1.3) meet or hinder other policies, values or objectives of the public authority

Answer

- The City Council strives to ensure that its pay systems are fair and non-discriminatory. The outcomes of the equal pay audit meet the council's policy on equal pay, its workforce strategy (recruitment and retention, employer of choice and workforce diversity)
- The undertaking of an equal pay audit with the identified outcomes supports the council's application for equality standard level 4
- Even where policies are in place (such as market supplement payments) the process for applying these has to be checked by legal services and senior HR managers prior to application to avoid bias or indirect discrimination

Action

- Undertake check on policies and processes listed above after completion of the equal pay audit to identify any conflict or issues arising

1.8 What factors or forces are at play that could contribute or detract from the outcomes identified in 1.3?

Answer

- A greater number of legal cases have been heard since the first audit was undertaken and the rulings arising from these help to inform this second equal pay audit. Furthermore the Court of Appeal and House of Lords are set to rule in a number of major test cases this year (2009), which will steer a way for how equal pay litigation will be conducted in the future.
- Review of tied accommodation emoluments is being undertaken. An equality impact assessment will be undertaken as part of that work
- A national review of school staff terms and conditions is proposed for 2009
- Business transformation is resulting in a downsizing of the organisation – especially at senior management level. This may have an impact on the gender distribution and diversity within those tiers. Equality impact assessments have been undertaken for the 2nd and 3rd reviews and the review of the associated PA / secretarial staff
- A review of third tier pay is taking part as part of the third tier review. The proposal will create three scales for 3rd tier officers (BG16 to BG18). An EqiA has been undertaken. It is as yet unknown what the diversity at this tier will

be

Action

- The impact of the above will have to be monitored over time to identify whether a differential impact on any equality group / particular work group is discernible

1.9 Consider if any of the six equalities groups have particular needs relevant to the equal pay audit.

Answer

Recent data published by the Equality and Human Rights Commission (“Pay Gap Across Equalities Areas”, Winter 2008

www.equalityhumanrights.com/en/publicationsandresources/Pages/PayGapsAcrossEqualitiesAreas.aspx) states that there is persistent gender disadvantage across equalities areas. Data below is quoted from this report. The information stated is simplified from the executive summary of the above report. It is important to point out that there is likely overlap / linkages between some categories – such as ethnicity and religion, which make the data more complex. Data used relates to full time workers only

- **BME:** All groups of ethnic minority women and men, except Indian and Chinese men, experience pay gaps relative to white British men. All ethnic minority women had pay gaps relative to White British men.
- **LGB:** Women in same sex couples did not experience a pay gap relative to married men. Married and single women experienced a pay gap relative to married men. Men in same sex couples did not experience a pay gap relative to married men. Single men had a pay gap of 39% relative to married or cohabiting men. The report is clear to point out that care must be taken not to generalise these findings as representative of the lesbian, gay and bisexual population
- Existing data relating to LGB employees at Bristol City Council is limited making meaningful data analysis challenging
- **Age:** It is unlikely to be age that is a key factor determining pay gaps, and the explanation is that older people are different – with different jobs, different (and on average lower) levels of qualifications – than those who are currently in their prime earning years. Women's pay fell behind in their late 30s and from this age onwards they experienced substantial pay gaps relative to prime aged men (40 – 44)

- Disability: Nationally, Disabled men and disabled women are disadvantaged compared to non-disabled men. Disabled women are particularly disadvantaged regardless of whether they have low or high qualifications, relative to similarly qualified non disabled men. Disabled women had a pay gap of 22% relative to non disabled men. Disabled men can expect to be paid better not only than disabled women but also than non-disabled women
- Religion & belief: Women of all religious denominations (and those with none) had pay gaps relative to Christian men
- Gender: Official, national figures show that women's pay has slipped further behind men's. The 2008 annual Survey of Hours and Earnings reported the full-time pay gap was 17.1 % in the year to April 2008, up from 17% the year before, and the part-time pay gap rose from 35.8% to 36.6%

Note: Qualifications have an important levelling power. Pay gaps across equality areas are partly due to different average levels of qualifications across the groups concerned. Pay gaps vary considerable across the range of qualifications. The gender pay penalty of women with higher qualifications compared to men with higher qualifications is substantially smaller than the pay penalty among those with lower qualifications. The area of qualifications has not been explored as part of this equal pay audit.

Further work is needed nationally to identify whether or not people's pay really decreases as they get older or whether this is in reality linked to qualifications, work experience or different types of work histories.

Action

- Through the equal pay audit try to establish whether figures within Bristol City Council are in line with or contrary to the research findings presented above
- identify whether any changes in data have occurred between the first and second equal pay audit

1.10 Taking the six strands of equalities is there anything in the equal pay audit that could discriminate or disadvantage any of these groups?

Answer

This is the first time that this level of data analysis for the different equality groups in relation to full and part time work has been undertaken. There is

therefore no comparison data to benchmark again

Publication of the findings and review of policies if necessary should raise levels of awareness and reassure employees that they are receiving a fair remuneration for their work regardless of equality status

- BME: Lack of available data will limit data collection, analysis and interpretation within Schools
- LGB: Lack of available data will limit data collection, analysis and interpretation
- Age: it is acknowledged that the organisation has a low level of young employees
- Disability: Lack of available data will limit data collection, analysis and interpretation within Schools
- Religion & Belief: Lack of available data will limit data collection, analysis and interpretation
- Gender:

Action

- The findings from this audit will add to a growing body of data which will build over the years to allow improved / more detailed data analysis in the future

1.11 From your perspective, how does or will the equal pay audit actually work in practice for each equalities group?

Answer

- The impact of the audit can only be ascertained once the data has been analysed and any pay differences are highlighted and interpreted. Pay differences per se between men and women and equality groups do not necessarily mean that discrimination is taking place. Some pay differences are objectively justifiable
- The audit provides data which allows the organisation to assess whether its pay policy is working effectively and whether there are areas of pay which need to be reviewed or investigated further to eliminate any pay discrimination
- The findings will inform future decision making and workforce planning
- The findings may provide certain equality groups with information upon which to base recommendations for change within BCC to ensure that

members within that equality group are paid fairly

Action

- Findings to be communicated to the equality groups for discussion

1.12 How does the local authority interface with other bodies in relation to the equal pay audit?

Answer

- Bristol City Council is part of regional and national network groups. The process of undertaking the audit and the findings arising can be shared with these networks and compared to their data to establish benchmarks and benefit from best practice in other authorities

Action

- Key data to be shared as appropriate with regional and national networks to establish benchmarks, identify comparator data and identify good practice

Consideration of available data, research and information

2.1 What do you already know about pay and work groups within the council?

Answer

- Data is available from Payroll and Workforce systems as well as from the regularly produced management information compendium
- Data from the first equal pay audit is available
- National data is available from trade unions and national research eg Equality and Human Rights Commission

Action

- Utilise available data to triangulate findings and to establish meaningful comparisons for the information arising from the 2007/08 data

2.2 What quantitative data do you already have?

Answer

- See http://intranet.bcc.lan/ccm/cms-service/stream/asset/?asset_id=1800542

2.3 What additional information is needed to ensure that all equality groups' needs are taken into account? Do you need to collect more data, carry out consultation at this stage?

Answer

- Data collection and consultation processes are set out in the Project Initiation Document and Terms of Reference
- Information arising from the data analysis will show whether the data collected is sufficient to provide meaningful data upon which to base recommendations

Action

- Further data collection may be undertaken for future equal pay audits

Assessment of Impact

3.1 Have you identified any differential impact on any group and does this adversely affect any groups in the workforce?

Answer

- The equal pay audit report will identify any differential impact on any groups. The focus of the project is on equality groups within the workforce

Action

- Equal Pay Audit report to highlight any differential impact on specific equality groups

3.2 Is the application of the pay policy directly or indirectly discriminatory

Answer

- Patterns of pay for full time and part time staff within different equality groups and across different grades will be highlighted by the equal pay report
- Teachers pay will also be considered in line with the scope of the project

Action

- Differences in pay which can not be objectively justified will be highlighted and where necessary the relevant policies will be reviewed

3.3 If there is an adverse impact can it be avoided, can we make changes, can we lessen it etc?

Answer / Action

- Specific interventions can only be suggested once the data and findings are available. It may be that in some cases pay reviews and alignment can address the adverse impact or that training for specific groups of staff and career progression opportunities can be developed to reduce any existing pay gaps and pay penalties

3.4 Does the equal pay audit meet any particular needs identified for any of the equalities groups?

Answer

- The audit aims to ascertain whether there are any pay gaps between different employee groups which can not be objectively justified. National data suggests that pay inequalities exist particularly between men and women but also between disabled and non disabled employees and white British employees and those from ethnic minorities

Action

- Data arising from the audit will be presented by equality group

3.5 Are there additional measures that could be adopted to further equality of opportunity in the context of this policy/service/function?

Answer/ Action

- Specific interventions can only be suggested once the data and findings are available. It may be that in some cases pay reviews and alignment can address the adverse impact or that training for specific groups of staff and career progression opportunities can be developed to reduce any existing pay gaps and pay penalties

Formal Consultation

4.1 Who do we need to consult with

Answer/ Action

- Project Board (incorporating trade unions) – during the project
- Project Manager – during the project
- Self Organised Groups – once data and findings are available
- Corporate equalities group – once data and findings are available
- WDWG– once data and findings are available

4.2 What method / form of consultation can be used?

Answer / Action

- Meetings
- Discussion

Monitoring

5.1 Who will carry out monitoring?

Answer/ Action

- Corporate Development HR team
- Corporate Equalities team

5.2 What needs to be monitored?

Answer/ Action

- Implementation of actions arising

5.3 What method(s) of monitoring?

Answer/ Action

- Periodic data review
- Policy review

5.4 How will the monitoring information be published?

Answer/ Action

- Via The Source
- to WDWG
- To HRC
- To HRMT

6.1 What are the key changes between the existing policy and the proposed one

Answer

- Not known as yet if any policy changes will be required

6.2 Is there any anticipated disproportionate impact on any of the six equalities groups from these specific changes?

Answer

- General: No

EIA Draft Action Plan

Action	Lead	Timescale	Outcome
<ul style="list-style-type: none">● Audit teachers pay● Audit factorised pay within the council, except in schools● Audit pay protection within the council● Analyse data in relation to ethnicity, disability and LGB – subject to available data – across			

<p>the workforce</p> <ul style="list-style-type: none"> ● To compare the 2008/09 audit against the inaugural audit (baseline data) to determine and differences ● Further analyse tied accommodation emoluments 			
<p><u>For the organisation</u></p> <ul style="list-style-type: none"> ● Specific actions will arise out of the findings of the audit. These may include further and more detailed research into specific pay bands or work groups, policy review,. <p><u>For employees</u></p> <ul style="list-style-type: none"> ● Organisational actions- as above- will impact on employees. ● Depending on findings, some employee groups may wish to propose actions 			
<ul style="list-style-type: none"> ● Regular updates via meetings with Project Board ● Updates with Project Manager – Andrew Stephens ● The final report will be available to all employees via the intranet 			
<ul style="list-style-type: none"> ● Revisions / amendments to be made to the PID and / or Terms of Reference via consultation with the Project Board if required. PID has been amended on several occasions between the end of November 2006 and mid September 2008, based on revisions to the project scope 			
<ul style="list-style-type: none"> ● In line with a commitment for a review every two years, the Equal 			

<p>Pay Policy should be reviewed in March 2009 following publication and agreement of the findings and actions arising of the second equal pay audit</p>			
<ul style="list-style-type: none"> • Undertake check on policies and processes listed above after completion of the equal pay audit to identify any conflict or issues arising 			
<ul style="list-style-type: none"> • The impact of the above will have to be monitored over time to identify whether a differential impact on any equality group / particular work group is discernible 			
<ul style="list-style-type: none"> • Through the equal pay audit try to establish whether figures within Bristol City Council are in line with or contrary to the research findings presented above • identify whether any changes in data have occurred between the first and second equal pay audit 			
<ul style="list-style-type: none"> • The findings from this audit will add to a growing body of data which will build over the years to allow improved / more detailed data analysis in the future 			
<ul style="list-style-type: none"> • Findings to be communicated to the equality groups for discussion 			
<ul style="list-style-type: none"> • Key data to be shared as appropriate with regional and national networks to establish benchmarks, identify comparator data and identify good practice 			

<ul style="list-style-type: none"> ● Utilise available data to triangulate findings and to establish meaningful comparisons for the information arising from the 2007/08 data 			
<ul style="list-style-type: none"> ● Further data collection may be undertaken for future equal pay audits 			
<ul style="list-style-type: none"> ● Equal Pay Audit report to highlight any differential impact on specific equality groups 			
<ul style="list-style-type: none"> ● Differences in pay which can not be objectively justified will be highlighted and where necessary the relevant policies will be reviewed 			
<ul style="list-style-type: none"> ● Data arising from the audit will be presented by equality group 			