

**UNIVERSITY OF  
CHANGE  
FOR GOOD  
WESTMINSTER**

# **Staff Equality, Diversity & Inclusion Annual Report 2018-19**

## **Appendix – Equal Pay Audit 2019.**

**Prepared by:  
HR Systems  
Resourcing and Reward**

## **EXECUTIVE SUMMARY**

An equal pay review is an analysis of an organisation's pay structure in order to identify and eliminate any gaps that cannot satisfactorily be explained on objective grounds other than gender. The overall gender pay gap is reflective of the distribution of men and women across pay grades as well as any pay discrimination [Equality Challenge Unit: Promoting Equality in Pay, April 2010]. In the context of a Higher Education Institution that has undertaken pay modernisation, as Westminster has, there are few significant pay gaps within grades, and the overall ratio of female to male pay will be determined largely by the gender distribution across grades. This may raise issues in relation to equality and diversity, which are important and require action, but are outside the scope of the equal pay review itself.

**The main conclusion from carrying out this Equal Pay Audit is that the University does not have any significant need for concern over equal pay issues when comparing employees within current grades.**

The UCEA Employment Bulletin in August 2016 noted *"The existence of a gender pay gap should not be conflated with unequal pay, as legally defined....a company can have a large gender pay gap and no equal pay problems while another can have no gender pay gap but have vulnerability to equal pay challenges."* It is therefore important to remain vigilant to any possible challenges to equal pay.

The University implemented a Transformation Project which resulted in a new organisational structure from 1 August 2018. A precursor to this was a voluntary severance programme which was effected on 1 August 2017. Impact Assessments undertaken to date do not indicate any adverse impacts on protected characteristic groups.

Data was extracted from HR SAP system and reports produced indicated the percentage value of any pay gaps, shown as a **-%** if **females are paid less** than males, and a **+%** if **females are paid more** than males.

Ethnicity: **-%** means gap in favour of white group, **+%** means gap in favour of BME group.

Disability: **+%** means gap in favour of Non-Disabled group, **-%** means gap in favour of Disabled group.

NB: this review does not look at bonus payments. This is covered by Gender Pay Report as published.

**1. Gender** - Where pay gaps were identified in respect of gender, further investigation and analysis showed that there were justifiable reasons for these. The main reason for any pay differential can be attributed to the position of individuals within a grade, as determined by automatic incremental progression, which is primarily based on length of service.

The audit has also reviewed criteria for appointing senior staff in particular to certain fixed salaries e.g. for Professorial staff. This audit did not highlight starting salaries to be a significant factor in relation to any gender-based pay differentials, which is a positive indicator of observance to the Human Resources guidance on starting salaries. A business case is required to be submitted to the Deputy Director of HR (Resourcing and Reward) / HR Director for their consideration, for any case that is made to offer a salary above the salary minimum for the grade.

Additionally, for Professorial staff the University has routinely advertised the salary at the start of the grade, rather than the full range from Prof C to Prof A, to strengthen adherence to this policy and to ensure fairness and consistency in appointment procedures for new starters.

**2. Ethnicity** - Although there may be a small number of variances in relation to ethnicity, there were legitimate explanations for the variances and in most cases we are dealing with very small numbers of staff in certain ethnic groups; it is therefore very difficult to make reasonable and statistically significant comparisons on pay. In most cases Westminster's average pay for BME staff is more favourable than the

sector average based on benchmark data available, but the under representation in more senior positions and across Professional Services, has been noted.

**3. Disability** - The number of colleagues who have declared a disability is low. Where there was a significant variance in pay, this is largely attributable to a small number of declared disabilities within this staff group.

**4. Age** – Salary differentials reflect length of service and career progression. Where incremental scales apply they have been limited to a maximum number of five, with one exception that is limited to 6 points.

**5. Senior Staff** - It became evident that in respect of some senior staff in Professorial and Head of College posts, a proven track record in research and scholarly activities were key factors in determining salaries at the appointment stage. Where colleagues have published high quality and high profile research which was valuable for the University's research profile, this was more significant than factors such as age in respect of salaries.

**6. Other equality areas** - We continue to collect sensitive information in the areas of 'sexual orientation' and 'religion and belief'. Disclosure rates although improving, remain low (approximately 62%) and therefore any analysis would not be statistically significant. We will continue to capture this data with the aim to reduce the number of 'unknowns'. The University is not aware of any reason why staff choose not to disclose this data. There is arguably scope to further encourage its disclosure should the University decide to prioritise resources to do this. As disclosure rates continue to improve, we hope to be able to report on these areas in the next Equal Pay Audit (2019/2020).

**7. Agency staff and "off payroll working"** - For the 2019 audit we have again reviewed data concerning agency staff and "off payroll working", otherwise referred to as "personal services companies". "Off payroll working" refers specifically to scenarios where an organisation engages the services of an individual via the individual's own limited company, known as a "personal service company" (PSC). We are pleased that the use of agency staff and PSCs has declined since 2016. This year there is only one member of agency staff registered at the University and no PSCs. We are mindful that there are currently 83 "consultants" and 91 "contract staff" and we need to be clear that these are appropriate appointments.

There are risks associated with having significant numbers of individuals paid outside our recognised pay structure; these individuals may be paid without reference to our graded salaries and can therefore create anomalies and misunderstandings within the pay grading structure, as well as a perceived lack of equality amongst members of staff. These roles should only be for genuine short term/one off instances of work, not covering long term or on-going work requirements. There are associated risks with having non-University staff in on-going roles who would not necessarily have been subject to the same rigorous recruitment processes, have the same grounding or understanding of University culture, and may not have long-term buy in or commitment to the organization.

There are a number of recommendations from the 2018 Equal Pay Audit which have been achieved and embedded into "business as usual" across the University. The full list of completed action points can be found in **Appendix 4**.

## **RECOMMENDATIONS FROM 2019 AUDIT**

Areas that we will monitor and work to strengthen include:

1. Continue to review and monitor use of agency staff, and those paid off payroll, in line with University policies on equal pay and recruitment and selection, on a cyclical 6 monthly basis. Extend this to include consultants and contract staff.
2. Monitor use of overtime to ensure work is being allocated and paid appropriately, ensuring equity in availability of work and University funds.
3. Continue to encourage and embed people planning processes to ensure promotional opportunities are available to relevant staff, and recruitment can be undertaken with a considered approach, particularly in areas that have been identified as difficult to recruit to.
4. Work with relevant departments to investigate use of intern roles to develop and encourage staff into difficult to recruit to roles.

**ANALYSIS**

All data was taken on the snapshot date of **30 June 2019**.

**1. Gender (headcount):**

| <b>Row Labels</b>  | <b>Headcount</b> | <b>Percentage</b> |
|--------------------|------------------|-------------------|
| Female             | 945              | 54.3%             |
| Male               | 797              | 45.7%             |
| <b>Grand Total</b> | <b>1742</b>      | <b>100.00%</b>    |

The 2019 audit reflects the outcomes of the Transformation Project, with a reduced University headcount (from 1836 overall staff in 2018 audit). Inevitably, this major restructure also impacted turnover levels as a whole, however the transformation project did not have a large impact on the overall gender balance (53.5 % female and 46.5% male in 2018 audit.)

Another key point to highlight is that where there are senior grades with more male staff, these higher salaries will dominate and impact overall statistics across the staff grading structure.

**Gender pay gaps (base mean salary %)**

| <b>Payscale Grouping</b>          | <b>Gender Pay Gap within Group</b> |
|-----------------------------------|------------------------------------|
| <b>L9</b>                         | -                                  |
| <b>L7</b>                         | <b>-6.44%</b>                      |
| <b>L5</b>                         | -                                  |
| <b>L4</b>                         | 0.00%                              |
| <b>L3</b>                         | -0.21%                             |
| <b>L2</b>                         | 0.00%                              |
| <b>L1</b>                         | -2.26%                             |
| <b>Heads of College</b>           | -                                  |
| <b>Associate Heads of College</b> | -2.16%                             |
| <b>Head of School</b>             | 0.00%                              |
| <b>Assistant Heads of School</b>  | 0.00%                              |
| <b>PROFA</b>                      | -3.55%                             |
| <b>PROFB</b>                      | -1.45%                             |
| <b>PROFC</b>                      | -1.08%                             |
| <b>PL/Reader/PRF</b>              | 0.24%                              |
| <b>SL/SRF/NG7 &amp; NG8</b>       | -0.23%                             |
| <b>L/RF/NG6</b>                   | -1.08%                             |
| <b>RA/NG5</b>                     | 0.23%                              |
| <b>NG4</b>                        | 0.73%                              |
| <b>NG3</b>                        | 0.90%                              |
| <b>NG2</b>                        | 3.08%                              |
| <b>NG1</b>                        | <b>-5.78%</b>                      |

The overall results for all staff (full and part time) based on gender identified that female staff are paid less on average than male staff, by **10.51%**. This can be attributed to there being fewer female staff in some more senior roles.

Within Level 7 there are only three individuals, so the pay gap can be explained by one individual salary being larger, supported by a business case at the time of appointment.

In NG1 there is only one female member of staff who has only joined the organization this year; other individuals within the group have higher salaries due to years of service.

There are significantly fewer female staff in higher grade groups (From PL/Reader/PRF upwards). Overall, 38.9% of staff in these groups are female; the biggest gap is within the Professors (31.8% female). There is no female representation in Heads of College, Level 5 or Level 9 (one person in Level 9).

## 2. Ethnicity (headcount):

| BME | White | Unknown | Info Refused | Total |
|-----|-------|---------|--------------|-------|
| 460 | 1203  | 60      | 19           | 1742  |

Overall, the University has a BME staff population of 26.4%. Our figures broken down into academic and non-academic compare favorably with the latest HESA data;

|                           | Westminster | HESA* |
|---------------------------|-------------|-------|
| <b>Academic staff</b>     | 20%         | 16%   |
| <b>Non-Academic Staff</b> | 33%         | 12%   |

\*<https://www.hesa.ac.uk/news/24-01-2019/sb253-higher-education-staff-statistics>

### Ethnicity pay gaps

The table below shows the difference in average salary of all BME staff in comparison to all White/Non-BME staff. As there is an under-representation of BME in the most senior positions, pay analysis can be misleading due to the small numbers involved.

It should be noted that there is no disclosed representation in Level 2 to Level 9, Heads of College, Associate Heads of College or Prof A group. Collectively there are 42 members of staff in these groups.

| Payscale Grouping          | Ethnicity pay gap |
|----------------------------|-------------------|
| L9                         | -                 |
| L7                         | -                 |
| L5                         | -                 |
| L4                         | -                 |
| L3                         | -                 |
| L2                         | -                 |
| L1                         | 1.43%             |
| Heads of College           | -                 |
| Associate Heads of College | -                 |
| Head of School             | 0.00%             |
| Assistant Heads of School  | 0.00%             |
| PROFA                      | -                 |
| PROFB                      | 0.54%             |
| PROFC                      | -0.62%            |
| PL/Reader/PRF              | 1.01%             |
| SL/SRF/NG7 & NG8           | 0.49%             |
| L/RF/NG6                   | 0.77%             |
| RA/NG5                     | 2.12%             |
| NG4                        | -0.48%            |
| NG3                        | 0.64%             |
| NG2                        | 0.43%             |
| NG1                        | 0.49%             |

The average Ethnicity pay gap is 15.95% and this is attributable to lack of representation in senior grades.

### 3. Disability (headcount)

| Yes | No   | Prefer not to say | Total |
|-----|------|-------------------|-------|
| 94  | 1645 | 3                 | 1742  |

#### Disability pay gaps (base mean salary)

The table below shows the difference in average salary of all disabled staff in comparison to all non-disabled staff. There is no disclosure/representation in Level 3, Level 4, Level 5, Level 7, Level 9, Heads of College or Professors. Collectively there are 85 members of staff in these groups.

| Payscale Grouping          | Disability Pay Gap |
|----------------------------|--------------------|
| L9                         | -                  |
| L7                         | -                  |
| L5                         | -                  |
| L4                         | -                  |
| L3                         | -                  |
| L2                         | 0.00%              |
| L1                         | 0.43%              |
| Heads of College           | -                  |
| Associate Heads of College | <b>-8.64%</b>      |
| Head of School             | 0.00%              |
| Assistant Heads of School  | 0.00%              |
| PROFA                      | -                  |
| PROFB                      | -                  |
| PROFC                      | -                  |
| PL/Reader/PRF              | -2.01%             |
| SL/SRF/NG7 & NG8           | -2.24%             |
| L/RF/NG6                   | -1.66%             |
| RA/NG5                     | -2.99%             |
| NG4                        | 2.42%              |
| NG3                        | -0.40%             |
| NG2                        | 4.74%              |
| NG1                        | -1.94%             |

One member of staff within the Associate Heads of College group has reported a disability, out of a total group of 6 members of staff. That one member of staff had a higher starting salary than other colleagues, supported by a business case at the time of appointment.



Overall, disabled staff are paid less on average than non-disabled staff by 1.96%. This is attributable to less disclosure in senior roles. The national disability pay gap is 12.2% as identified in the Office for National Statistics 2018 report; this figure is not limited to the HE sector.<sup>2</sup>

#### 4. Age:

| Age       | Less than 25 | 25-34 | 35-44 | 45-54 | 55-64 | 65+ | Total |
|-----------|--------------|-------|-------|-------|-------|-----|-------|
| Headcount | 39           | 294   | 445   | 515   | 376   | 73  | 1742  |

In accordance with the recommendation made by the Equality Challenge Unit in its April 2010 publication ("Promoting Equality in Pay"), we have adopted the Higher Education Statistics Agency (HESA) age groupings. Group 1 covers staff aged 25 and under, group 2 covers 25 to 34, group 3 covers 35 to 44, group 4 covers 45-54, group 5 covers 55-64 and group 6 covers staff aged 65 and over.

In a context of salary progression based upon continuous service and length of time in a grade, with annual incremental progression for staff in groups up to Level 1/PL/Reader/PRF, the results show salary increases that reflect length of service in a grade for the different age categories. The largest numbers of staff fall within the '35-44' and '45 to 54' age grouping.

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<sup>2</sup> Source:

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilitypaygapsintheuk/2018>

## Age pay gaps (base mean salary)

| Payscale Grouping          | 25 and under pay gap | 25-34 pay gap | 35 to 44 Pay Gap | 45 to 54 Pay Gap | 55 to 64 Pay Gap | 65+ Pay Gap |
|----------------------------|----------------------|---------------|------------------|------------------|------------------|-------------|
| L9                         | -                    | -             | -                | -                | 0.00%            | -           |
| L7                         | -                    | -             | -                | -10.41%          | 5.21%            | -           |
| L5                         | -                    | -             | -                | -4.29%           | 4.29%            | -           |
| L4                         | -                    | -             | -                | 0.00%            | -                | -           |
| L3                         | -                    | 0.14%         | -                | -0.14%           | 0.14%            | -           |
| L2                         | -                    | -             | 0.00%            | 0.00%            | -                | -           |
| L1                         | -                    | 5.67%         | 0.73%            | -0.99%           | -0.19%           | -           |
| Heads of College           | -                    | -             | -                | 2.11%            | -1.05%           | -           |
| Associate Heads of College | -                    | -             | 1.42%            | -1.42%           | 1.42%            | 1.42%       |
| Head of School             | -                    | -             | 0.00%            | -                | 0.00%            | -           |
| Assistant Heads of School  | -                    | -             | 0.00%            | 0.00%            | 0.00%            | -           |
| PROFA                      | -                    | -             | -7.43%           | 1.59%            | 1.27%            | 0.23%       |
| PROFB                      | -                    | -             | 4.77%            | -1.02%           | -4.73%           | 2.50%       |
| PROFC                      | -                    | -             | -0.35%           | 0.66%            | 0.50%            | -2.93%      |
| PL/Reader/PRF              | -                    | -             | 3.63%            | 0.82%            | -1.24%           | -1.23%      |
| SL/SRF/NG7 & NG8           | -                    | 6.05%         | 1.63%            | -0.38%           | -2.05%           | -2.23%      |
| L/RF/NG6                   | -                    | 4.31%         | -0.55%           | -1.12%           | -3.54%           | -4.22%      |
| RA/NG5                     | 4.10%                | 5.41%         | -1.15%           | -3.61%           | -6.84%           | -7.66%      |
| NG4                        | 4.79%                | 3.19%         | -1.48%           | -3.11%           | -3.32%           | -1.97%      |
| NG3                        | 5.13%                | 2.12%         | -1.30%           | -2.79%           | -2.91%           | -4.18%      |
| NG2                        | 4.30%                | 4.30%         | -0.43%           | -0.96%           | -3.88%           | -4.55%      |
| NG1                        | -                    | 4.46%         | 1.32%            | -1.28%           | -1.83%           | 0.96%       |

Where the results have identified some pay gaps of more than 5%, further investigation and analysis has revealed that the pay gaps were attributed to salaries increasing with length of service, age in respect of experience and seniority, complexity of roles and market forces in the wider economic context. In addition, in some cases, we are again dealing with a very small group of colleagues. It is therefore very difficult to make statistically significant comparisons on pay, and we run the risk of identifying individuals. Market forces are also a prime consideration when recruiting to senior level posts and these vary over time. Sometimes where a pay gap has been identified there is only one individual in that age group in that pay band, or a small number of individuals with many years of service.

## **5. Part Time – All Staff**

The University applies the same pay and grading structures and policies to part-time staff. Analysis of the difference in average salary of part-time staff compared to full time staff at each grade level showed no significant differences of 5% or above.

### **Gender, Ethnicity and Part-time staff**

Analysis of the differences in average salary of part time staff, showed some differences above 5% for gender and ethnicity. Most of these differences are attributable to a small number of senior part time roles.

### **Disability and Part-time staff**

Analysis of the differences in average salary of part-time disabled staff showed no significant differences.

### **Age and Part-time staff**

Analysis of the difference in average salary of part-time staff compared to full-time staff across the various age categories showed two significant differences at 5% or above.

- Groups 45-54 and 55-64 have pay gaps of over 5%, attributable to a small number of senior roles that are held by members of this age group that are all full-time.

## **6. Visiting Lecturers (Hourly paid / part time)**

The results showed no significant pay differences between Visiting Lecturer staff with respect to gender, ethnicity, disability or age category.

## **7. Sexual Orientation and Religion & Belief**

Data analyses in respect of sexual orientation and religion or belief has raised some practical difficulties, due to the lack of systematic data in respect of most staff. The number of responses to this information has been increasing but, the available data collected could not yet be regarded as 'statistically significant', as any analysis would only represent approximately 62% of the workforce. The University is considering methods of improving the available data to find a solution and more efficient way of collecting information securely via employee self-service, working within the challenges of appropriate methods from an information security perspective. We continue to work with the staff LGBTQ+ network to also encourage greater disclosure.

## **APPENDICES**

- (1) Context**
- (2) Part Time Visiting Lecturers**
- (3) Audit Process**
- (4) University policies supporting the Equal Pay Audit**
- (5) Progress on recommendations made in 2018 Audit**

## Appendix 1

### Context

The University and UCU concluded in July 2017 a number of agreements relating to the terms of and conditions of employment for academic staff. The relevant terms in relation to remuneration are as follows:

- The London Weighting for academic staff who opted out of the University's new offer of terms and conditions in 2009 was harmonised with the weighting for all other academic staff, retrospectively to the 1 August 2016.
- Similarly, incremental progression dates were also harmonised with effect from 1 August 2017.
- The historical Senior Academic scale for a small number of remaining academics has now been removed and pay red circled for those affected.
- All new Part Time Visiting Lecturers appointed from 1 October 2017 onwards are paid at a fixed hourly rate (VL pt 2 'opted-in' scale (spine point 34 equivalent) and are not eligible for incremental progression. It was agreed that the University would also review pay progression for all other existing VLs.
- The Grading Review process for academic staff has ceased with effect from 2017/8 and is being replaced by an annual internal promotion round whereby staff may apply for approved academic vacancies.

It is intended that the above will achieve better alignment and transparency in staff remuneration, as well as encourage managers to ensure that staff assume duties appropriate to their pay grade.

In 2017 and 2018 the University effected two voluntary severance schemes (effective 1/8/17 and 1/8/18), with the former applying to Professional Services staff and the latter available to all staff, subject to agreement by the relevant Directors and Heads of College. These schemes formed part of a streamlining and downsizing of the staffing structure in order to reduce costs. This audit has not identified any adverse impacts on the University equality profile across the groups of protected characteristics.

### Job Evaluation

The University's pay and grading structure is underpinned by using the Hay Job Evaluation methodology. Job evaluation is a method of comparing different jobs through a process that seeks to objectively measure the different elements of a job resulting in a total score for each job. A single, analytical job evaluation scheme is a prerequisite for developing a common salary structure which meets the requirements of equal pay legislation and is therefore a key factor in ensuring fairness and consistency of treatment for all staff. It provides the only consistent basis for assessing the relative size of all jobs within an organisation. Jobs are placed in a rank order, according to their size, and placed within appropriate grades, providing a basis for a fair pay and grading structure. Only the job is evaluated, not the person doing the job.

### Data Protection

Equal pay reviews are covered by the Data Protection Act 1998 in terms of the processing of the raw data, the disclosure of data to third parties involved in the review, and the publication of the results. The Act provides protection in relation to '*sensitive personal data*'. Therefore the results of this audit can be disclosed as regards individuals or small groups as long as they are in a '*sufficiently anonymised form*', and in more detail only if the individuals concerned have consented a disclosure. The relevant sections of this report will highlight these points as applicable.

## Appendix 2

## Part time Visiting Lecturers

From 1<sup>st</sup> October 2017 all part time Visiting Lecturers are issued with permanent contracts, except for a handful of recognised exceptions e.g. PhD student or limited funding. Bearing this in mind, we are now looking to expand our reporting for part time Visiting Lecturers, in recognition of their permanent employment status.

| <b>GENDER</b>      | <b>Headcount</b> | <b>Percentage</b> |
|--------------------|------------------|-------------------|
| Female             | 435              | 50.46%            |
| Male               | 427              | 49.54%            |
| <b>Grand Total</b> | <b>862</b>       | <b>100.00%</b>    |

| <b>ETHNICITY</b>    | <b>Headcount</b> | <b>Percentage</b> |
|---------------------|------------------|-------------------|
| BME                 | 175              | 20.30%            |
| Information Refused | 24               | 2.78%             |
| Unrecorded          | 99               | 11.48%            |
| White               | 564              | 65.43%            |
| <b>Grand Total</b>  | <b>862</b>       | <b>100.00%</b>    |

| <b>DISABILITY</b>                    | <b>Headcount</b> | <b>Percentage</b> |
|--------------------------------------|------------------|-------------------|
| Has (or previously had) a Disability | 45               | 5.22%             |
| No Known Disability                  | 805              | 93.39%            |
| Prefer not to say                    | 5                | 0.58%             |
| Unrecorded                           | 7                | 0.81%             |
| <b>Grand Total</b>                   | <b>862</b>       | <b>100.00%</b>    |

| <b>AGE GROUP</b>   | <b>Headcount</b> | <b>Percentage</b> |
|--------------------|------------------|-------------------|
| Less than 25       | 10               | 1.16%             |
| 25 to 34           | 174              | 20.19%            |
| 35 to 44           | 210              | 24.36%            |
| 45 to 54           | 211              | 24.48%            |
| 55 to 64           | 158              | 18.33%            |
| 65+                | 99               | 11.48%            |
| <b>Grand Total</b> | <b>862</b>       | <b>100.00%</b>    |

## Appendix 3

## Audit Process

An Equal Pay Audit involves:

- The comparison of pay of men and women doing equal work, those from different racial groups, those who are disabled and those in different age groups.
- The identification of equal pay gaps.
- The explanation and justification of gaps using objective criteria.
- The addressing of any gaps that cannot be satisfactorily explained on the grounds of work content.
- On-going monitoring.

A three stage review process has been adopted for all the University's audits for consistency:

**STAGE 1 = ANALYSIS** - data analysis, comparing pay data

**STAGE 2 = DIAGNOSIS** - establish the nature & cause & diagnosis of any pay gaps

**STAGE 3 = ACTION** - developing a remedial equal pay action plan

This is in line with JNCHEs guidance "Equal Pay Reviews: Guidance for Higher Education Institutions" as revised in 2018. This guidance notes that there will be practical constraints on what is possible, with regard to known data on all equality considerations and also recommends that HEI reviews should address equal pay, in respect of part-time employees to reflect legislation on prevention of less favourable treatment for such staff and as noted above this audit includes this further analysis as applicable.

In addition, as a reference guide, the EOC advocates that;

- where a pay differential related to sex is less than 3%, no action is necessary.
- where the difference is greater than 3% but less than 5%, the position should be regularly monitored and
- for gender pay gaps of more than 5%, action is needed to address the issue and close the gap.

**STAGE 1: ANALYSIS** A basic analysis of the relative rates of pay for men and women, people from different racial groups, those with or without disabilities, and those of different sexual orientations, religions or belief and those in different age groups carrying out work perceived to be of "equal value", together with analysis of relative pay rates for full and part time staff (see chart below). The aim is to establish the degree to which inequality exists in the form of a significant pay gap, i.e. any pay gaps which are more than 5%, so that action can be taken in subsequent stages to address any issues and to ultimately close any pay gaps.

### Pay Gap Analysis:

- In terms of base pay for each group of staff in terms of work rated as equivalent.
- The pay gap for staff in each occupational group as a whole.
- The pay gap between members of different racial groups, male and female staff and those with or without disabilities and those of different sexual orientations, religions or belief and those in different age groups.

### All staff are "grouped" in terms of:

- Working arrangements – e.g. full/part time.
- Work rated as equivalent e.g. identifying the jobs that have been evaluated in the same grade at the University, as follows:-

All roles at the University have been evaluated and are placed in an applicable grade. The report does not comment on academic groups and professional support staff groups separately, but across the two groups as "work rated as equivalent" for staff on the national pay spine. The pay of part-time staff is expressed on the same basis as full-time staff (fte). The report looks at mean basic pay. The University does not have a bonus culture. Further detail on any exceptional bonuses paid is available in the University's 2019 published Gender Pay Report.

**STAGE 2: DIAGNOSIS** To establish the nature of any inequities in pay gaps, their causes and diagnosis of any likely factors. The review has sought:

- Why the gap exists.
- Extent to which the gap can be objectively justified.
- Identify any remedial action.

**STAGE 3: ACTION** Remedial action to remove pay gaps, specified, planned and implemented. For example:

- Ensuring that HR reward structures, policies and practices are effectively in place to deliver equal treatment and opportunity. It is also essential that we have consistency in pay practices as well as justifiable and transparent criteria.
- Identifying the steps required to remove causes of pay gaps as identified.
- A programme for implementing agreed actions with timescales, if required.
- Agreeing the arrangements for monitoring the plan and evaluating the outcomes.

### **Data collection**

Data was extracted from SAP and reports produced indicated the percentage value of any pay gaps, shown as a **-% if females are paid less than males**, and a **+% if females are paid more than males**. Pay gap reports were produced based on the groupings and individual grades for the following:

- All staff, Gender
- All staff, Disability
- All staff, Ethnicity
- All staff, Age
- All staff, Religion and Belief and Sexual Orientation
- Full time staff compared to Part time staff, Gender, Disability, Ethnicity, Age



## Appendix 4 University policies supporting the Equal Pay Audit

The JNCHES literature review 2010 highlighted a range of policies that are recognised as having a demonstrable impact, supporting the work of Equal Pay audits and disclosure of relevant data. These policies include the following and Westminster's approach to each is tabled below.

| POLICY   | WESTMINSTER APPROACH   |
|--|--|
| Flexible working / Family-friendly practices and 'good' part-time working opportunities. | Website address for relevant policies;<br><a href="https://universityofwestminster.sharepoint.com/sites/Resources/SitePages/Family%20friendly%20benefits.aspx">https://universityofwestminster.sharepoint.com/sites/Resources/SitePages/Family%20friendly%20benefits.aspx</a>  |
| Transparency e.g. Equal Pay Reviews  | Undertaken every two years up to 2018, annual reporting thereafter. Presented to HR Committee and the University's Court of Governors and published on the University's website. Policy available on;<br><a href="https://www.westminster.ac.uk/about-us/our-university/corporate-information/policies-and-documents-a-z/annual-reporting">https://www.westminster.ac.uk/about-us/our-university/corporate-information/policies-and-documents-a-z/annual-reporting</a>   |
| Development / Training and tackling discrimination and stereotyping.                     | Staff training and development has been reduced as result of cost-cutting imperatives in 2017/18. However, the University remains committed to provision of core training on and support for equality and diversity.<br><br>Mandatory e-learning module for all staff on equality and diversity:<br><a href="https://universityofwestminster.sharepoint.com/sites/Resources/SitePages/Mandatory%20E-learning%20modules.aspx">https://universityofwestminster.sharepoint.com/sites/Resources/SitePages/Mandatory%20E-learning%20modules.aspx</a><br><br>Specific staff networks programmes aimed at supporting an enabling work environment are listed at:<br><br><a href="https://universityofwestminster.sharepoint.com/sites/00266/SitePages/Networks.aspx?csf=1&amp;e=gqHaw0">https://universityofwestminster.sharepoint.com/sites/00266/SitePages/Networks.aspx?csf=1&amp;e=gqHaw0</a> |
| Representation   | The University's senior leadership team, the University Executive Board Extended Directors Group, currently has one female representative and five males. The proportion of female representatives has decreased since the 2016 audit, as has the size and composition of the Board. The University Executive Board Extended Directors Group in 2016 comprised 10 male and 7 female staff members.   |
| Pay systems  | All incremental pay grades comply with recommended number of annual incremental steps (i.e. a maximum of 6)  |
| Unions and collective bargaining   | The University is committed to UCEA and JNCHES to manage collective bargaining for the University within the HE sector arrangements, in the UK.  |

## Appendix 5 Progress on recommendations made in 2018 audit

### Completed and consolidated

- 1. Monitor impact of current Transformation Project and associated restructure programme as implemented in 2019/20 in 2019 report.**

There is on-going monitoring through quarterly reporting on Professional Services departments, and annual People Planning exercises through Heads of Colleges for academic staff. Equal Pay Audit and Gender Pay Gap reporting has not suggested any adverse effects following the Transformation Project.

### Recommendations in progress

- 1. Encourage staff to disclose and update data regarding protected characteristics by communicating the benefits and reminding them of the opportunity to do so via the University's Self-Service portal.**

Disclosure rates continue to slowly increase, primarily through the capture of new staff data, as well as working with staff networks to promote disclosure.

- 2. Continue to review and monitor use of agency staff, and those paid off payroll, in line with University policies on equal pay and recruitment and selection, on a cyclical 6 monthly basis.**

Regular monitoring suggests steady decline in use of agency staff and PSCs, however use of consultants, contract staff, one-off payments and overtime payments continue to be used in large numbers and need to be monitored.