

Equality, Diversity & Inclusion Annual Report 2021-22

Appendix – Equal Pay Audit as of 30th June 2022

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HR Systems
Resourcing and Reward
November 2022**

WELCOME

The University of Westminster has long supported the principles of equal pay for work of equal value and our annual Equal Pay Audit builds on the University's commitments to equality, diversity and inclusion, as well as our Sustainable Development goals, in particular Gender Equality and Reduced Inequalities. The Equal Pay Audit forms part of a range of activities that support monitoring and provide analysis and recommendations to the EDI Committee. In line with our University values, we choose to go beyond our statutory obligations and review pay gaps across the full range of protected characteristics.

Westminster will be known as a place where everyone can bring their whole self to work or study and know they belong – our commitment to equality, equity, diversity and inclusion is at the core of how we engage with everyone.

All Westminster colleagues and students will be in a supportive and safe learning and working environment which is equitable, diverse and inclusive, is based on mutual respect and trust, and is a place where harassment and discrimination are not tolerated.

As a responsible institution, we strive to ensure and to champion equality. As a progressive institution, we take pride in our diversity. As a compassionate institution, we commit to an inclusive culture that allows students and colleagues to reach their full potential.

Regular, clear and transparent equal pay monitoring helps to support these key aims and objectives.

INTRODUCTION

What is an equal pay audit?

An equal pay audit is an analysis of an organisation's pay structure in order to compare the pay of colleagues undertaking equal work within the same pay grade, and therefore identify any equal pay gaps. Any identified gaps can be reviewed, addressed and where applicable, explained or eliminated.

Benefits of undertaking an equal pay audit;

- Ensure compliance with the Equality Act 2010
- Go beyond our statutory duties to report more widely on a full range of protected characteristics
- Identify and investigate any gaps and seek to eliminate any gaps that cannot be satisfactorily explained on objective grounds
- Publicly highlight our on-going commitment to equality, diversity and inclusion
- Ensure equal pay is embedded in University wide policies and processes

- Make recommendations to the EDI Committee and wider University as a whole
- Report on and have an overview of any trends within our pay structures over a number of years
- Ensure consistent, fair and transparent pay structures across the University

This audit is undertaken 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 colleagues.

Methods for calculating the pay gap

Data is extracted from the HR SAP system and all colleagues have their salaries converted to a Full Time Equivalent (FTE) so we are comparing like for like salaries. Within each pay grade the average salary within that grade is calculated and other salaries within the pay grade are compared against this. We then review the relevant comparators for each protected characteristics group e.g. male and female in the case of gender pay gap, to establish if there are any significant gaps.

Pay gaps over 5% are considered to be significant and require further investigation. Gaps under 5% can be caused by natural movements between grades, starters and leavers to the University and general fluctuations within the overall colleague profile.

The final reports produced indicate the percentage value of any pay gaps, shown as below;

Gender: +% means gap in favour of male group (females paid less), -% means gap in favour of female group.

Ethnicity: +% means gap in favour of white group (diverse groups paid less), -% means gap in favour of diverse groups.

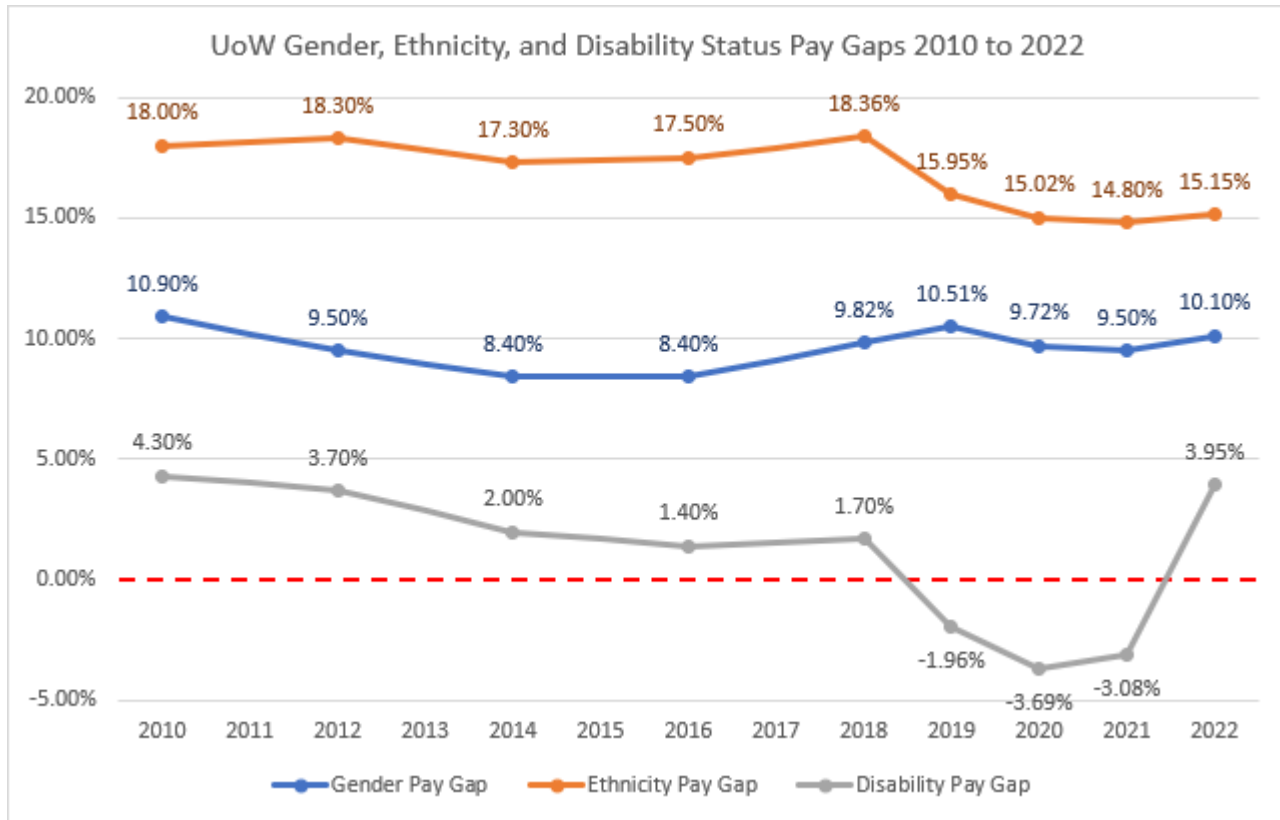
Disability: +% means gap in favour of non-Disabled group (disabled group paid less), -% means gap in favour of Disabled group.

All data was taken on the snapshot date of **30 June 2022**.

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

Historical overview of Equal Pay Audit findings

The University has been undertaking Equal Pay Audits since 2010, initially every two years but they have been undertaken annually since 2018. This has allowed us to build up a clearer picture of trends over the years, but also ensure we can review, disseminate and act on any findings year on year. This year is the 9th Equal Pay Audit undertaken by the University.



In the context of a Higher Education Institution that has undertaken pay modernisation, as Westminster has, what we find year on year is that there are few significant pay gaps within grades. The overall pay gaps are reflective of the distribution of different groups across pay grades e.g. in the case of gender, the distribution of men and women across the 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.

CONCLUSIONS AND RECOMMENDATIONS

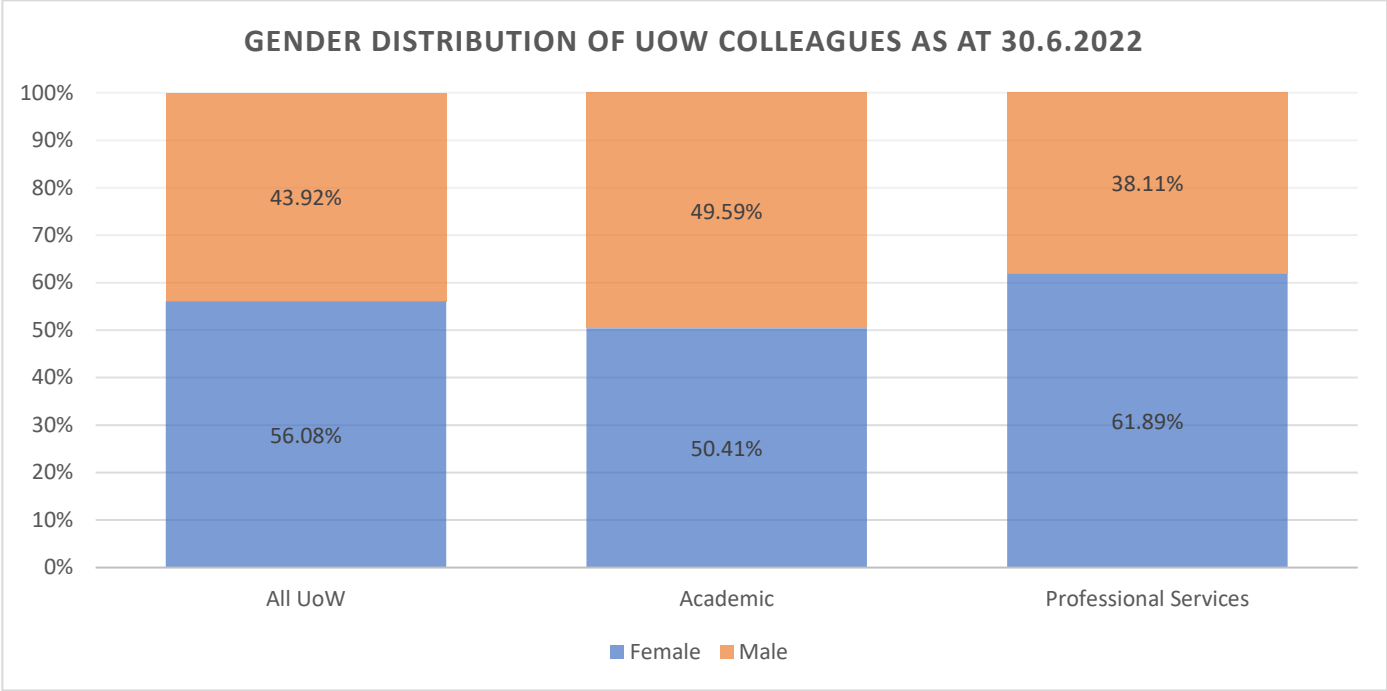
The main conclusion from carrying out this Equal Pay Audit is that the University does not have any significant need for concern over equal pay issues when comparing employees within the same pay grade.

Where any significant pay gaps (above 5%) were identified within individual pay grades, further investigation and analysis showed that there were justifiable reasons for these.

2022 Audit Recommendations

| November 2022 |
|--|
| 1. To recommend EDI Committee give consideration to appropriate methods for increasing and improving data held on protected characteristics, particularly in regard to sexual orientation and religious belief. To also consider whether any improvements could be made to disclosed disability data , working with University colleague networks as appropriate. |
| 2. For EDI Committee to consider in particular whether there should be any targeted methods of increasing and improving data within senior leadership roles to reduce any unknown or unrecorded data, to increase understanding of diverse profiles within senior leadership roles e.g., encouraging colleagues at a senior level to review their personal data disclosure. |
| 3. To recommend EDI Committee continue to promote targeted programmes e.g. EDI Development Programme, to support further diversification of the workforce at the University. This is particularly required within the lower and upper quartiles in order to address the re-balancing of distribution when it comes to gender and ethnicity within the pay structure. Recommend annual review of programmes and activities to assess impact on gender and ethnicity pay gaps. |

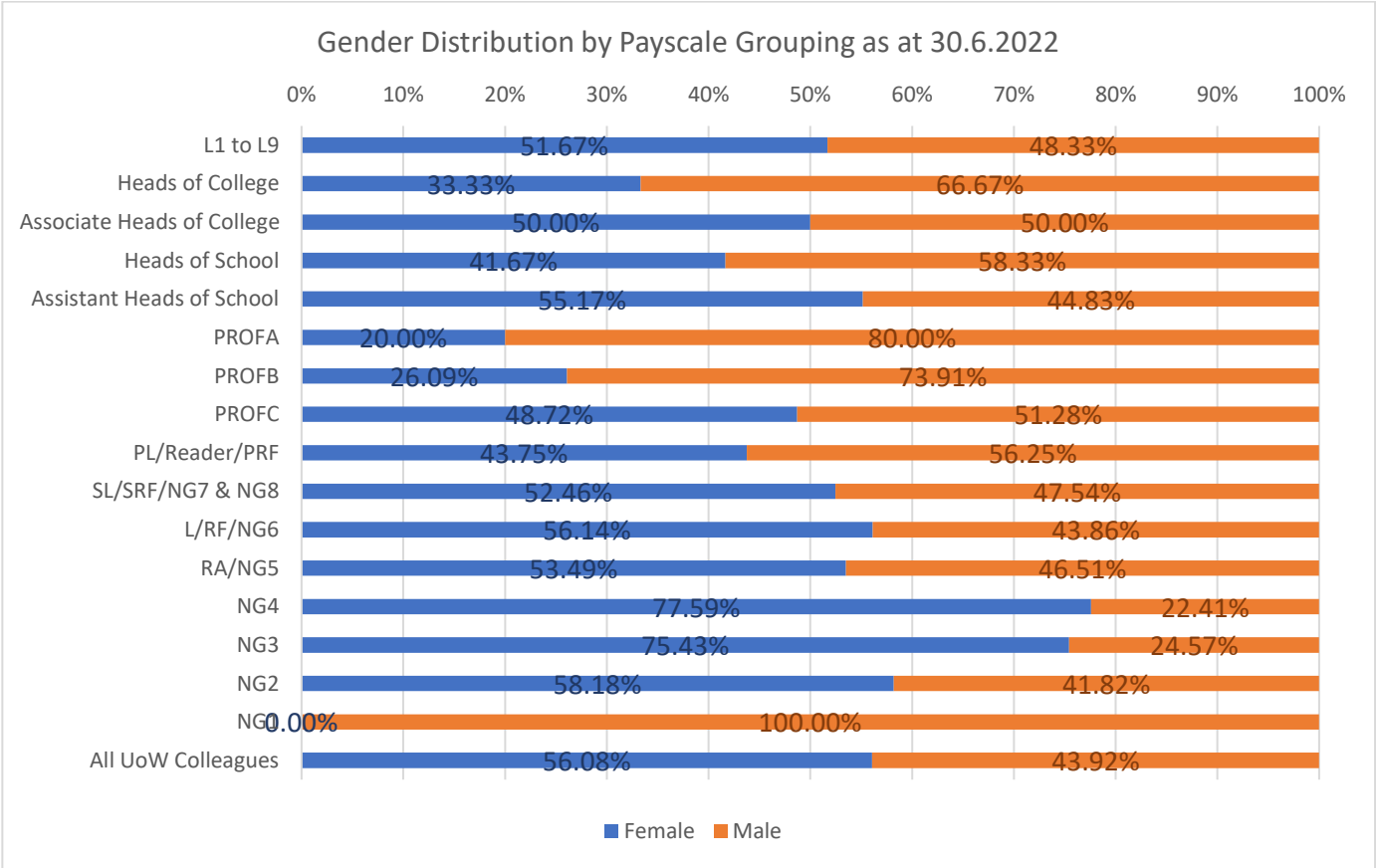
GENDER- Distribution



Gender distribution at the University and particularly within Academic colleagues is fairly evenly balanced.

Professional Services roles have for some time been dominated by female colleagues, although we know the majority of NG2, NG3 and NG4 roles are held by females suggesting distribution of male and female colleagues within Professional Services is not evenly balanced within the grading structure, and a disproportionate number of female colleagues are within the lower grades. (NG1 roles are held entirely by male colleagues although there are only 14 role holders within this grade).

There are significantly less females within Prof A and Prof B pay grades, although these are relatively small groups (Prof A -12 colleagues and Prof B- 21 colleagues).



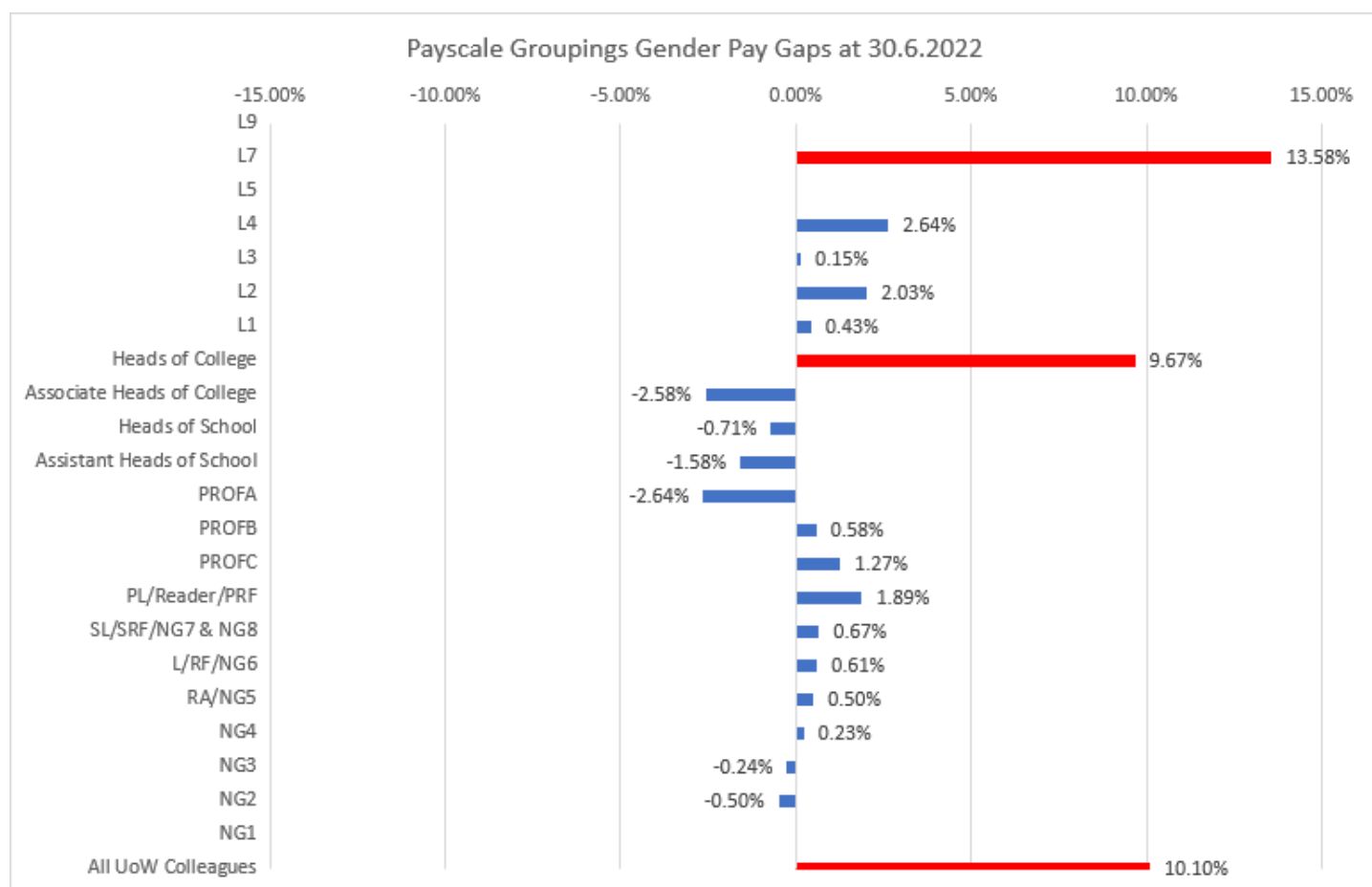
GENDER- Equal Pay Review

There are two identified pay grades where there could be a potential equal pay concern, where it has been identified that male colleagues within the pay grade are paid more than female colleagues by more than a 5% differential.

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, and subject to annual review and scrutiny, subject to Remuneration Committee and Higher Education Senior Staff Remuneration Code (CUC) code of practice.

Within Heads of College, again there are only three individuals, with one a more recent starter so the pay gap can be explained by two individuals having higher salaries due to having more experience within the role and market forces. It should also be noted that as of 1st August 2022 there have been some changes to salaries within this grade which will be reflected in next year's Equal Pay Audit and will likely reduce the pay gap within this grade.

Where no pay gap is identified this means either male and female colleagues are paid the same, or more likely that there is no female representation within that group. We know there is no female representation within Level 9 (1 person), Level 5 (4 people) or NG1 (14 people).



GENDER- University pay gap

The previous data confirms that the University does not have any significant need for concern over equal pay issues when comparing male and female colleagues within the same pay grade.

The overall results for all colleagues (full and part time) based on gender identified that female colleagues are paid less on average than male colleagues, by **10.10%**. This represents a small increase on last year's pay gap of 9.5%. It is not uncommon for pay gaps to go up or down within a percentage or two year-on-year and this does not represent cause for concern. Natural movement between grades and starters or leavers can cause the overall pay gap to fluctuate.

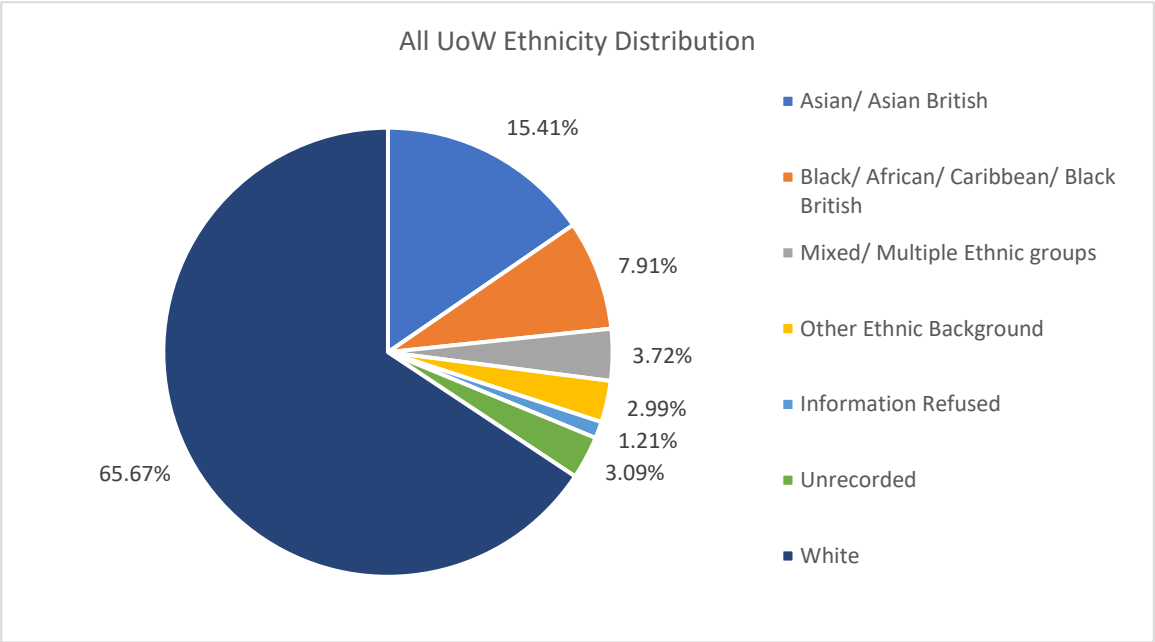
The pay gap can be attributed to there being fewer female colleagues in more senior roles, and fewer male colleagues in the lower quartile of the pay grades. This is particularly prevalent within Professional Services where the lower quartile is dominated by women. Improvements in the overall gender pay gap at the University would need to be driven by an increase in women in senior roles, as well as an increase in male colleagues within the lower quartile.

If we break the gender pay gap down by Academic and Professional Services roles, we can see that our academic profile has a less than 5% pay gap between male and female colleagues.

| | Gender Pay Gap |
|--------------------------|---------------------------|
| Academic | 4.12% |
| Professional Services | 10.26% |
| All UoW | 10.10% |

The University's overall gender pay gap still compares favorably with the national gender pay gap of 15.4% (2021), as well as the Higher Education gender pay gap of 16.2% (2021).

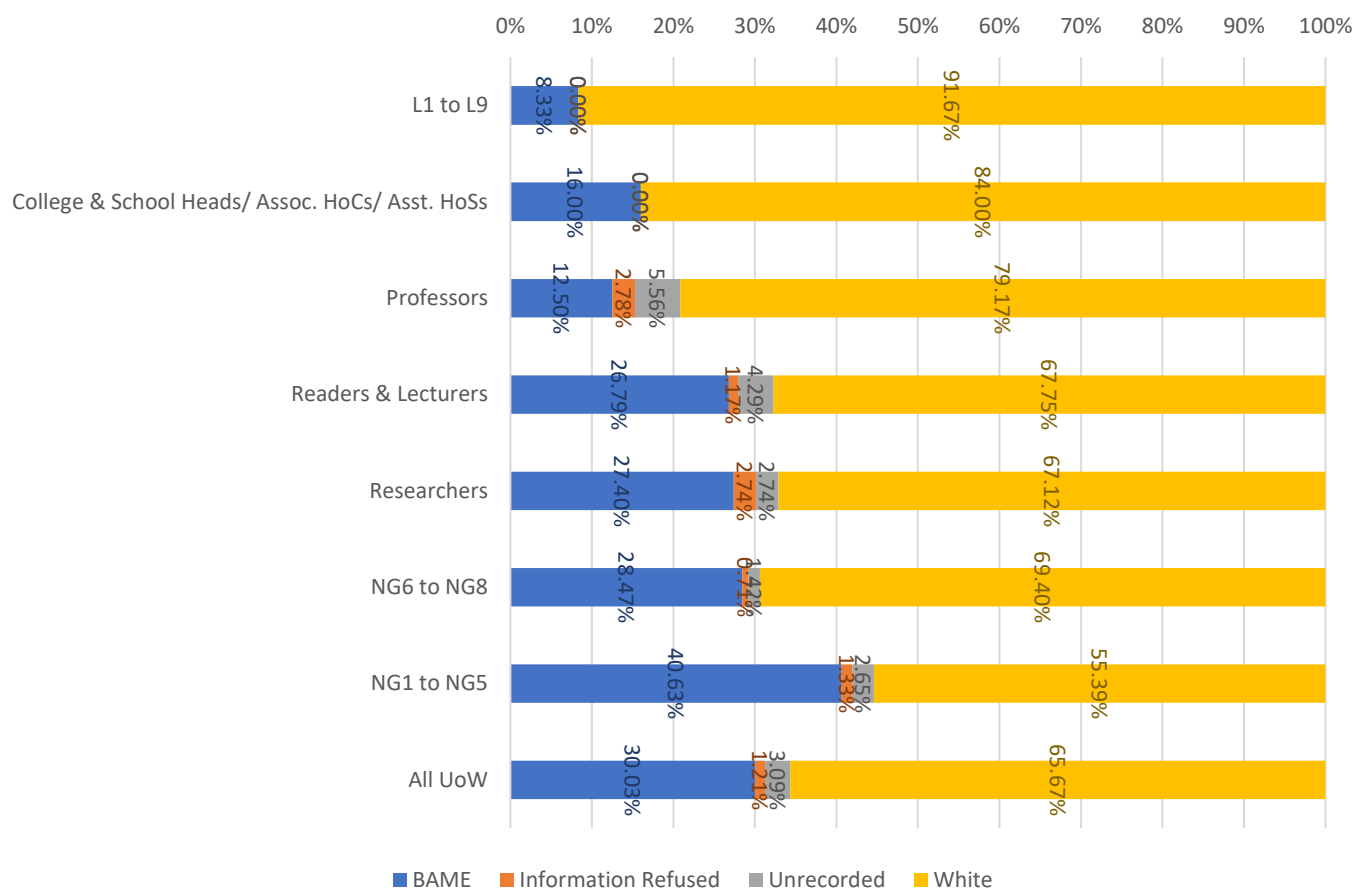
ETHNICITY- Distribution



The overall proportion of our colleagues who describe themselves as white is less than the HE Sector average which is **77.58%** (HESA 2021). Overall, the University has a diverse colleague population of **30.03%**. We know that the proportion of diverse colleagues becomes increasingly smaller higher up the pay structure.

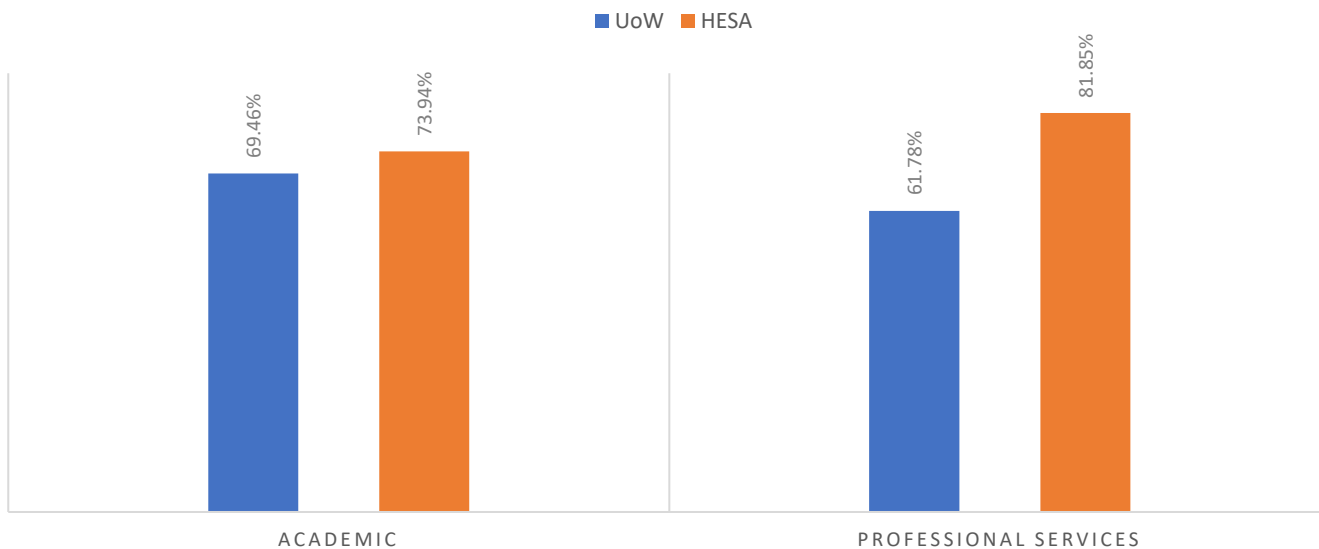
As a University we recognise that BAME is not a helpful descriptor and have moved away from using it wherever possible. However, it is sometimes necessary for ease of comparison to return to the use of BAME, for example in order for the below chart to simplify visual representation.

Ethnicity Distribution in Payscale Groupings as at 30.6.2022



Our figures broken down into Academic and Professional Services confirm the University of Westminster has a more diverse population when compared with the latest HESA data (2021).

PROPORTION OF WHITE COLLEAGUES



ETHNICITY- Equal Pay Review

Within each of our individual pay grades, there are only two pay grades where there is a percentage gap between white and non-white colleagues which is greater than 5%.

There is a gap of 5.67% within the Associate Heads of College. This group contains only six individuals overall, and those colleagues who are white have higher salaries based on length of service, experience and performance within the role. This pay gap is generated by one new starter. Salaries for this grade are independently reviewed as part of the Senior Colleague salary review process, including a final review by the Moderation Panel which takes EDI data into consideration to ensure consistency of application for salary awards.

There is a gap of 6.23% for Heads of School. Again this is a relatively small group with only 12 individuals in total. At the snapshot date of 30th June 2022 there were two interim Heads of School in post who had higher salaries for a fixed period. Both these role holders have now left the University and we would not expect to see a large pay gap next year. Salaries for this grade are also independently reviewed as part of the Senior Colleague salary review process, including a final review by the Moderation Panel which takes EDI data into consideration to ensure consistency of application for salary awards.

ETHNICITY- University pay gap

By looking at ethnicity pay gaps within the below groupings we can start to get a sense of where and how the overall University ethnicity pay gap emerges.

The average Ethnicity pay gap across the University is **15.15%** and this is attributable to lack of representation in senior grades. This compares favorably on the reported ethnicity pay gap within London of **23.8%** (Office for National Statistics 2019).

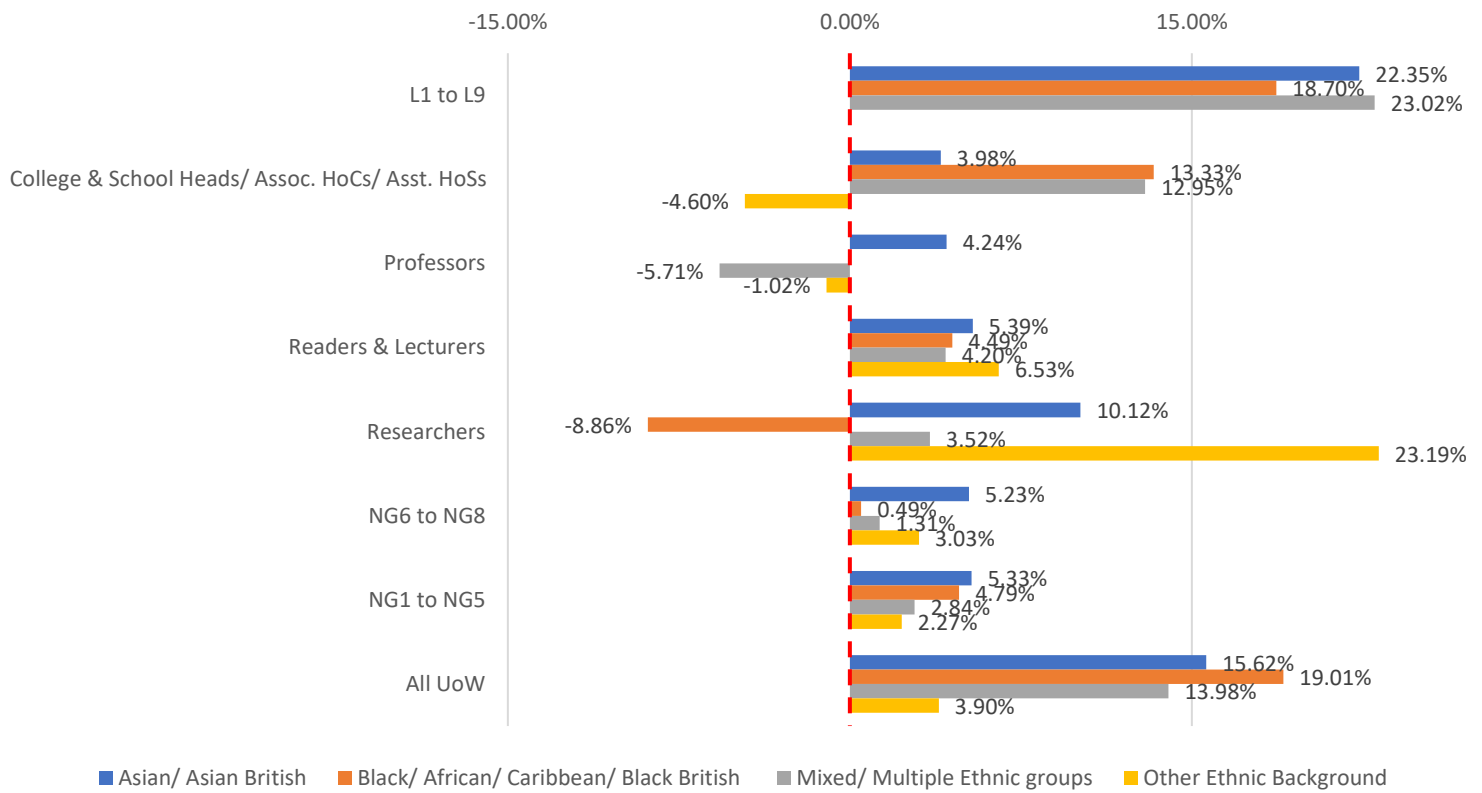
The diverse population of London stands at 42% in the 2021 census, which largely aligns with the diverse population within our lower quartile (42.97%), but this reduces to 16.16% diversity within the upper quartile.

In the below chart the red dotted line represents the average white salary within that pay grouping, so we can see where there are clear differences between pay of those who describe themselves as white, and those who have declared a different ethnicity. The largest differences are within the L1 to L9 group, as well as some key differences within Researchers (although they also have a pay gap in favour of Black/African/Caribbean/Black British group). Researchers are a relatively small group at Westminster (73 in total in comparison to 769 Readers and Lecturers) meaning pay gaps could emerge based on a small number of higher salaries for those with length of service and established experience.

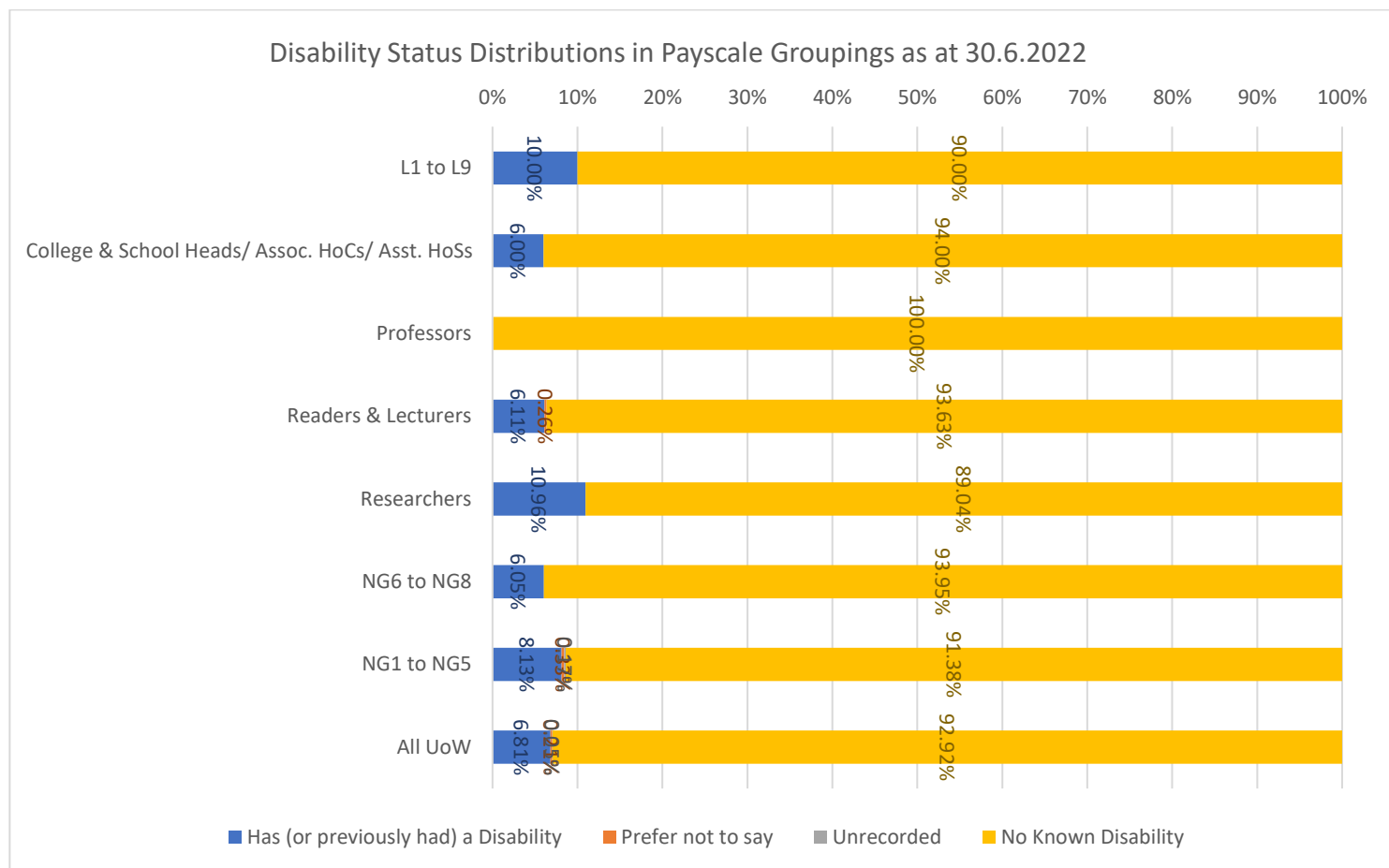
It should be noted that there is no disclosed representation in Level 3 to Level 9, or within Heads of College, and this is what drives the large pay gaps in these areas. The diverse representation in the group L1- L9 is all within Levels 1 and Levels 2, and those salaries will be markedly lower than the salaries in Levels 5 and above.

There are no declared Black/African/Caribbean/Black British colleagues within the Professorial group, and this group has the highest pay gap to white colleagues overall at the University (19.01%).

Ethnicity Groupings Pay Gaps to White Grouping as at 30.6.2022



DISABILITY- Distribution



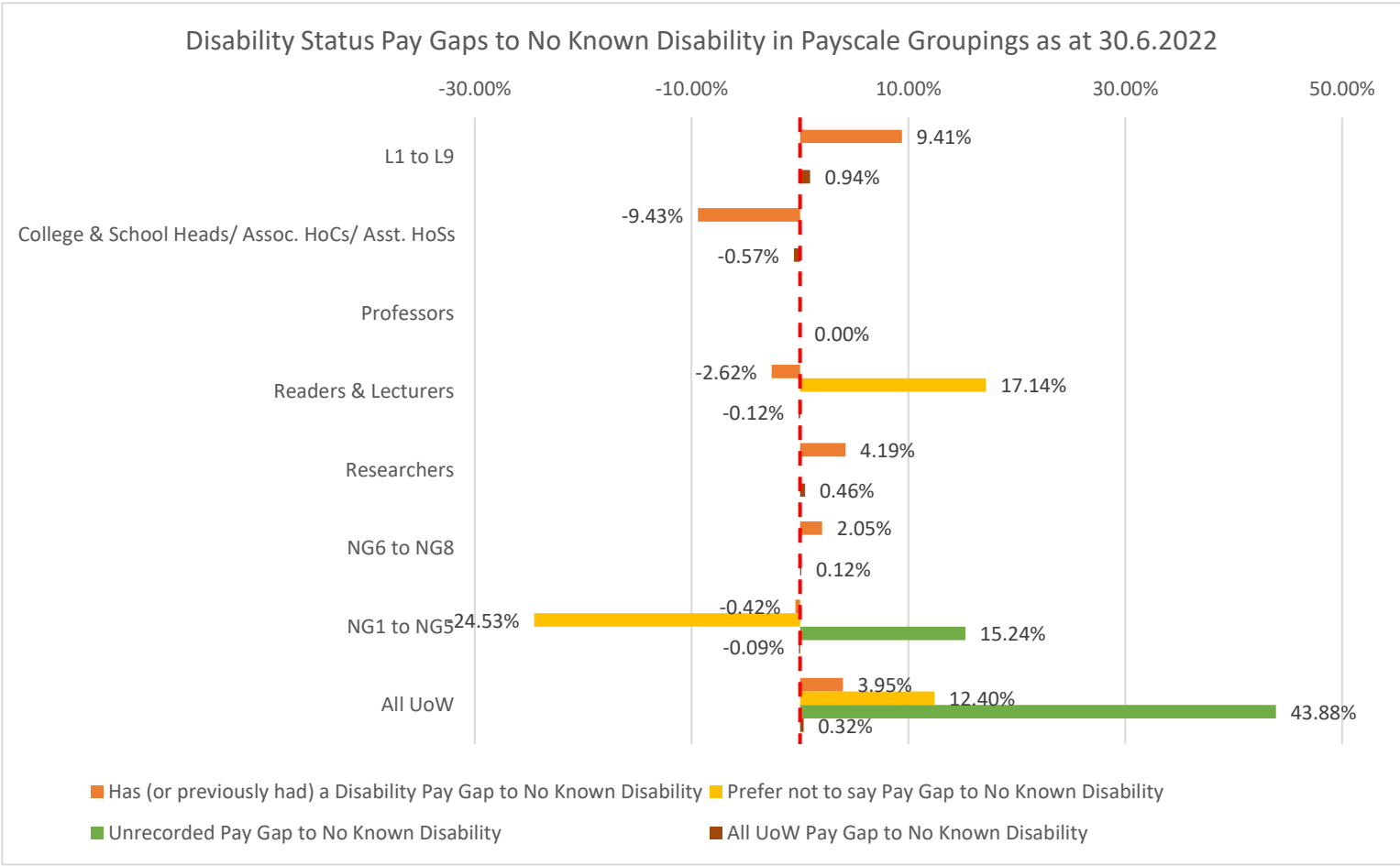
The government estimates that 1 in 5 of the working-age population are classed as disabled at any given time but that disabled colleagues are more likely than non-disabled colleagues to be working in lower-skilled occupations. Our distribution of disabled colleagues shows a fairly even spread across the different pay levels, with the exception of Professors where there are no disclosed disabled colleagues.

DISABILITY- Equal Pay Review

Within individual pay grades there are no significant pay gaps between disabled and non-disabled colleagues.

DISABILITY- University pay gap

Overall, disabled colleagues are paid less on average than non-disabled colleagues by 3.95%. Westminster reflects well against the national disability pay gap of 13.8% (Office for National Statistics 2021).

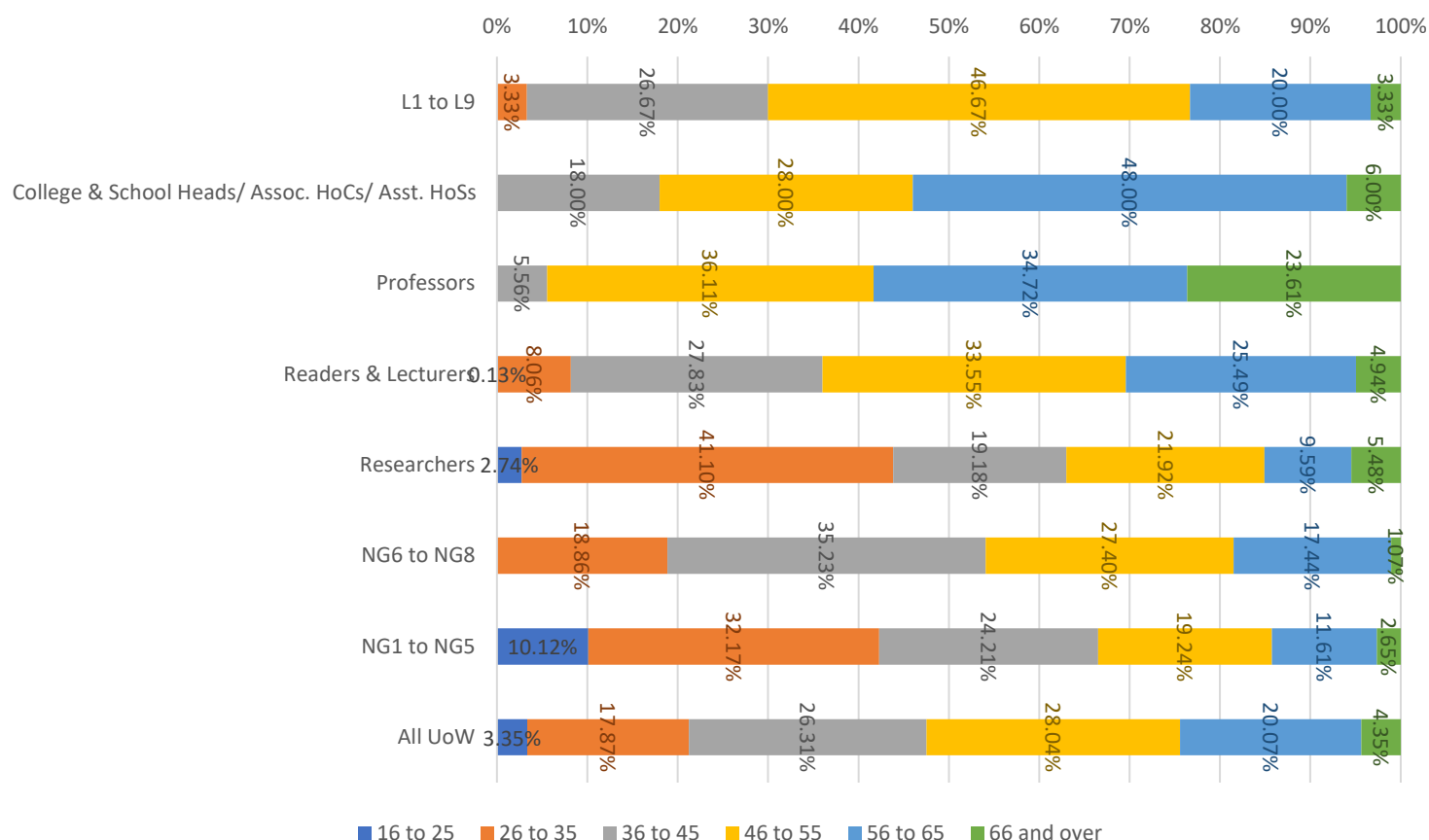


The red dotted line represents the average pay within that pay grouping of those with no declared disability.

What the above chart shows is that in some places there are quite high levels of pay gaps between those without a disclosed disability and those who prefer not to say, or where we do not have any information (unrecorded). More complete data would help us to understand if the disability pay gap is wider or better than our current figure.

AGE- Distribution

Age Group Distributions in Payscale Groups as at 30.6.2022



The largest age groups across the University are 36 to 45 (26.31%) and 46 to 55 (28.04%). As you go up the pay grades there is an increase of those aged 56-65, particularly on the academic side. The highest number of those aged 66 and over is within the Professors group.

AGE- Equal Pay Review

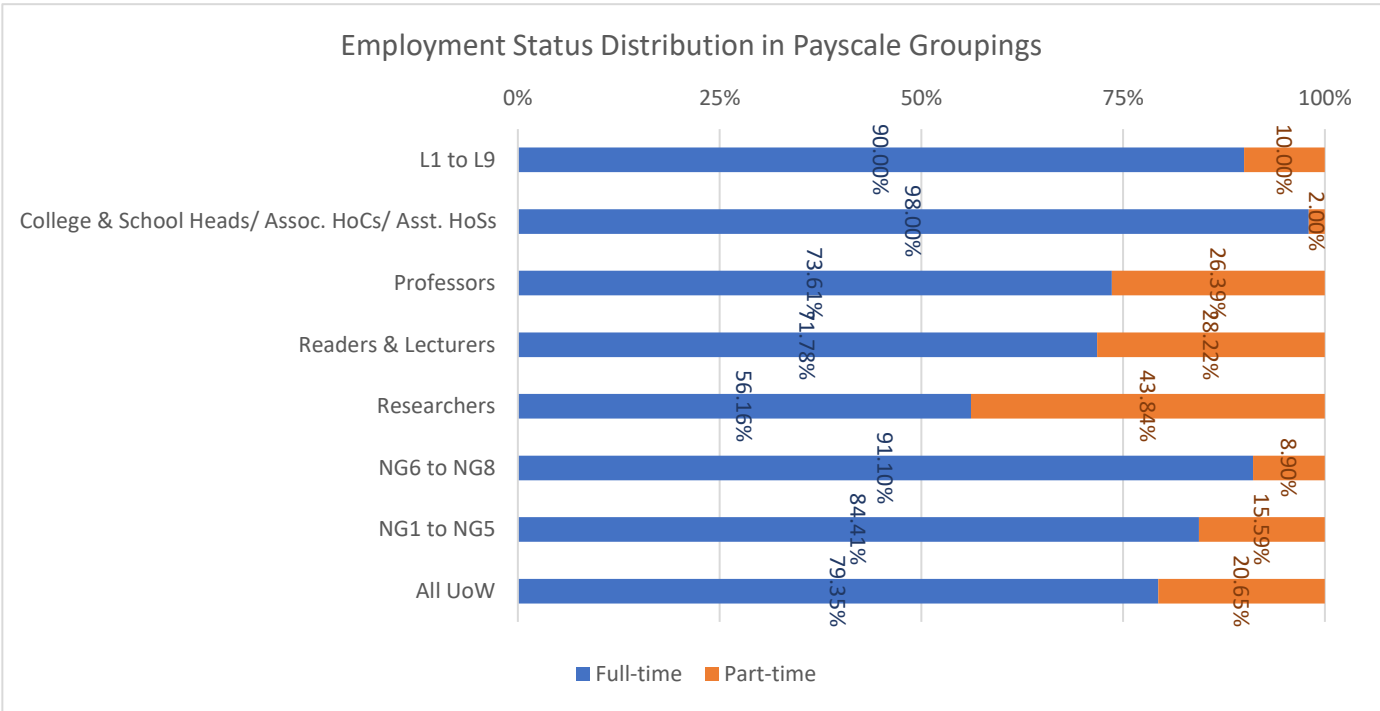
There are seven occurrences of pay gaps within the same pay grade which are above 5%, when we compare the average salary of that age group to the average salary for the pay grade as a whole.

In a context of salary progression based upon continuous service and length of time in a grade, with annual incremental progression for colleagues 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.

Where the results have identified 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.

PART TIME COLLEAGUES- Distribution



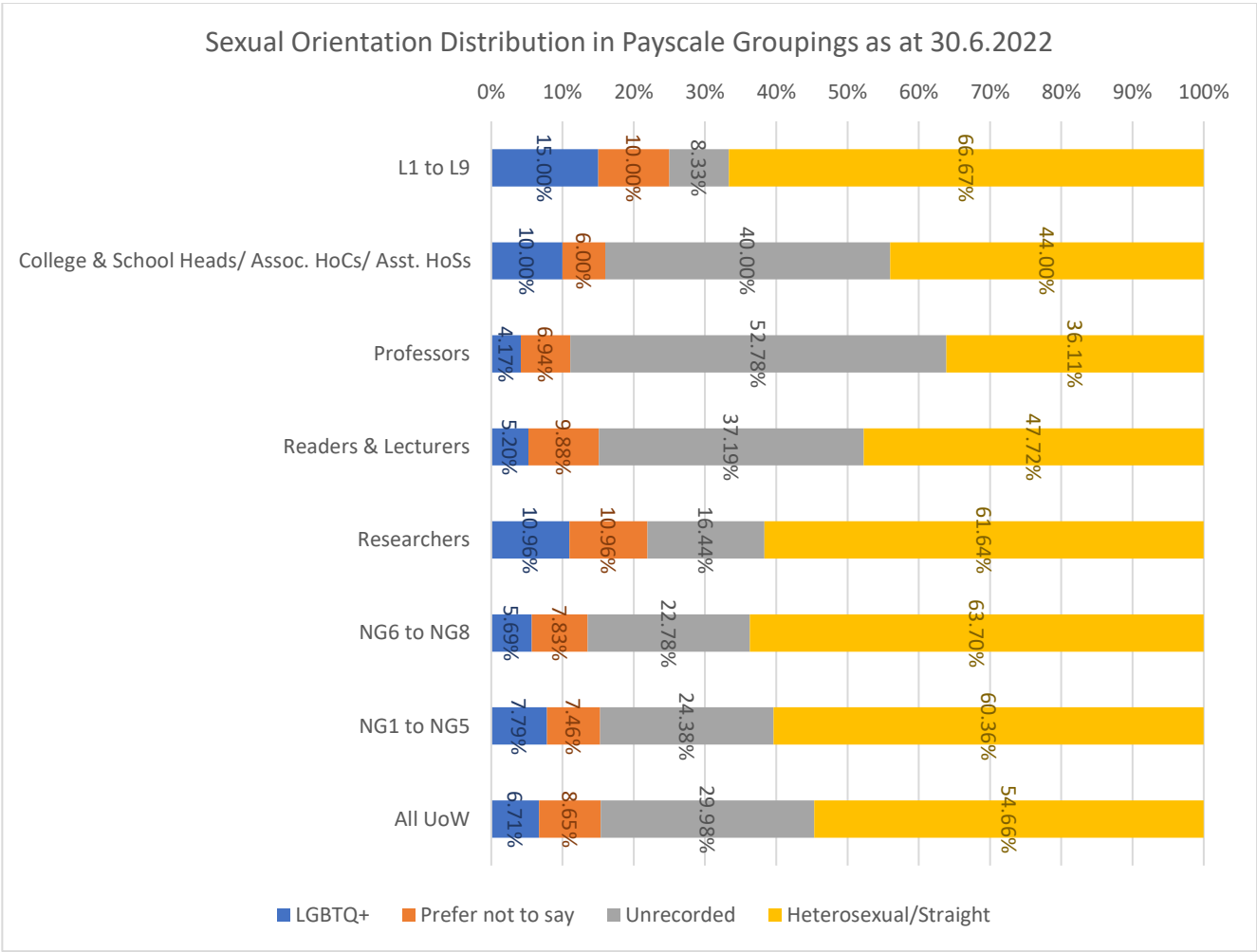
The largest proportion of part time colleagues are within academic roles, although this does reflect the nature of some academic roles e.g. part academic, part industry, working across the sector etc. The above figures do not include part time visiting lecturers.

PART TIME COLLEAGUES- Equal Pay Review

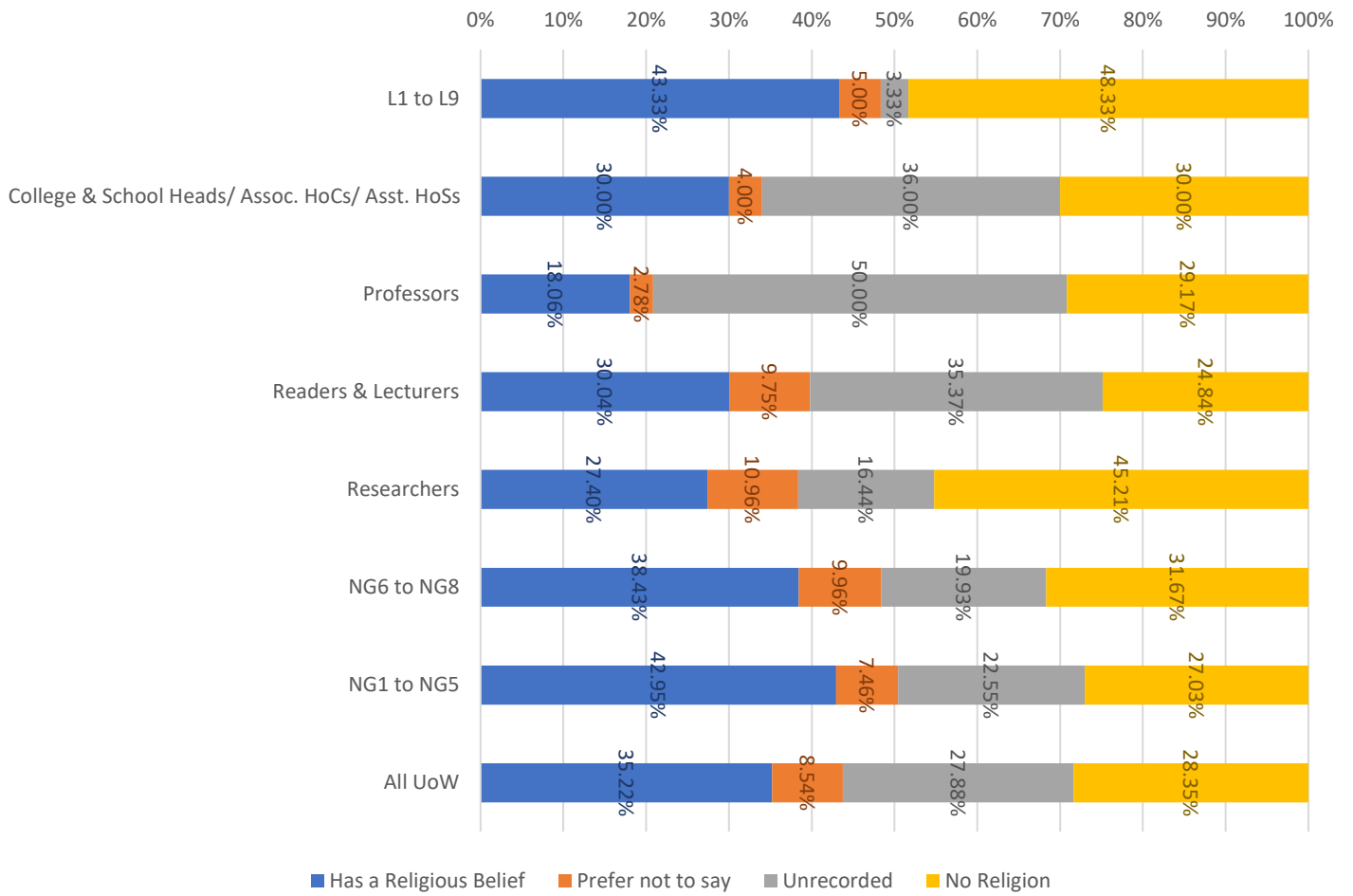
The University applies the same pay and grading structures and policies to part-time colleagues. Analysis of the difference in average salary of part-time colleagues compared to full time colleagues at each grade level showed two significant differences of 5% or above. In these cases part time colleagues were paid more and on investigation this was down to long serving individuals with higher salaries reducing their hours, and one part time interim role at a high level (which has now ended). The higher salaries were justified by length of service and stringent internal salary review processes based on a proven track record in research and scholarly activities.

SEXUAL ORIENTATION and RELIGIOUS BELIEF- Distribution

Historically data analyses in respect of sexual orientation and religious belief has raised some practical difficulties, due to the lack of systematic data in respect of most colleagues. 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 **72%** of the workforce for Religious Belief and **70%** for Sexual Orientation. 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 appropriate colleague networks to also encourage greater disclosure. In the interim we are now highlighting the distribution of known and unknown information across the pay scales.



Religious Belief Distribution in Payscale Groupings as at 30.6.2022



PART TIME VISITING LECTURERS

The results showed no significant pay differences between Visiting Lecturer colleagues with respect to gender, ethnicity, disability or age category. The PTVL data recorded largely aligns to the trends within the rest of the University e.g. gender distribution, ethnicity distribution, numbers with declared disability.

From 1st 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.

| COLLEGE | Headcount | Percentage |
|--------------------------------|-----------|------------|
| Design, Creative & Digital Ind | 482 | 53.38% |
| Liberal Arts & Sciences | 272 | 30.12% |
| Westminster Business School | 141 | 15.61% |
| CETI | 8 | 0.89% |
| All UoW | 903 | 100.00% |

| GENDER | Headcount | Percentage |
|---------|-----------|------------|
| Female | 453 | 50.17% |
| Male | 450 | 49.83% |
| All UoW | 903 | 100.00% |

| ETHNICITY | Headcount | Percentage |
|--|-----------|------------|
| Asian/ Asian British | 98 | 10.85% |
| Black/ African/ Caribbean/ Black British | 43 | 4.76% |
| Mixed/ Multiple Ethnic groups | 36 | 3.99% |
| Other Ethnic Background | 26 | 2.88% |
| Information Refused | 32 | 3.54% |
| Unrecorded | 82 | 9.08% |
| White | 586 | 64.89% |
| All UoW | 903 | 100.00% |

| DISABILITY STATUS | Headcount | Percentage |
|--------------------------------------|-----------|------------|
| Has (or previously had) a Disability | 52 | 5.76% |
| No Known Disability | 845 | 93.58% |
| Prefer not to say | 6 | 0.66% |
| All UoW | 903 | 100.00% |

| AGE GROUP | Headcount | Percentage |
|-----------|-----------|------------|
|-----------|-----------|------------|

| | | |
|-------------|-----|---------|
| 16 to 25 | 8 | 0.89% |
| 26 to 35 | 197 | 21.82% |
| 36 to 45 | 230 | 25.47% |
| 46 to 55 | 206 | 22.81% |
| 56 to 65 | 170 | 18.83% |
| 66 and over | 92 | 10.19% |
| All UoW | 903 | 100.00% |

| RELIGIOUS BELIEF | Headcount | Percentage |
|------------------------|-----------|------------|
| Has a Religious Belief | 344 | 38.10% |
| Prefer not to say | 127 | 14.06% |
| Unrecorded | 137 | 15.17% |
| No Religion | 295 | 32.67% |
| All UoW | 903 | 100.00% |

| SEXUAL ORIENTATION | Headcount | Percentage |
|--------------------|-----------|------------|
| LGBTQIA+ | 57 | 6.31% |
| Prefer not to say | 149 | 16.50% |
| Unrecorded | 125 | 13.84% |
| Heterosexual | 572 | 63.34% |
| All UoW | 903 | 100.00% |

