

**UNIVERSITY OF
CHANGE
FOR GOOD
WESTMINSTER**

Equality, Diversity & Inclusion Annual Report 2019-20

Appendix – Equal Pay Audit as of 30th June 2020

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October 2020**

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.

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.

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.

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.

We have taken a "traffic light" approach to highlight data;

- Areas highlighted in **green** confirm there are no problems
- Areas highlighted in **orange** confirm there may not be data available, possibly due to under-representation
- Areas highlighted in **red** confirm there are concerns in these areas

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 colleagues in particular to certain fixed salaries e.g. for Professors. 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 Professors 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 colleagues 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 colleagues is more favourable than the sector average based on benchmark data available, but the under representation in more senior positions 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 could be down to just one individual declaring a disability within a particular colleague 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 six points.
5. **Senior Colleagues**- It became evident that in respect of some senior colleagues 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 65%) 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 colleagues choose not to disclose this data, and it is now regularly disclosed by new starters as part of the standard onboarding process. There is arguably scope to further encourage its disclosure from existing colleagues, should the University decide to prioritise resources to do this.
7. **Agency, Consultants and Contract Colleagues**- For the 2020 audit we have reviewed data concerning colleagues who are paid separate to our established pay grade and salary scale systems, including agency, consultants and contract colleagues. This year there are 3 agency colleagues registered at the University, 80 Consultants and 92 Contract colleagues. The numbers have only changed slightly since the 2019 audit but we continue to monitor the use of external colleagues to ensure that these continue to be 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 colleagues. 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 colleagues 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. We also cannot demonstrate that recruitment of these roles fits with our commitment to Equality, Diversity and Inclusion.

Progress on recommendations made in 2019 audit

- 1. Continue to review and monitor use of agency colleagues, 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 colleagues.**

Regular monitoring suggests the numbers of agency colleagues continue to be small, however use of consultants, contract colleagues, one-off payments and overtime payments continue to be used in large numbers and need to be monitored.

Recommendation to continue for 2020- to include consultants and contract colleagues as well.

- 2. Monitor use of overtime to ensure work is being allocated and paid appropriately, ensuring equity in availability of work and University funds.**

A lot of work was undertaken towards the end of 2019 and the beginning of 2020 to review overtime payments being issued and identify any areas of possible concern. This work was paused due to Covid-19 and the large-scale remote working of the majority of our colleagues. This had an impact on overtime, for example overtime associated with running events on campus was not necessarily required. This will continue to be reviewed to monitor any changes with remote working and return to larger scale on site-working in 2021.

Recommendation to continue for 2020- To review any impact of Covid-19 on overtime.

- 3. Continue to encourage and embed people planning processes to ensure career pathways and promotional opportunities are available to relevant colleagues, and recruitment can be undertaken with a considered approach, particularly in areas that have been identified as difficult to recruit to.**

This remains an on-going priority and will continue to be monitored. As part of this work the University has agreed with effect from 1st January 2021 to ensure a minimum period of two weeks advertising for both internal and external roles to ensure availability of opportunities to as many colleagues as possible.

Recommendation to continue for 2020

- 4. Work with relevant departments to investigate use of intern roles to develop and encourage staff into difficult to recruit to roles.**

Successfully launched two interns, however due to Covid 19 the University Talent bank is presently focused on employment opportunities for current students, as opposed to graduates.

New recommendation for 2020

- 1. To ensure that analysis undertaken for the Equal Pay Audit is linked into the newly formed EDI Committee, and can be used to support and give focus to any actions and commitments agreed as part of that Committee.**

ANALYSIS

All data was taken on the snapshot date of **30 June 2020**.

1. Gender (headcount):

Row Labels	Headcount	Percentage
Female	963	54.2%
Male	815	45.8%
Grand Total	1778	100.00%

The 2020 audit continues to reflect the outcomes of the Transformation Project, with a reduced University headcount (from 1836 overall colleagues 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 colleagues, these higher salaries will dominate and impact overall statistics across the grading structure.

Gender pay gaps (base mean salary %)

Payscale Grouping	Gender Pay Gap within Group 2020
L9	-
L7	-13.28%
L5	-
L4	0.00%
L3	2.11%
L2	-0.49%
L1	-1.66%
Heads of College	-
Associate Heads of College	-2.12%
Head of School	0.00%
Assistant Heads of School	0.00%
PROFA	-0.57%
PROFB	-1.72%
PROFC	-1.51%
PL/Reader/PRF	-0.29%
SL/SRF/NG7 & NG8	-0.29%
L/RF/NG6	-0.44%
RA/NG5	-0.50%
NG4	0.35%
NG3	1.25%
NG2	1.29%
NG1	-

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 **9.72%**. This represents an improvement on last year's pay gap of 10.51%. The pay gap can be attributed to there being fewer female colleagues in more senior roles.

In Level 9, Level 5, Heads of College and NG1 there are no female colleagues to compare pay against.

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.

There are significantly fewer female colleagues in higher grade groups (From PL/Reader/PRF upwards). Overall, only 40% of colleagues in these groups are female; the biggest gap is within the Professors (31.3% female). There is no female representation in Heads of College*, Level 5 or Level 9 (one person in Level 9).

**Due to change in colleagues as of December 2020 there will be female representation in this pay group which will be reflected in the next Equal Pay Audit.*

2. Ethnicity (headcount):

BME	White	Unknown	Info Refused	Total
474	1221	61	22	1778

Overall, the University has a BME colleague population of 26.7%. Our figures broken down into academic and non-academic compare favorably with the latest HESA data;

	Westminster	HESA*
Academic	21.2%	17%
Non-Academic	32.4%	12%

* <https://www.hesa.ac.uk/news/23-01-2020/sb256-higher-education-staff-statistics>

Ethnicity pay gaps

The table below shows the difference in average salary of all BME colleagues in comparison to all White/Non- BME colleagues.

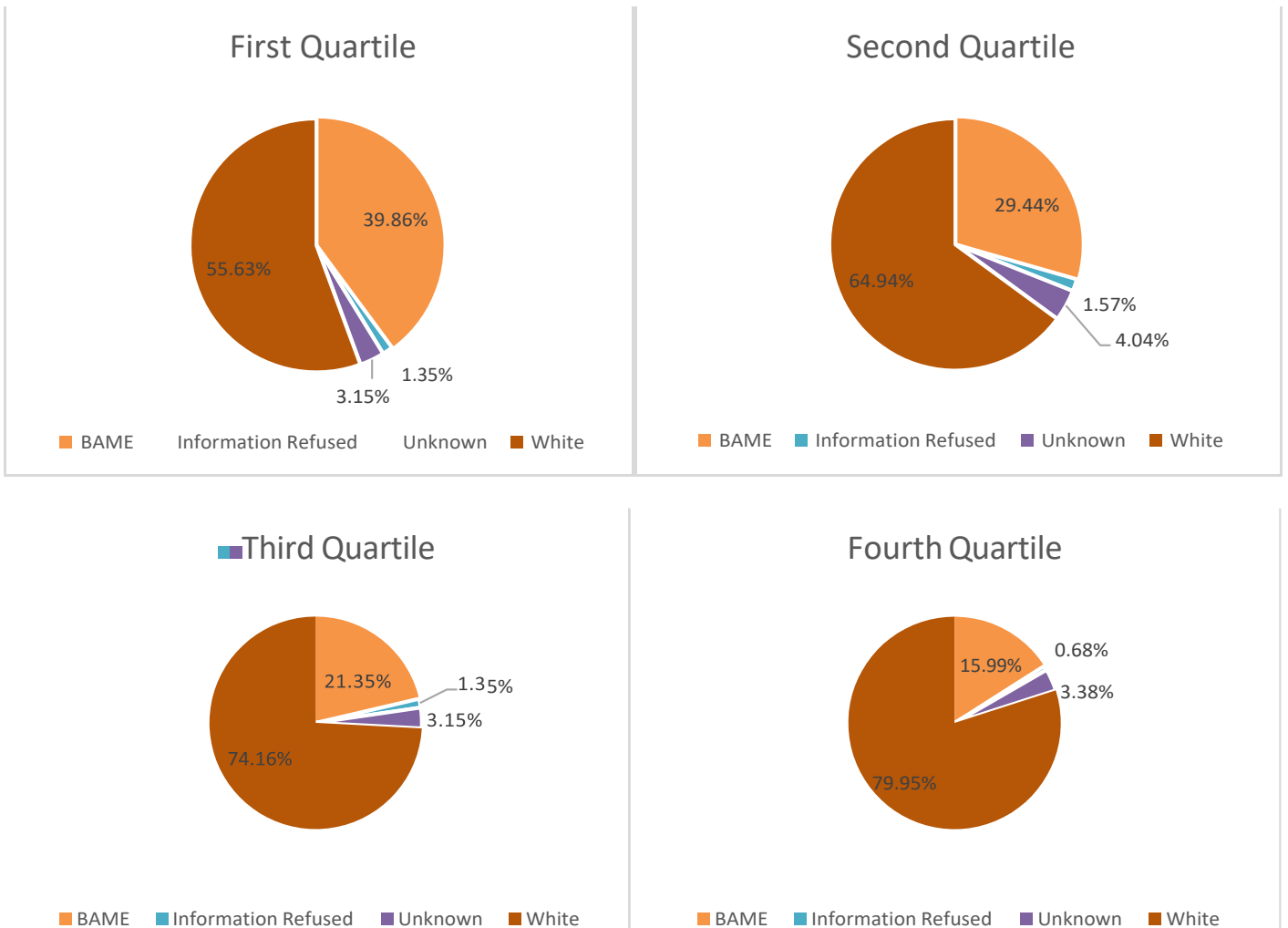
It should be noted that there is no disclosed representation in Level 2 to Level 9, Heads of College or Associate Heads of College. Collectively there are 36 colleagues in these groups.

Payscale Grouping	Ethnicity pay gap
L9	-
L7	-
L5	-
L4	-
L3	-
L2	-
L1	-2.9%
Heads of College	-
Associate Heads of College	-
Head of School	0.00%
Assistant Heads of School	0.00%
PROFA	-4.13%
PROFB	-1.73%
PROFC	-1.50%
PL/Reader/PRF	-1.20%
SL/SRF/NG7 & NG8	-0.96%
L/RF/NG6	-1.37%
RA/NG5	-0.38%
NG4	0.14%
NG3	-0.47%
NG2	0.94%
NG1	-1.25%

The average Ethnicity pay gap is **15.02%** and this is attributable to lack of representation in senior grades.

This is an improvement on the pay gap of 18% reported in Peter Bonfield's blog to colleagues as of 19th June 2020.

The lack of representation at senior levels is demonstrated when we split the data into quartiles. This means we split the workforce into four groups, the first quartile representing the lower end of the salary scales and the fourth quartile representing the highest end of the salary scales. The proportion of BME colleagues gets steadily smaller higher up the quartiles/salary scales.



3. Disability (headcount)

Yes	No	Prefer not to say	Total
103	1673	2	1778

Disability pay gaps (base mean salary)

The table below shows the difference in average salary of all disabled colleagues in comparison to all non-disabled colleagues. There is no disclosure/representation in Level 3, Level 4, Level 5, Level 7, Level 9, Heads of College or Professors. Collectively there are 83 colleagues in these groups.

Payscale Grouping	Disability Pay Gap 2020
L9	-
L7	-
L5	-
L4	-
L3	-
L2	0.33%
L1	3.39%
Heads of College	-
Associate Heads of College	-8.64%
Head of School	0.00%
Assistant Heads of School	0.00%
PROFA	-
PROFB	-
PROFC	-
PL/Reader/PRF	-0.65%
SL/SRF/NG7 & NG8	-2.13%
L/RF/NG6	-1.64%
RA/NG5	-0.16%
NG4	1.02%
NG3	0.60%
NG2	3.41%
NG1	-1.59%

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

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

Overall, disabled colleagues are paid less on average than non-disabled colleagues by 3.69%. This is attributable to less disclosure in senior roles. Overall Westminster reflects well against the national disability pay gap of 12.2% as identified in the Office for National Statistics 2018 report; this figure is not limited to the HE sector.²

4. Age:

Age	Less than 25	25-34	35-44	45-54	55-64	65+	Total
Headcount	40	295	452	519	379	93	1778

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 colleagues 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 colleagues 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 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. The largest numbers of colleagues fall within the '35-44' and '45 to 54' age grouping.

² 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	-	-	-	9.71%	-4.86%	-
L5	-	-	-	4.29%	-4.29%	-
L4	-	-	-	0.00%	-	-
L3	-	1.05%	-	1.05%	-1.05%	-
L2	-	-0.27%	-0.27%	0.32%	-0.27%	-
L1	-	-1.87%	-0.62%	1.22%	-2.41%	3.63
Heads of College	-	-	-	-3.38%	1.69%	-
Associate Heads of College	-	-	-1.42%	2.84%	-1.42%	-1.42%
Head of School	-	-	0.00%	-	0.00%	0.00%
Assistant Heads of School	-	-	0.00%	0.00%	0.00%	0.00%
PROFA	-	-	9.81%	-1.13%	-3.88%	2.62%
PROFB	-	-	-4.77%	1.50%	1.97%	-2.07%
PROFC	-	-	2.21%	-0.71%	-0.10%	1.07%
PL/Reader/PRF	-	-	-4.66%	-0.58%	0.89%	1.79%
SL/SRF/NG7 & NG8	-	-5.39%	-2.32%	0.67%	2.00%	2.50%
L/RF/NG6	-	-2.83%	0.19%	0.67%	3.07%	2.68%
RA/NG5	-5.86%	-3.89%	0.62%	3.05%	5.09%	6.50%
NG4	-5.91%	-2.86%	1.06%	3.67%	2.43%	2.70%
NG3	-5.35%	-2.34%	1.29%	2.09%	3.92%	4.13%
NG2	-3.64%	-3.39%	1.91%	0.64%	4.67%	-
NG1	-	-3.72%	1.50%	1.50%	1.50%	-0.38%

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 Colleagues

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 only one significant difference of 5% or above. This was down to just two individuals whose higher salaries had been justified through stringent internal salary review processes and were based on a proven track record in research and scholarly activities.

Gender, Ethnicity and Part-time colleagues

Analysis of the differences in average salary of part time colleagues, showed some differences above 5% for gender and ethnicity. Most of these differences are attributable to the majority of part time colleagues being female, there being fewer part time colleagues in general in senior roles, and fewer BME colleagues in general in senior roles. There is no representation of either part time working or job sharing in senior roles (L2 and above) other than some part time roles within the Professoriate.

Disability and Part-time colleagues

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

Age and Part-time colleagues

Analysis of the difference in average salary of part-time colleagues compared to full-time colleagues across the various age categories showed some differences. This is attributable to a small number of part time colleagues in more senior roles, and part time colleagues being more likely in some age categories e.g. age groups which are more likely to be associated with higher salaries due to length of service and experience.

6. Visiting Lecturers (Hourly paid / part time)

The results showed no significant pay differences between Visiting Lecturer colleagues 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 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 65% 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 colleague LGBTQ+ network to also encourage greater disclosure.

Appendix 1**Part time Visiting Lecturers**

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. Bearing this in mind, we are now looking to expand our reporting for part time Visiting Lecturers, in recognition of their permanent employment status.

GENDER	Headcount	Percentage
Female	449	50.79%
Male	435	49.21%
Grand Total	884	100.00%

ETHNICITY	Headcount	Percentage
BME	183	20.70%
Information Refused	28	3.17%
Unrecorded	98	11.09%
White	575	65.05%
Grand Total	884	100.00%

DISABILITY	Headcount	Percentage
Has (or previously had) a Disability	6	0.68%
No Disability	873	98.76%
Unrecorded	5	0.57%
Grand Total	884	100.00%

AGE GROUP	Headcount	Percentage
Less than 25	5	0.57%
25 to 34	176	19.91%
35 to 44	222	25.11%
45 to 54	211	23.87%
55 to 64	167	18.89%
65+	103	11.65%
Grand Total	884	100.00%

SEXUAL ORIENTATION*	Percentage
Bisexual	1.24%
Gay Man	3.17%
Gay Woman / Lesbian	1.02%
Heterosexual/Straight	60.86%
Other	0.34%
Prefer not to say	14.93%
Unrecorded	18.44%
Grand Total	100.00%

RELIGION*	Percentage
Buddhist	1.24%
Christian	24.10%
Hindu	1.13%
Jewish	1.36%
Muslim	3.51%
No Religion	31.22%
Other	0.79%
Prefer not to say	12.67%
Sikh	0.57%
Spiritual	2.26%
Unrecorded	21.15%
Grand Total	100.00%

*Headcount not recorded due to small numbers involved

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