

Staff Equality, Diversity & Inclusion

Annual Report 2011-12

Appendix 7: Equal Pay Report 2012

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Equal Pay Report 2012

Introduction

Equal Pay is firmly part of the social and political agenda. The University's Gender Equality Scheme (in response to the Equality Act 2006) and Equal Pay Policy reinforce our commitment to equal pay and require us to carry out an Equal Pay Audit every two years. The new Equality Act 2010 replaces all existing equality legislation, including the Equal Pay Act (1970), and introduces a range of specific measures, including the publication of gender pay gap data by individual HEIs, and will place a significant emphasis on closing the gender pay gap, where it exists.

The University supports the principle of equal pay for work of equal value. Legislation allows an individual to claim Equal Pay with a member of the opposite sex on the grounds that they are doing:

- Like work.
- Work rated as equivalent under a job evaluation scheme.
- Work of equal value – in terms of demands made under headings e.g. effort, skill and decision making.

Additionally, we are committed to making the same comparisons for all protected characteristics in respect of ethnicity, disability, age and for the first time in this audit, we will make reference to the two further categories of sexual orientation and religion and belief.

The Equal Pay Audit has three main aims:

- 1 To compare the pay of University staff undertaking equal work.
- 2 To investigate the causes of any gender, ethnicity, disability and age pay gaps.
- 3 Take action to close gaps that are based on the grounds of gender, ethnicity, disability and age.

The 2012 Equal Pay Audit is the fourth audit to be carried out by the University. The first audit was undertaken out in the summer of 2006. A formal Equal Pay Policy was developed and approved as a result. The 2006, 2008 and 2010 audits were carried out using the UCEA Equal Pay Toolkit. This toolkit was specifically designed to support the production of equal pay reports and aid any investigation into ensuring equal pay for work of equal value. In order to get further detailed reports, some level of customisation to the toolkit was also undertaken. The UCEA Equal Pay Toolkit is focused primarily on gender-based equal pay gaps. Westminster's audit has been extended to include ethnicity, disability, age, sexual orientation and religion and belief. The remainder of the audit was carried out using data in the HR SAP system, extracted onto bespoke Excel spreadsheets, to produce combined statistical reports showing pay gaps and variance actions which form the basis of the audit.

Background Information

The 2010 audit looked at pay data, since the University implemented the JNCHES Framework Agreement and offered a new pay and benefit package to staff covered by this Framework from 1st August 2009. Overall 83% of these staff are covered by the new package. This audit includes comparisons with the 2006, 2008 and 2010 audit outcomes.

The new benefits introduced in 2009 addressed a number of harmonisation issues between the academic and professional support staff groups and included for academic staff; a higher London weighting allowance and higher starting salaries on Lecturer, Senior Lecturer and Principal Lecturer pay grades as well as higher salaries at the top of all three grades as well.

For professional support staff the package offered a higher annual leave allowance and two grades were merged to match the academic Senior Lecturer grade, allowing for incremental

progression to a higher salary. Over a two year phased period this longer grade of eight increments has been reduced to six. Government advice in relation to the Employment Equality (Age) Regulations 2006, is that, in general, differences in pay between men and women resulting from pay progression within a grade by traditional annual increments, may be justified by the benefits to the organisation of increased experience, competence or performance ensuring greater expertise. This is sufficient for systems providing payments up to five years. In practice this means anything up to a six-point pay scale (minimum point on the scale plus five incremental points). After this period specific justification may be required. This has become regarded as good practice in relation to other equality areas and one to which Westminster adheres.

The University employs a large number of Visiting Lecturers (VLs). Visiting Lecturers are paid on the same scale as Lecturer grade staff (pro rata) and, as for all staff on appointment, they start at the bottom of the pay grade and are entitled to annual incremental progression, dependent upon meeting continuous service requirements. This has been applied consistently since the implementation of the single 51 point pay scale in 2005, for all University staff.

Where the nature of the work indicates that these hourly paid staff should be placed more appropriately on to a fractional contract with the University, a conversion to a fractional contract at the appropriate grade is undertaken, following a successful application for Grade Review. Since the University implemented the JNCHES Framework Agreement and offered a new pay and benefit package to staff covered by this Framework from 1st August 2009, approximately 140 Visiting Lecturers have converted to a fractional contract, reflecting their more notable commitment in terms of the hours of work they undertake for the University and their length of service. They are included in the applicable Audits.

In 2010 the University introduced a teaching-only job description and contract for a specific group of staff in the School of SSHL, this report includes this new group of staff (ref: Group 14 'Teacher').

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. The University audits the outcome of its grade review scheme and publishes the results on the HR website.

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.

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 March 2007. 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 HEIs' 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).

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
- Full time staff compared to Part time staff, Disability
- Full time staff compared to Part time staff, Ethnicity
- Full time staff compared to Part time staff, Age

Key results

Processing and disclosure of personal information is protected by the Data Protection Act 1998 and any data from which individuals can be identified are considered personal data. Where pay gaps were identified, as highlighted in previous audits, we are often dealing with a small number of people. In addition to making it difficult to get statistically significant comparisons, we also run the risk of identifying individuals. In order to protect the credibility and confidentiality of this exercise, we needed to ensure complete anonymity and compliance with Data Protection principles in the way that information is presented in this report. In accordance with the recommendation made by the Equality Challenge Unit in its April 2010 publication ("Promoting Equality in Pay"), in circumstances where small numbers of individuals may be identifiable, having determined whether they are undertaking equal work, their pay will be described in relative as opposed to absolute terms. (i.e. more / less / equal to counterparts, without providing actual figures), to provide suitable 'anonymity'.

PART TIME:

The difference in the average salary of part time female staff was compared to part time male staff. The average salary for female staff compared to male staff (across all grades as a total figure) is **-2.3%**.

The results showed no significant differences, but highlighted two groups to continue to monitor, Professor (-4.5%) and Senior Academic (-3.5%) although both have improved since the last audit was undertaken.

Part-time female staff on the Professorial Grade form 31% of part-time Professors which is already a very small group of people. Therefore, it is very difficult to make statistically significant comparisons on pay, and we also run the risk of identifying individuals. This also applies to the Senior Academic group – there are only nine members of staff in total within this historical grade / group. The University is satisfied that any differences are objectively justified.

GENDER:

	Female	Male	Total
Gender 2006	960	982	1942
Gender 2008	1047	976	2023
Gender 2010	1027	990	2017
Gender 2012	966	866	1832

Although the ratio of male and female members of staff is fairly evenly split, the overall number of female staff increased has increased since 2006. The data in 2012 reflects the reduced headcount for all male and female staff at the University, following the outcome of the University's response to its financial challenge and the need to reduce the staff salary bill by £6.9m. It is important to note there are 100 more female staff recorded in the 2012 audit, the highest difference since 2006, which reflects the national picture *"the relative position of women has not so far worsened as much as commonly perceived or was widely anticipated given the high concentration of women workers in the public sector and in part-time jobs more generally. This might indicate that the impact of economic austerity will prove to be more gender balanced than at first thought, although it also underlines how tough things are becoming for both sexes in our increasingly depressed jobs market. (Ref: CIPD December 2011 "How men and women have fared in the post-recession jobs market")*.

Another key point to highlight is that where there are senior grades with more male staff, these higher salaries will dominate lower grades with a more even distribution of male and female staff and groups where there are higher average female salaries. Table 1 below shows the difference in average salary of all female staff in comparison to all male staff. Overall, female staff continue to be paid less on average than male staff. This can be attributed to there being less female staff in more senior roles. There are significantly less females in grade groups 8 to 11 (Head of Department, Professors, Principal Lecturers and Principal Research Fellows). Overall, 37.5% of groups 8 to 11 are female; the biggest gap is within the Professors grouping (30.5% female) and the smallest within the PL/PRF/Reader group (40.7% female).

Table 1: Gender pay gaps

	2006	2008	2010	2012
1. Level 5	-1.3%	0.0%	-0.6%	0.00%
2. Level 4	-7.1%	-10.6%	-	-
3. Level 3	0.0%	-5.1%	2.3%	8.70%
4. Level 2	0.4%	1.8%	1.3%	1.80%
5. Level 1	1.0%	-0.7%	-0.8%	-0.80%
6. Dean of School	4.3%	-4.0%	5.6%	-2.20%
7. Director - Academic/ Associate Dean/ Deputy Dean	9.8%	-3.7%	0.7%	1.90%
8. Head of Departments	-4.7%	0.9%	1.1%	1.70%
9. Professor	-1.4%	-2.2%	-2.1%	-2.20%
10.Senior Academic	-0.6%	1.6%	1.5%	0.00%

11. Principal Lecturer /Principal Research Fellow/Reader	-0.4%	0.5%	0.0%	-0.60%
12. Senior Lecturer/Senior Research Fellow/NG7/NG8	-0.1%	-0.7%	-1.6%	-1.40%
13. Lecturer/Research Fellow/NG6	-0.9%	-1.9%	-0.9%	-0.20%
14. Teacher/Research Associate/NG5	-2.0%	-2.4%	-0.9%	-1.00%
15. NG4	0.2%	1.0%	0.4%	-0.70%
16. NG3	0.1%	0.0%	-0.4%	0.10%
17. NG2	-4.1%	-1.8%	-2.8%	-0.20%
18. NG1	4.0%	0.9%	2.4%	-6.40%
19. NG0	-	-	-	-

The analysis reveals the following two significant differences (i.e. 5%), in more detail:

- Grade Group 3, Level 3 - The female member of staff in this category is paid 8.70% more on average than the male member of staff. This is due to a combination of a case for a market competitive salary and a significantly longer serving member of staff at this grade. It is important to note that this difference reflects one individual and so further details cannot be provided, but the University is satisfied that the difference is objectively justified.
- Grade Group 18, NG1 – There is only one new female member of staff within this grade placed towards the bottom of this pay grade and therefore collectively the male average salaries are higher at 6.40%. The University is satisfied that the difference is objectively justified.

However, 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 9.5%, this is an improvement of 1.4%, which is attributed to there being less female staff in more senior roles, as there are significantly less females in grade groups 8 to 11 as shown above.

Background to the Professorial appointment process

Professors are placed on a fixed salary at appointment which is reviewed at the annual Professorial Salary Review Committee meeting. Professors are placed on a fixed point scale. Their position is dependent upon the “quality” of research and esteem factors that a Professor can bring to the University to enhance its reputation in their field of excellence in line with the University’s strategic vision.

Following successful appointment to the title of Professor, further salary advances are dependent on meeting and exceeding, on a sustained basis, performance-related criteria. The evidence required to demonstrate this includes; number of research students, MPhil/PhD completed by students; research income generated; research contracts obtained; research papers published; books published; actual teaching load; student projects supervised (subdivided into undergraduate and postgraduate projects); external committee work; consultancy income generated, and any other responsibilities, for example, Course Leader. Clear and robust criteria that describe expected outputs of delivery for the University’s three categories of Professor (Professors A, B and C) under the four headings of; Research, Teaching, Leadership & Management and Knowledge Transfer & Professional Standing, have been recently enhanced and are published on the HR website.

Comparison with 2006, 2008 and 2010 data

A clear and positive improvement can be reported. The average pay gap between male and female staff has decreased by 3% since 2008. Further observations with regards to trends since 2006 reveals the following:

- Grade Group 6, Dean of School – There are only seven individuals in this group, therefore any fluctuation can be the result of a salary for one individual. The previous significant difference in 2010 was due to a combination of a higher starting salary for both an internal and external appointee and a longer serving member of staff at this grade. The latter has now left the University and this change is reflected in the 2012 figure.

ETHNICITY:

	BME	White	Unknown	Total
Ethnicity 2006	340	1339	263	1942
Ethnicity 2008	424	1418	181	2023
Ethnicity 2010	441	1459	117	2017
Ethnicity 2012	411	1341	80	1832

The number of BME staff has been increasing since 2006 and the number of staff recorded as “unknowns” has been reducing. It is important to note that this reduction is also proportional to the overall reduction in headcount. Overall the University has a BME staff population of 22.7%, which compares very favourably with the HE sector average of 11.3%.

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. Overall, the results show no significant differences of greater than 5%. This is a positive indication of no disproportionate impact as a result of the University's financial challenge and reduced headcount. Additionally, the groupings of work rated as equivalent identified no groups greater than 3%. However, it should be noted that there is no disclosed representation in groups 1 to 4 – Level 2 to Level 5, Dean of School and Academic Director; collectively there are 38 members of staff in these groups.

Ethnicity pay gaps	2006	2008	2010	2012
1. Level 5	-	-	-	-
2. Level 4	-	-	-	-
3. Level 3	-	-	-	-
4. Level 2	-	-	-	-
5. Level 1	-0.3%	-	-1.2%	0.6%
6. Dean of School	-	-8.7%	-	-
7. Director - Academic/ Associate Dean/ Deputy Dean	-	-	-	-
8. Head of Departments	4.1%	2.6%	-0.7%	1.9%
9. Professor	-2.9%	-4.5%	-3.4%	-1.5%
10. Senior Academic	-0.9%	0.0%	0.2%	-0.2%
11. Principal Lecturer /Principal Research Fellow/Reader	-1.4%	-2.3%	-0.2%	0.7%
12. Senior Lecturer/Senior Research Fellow/NG7/NG8	-2.2%	-2.0%	-1.0%	-1.4%
13. Lecturer/Research Fellow/NG6	1.3%	0.3%	0.7%	1.0%
14. Teacher/Research Associate/NG5	-2.4%	-2.2%	0.9%	0.7%
15. NG4	-0.1%	-0.5%	0.8%	0.7%

16. NG3	0.2%	0.0%	0.5%	0.6%
17. NG2	2.6%	3.0%	3.9%	2.3%
18. NG1	2.4%	1.7%	0.5%	-0.7%
19. NG0	-	-	0.0%	0.0%

Part- time pay gaps

The difference in average salary of part-time BME staff compared to white staff is as follows. There is one significant difference at 5% or above.

- Grade Group 17, NG2 – the difference is 5.74%, a more favourable pay difference for part-time female staff. On further investigation, it can be confirmed that this is due to length of service at the University.

There is one pay grouping where the difference is 3% or greater:

- Grade Group 15, NG4 - the difference is 4.66% a more favourable pay difference for female staff and again on investigation, is due to service at the University;

It should be noted that the majority of staff in the BME category are at the top of their respective grade, therefore pushing the average salary higher than the staff in the White category where the majority are either on the bottom or the middle spine points of their respective grade. Additionally, there are small numbers of disclosed representation within these two grades for part-time BME staff and therefore it is very difficult to make statistically significant comparisons on pay, and we also run the risk of identifying individuals.

Comparison with 2006, 2008 and 2010 data

Little change can be reported. The average Ethnicity pay gap is 18.3% and this is directly attributable to lack of representation in senior grades. It is encouraging however to note that there has been an improvement in the Academic Head of Department grade, an increase of 2.6%, a recovery following a declining trend since 2006, as well as slight improvements in other academic groups including; Principal Lecturer/Principal Research Fellow and Reader, Senior Lecturer/Senior Research Fellow and Lecturer/Research Fellow.

DISABILITY:

	Yes	No	Total
Disability 2006	44	1898	1942
Disability 2008	46	1977	2023
Disability 2010	84	1933	2017
Disability 2012	88	1744	1832

The table below shows the difference in average salary of all disabled staff in comparison to all non-disabled staff. The disclosure rate of disabled staff has doubled in 2010 due to a successful data capture exercise and there has been a further increase of four disclosures despite the reduction in headcount, which confirms that there has been no disproportionate impact. Overall there are no significant differences at 5% or above. There is no disclosure / representation in Level 4, Level 3, Dean of School, NG2 and NG0.

There are two pay groupings where the difference is 3% or greater:

- Grade group 14, Teacher/Research Associate and NG5 - disabled staff are paid 3.7% more on average than their non-disabled counterparts. As the difference in pay is less than 5%, this will be monitored in future pay audits to ensure that the gap does not widen, and it is important to note that this has steadily decreased since the 2006 and 2008 audits and now remains constant since 2010. This is a positive indicator that the inclusion of the new category of 'Teacher' (staff on teaching-only contracts) in this group,

for this 2012 audit, reflects good representation and has not disproportionately affected salaries within this category.

- Grade group 7, Academic Director – this grade covers a very small number of people, disabled staff are paid 5.6% higher, on investigation this can be confirmed to be due to two individuals and the University can confirm that this gap is objectively justified.

In 2010 Grade Group 16, NG3 – it was noted that disabled staff were paid 3.0% more on average than their non-disabled counterparts. As the difference in pay was less than 5%, this was required to be monitored in future pay audits to ensure that the gap did not widen, and it can be noted that this has now reduced to -0.5% in 2012.

Disability pay gaps

	2006	2008	2010	2012
1. Level 5	-	-	-	-
2. Level 4	-	-	-	-
3. Level 3	-	-	-	-
4. Level 2	-	-	0.2%	0.0%
5. Level 1	0.3%	0.5%	0.7%	2.1%
6. Dean of School	-	-	-	-
7. Director - Academic/ Associate Dean/ Deputy Dean	-	-	-	5.6%
8. Head of Departments	-1.8%	3.0%	0.3%	-1.3%
9. Professor	-0.7%	-0.5%	0.5%	-1.3%
10. Senior Academic	-	-	1.6%	-0.2%
11. Principal Lecturer /Principal Research Fellow/Reader	-1.2%	5.1%	2.7%	1.4%
12. Senior Lecturer/Senior Research Fellow/NG7/NG8	-2.7%	0.2%	0.9%	0.7%
13. Lecturer/Research Fellow/NG6	-0.9%	-0.9%	1.1%	1.5%
14. Teacher/Research Associate/NG5	-5.4%	4.1%	3.7%	3.7%
15. NG4	2.4%	1.4%	-1.3%	2.2%
16. NG3	-1.1%	3.9%	3.0%	-0.5%
17. NG2	2.6%	-4.2%	-	-
18. NG1	-	-	1.3%	2.6%
19. NG0	-	-	-	-

Comparison with 2006, 2008 and 2010 data

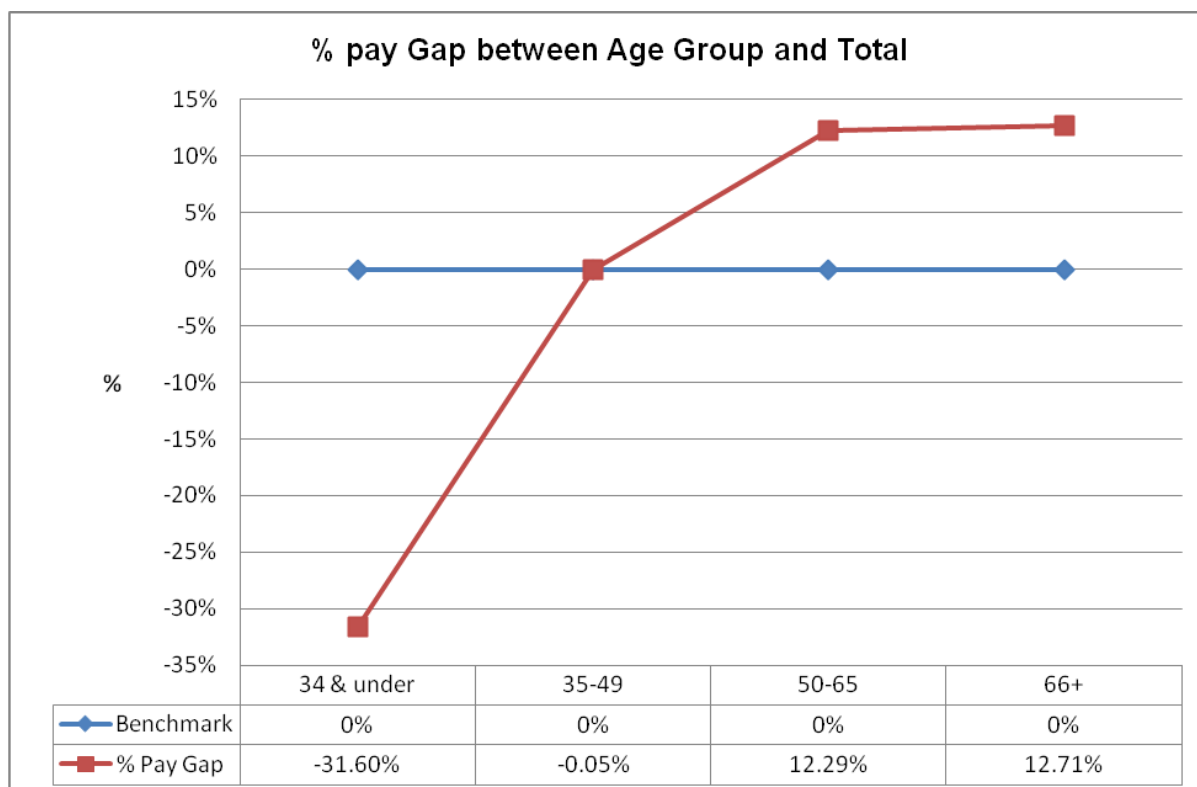
Overall, there is a positive picture, with a decrease in the pay gap since 2006 of 12.8%, and this pay gap is in favour of disabled people. Overall, disabled staff are paid more on average than non-disabled staff by 3.7%. This is attributed to a higher disclosure rate in more senior roles. This is particularly visible in grade Level 1, Academic Director and NG1 - in terms of the proportion of staff that have disclosed a disability and the number of staff in these grades. It should be noted that there has been a steady decrease in category 11 (PL/PRF/R) since 2008, as the difference in pay is less than 3%, this will be monitored, as noted previously.

AGE:

	34 and under	35 - 49	50 - 65	66 and over	Total
Age 2006	481	786	671	4	1942
Age 2008	461	819	736	7	2023
Age 2010	435	820	758	4	2017
Age 2012	379	801	647	5	1832

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 (e.g. Group 1 covers staff aged 34 and under, group 2 covers 35 to 49, group 3 covers 50 to 65 and group 4 covers staff aged 66 and over. This chart shows a decrease in the number of staff in all the age groupings (apart from 66 and over) as a consequence of the reduction in headcount. The reduction is the greatest in the 50 - 65 age category, which reflects the higher number of staff opting for a Voluntary Severance package, as part of the University's response to its financial challenge.

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 11 to 19, the results show salary increases that reflect length of service in a grade for the different age categories. The largest number of University staff fall within the 35 to 49 age grouping and are generally at an earlier stage in their career within these grades. Where the results have identified some pay gaps of more than 5% for senior staff, 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 and complexity of roles. In addition, in some cases, we are again dealing with a very small group of senior academic 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 these senior level posts and these vary over time.



Part- time pay gaps

In order to investigate the potential pay gaps within age combined with employment status (part-time or full-time), the difference between average salary for part-time and full-time members of staff was calculated for each age category. This has allowed for a detailed analysis of this area. This action has revealed few potential areas of concern and each area has been identified and investigated as follows;

- Grade Group 15, NG4 – within the 50-65 age category, there is an average pay gap of - 9.11% between part-time and full-time staff. After investigation, the data reveals a total of 21 members of staff in this category with just 1 part-time member of staff. The part-time member of staff is on the lower end of the grading scale (due to service in grade) and the majority of the full-time staff are on the top end of the grade (again, due to service in grade). The University is satisfied that this difference is objectively justified.
- Grade Group 9, Professors - within the 50-65 age category, there is an average pay gap of -6.67%, this is due to the salary range in this group (which covers three categories of Professor) and the length of service in this grade. As noted under previous sections, professorial staff salary progression is based upon annual review of evidenced based performance related criteria. Where colleagues have published high quality and high profile research which is valuable for the University's research profile, this was more significant than factors such as age , for example, in respect of salaries. Following investigation, the University is satisfied that this difference is objectively justified and will continue to monitor in future audits, but no direct action is required at this time.
- Grade group 11 (Principal Lecturer / Principal Research Fellow / Reader) – there is an average pay gap -6.08%, this is due to the salary range in this group and also mainly due to length of service in grade. There will also be salary fluctuations due to the differences between salary scales depending on whether a member of staff chose to opt in or out of the New Offer. This combination of factors provide an objective justification for the difference.

Overall, further investigation showed that salary increases with regard to age and length of service in grade combined, contribute to, and objectively justify, these highlighted differences.

Age Comparison with 2006, 2008 and 2010 data

As shown in the table below, the University's age profile broadly mirrors the HE sector, but with a slightly lower proportion in the 16-24, 25-34 and 65-74 age categories. The sector benchmark now recognises 75+ as a new category in response to the removal of the default retirement age. The University has seen an increased number of staff in the over 65 categories over the past year, but will only see an increase in headcount in the 75+ age category before the next Equal Pay audit, should there be any recruitment of new starters in that category. Overall, there has been little change in the University's age profile and as with other areas with small changes, this may be attributed to reporting on a decreased headcount.

Age Category	Benchmark (DLA) %	UoW All Staff %
16-24	3.5%	1.1%
25-34	21.4%	19.8%
35-44	26.1%	28.6%
45-54	27.9%	28.3%
55-64	19.1%	20.9%
65-74	2%	1.2%
75+	0.1%	0%

CONCLUSIONS

It is important to note the following the Equality Challenge Unit (Ref: April 2010 publication "Promoting Equality in Pay"), the overall gender pay gap is reflective of the distribution of men and women across pay grades as well as any pay discrimination. 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 implementation of the Pay Framework, new pay and benefit package offered to staff from 1st August 2009, and the University's response to its' financial challenge and reduced headcount, has not impacted adversely on any of the staff groupings that this audit has looked at.

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 Head of 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 Professional support staff, the University now routinely advertises the salary at the start of the grade, rather than the full range, to strengthen adherence to this policy and to ensure fairness and consistency in appointment procedures for new starters, which is a particular concern in the current economic context of high unemployment, greater competition for jobs and arguably appointments made to more experienced and skilled candidates.

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 the majority of cases Westminster average pay for BME staff is more favourable, but the under representation in more senior positions has been noted.

Disability - The number of colleagues who have declared a disability is low; it equates to less than 5% of *all* staff at the University. Where there was a significant variance in pay which was actually in favour of the disabled colleagues; this was attributed to longer lengths of service.

Age – Salary differentials reflect length of service and career progression.

Senior Staff - It became evident that in respect of some senior staff in Professorial and Dean of School 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.

The New JNCHES Equality Working Group note in their Overview Report published in January 2011, that the gender pay gap in HE is undoubtedly influenced by the structure of its

workforce, where there is significant vertical segregation, occupational segregation and part-time working differences between the sexes in HE. With respect to vertical segregation, Heads of Institution are disproportionately male as is the case with senior managers and Professors, although at Westminster we have seen a gradual improvement in these groups, women at Westminster comprise **47.4%** of academic staff at the University (compared to 43% in the UK), but only **6.3%** of those are in professorial or Head of Department positions (19% in the UK). Gender discrimination, stereotyping and organisational cultures are also believed to play a role in the differences between the pay of women and men and thus measures to tackle these sources of inequality are still necessary.

The JNCHES literature review undertaken highlights a range of policies that are recognised as having a demonstrable impact, 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.	<p>Website address for relevant policies; http://www.wmin.ac.uk/page-126</p> <p>Guidance provided on entitlement to staff to request flexible working; http://www.wmin.ac.uk/page-482</p>
Transparency e.g. Equal Pay Reviews	<p>Undertaken every two years, presented to HR Committee and the University's Court of Governors and published on the University's website. Policy available on; http://www.wmin.ac.uk/page-126</p>
Development/Training and tackling discrimination and stereotyping.	<p><u>Website</u> address for all development / training available; http://www.wmin.ac.uk/page-54</p> <p><u>Specific development programmes</u> aimed at supporting an enabling work environment are listed on; http://www.wmin.ac.uk/page-16976 and include; Corporate Services Management Programme & Future Leaders (CSMP), Fresh Steps, Management Development Programme, MOSAIC, Navigator, Performance Management, Springboard and Springforward.</p> <p><u>Specific Initiatives</u> include; Developing a Single Equality Policy, developing recruitment routes for young people and early career academics, Stonewall Diversity Champion and tailored Disability Awareness sessions.</p>
Representation	<p>Female representation in the group that make up the most senior leadership teams is encouraging. The University Executive Board Extended Directors Group is 10 female and 7 male staff members. While the constituency of the group will be revised from time to time,</p>

	this is a good role model for leadership teams across the University.
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.

RECOMMENDATIONS

Taking into consideration all of the above and whilst recognising that there may be legitimate reasons for pay gaps; we will continue to ensure that we have HR policies and practices in place that will help to close the gaps rather than widen them. Areas that we will monitor and work to strengthen include:

- Continue to promote pay transparency and consistent application of pay practices by embedding equal pay principles in all relevant HR policies and procedures and ensuring that measures are in place to minimise the risk of unequal pay practices. For example, having published salary scales, a pay structure based upon job evaluation, a grade review process and ensuring the effective implementation of the University's Equal Pay Policy.
- Development programmes for managers and staff – Including the achievement of Investors in People for the University's Corporate Services departments and the Corporate Services Management Programme have had a positive impact on skills and behaviours across managers in all departments. Invaluable outcomes include; generating a consistent understanding of management, consistency and coherence to University policies. This will enable the University to retain and develop high calibre members of staff.
- Other equality areas – we have started to collect sensitive information in the areas of sexual orientation and religion and belief and have included data on these two categories within this audit. Disclosure rates are low and therefore analysis is not yet statistically significant. We will continue to capture this data with the aim to reduce the number of 'unknowns'. This equality area will be reviewed again at the time of the next audit in 2014 and we will consider the results of any data collection exercise that has been carried out and the comprehensive / accuracy of any data collected.
- Mandatory recruitment and selection briefing for all those involved in appointment processes supported by clear guidance on good recruitment and selection practices. HR Managers have continued their increased participation in interview panels, including academic appointment panels at Dean of School and Professoriate level with the aim of embedding good practice and will continue to do so, within resource and practical constraints.
- Continuing to ensure our commitment to embracing diversity, promoting equality and working to ensure that there are no perceived barriers to progression for all staff with appropriate development and training opportunities and interventions.
- Continue to promote flexible working and family friendly policies practices for *all* staff.
- Review reward and remuneration policies and procedures in line with legislation and best practice.

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