

Equal Pay Audit 2018-19

February 2021



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EQUAL PAY AUDIT 2018-19

1.0 INTRODUCTION

Carmarthenshire County Council ("the Authority") is committed to supporting and promoting all aspects of equality and diversity and providing a working environment that is fair, inclusive and free from discrimination.

Equal pay for work of equal value is a fundamental part of this aim. In support of this, a single status pay and grading structure and single status terms and conditions have been introduced for all employees covered by NJC "green book" terms and conditions.

Devolved Public Bodies in Wales are covered by Schedule 2 to the Equality Act 2010 (Specific Duties and Public Authorities) Regulations. We are required, under the Act, to have equality objectives in place that address the causes of pay difference, including those relating to gender, between our employees. This Equal Pay Audit identifies those pay gaps, explains the reasons for them and suggests, in the form of an action plan, ways in which we can work towards reducing or removing those gaps.

Job evaluation of all posts covered by the single status pay and grading structure has been carried out using the Greater London Provincial Council (GLPC) job evaluation scheme to ensure all employees are rewarded fairly for the work they do. The GLPC job evaluation scheme is analytical, factor-based and has been reviewed at a national level to ensure it meets equality standards.

Local terms and conditions for Soulbury and Chief Officers' posts have been brought in line with those agreed under single status.

The single status pay and grading structure and terms and conditions were subject to an Equality Impact Assessment prior to being introduced in April 2012. This was carried out by an independent consultant.

Following on from the Equality Impact Assessment, Equal Pay Audits have been completed for each financial year from 2013/14. This document is the sixth Equal Pay Audit for the Authority and will highlight any changes to the overall pay gap.

The Authority continues to undertake a data collection exercise to update employee records with information on protected characteristics as described in the Equality Act 2010. This is a voluntary declaration process on the part of the employee but the aim of the exercise is to continue to improve the quality and quantity of equal opportunities data held against each employee's record. As the level of data held for some of the protected characteristics is currently low, this Equal Pay Audit focuses on the protected characteristics of sex and age only. It is anticipated that by encouraging employees to declare more information, the availability of data will improve and other protected characteristics, such as ethnicity, can be included in future analyses.

2.0 OBJECTIVES

The primary objective of completing an Equal Pay Audit is to identify the overall pay gap for the Authority between men and women. In addition, any pay gaps in individual grades, or any other areas which may require further analysis or action, will be highlighted. It is also an opportunity to identify areas where there is room for improvement in data collection or in the application of allowances.

The EHRC advise that a pay gap of 3% or more (marked in *italics* in the tables) requires further investigation. A pay gap of 5% or more (marked in **bold** in the tables) requires investigation and action if there is no clear justification for the difference and where that justification is unrelated to protected characteristics.

The "outcomes" section of the Audit will identify any actions needed and these will form part of an ongoing action plan. The results of implementing any changes from the action plan will be reviewed as part of future Equal Pay Audits.

3.0 EQUAL PAY AUDIT – A 5 STEP PROCESS

An Equal Pay Audit involves:

- Comparing the pay of men and women carrying out equal work
- Identification and explanation of any significant pay gaps
- Devising an action plan to address any areas of concern

The Equal Pay Audit follows the approach recommended by the Equality and Human Rights Commission (EHRC) which has five main steps.

- Step 1 Decide scope of Audit and identify data needed
- Step 2 Identify where protected groups are doing equal work
- Step 3 Collect pay data
- Step 4 Identify causes of pay gaps (if any)
- Step 5 Develop an action plan

The Equal Pay Act 1970 provides three definitions of equal work and how it can be assessed. These are:

- “Like work” (work that is the same or very similar)
- “Work rated as equivalent” (rated as equivalent under a job evaluation scheme)
- “Work of equal value” (when compared under headings such as effort and skill)

Where jobs have been rated under a job evaluation scheme, “work rated as equivalent” is the most appropriate way in which equal work can be measured. This is the method used to measure equal pay for equal work in this Audit.

4.0 SCOPE

Pay gaps are identified on basic pay, and on total pay which includes the allowances specified in **Appendix A**. Allowances have been included in the Equal Pay Audit where they either affect a large number of employees or are of a large monetary value. Excluded are any that are only received by a very few employees or those that are in respect of a reimbursement of expenses (for example, travel payments).

All Authority posts are included in the Audit with limited exceptions (see below). Included are staff groups on single status pay and terms and conditions as well as staff on Soulbury (blue book) and Chief Officer graded posts. The report is based on headcount figures and not Full Time Equivalent (FTE) in relation to employees of Carmarthenshire County Council.

Certain posts are excluded from the Audit. These posts are:

- Teachers (other than those centrally employed) as they are nationally graded.
- Nationally graded posts such as Modern Apprentices and other training positions
- Employees of Voluntary Aided schools as these are not employees of the Authority

Casual workers are also excluded for the purposes of any audit but are paid in accordance with the Authority's agreed pay scales for hours worked.

5.0 METHODOLOGY

During 2018/19 Carmarthenshire County Council employed around 6,267 people across five departments and in a wide variety of roles. 14.14% of our employees hold more than one job with the Authority and the Audit will cover all the posts they hold, providing they are not excluded from the scope, as shown above. Where people hold multiple posts, each job has been evaluated separately and the employee is paid at the relevant rate for each job thus supporting the principle of equal work for equal pay.

The data used in the Audit has been extracted from the HR/Payroll system. It includes anyone who was in post on 31st March 2019 and covers pay and allowances received for the period 1st April 2018 to 31st March 2019. Where an employee started in post after 1st April 2018 and before 31st March 2019 their pay and allowances have been calculated as a full year's equivalent to allow for accurate comparison with other employees.

Part-time salaries have been uplifted to a full-time equivalent for the purposes of comparing like figures. Average salaries have been calculated on a mean average basis. This allows us to identify pay gaps in average salaries. Positive outcomes identify pay gaps in favour of women and negative outcomes identify pay gaps in favour of men.

6.0 PAY STRUCTURES

The Authority's NJC pay structure consists of 15 basic grades and remained linked to the national rates of pay during 2018/19.

Grade O does not overlap with any other grades. Grades E, F, G, H, and I all have two SCP overlaps either at the top or the bottom of the grade. All the other grades overlap by one SCP.

The usual expectation is that employees will start at the lowest SCP for their grade. Where someone is appointed at a higher spinal column point, justification is required in line with the Authority's Recruitment Salaries' guidance. There is no evidence within the Equal Pay Audit that recruitment salaries have led to any significant inequality of pay.

Again, it is expected that employees will progress through the grade by means of time-served annual increments. Where someone progresses through the grade more quickly, justification is required in line with the Authority's Accelerated Increments' guidance. Numbers receiving accelerated increments are low and there is no evidence within the Audit that accelerated increments have led to any significant inequality of pay.

Our current Pay Policy, which includes all pay structures operating within Carmarthenshire County Council can be viewed on our website under downloads and templates here: [Pay Policy](#)

7.0 ADJUSTMENT PERIODS

When an employee is deemed "at risk" and transfers to a lower graded post via the Redeployment Policy, other than through them actively applying for that post, they remain in their substantive post for a period of up to 12 weeks as an adjustment period whilst undertaking a work trial in the new post. During that period they remain on the salary for their substantive post. Transfers of this nature may occur as a result of redeployment in a redundancy situation or other instances of suitable alternative employment being found for an individual. The adjustment period is carefully monitored and ceases at the end of the agreed period or when the employee's salary reaches, or exceeds, its former level, whichever happens first.

The Authority also allows for a period of adjustment when staff are transferred to the NJC grading structure from another pay structure and where their salary decreases. The adjustment period is carefully monitored and ceases at the end of the agreed 12 month period or when the employee's salary reaches, or exceeds, its former level, whichever happens first.

During the year 2018/19 there were 5 employees who remained on their substantive salary for period of adjustment as a result of a reduction to their grade. 3 of these employees (60%) were women and 2 (40%) were men. There is no evidence within the Audit that the adjustment periods have led to any significant inequality of pay.

8.0 MARKET SUPPLEMENTS

The Authority has a Market Supplement Scheme to recognise that there may be times when specific skills and experiences are in short supply. Use of market supplement payments is one way of ensuring we can recruit and retain sufficient employees with the required skills to safeguard the provision of these services.

A key purpose of the scheme is to ensure that any market supplements are paid fairly and consistently to avoid the risk of non-compliance with equal pay legislation. There needs to be clear evidence that the basic rate of pay for a specific job is significantly lower than the market rate for a relevant and equivalent post in a similar market and that any recruitment or retention problems are due to rates of pay.

The introduction of market supplements must be properly controlled in order to avoid the creation of potentially unlawful pay disparities and Equal Pay Act risks. There are, therefore, very specific rules to the application of market supplements to ensure that they can be objectively justified.

During the period 2018/19, 41 employees received market supplement allowances across two job groups. 8 (20%) of the employees were male and 33(80%) female which is broadly in line with the male / female split across the Authority. In all instances of market supplements being paid, business cases evidencing recruitment and retention difficulties for specific job roles have been agreed. The market supplement business cases are reviewed after a maximum of 12 months to ensure the business case is still relevant or decide that the payment should cease.

There is no evidence that Market Supplement allowances have led to any inequality of pay.

9.0 OUTCOME

The staff groups covered by the Equal Pay Audit consist of 76% women and 24% men. This is broken down in **Table 1** below to show the percentages of women and men in the various groups.

Table 1: Gender analysis per grade group

Grade Group	Female	Male	Total	Female	Male
NJC (green book) plus locally agree grades	5603	1712	7315	76.6%	23.4%
Soulbury Advisers/Inspectors	47	13	60	78.3%	21.7%
Teaching Pay Scales	50	25	75	66.7%	33.3%
Chief Officer Grades	6	18	24	25%	75%
Miscellaneous Grades	6	1	7	85.7%	14.3%
Grand Total	5712	1769	7481	76.4%	23.6%

Table 1 – men and women within grade groups

97.8% of the workforce is currently covered by NJC terms and conditions and the Single Status Agreement.

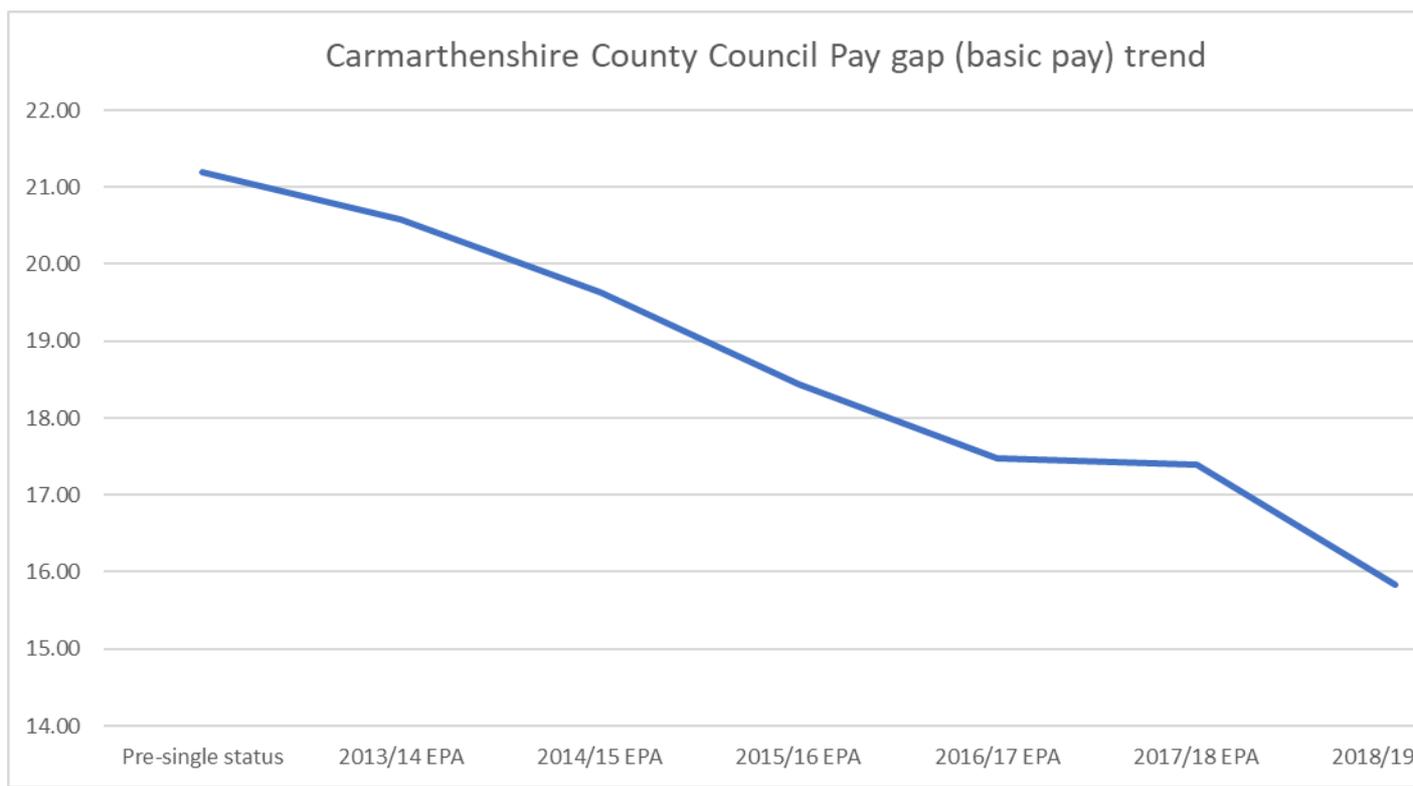
64.4% of the workforce works part time (less than 37 hours per week) of which 89% is female. 45% are term time only workers, as denoted by their job, of which 92% is female.

The overall pay gap for the Authority is -15.84% on basic pay only. The overall pay gap for total pay (basic pay plus the allowances included in Appendix A) is -17.09. A breakdown of the grades that have a pay gap of 3% or more on either basic pay or total pay follows below.

The pay gap pre-single status was -21.2% on basic pay only. We have therefore seen a continual year on year reduction in the pay gap between men and women as shown in the table below.

Year	Basic pay gap	Year on year Difference	% Change	Cumulative change
Pre-single status	21.20	-	-	
2013/14 EPA	20.58	0.62	2.92%	2.92%
2014/15 EPA	19.63	0.95	4.62%	7.41%
2015/16 EPA	18.44	1.19	6.06%	13.02%
2016/17 EPA	17.48	0.96	5.21%	17.55%
2017/18 EPA	17.39	0.09	0.51%	17.97%
2018/19 EPA	15.84	1.55	8.91%	25.28%

Table 2 –pay gaps on basic pay only between men and women



Pay gaps resulting from average full time equivalent (FTE) basic pay only

The analysis of our pay data has identified nine significant pay gaps resulting from average FTE basic pay only. Five of these pay gaps are in favour of women (**shown as positive %**) and four are in favour of men (**shown as negative %**). Details are shown in the table below:

Grade	Number of women in Post	Average FTE Basic Pay	Number of men in Post	Average FTE Basic Pay	% difference
Educational Psychologist	7	48,258.00	1	45,693.00	5.61%
Grade G + 4%	29	27,737.55	6	26,615.50	4.22%
Grade F + 4%	277	24,480.16	46	23,500.65	4.17%
Soulbury 15 - 19	3	58,817.00	1	56,891.00	3.39%
Grade E + 4%	529	21,998.73	24	21,341.29	3.08%
Main Pay Scale Teacher	5	33,482.40	8	34,608.38	-3.25%
School Improvement Officer	5	59,580.80	2	61,976.50	-3.87%
Leadership Teacher	1	45,213.00	1	52,414.00	-13.74%
Deputy Head Teachers	1	55,064.00	1	75,735.00	-27.29%

Table 3 – pay gaps of 3% and more, on average FTE basic pay, between men and women

Pay gaps in favour of women

Four of the five pay gaps relating to basic pay and in favour of women have reduced during the year with only Grade F+4% increasing slightly from 3.85% to 4.17%. All of the differences can be accounted for by length of service with women, on average, having been in post longer than men on the same grades.

Pay gaps in favour of men

The pay gap for **School Improvement Officers** has reduced from -9.11% to -3.87%. The remaining pay gap is due to a combination of length of service and plussage points, the latter being paid to three men and two women.

There is no change to the **Deputy Head Teacher** pay gap. This relates to two specific non-school based posts. The woman's role changed during the year and the reduction in responsibilities has prevented any closing of the pay gap.

Pay gaps for **Main Pay Scale Teacher** and **Leadership Teacher** are new this year. In the case of the Main Pay Scale Teacher grade the difference is accounted for by length of service. The Leadership Teacher grade relates to two employees with very different roles which accounts for the difference in pay.

Pay gaps resulting from average full time equivalent (FTE) total pay

The analysis of our pay data has identified eighteen significant pay gaps resulting from average FTE total pay. Total pay is average FTE basic pay plus FTE allowances and additional payments as identified in Appendix A which were received during the year. Six of these pay gaps are in favour of women and twelve are in favour of men. The table below details these grades:

Grade	Number of women in Post	Average FTE Total Pay	Number of men in Post	Average FTE Total Pay	% difference
Educational Psychologist	7	48,300.04	1	45,693.00	5.71%
Soulbury 15 - 19	3	59,964.58	1	56,891.00	5.40%
Grade D + 8%	262	22,237.36	52	21,098.23	5.40%
Grade C + 8%	224	20,815.56	29	19,889.94	4.65%
Grade F + 4%	277	24,615.64	46	23,621.06	4.21%
Grade G + 4%	29	27,909.30	6	27,037.62	3.22%
Grade C	107	17,768.08	94	17,580.11	-3.32%
School Improvement Officer	5	59,580.80	2	61,976.50	-4.08%
Directors (JNC)	2	123,466.00	3	124,943.33	-4.39%
Grade B	21	17,157.77	8	16,881.00	-5.92%
Grade F	223	23,893.78	188	23,945.81	-5.94%

Main Pay Scale Teacher	5	33,518.22	8	34,608.38	-6.08%
Grade A + 8%	45	18,618.19	2	18,095.00	-7.08%
Grade D	288	18,605.70	239	18,608.84	-7.29%
Grade E	182	21,073.19	127	21,020.42	-8.00%
Grade B + 8%	19	18,983.23	12	18,212.00	-9.41%
Leadership Teacher	1	45,213.00	1	52,414.00	-13.74%
Deputy Head Teachers	1	55,064.00	1	75,735.00	-27.29%

Table 4 – pay gaps of 3% and more on average FTE total pay, between men and women

Pay gaps in favour of women

The pay gaps on total pay for **Educational Psychologists** and for **Soulbury 15-19** have reduced this year. The majority of the remaining pay gap is due to differences in basic pay as explained above. The remainder is as a result of one woman in each of the grades being paid an honorarium.

Grade D+8% and **Grade C+8%** have no significant pay gap on basic pay but a variety of allowances are paid to employees within these grades and, with the majority of the employees being women, this has resulted in the total pay gaps shown above.

The total pay gap for **Grade F+4%** is mostly accounted for by basic pay (4.17%). Employees within this grade cover a variety of school-based roles and are paid various allowances. With the majority of the employees in this grade being women, this accounts for the total pay gap.

Finally, the pay gap for **Grade G+4%** closes from 4.22% on basic pay to 3.22% on total pay due to the average amount of allowance paid to men within the group compared to the larger number of women on this grade is greater.

Pay gaps in favour of men

The total pay gaps for **Leadership Teachers** and **Deputy Head Teachers** relate to basic pay only and the explanation for these gaps is shown above.

The **School Improvement Officers** and the **Main Pay Scale Teachers** pay gaps are partly due to basic pay differences. The remainder results from more men receiving allowances than women.

The **Directors** pay gap has reduced since last year but remains due to payment of an honorarium to one male director.

The remaining total pay gaps in favour of men are all as a result of either a greater number of male occupied roles attracting allowances or the average allowance payment to men compared to women being higher during the year.

10. ANALYSIS CONCLUSION

The analysis of the pay gaps does not suggest any evidence of discrimination within the pay structures nor the allowances paid. The pay gaps are generally as a result of segregation of the sexes between job types rather than application of the allowances and this is an area that the Authority needs to continue to work on as part of any future reduction in pay gaps as well as for future workforce planning.

11.0 AGE PAY ANALYSIS

Organisation distribution by age

Grade	Number job holders per grade	Average Age @ 31/3/19 (Mean)	Difference from Overall Average age
Tupe - Midshires	5	55.20	8.41
Grade A	172	52.21	5.42
Grade A + 4%	1590	49.00	2.20
Grade A + 8%	47	54.70	7.91
Grade B	29	45.31	-1.48
Grade B + 4%	516	44.13	-2.66
Grade B + 8%	31	49.39	2.59
Grade C	201	47.58	0.78
Grade C + 4%	51	49.00	2.21
Grade C + 8%	253	46.96	0.17
Grade D	527	46.88	0.08
Grade D + 4%	324	46.19	-0.60
Grade D + 8%	314	47.86	1.07
Foreign Language Assistants	2	55.00	8.21
Grade E	309	45.39	-1.40
Grade E + 4%	553	44.30	-2.49
Grade E + 8%	31	47.84	1.05
Grade F	411	45.40	-1.40
Grade F + 4%	323	44.63	-2.16
Grade F + 8%	103	45.98	-0.81
Unqualified Teacher	8	49.00	2.21
Grade G	389	44.99	-1.80
Grade G + 4%	35	45.77	-1.02
Grade G + 8%	13	49.85	3.05
Grade H	210	45.69	-1.11
TUPE - Cartrefi Hafod	2	53.50	6.71
Grade H + 4%	8	52.38	5.58
Grade H + 8%	21	46.43	-0.36
Grade I	366	43.71	-3.08
Grade I + 4%	1	39.00	-7.79

Main Pay Scale Teacher	13	43.62	-3.18
Grade I + 8%	1	50.00	3.21
Grade J	150	46.98	0.19
Grade J + 4%	3	38.00	-8.79
Grade J + 8%	1	51.00	4.21
Upper Pay Scale Teacher	42	48.57	1.78
Soulbury 7-9	1	52.00	5.21
Upper Pay Teacher & TLR	8	51.63	4.83
Youth & Community Officer	1	59.00	12.21
Grade K	148	48.95	2.16
Grade K + 4%	1	51.00	4.21
Community Learning Manager	1	50.00	3.21
Grade L	103	47.85	1.06
Grade L + 4%	1	49.00	2.21
Soulbury 8-12	23	45.70	-1.10
Grade L + 8%	1	56.00	9.21
Leadership Teacher	2	47.00	0.21
Grade M	29	50.45	3.66
Associate School Improvement Officer	2	51.50	4.71
Educational Psychologist	8	47.75	0.96
Grade N	41	51.63	4.84
Senior Educational Psychologist	5	53.80	7.01
Soulbury 15 - 19	4	50.75	3.96
SOULBURY 20-23	3	52.33	5.54
Principal Educational Psychologist	1	54.00	7.21
School Improvement Officer	7	50.29	3.49
Principal School Improvement Officer	1	48.00	1.21
Senior Challenge Advisor	1	45.00	-1.79
Grade O	8	49.13	2.33
Head of Service (1)	17	52.35	5.56
Deputy Head Teachers	2	51.00	4.21
Assistant Chief Executive	1	57.00	10.21
Directors (JNC)	5	51.20	4.41
Chief Executive	1	59.00	12.21
Grand Total	7481	46.79	0.00

12.0 OVERALL CONCLUSION

The Equal Pay Audit confirms there is no evidence of systemic pay discrimination in the employee groups covered by the review. It also shows a progressively shrinking pay gap between men and women year on year. However, it is important that the Authority strives to maintain this position so regular reviews of the pay structure, the terms and conditions and all policies in relation to how we manage pay will continue and, where improvement can be made, recommendation will be made to the Corporate Management Team and Executive Board. The application of payment of allowances was reviewed as part of the implementation of single status and is regularly monitored so that fairness and consistency of application continues.

Standby remains one of the biggest causes of pay differences between men and women. The standby rate reduced on 1st April 2018 and there was a marked reduction in payments from £773,270 in 2017-18 to £616,302 during 2018-19.

On 1st April 2019 the revised national spinal column points for NJC Green Book employees were incorporated into the pay structure and this will be reflected in the 2019-2020 Equal Pay Audit.

13.0 ACTION PLAN

The actions below remain the target areas for Heads of Service and recruiting managers to consider and review in their service areas. Further work will continue with the education service to ensure links are strengthened with work being carried out in schools and colleges so that the next generations of employees coming into the workplace have as great an opportunity to move into non-traditional roles as possible.

- 1) We continue to gather data from staff, and improved HR / Payroll systems together with more accessible self-service systems are expected to improve the availability of data going forwards.
- 2) We will continue to monitor the pay gap and report on it by publishing an annual equal pay audit.
- 3) We will continue to review allowances to ensure they are a) paid in a fair and consistent manner and b) remain relevant as the economic climate changes. Recruiting managers and Heads of Service are responsible for reviewing the payment of allowances within their service

area and considering new ways of working (e.g. standby, weekend working).

- 4) We will continue to review gender segregation across job types and the People Strategy Group have been asked to develop strategies to tackle this.
- 5) The NJC pay structure underwent a fundamental change in 2019 as a result of the national review of pay scales and we will continue to make improvements where opportunities arise.
- 6) We will continue to check and monitor the use of 'gender neutral' language in job profiles, job adverts and the recruitment process. Recruitment training continues to be rolled out across the Authority and revised guidance has been circulated to all managers.
- 7) Part of the Strategic Equality Plan and one of the workstreams for the People Strategy Group is to work towards a more gender balanced mix of staff in what have traditionally been gender stereotyped roles such as carers, caterers, refuse loaders etc. Where departments have had success in this area, best practice to be shared and rolled out to other areas. HR Advisers to consider options at all stages of recruitment.
- 8) Ensure development and training opportunities are available for staff at all levels within the authority whether this is to improve skills in their existing roles, open up opportunities for career progression within a chosen field of work or consider opportunities which employees may wish to take in different fields.

APPENDIX A

Allowances included as part of Equal Pay Audit

Acting up allowances

Additional pay

Bank holiday pay

Call out

Holiday hours

Honoraria

Market Supplements

Night duty pay

Overtime

Pay protection

Plussages on basic pay

Sleep in allowance

Standby payments