

Diversity and Inclusion: Equal Pay Audit, Gender, Ethnicity and Disability Pay Gap Reporting

June 2022



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Diversity and Inclusion: Equal Pay Audit, Gender, Ethnicity and Disability Pay Gap Reporting

June 2022





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1. Introduction

The purpose of this report is to provide information relating to the Senedd Commission's 2022:

- Equal Pay Audit;
- Gender Pay Gap figures;
- Ethnicity Pay Gap figures;
- Disability Pay Gap figures.

The purpose of providing this data is to ensure that pay practices are free from unfairness and discrimination on any grounds related to a protected characteristic. The overall objective is to identify the actions that the Commission can take to ensure there is ultimately no overall difference in pay between different groups.

2. Definitions

What is an Equal Pay Audit?

'An equal pay audit is an assessment tool that is used to determine whether an employer is meeting its obligations under the Equality Act 2010 to provide different groups of staff **equal pay for equal work**. An equal pay audit involves:

- Comparing the pay of protected groups (sex, age, disability, sexual orientation, race, and religion or belief) who are doing equal work within the Commission;
- Investigating the causes of any pay differences within these groups; and
- Identifying any actions required to close any gaps that cannot be justified on grounds other than one of those characteristics.¹

It should be noted, that where the amount of representation of a protected group in a particular pay grade is less than 5 people or less than 5% of the group is within that pay grade, this is too small to make any meaningful finding.

What do we mean by Gender Pay Gap reporting?

The Gender Pay Gap is the percentage difference between the average (mean and median) earnings of men and women across a workforce. It is different to equal pay, which considers the pay of men and women doing the same for equal or similar work. Instead, it is the difference between what men typically earn in an organisation compared to what women earn, irrespective of their role or seniority or type of work.

In line with the **Equality Act 2010 (Gender Pay Gap Information) Regulations 2017**, employers need to publish six calculations showing:

- mean gender pay gap in hourly pay;
- median gender pay gap in hourly pay;
- mean bonus gender pay gap;
- median bonus gender pay gap;

¹ Equality and Human Rights Commission – Equal Pay Audit Toolkit

- proportion of males and females receiving a bonus payment; and the
- proportion of males and females in each pay quartile.

What do we mean by Ethnicity Pay Gap reporting?

We have voluntarily published our Ethnicity Pay Gap information since 2019. The Ethnicity Pay Gap measures the difference in pay between all employees who have identified as ethnic minority employees and those who employees who have identified as White in the Senedd Commission’s workforce. The Commission reports the Ethnicity Pay Gap against the same measures as those for the Gender Pay Gap.

What do we mean by Disability Pay Gap reporting?

This year, for the first time, we have voluntarily published our Disability Pay Gap information. The Disability Pay Gap measures the difference in pay between all employees who have identified as having a disability, and those employees who have identified as not having a disability. The Commission reports the Ethnicity Pay Gap against the same measures as those for the Gender Pay Gap.

It should be noted that the Commission works in line with the **Government Statistical Service (GSS) definition** of “disabled”². However, with regards to the data analysed as part of the Disability Pay Gap here, employees were asked to self-identify whether they have a disability, and no objective assessment against the definition above, has been applied to the employee group for the purposes of Disability Pay Gap reporting.

Mean and Median

Throughout the report, the information used looks at both the ‘mean’ (average) and the ‘median’ (middle) pay. This allows us to have due consideration for the average pay for the different groups, but also use the median calculations to identify areas where the mean may have skewed the overall data.

Mean is the average hourly rate of pay, calculated by adding the total hourly pay rate for all employees then dividing that figure by the number of employees.

² ‘A person who has a physical or mental health condition or illness that has lasted or is expected to last 12 months or more, that reduces their ability to carry-out day-to-day activities.’

To calculate the median, the pay rates for all employees are arranged in order from lowest to highest. The median is the hourly rate which appears exactly in the middle.

In line with the Gender Pay Gap reporting website, percentages throughout this report have been rounded to one decimal point.

3. Scope

Due to some differences in which Equal Pay audits and Pay Gaps are reported, there are some differences in scope between these. The below table summarises these:

	Equal Pay Audit	Gender/Ethnicity/Disability Pay Gap
Period of time taken into account	31 March 2022 only (1 day)	1-31 March 2022 (1 month)
Definition of pay	Full Time Equivalent Salary including allowances ("Total pay")	Actual salary for the whole of March (which may be pro-rated for Part Time staff) after salary sacrifice deductions (except childcare vouchers) and including allowances
Headcount	474	460
All staff on perm/temp contracts employed on 31 March were included except:	Internal secondments and staff currently on career breaks or anyone not on a pay band	Internal secondments and staff currently on career breaks or anyone not on a pay band. Anyone who has worked less than a full month (for example leavers or people on long term leave)
Information source	HR/Payroll System (Cognos / Resource Link)	

Pay and Reward system

The applicable pay scales came into effect on 1 April 2021 (Annex 1). It should be noted that:

- Bands within the pay scales are designed to be relatively short to minimise any likelihood of pay discrimination;
- We use minimal allowances, minimising any potential for pay differentials;
- We do not pay bonuses to any of our employees;
- The usual practice is for new starters to begin on minimum pay point, and any differences to this have to go through an objective approval process;
- Trade Union Side are involved in pay reviews and negotiations with current pay arrangements in place till 2025 (subject to review) and informed by the Annual Survey of Hours and Earnings (ASHE) index; and

- We use the Cabinet Office's Job Evaluation Grading System (JEGS) system for most grades, and the Cabinet Office's Job Evaluation Senior Posts (JESP) system for Director level and above.

4. Equal Pay Audit 2022

Overview: pay differences between groups

Group	Group 1 (% of workforce)	Group 2 (% of workforce)	Median / Mean	2022 - % more Group 1 are paid than Group 2 *	2021 - % more Group 1 are paid than Group 2 *	Pay difference change since last year Δ
FTE Total salary Δ						
Sex	Women (50.8%)	Men (49.2%)	Median	8.4%	8.9%	↓
			Mean	5.4%	5.3%	=
Age	46-50 (11.6%)	All other ages (88.4%)	Median	5.3%	11.72%	↓
			Mean	16.5%	14.98%	↑
Disability	Staff who don't identify with a disability (84%) †	Staff who identify with a disability (6.3%) †	Median	0.0%	0.0%	=
			Mean	-2% ‡	3.7%	↓
Sexual Orientation	Non-LGBQ+ staff (82.3%) †	LGBQ+ staff (4.2%) †	Median	0.0%	7.1%	↓
			Mean	-6.31% ‡	0.3%	↓ (Although reduced, inverse gap increased)

Diversity and Inclusion: Equal Pay Audit, Gender, Ethnicity and Disability Pay Gap Reporting

Group	Group 1 (% of workforce)	Group 2 (% of workforce)	Median / Mean	FTE Total salary Δ		Pay difference change since last year Δ
				2022 - % more Group 1 are paid than Group 2 *	2021 - % more Group 1 are paid than Group 2 *	
Race/ Ethnicity	Staff identifying as White (92.2%) †	Ethnic Minority staff (4.2%) †	Median	34.7%	38.9%	↓
			Mean	25.5%	27.8%	↓
Religion/ Belief	Agnostic/ Atheist/ Christian/ None/Other (76.2%) †	Muslim (1.5%) †	Median	38.9%	40.4%	↓
			Mean	37%	38.9%	↓

* Green = <10% / Amber = >10%, <25% / Red = >25%

Δ Green = Reduced, or remained the same where no pay difference / Amber = Remained the same where still a pay difference / Red = Increased

† Does not total 100% of workforce as some staff have not specified

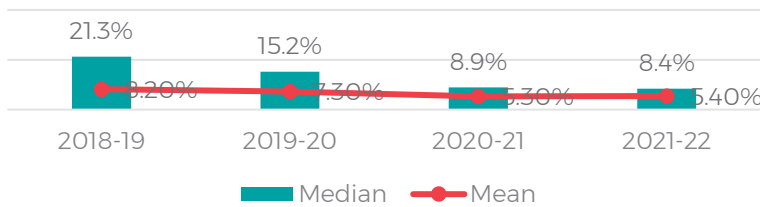
‡ A negative number means Group 2 are paid more than Group 1

5. Insights and Analysis

Sex

As we have seen over the last three years, the inverse equal pay gap has continued to decrease this year, which marks further progress towards neutralising the gender equal pay gap.

 <p>49.2% 233</p> <p>50.8% 241</p>	<p>The male/female split across the workforce remains nearly equal</p>	<p>8.4% Women are paid 8.4% more than men when looking at the median difference in total salary</p>
		<p>5.4% Women are paid 5.4% more than men when looking at the mean difference in total salary</p>

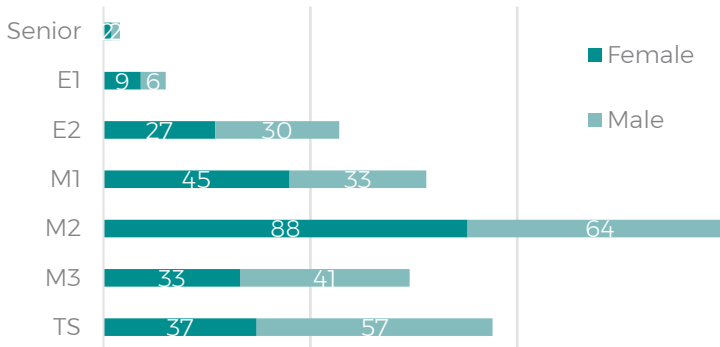


Mean and median differences in total salary have broadly remained the same as last year

Part time males are paid 30.9% less on median total pay than full time males. Of the 20 part time males, 14 of these are in the two lowest grades, which is likely to account for the difference. There are no part time males above SEO/M1 level. Compared to last year (8.5%) part time males has risen to 8.5% this year



Part time females are paid the same as full time females against median total pay



At Board level, there is equal representation between males and females, and a 3:2 ratio of female:males at Senior Leadership Team level. There is nearly a third more females at HEO level, and just less than a 2:1 male/female ratio at TS level

The only Grade with more than 5 people with a median or mean pay difference of more than 5% was Team Support. The mean difference for **total** pay here shows men were paid 6.1% more than women. However this is due to the higher numbers of men in Security Team Support roles, where shift allowances are payable (as evidence by the **basic** pay difference of 0%).



Age

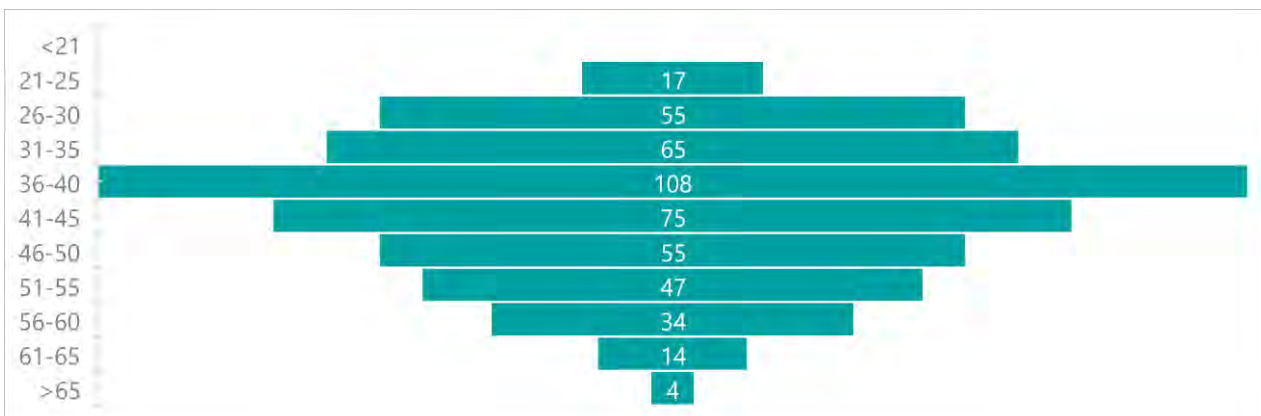
When comparing different age groups against each other, there are differences in the mean and median pay. Although 46-50 year olds are the highest paid group overall, broadly, for staff between 36-60, there is no significant difference in pay. There is a much more significant difference for staff under 30, however this is to be expected due to the fact that progression through the pay grade is linked to length of service. Staff age 30 or under are more likely to have a shorter length of service than staff in other age groups, and are therefore more likely to be paid at the lower levels of the pay grade. The smaller numbers of staff in the 61+ groups (18) means that this group is sensitive to even small changes in the cohort.

↑
46-50

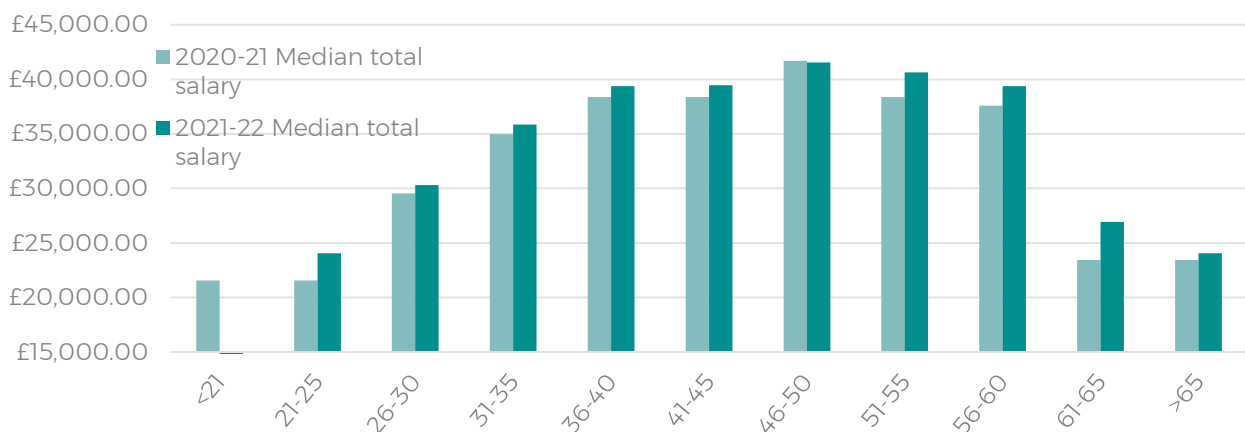
This group are the highest paid age group when looking at both the **median** and **mean** total salary. This remains the same as last year

↓
21-25
>65

These groups are the lowest paid when looking at **median** and **mean** total salary. However, the smaller numbers of staff within these groups mean they are more likely to be skewed when comparing with other larger age groups





In terms of actual numbers of staff against the different age bands, there is a natural bell curve, as would be expected. There is currently no one younger than 21 working for the Commission.



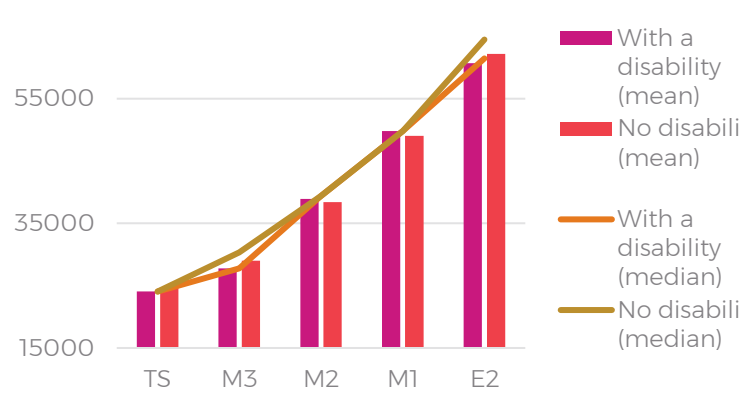
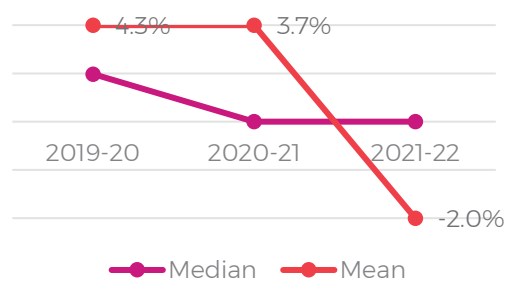
Disability

The median total pay difference continues to be 0%. Against mean total pay, staff with a disability are paid very slightly more than non-disabled staff. Due to the small numbers involved, the data is sensitive to even small changes in the cohort.

 6.3% 30	 83.8% 398	The current ratio of people with a disability to people without a disability is 1:13.	=	People with a disability are paid the same as people without a disability when looking at the median difference in total salary
			2%	People with a disability are paid 2% more than people without a disability when looking at the mean difference in total salary

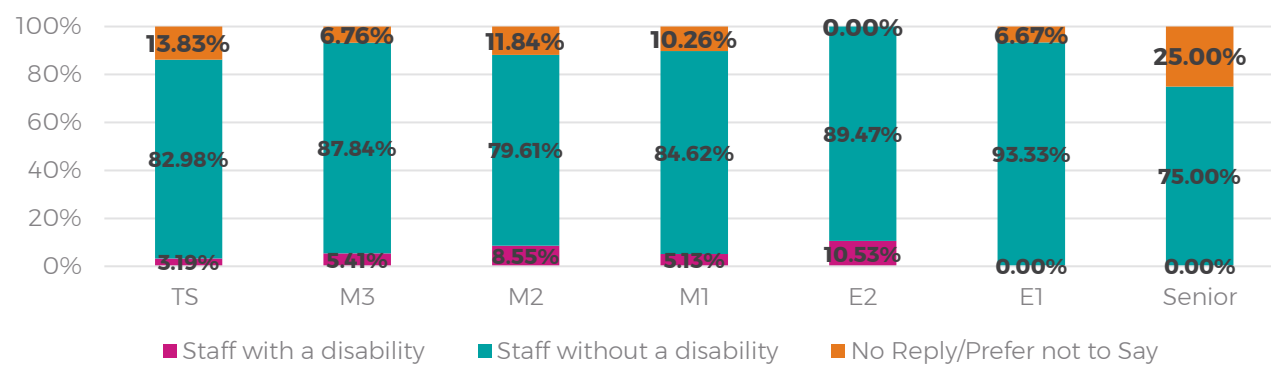
 **9.9%** % of people who did not disclose their disability status (47 people). There have been an additional 6 people this year who have disclosed they have a disability.

Mean differences in total salary have continued to reduce compared to previous years, and are now showing an inverse pay difference. For the second year running, the median total pay difference is 0%



When comparing pay for staff with a disability vs staff without a disability within each pay grade, the median and mean pay is broadly the same.

At the two most senior grades, there are no staff identifying as having a disability



Sexual Orientation

As the number of staff declaring themselves LGBQ+ is still very small overall, any small changes here can have a significant impact on the overall figures, however LGBQ+ staff are paid slightly more than non-LGBQ+ staff when looking at mean total salary, and LGBQ+ and non LGBQ+ staff are paid the same mean total salary.

1:20

4.2% 82.3%
20 390

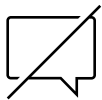
The current ratio of LGBQ+ staff to non-LGBQ+ staff is 1:20.

0%

LGBQ+ staff are paid 0% more than non-LGBQ+ staff when looking at the **median** difference in total salary

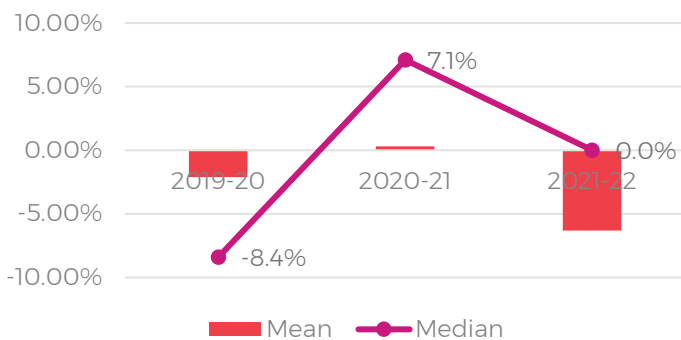
6.31%

LGBQ+ staff are paid 6.31% more than non-LGBQ+ staff when looking at the **mean** difference in total salary

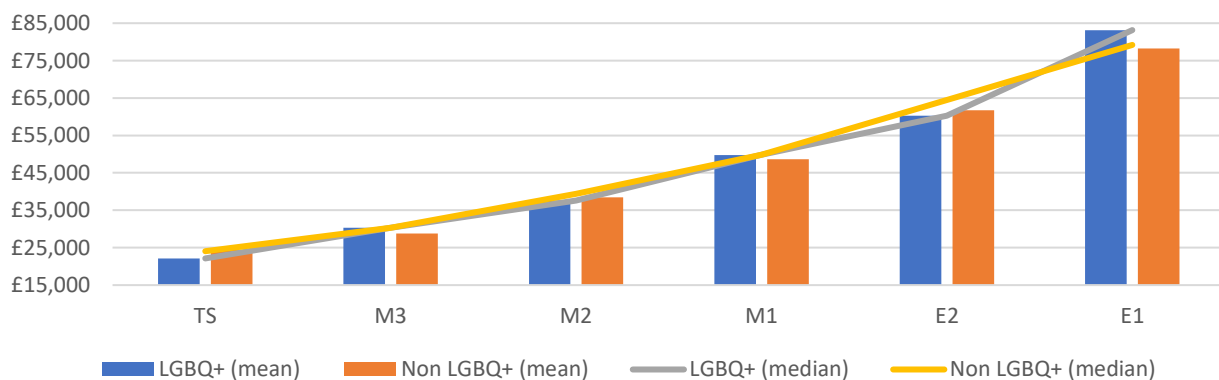


13.5%

% of people who did not disclose their sexual orientation (64 people). This is comparable to last year's did not disclosure rate of 13.9%



As the number of staff declaring themselves to be LGBQ+ is still very small overall, any small changes here can have a significant impact on the overall figures, which we have seen over the last 3 years



When comparing pay for staff within each pay grade, the median and mean pay is broadly the same. For all grades bar the M2/HEO and M1/SEO grades, there were less than 5 LGBQ+ staff in each grade, meaning it's not possible to undertake any meaningful comparison. For both HEO/SEO grades, the difference in mean and median total salaries were less than 5%

Race / Ethnicity

The mean and median total pay difference has reduced this year against last year. Analysis within grades demonstrates there is not an equal pay issue, but the overall figures are affected by the lack of Ethnic Minority representation at higher grades. As the number of Ethnic Minority staff is still very small overall, any small changes can have a significant impact on the overall figures

1 : 22

4.2% 92.2%
20 437

The current ratio of Ethnic Minority staff to White staff is 1:22

34.7%

White staff are paid 34.7% more than Ethnic Minority staff when looking at the **median** difference in total salary

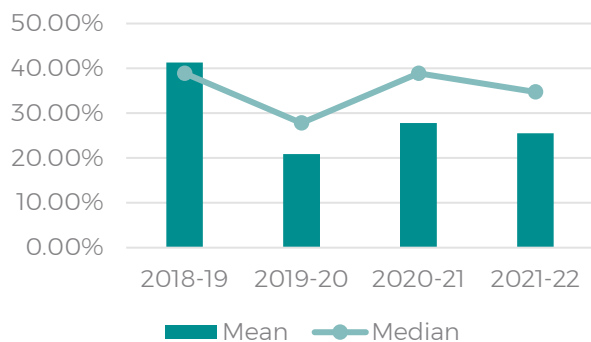
25.5%

White staff are paid 25.5% more than Ethnic Minority staff when looking at the **mean** difference in total salary

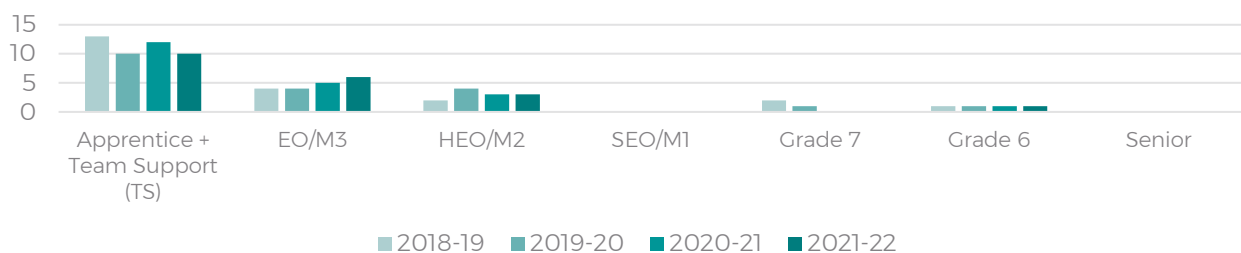


3.6%

% of people who did not disclose their race/ethnicity (17 people), which is comparable to last year's rate of 3.9%



There has been a downward trajectory in the pay difference over the last 4 years (with mean total pay difference 15.8% less than it was 4 years ago, and median down by 4.2%). Against last year, the mean and median pay difference have both decreased, however the overall pay difference remains high.




Within the two bands with more than 5 people who are of an ethnic minority, there is a 0% pay mean and median difference at EO/M3 level between, and a 0% median / -0.5% mean pay difference at TS level. This shows that the overall median and mean pay differences of 34.7% and 25.5% are not as a result of an equal pay for equal work issue, but instead is due to a lack of representation across more senior bands in the organisation (5.3% of staff identify as either ethnic minority or have not disclosed their ethnicity across grades E2, E1 and-Senior level).

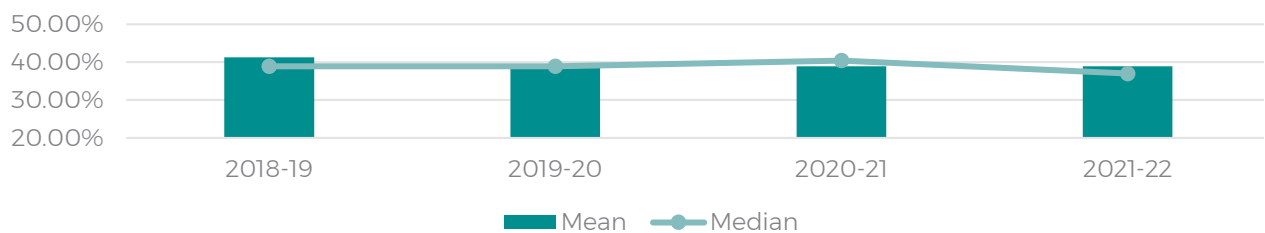
Religion / Belief

When comparing the pay difference between religions and beliefs, there was no significant pay difference between the majority of these (Agnostic, Atheist, Christian, None and Other). This group makes up 76.2% of the workforce. However, there is a pay difference between staff who have identified their religion as Muslim compared to all other religions and beliefs (and excluding those who did not state a religion or belief). However, as number of staff declaring themselves to be Muslim is still very small (7 people) the overall figures are easily skewed by the size of this group.

<p>1 : 51</p> <p>1.5% 76.2%</p> <p>7 361</p> <p>The current ratio of Muslim staff to Agnostic/ Atheist/ Christian/ None/ Other is 1:51</p>	<p>38.9% Agnostic/ Atheist/ Christian/ None/ Other are paid 38.9% more than Muslim staff when looking at the median difference in total salary</p>
	<p>37% Agnostic/ Atheist/ Christian /None /Other are paid 37% more than Muslim staff when looking at the mean difference in total salary</p>

 **22.4%** % of people who did not disclose their religion/belief (106 people), which is a very slight decrease on last year (23.1%). This is a significantly higher non-disclosure rate than for the other characteristics

Mean and median differences in total salary have overall very slightly reduced when looking at the past 4 years, however this does not represent a significant change.



There has been a very slight increase of Muslim staff at Team Support and M3/EO level: 7 staff this year compared to 6 staff last year. considering the pay for Muslim staff at the Team Support level compared to the rest of



the workforce at this grade, there is 0% difference in median pay, and a small inverse difference in mean (Muslim staff at this level paid 3.6% more). This demonstrates that the overall mean/median pay difference across the workforce as a whole is linked to poor representation at more senior levels of the organisation rather than an endemic difference in in equal pay for equal work.

6. Gender Pay Gap Reporting

This analysis is based on 460 staff: 227 women and 233 men. Staff not currently on payroll due to working less than a full month (for example leavers or people on long term leave), internal secondments or career breaks were excluded from the analysis.

Gender Pay Gap – Hourly Pay

	2021-22	2020-21	2019-20	2018-19	2017-18
Mean Gender Pay Gap	-6.5%	-5.3%	-6.7%	-8.5%	-5.7%
Median Gender Pay Gap	-9.75%	-9.8%	-15.2%	-21.3%	-23.2%

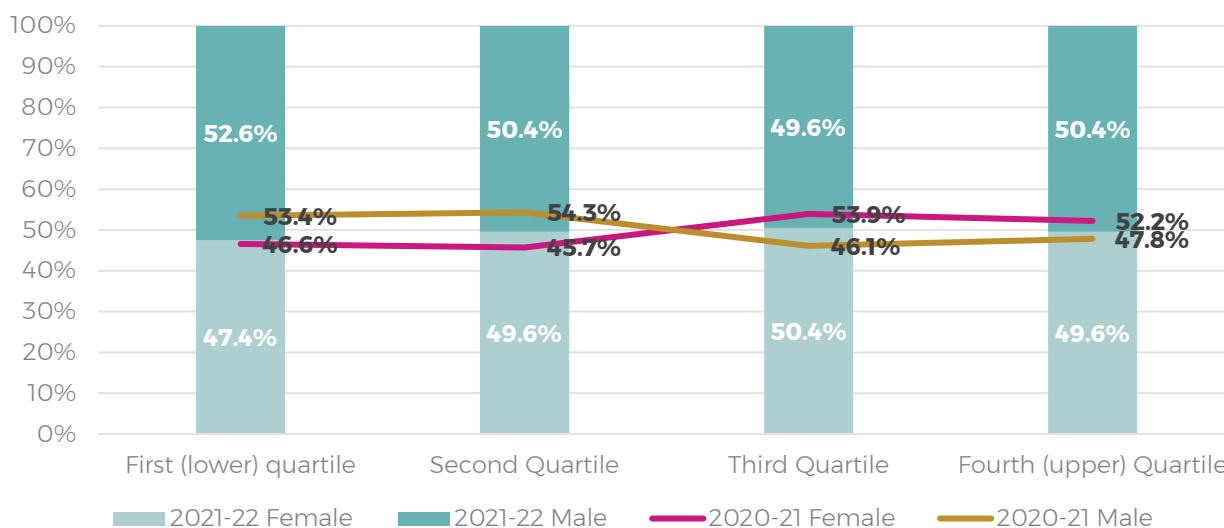
Bonus Pay

We do not pay bonuses to any of our employees.

Proportion of Women and Men in Each Pay Quartile

Each quartile represents one quarter of employees working for the Senedd Commission when ordered from lowest to highest paid.

Male/Female Split against the pay quartiles in numbers:



Analysis:

As with previous years, the Commission continues to experience an inverse gender pay gap, where women overall are paid more than men. This bucks the national trend which in April 2021 was 7.9%³. Whilst the median pay gap has continued (as with previous years) to very slightly decrease, the mean pay gap this year has increased. This can partly be attributed to a restructure of salaries at Executive Board level, as well as a 60:40 female to male split at E1 /Grade 6 level this year, compared to last year when it was 50:50 (as a result of two new joiners).

³ [Gender pay gap in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/peopleinwork/payandpensions/genderpaygap/articles/genderpaygapintheuk2021)

7. Ethnicity Pay Gap Reporting

This analysis is based on the number of staff who declared their ethnicity as at 31 March 2022.

White: 424. / Ethnic minority: 19. / Not declared: 17

Ethnicity Pay Gap – Hourly Pay

	2021-22	2020-21	2019-20	2018-19
Mean Ethnicity Pay Gap	26.1%	28.1%	20.4%	25.6%
Median Ethnicity Pay Gap	35.82%	38.9%	21.7%	38.9%

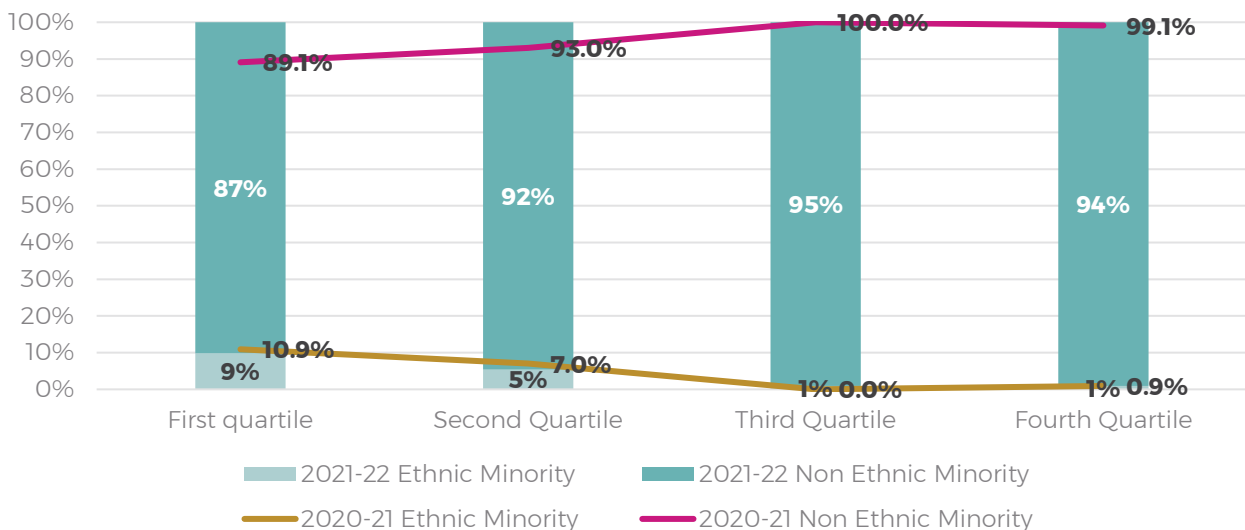
Bonus Pay

We do not pay bonuses to any of our employees.

Proportion of Ethnic Minority Employees and White Employees in Each Pay Quartile

Each quartile represents one quarter of employees working for the Senedd Commission when ordered from lowest to highest paid.

Ethnic Minority Employees and White Employees Split against the pay quartiles in numbers:



Analysis:

As with previous years, the Senedd continues to have a significant ethnicity pay gap. This is mainly due to:

- A limited number of Ethnic Minority staff employed by the Commission as an overall percentage of the overall workforce; and
- The uneven distribution of Ethnic Minority staff, who are mainly being employed at lower bands on the pay scale (53% of Ethnic Minority staff are at the Team Support level).

Caution is needed when reviewing this pay gap, as due to the small numbers of staff declaring themselves to be of an ethnic minority, even small changes to our staffing profile will have an impact.

8. Disability Pay Gap Reporting

This analysis is based on the number of staff who declared their disability status as at 31 March 2022.

Identify as having a disability 29 / Identify as not having a disability 386/ Not declared: 45

Disability Pay Gap - Hourly Pay

As this year is the first year we are reporting the Disability Pay Gap, previous years data is not available

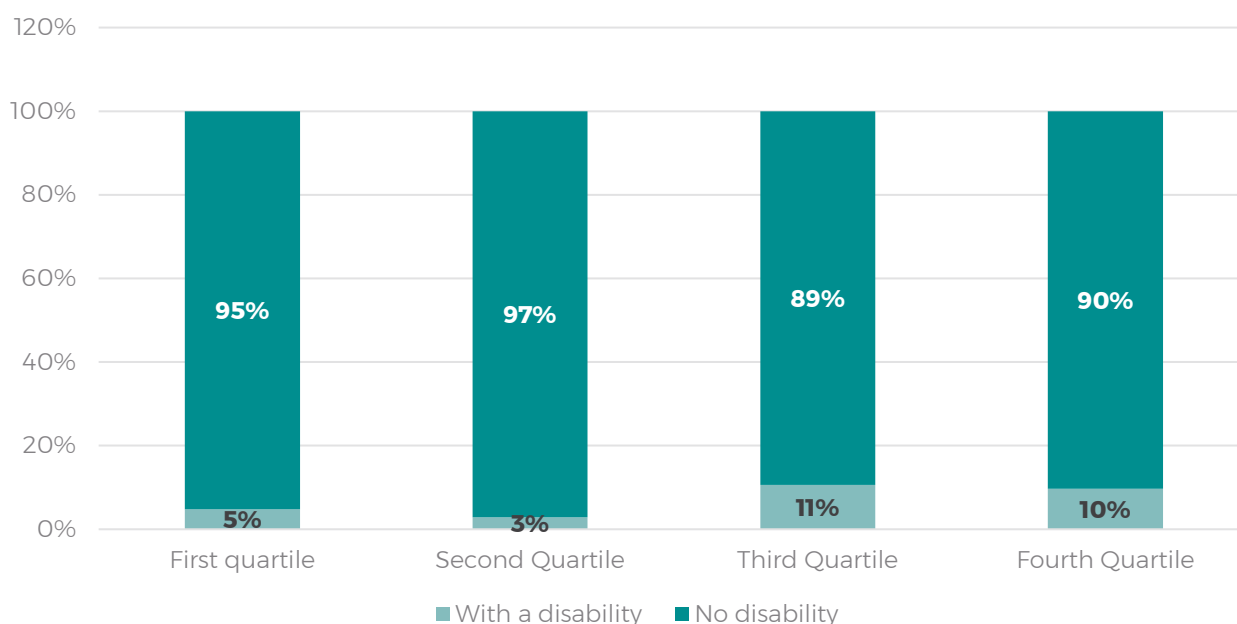
	2021-22
Mean Disability Pay Gap	-2.87%
Median Disability Pay Gap	0%

Bonus Pay

We do not pay bonuses to any of our employees.

Proportion of Staff identifying with a Disability and Staff identifying as not having a disability in Each Pay Quartile

Each quartile represents one quarter of employees working for the Senedd Commission when ordered from lowest to highest paid.



Analysis:

The Commission has no pay gap against median pay for staff with a disability / staff with no disability. When looking at the mean pay gap, there is a small inverse pay gap, where staff with a disability overall are paid slightly more than staff with no disability. Caution is needed when reviewing this pay gap, as due to the small numbers of staff identifying as having a disability, even small changes to our staffing profile will have an impact.

9. Equality Objectives /Action Plan/Priorities

In our **consolidated action plan** for our workforce, recruitment and pay data analyses, we have set out the key steps we will take in 2022-23 in relation to equal pay, in order to meet the Commission's public sector equality duty ("PSED") to:

- (a) Eliminate discrimination and other conduct prohibited by the Equality Act 2010;
- (b) Advance equality of opportunity between persons of different protected characteristics; and
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

10. Annex 1: Pay Scale by Grade (effective as of 01/04/2021)

Grade		Minimum	Maximum
Team Support (TS)		£20,913	£24,060
Executive Officer (EO)	Management 3 (M-3)	£25,263	£30,318
Higher Executive Officer (HEO)	Management 2 (M-2)	£32,458	£39,360
Senior Executive Officer (SEO)	Management 1 (M-1)	£41,547	£49,793
Grade 7	Executive 2 (E-2)	£53,788	£64,492
Grade 6	Executive 1 (E-1)	£67,717	£79,191
Senior	Senior Staff (S-3)	£83,056	£108,817
	Senior Staff (S-2)	£103,677	£132,310
	Senior Staff (S-1)	£132,537	£162,454