

Equality Impact Assessment (EqIA)

Introduction

This EqIA is for:

Gender Pay Gap Reporting - an analysis of Nottinghamshire County Council's Gender Pay Gap for publication in response to the Council's new public sector duty under the Equality Act 2010 and the proposed action plan to reduce the gap.

Details are set out:

Personnel Committee report 7th March 2018

Officers undertaking the assessment:

Claire Gollin – Group Manager HR

Assessment approved by:

Marjorie Toward, Service Director
Customers and HR

Date: February
2018

The Public Sector Equality Duty which is set out in the Equality Act 2010 requires public authorities to have due regard to the need to: Eliminate unlawful discrimination, harassment and victimisation; Advance equality of opportunity between people who share a protected characteristic and those who do not; Foster good relations between people who share a protected characteristic and those who do not.

The purpose of carrying out an Equality Impact Assessment is to assess the impact of a change to services or policy on people with protected characteristics and to demonstrate that the Council has considered the aims of the Equality Duty.

Part A: Impact, consultation and proposed mitigation

1 What are the potential impacts of proposal? *Has any initial consultation informed the identification of impacts?*

Basis of reporting:

The Government's Equality Act 2010 (Gender Pay Gap Information) Regulations 2016 introduced a mandatory gender pay gap reporting duty for employers of 250 or more employees and came into force for qualifying public sector employers from 6th April 2017 as an extension of the existing Public Sector Equality Duty. The pay information provided must be based on data from a specific pay period with employers having to calculate and publish their overall mean and median pay gap information before 30th March 2018 and annually thereafter as part of a regular reporting cycle.

Nottinghamshire County Council's initial GPG reporting sets out the position at the "snapshot" date of 31st March 2017. The Council's "Gender Pay Gap" (GPG) calculation shows the difference between the mean (average) and the median (mid-point), earnings between men and women expressed as a percentage of men's earnings and a breakdown by pay quartiles.

[GPG info graphic v final draft.pdf](#)

Impact and Analysis:

The overall GPG in Nottinghamshire County Council is a **mean gap of 12.33%** and a **median gap of 25.37%**. This outcome shows an overall negative impact on women who overall across the Council earn less on average than men.

There is a significant variation in the GPG between service departments and within the range of services provided by each department. In some cases there is negative GPG, meaning that female pay is more than that of males, in others the gap is higher than for the Council overall.

The GPG is widest in those service areas where there are a preponderance of women undertaking in-house front line services (for example catering and cleaning) and administrative occupations which make up the business support function.

The Council's GPG outcome is influenced by the following facts:

- the type, scope and range of services it provides and how these are provided and by the type of associated job roles provided by its constituent service departments reflected in its organisational structure at the snapshot date
- the size of the GPG equivalent headcount in scope at the reporting date of 31st March 2017 was 7,850 overall, 77.6% of which was female. This is typical of the ongoing predominance of women in the overall County Council workforce as reported in the Council's annual Workforce Profile report
- across the whole Council overall men are most highly represented in the upper pay quarter at 30.4% and women are most highly represented in the lowest pay quartile at 85.1%.
- in the majority of "technical" occupations men make up the highest proportion of the highest paid workers.
- women are well represented at all levels in the "caring professions", with a concentration in mid-grade and managerial posts.
- overall women are underrepresented in the most senior posts (Service Director level and above) although this varies between departments.

2 Protected Characteristics: Is there a potential positive or negative impact based on:

Age	<input type="checkbox"/> Positive	<input type="checkbox"/> Negative	<input checked="" type="checkbox"/> Neutral Impact
Disability	<input type="checkbox"/> Positive	<input type="checkbox"/> Negative	<input checked="" type="checkbox"/> Neutral Impact
Gender reassignment	<input type="checkbox"/> Positive	<input type="checkbox"/> Negative	<input checked="" type="checkbox"/> Neutral Impact
Pregnancy & maternity	<input type="checkbox"/> Positive	<input type="checkbox"/> Negative	<input checked="" type="checkbox"/> Neutral Impact
Race including origin, colour or nationality	<input type="checkbox"/> Positive	<input type="checkbox"/> Negative	<input checked="" type="checkbox"/> Neutral Impact
Religion	<input type="checkbox"/> Positive	<input type="checkbox"/> Negative	<input checked="" type="checkbox"/> Neutral Impact
Gender	<input type="checkbox"/> Positive	<input checked="" type="checkbox"/> Negative	<input type="checkbox"/> Neutral Impact
Sexual orientation including gay, lesbian or bisexual	<input type="checkbox"/> Positive	<input type="checkbox"/> Negative	<input checked="" type="checkbox"/> Neutral Impact

3 Where there are potential negative impacts for protected characteristics these should be detailed including consideration of the equality duty, proposals for how they could be mitigated (where possible) and meaningfully consulted on:

How do the potential impacts affect people with protected characteristics <i>What is the scale of the impact?</i>	How might negative impact be mitigated or explain why it is not possible	How will we consult
The Council's current GPG illustrates the negative impact on women of real or perceived organisational barriers which constrain women from applying for more highly paid job roles.	<p>The Council is committed to taking appropriate action to reduce its GPG and monitoring its progress over time a series of actions and measures have been identified to reduce the gap as priorities for 2018/19.</p> <p>An Employer Equalities Action Plan for 2018/19 is being developed which will include a corporate commitment to identifying and taking steps to remove real or perceived barriers which constrain women from applying for more highly paid job roles within the Council.</p>	The Council will continue to work with the Trades unions, Corporate Equality Group, employee support networks and other stakeholders to further develop and deliver new and existing measures to continue to incrementally reduce its GPG over time.

Part B: Feedback and further mitigation

4 Summary of consultation feedback and further amendments to proposal / mitigation

Consultation feedback

- The Corporate Equalities Group considered and commented on the GPG reporting information at its meeting on 21st February 2018.
- The Trades Unions were informed of the GPG reporting information at the Central Joint Consultative and Negotiating Panel meeting on 1st March 2018
- At the meeting of Personnel Committee on 7th March 2018 Elected Members were recommended to approve the action plan to reduce the Council's Gender Pay gap and receive an annual report setting out the situation at future "snapshot dates" and recommended actions in order to monitor progress.

The Council will continue to work with the Trades unions, Corporate Equality Group, employee support networks and other stakeholders to further develop and deliver new and existing measures to continue to incrementally reduce its GPG over time

Mitigations: Action Planning to reduce the Council's GPG

A range of employment policies, procedures and practices are already in place which will support the Council to tackle the gender pay imbalance over the longer term, in addition:

- The Council's Equality and Diversity learning resource package is regularly reviewed and updated to ensure that all managers are aware of their responsibility to promote gender inclusivity in all elements of employment.
- The Council remains committed to ensuring that any review of policy on pay, pensions, reward and employee recognition continues to be "equal pay proofed" and transparent and to undertaking Equal Pay Audits at regular intervals.

The proposed organisational priorities for immediate further action to reduce the GPG during 2018/19 are:

Priority 1- Recruitment:

- Undertake targeted careers outreach activity to promote job opportunities, including Apprenticeships in certain more highly-paid technical professions or service areas to attract women in the local and national job markets
- Ensure that all job advertisements use gender neutral language which does not unconsciously deter women from applying
- Raise awareness of the potential for unconscious gender bias at the point of appointment, including to the most senior roles and developing learning solutions and guidance which raise awareness of good management practice
- Consider any proportionate positive action to remove barriers or disadvantage for female job applicants and/or employees that comply with the provisions of the Equality Act 2010 where it is appropriate because it has been evidenced that their representation at a level or service in the organisation is disproportionately low.

Priority 2- Flexible working:

- Advertise all vacant posts as open to flexible working unless there are demonstrable business reasons not to do so
- Actively promote the range of part-time/flexible working provisions available to NCC employees, including part-time working, homeworking, job sharing, flexi time and compressed hours
- Engage with the Timewise organisation and recognised trades unions to review and develop the Council's overall approach to flexible working
- Encourage managers to design jobs to be flexible wherever possible and to think creatively about how work is organised to maximise the potential for flexible working
- Identify and remove barriers to flexible working at all levels, including in the most senior, higher paid jobs and encourage the Council's leadership cohort to act as role models by working flexibly themselves
- Encourage the take up of shared parental leave provisions.

Priority 3- Career development and progression:

- Ensure that female employees seeking to move into senior or managerial roles are exposed to diverse senior female role models and have access to coaching, mentoring and networking opportunities
- Encourage managers to use "keep in touch" provisions for women taking maternity leave and to put a structured programme of return to work support in place to avoid detriment to their careers due to long term absence
- Ensure that the Council's talent management strategy and the pipeline to senior roles is not creating any barriers for women and that appropriate targeted development opportunities are in place to enable them to progress to higher paid roles
- Use the ongoing Management and Leadership Development Programme to actively encourage, coach and equip existing female employees to take up management positions and develop their skills, knowledge and qualifications to progress into higher paid leadership roles
- Encouraging women to progress by providing online career management resources, secondment, targeted leadership and management development opportunities which enable talented employees of both genders to progress within the Council.

Complimentary to corporate action planning, each departmental senior leadership team has been engaged in identifying actions using a detailed analysis of the GPG by service to reduce the GPG in those areas where it is most pronounced and have committed to incorporate this into their future service

and workforce planning priorities. Individual departments have identified a range of local actions, including:

- Targeted departmental leadership development activity complimentary to the corporate programme to increase the representation of women on the extended Senior Leadership team in those departments where they are underrepresented
- Encouraging managers to promote the Council's coaching offer to women through the Employee Performance and Development Review (EPDR), and supervision process to enable them to be coached as a means of focusing on progressing their own career development
- Proactively encourage women to apply for job roles in which they are underrepresented, particularly in skill gap areas
- Raise awareness to ensure that all working environments are "female friendly", particularly those that are male dominated, and adopt a zero tolerance approach to inappropriate or sexist behaviour
- Ensuring that women's voices are heard when developing and consulting on strategies for improvement.

Completed EqIAs should be sent to equalities@nottsc.gov.uk and will be published on the Council's website.