

EQUAL PAY AUDIT REPORT

College Workforce Statistics generated on 2 April 2013

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Introduction

The College supports the principle of equal pay for work of equal value and recognises the need to operate a pay system that is free from bias and is based upon objective criteria. The College carried out an institution-wide pay and grading exercise that was implemented in 2006/07 whereby most employees moved to the National Single Pay Spine (SPS) underpinned by job evaluation using Higher Education Role Analysis (HERA) methodology.

The Public Sector Equality Duty came in to force in April 2011 and as created by the Equality Act 2010. There is a requirement for employers covered by the duty to publish information such as the gender pay gap and an equal pay statement.

This is the third Equal Pay Audit (EPA) undertaken by the College compiled their last Equal Pay Audit in February 2011

The next Equal Pay Audit will be published in 2015.

In line with the previous audit this report covers the protected characteristics of gender, ethnic origin, disability, age and contractual status and all aspects of remuneration using the Equal Opportunities Commission (EOC) Equal Pay Review Model (EPRM) as its basis.

The EPRM consists of 5 steps:

- (1) The Scope of review; assembly of data
- (2) Identification of equal work, as defined by the Equal Pay Act:
 - a. 'Like work'
 - b. 'Work rated as equivalent under a job evaluation study'
 - c. If necessary, 'work of equal value'
- (3) Calculation of average male and female salaries/ total earnings for those undertaking equal work
- (4) Establishment of reasons for any significant differences between male and female average salaries for equal work; determination as to whether these provide objective justification, including review of pay policies, for example:
 - a. Job evaluation system
 - b. Pay progression system
 - c. Starting salary policy
 - d. Market supplement system
 - e. Pay protection policies
 - f. Any other relevant pay policies
- (5) Development of an action plan to deal with any outstanding issues and, if necessary, an equal pay policy for the future.

1. Assembly of Data

The statistical analysis and report are based upon:

- An Excel spreadsheet of the required pay, hours of work, grade, job evaluation points and diversity data for each individual employee (identified only by reference number)
- Reference to College documents which explain various aspects of pay policy

The data was taken from the HR system as at 2 April 2013.

A useful background analysis is to identify the pattern of employment for each of the diversity strands under consideration. This is done for gender in Table 1.1 below.

TABLE 1.1: WRITTLE COLLEGE WORKFORCE BY GRADE AND GENDER

Grade	Female	% of females	Males	% of Males	Total
9	9	50.00	9	50.00	18
8	17	41.46	24	58.54	41
7	24	60.00	16	40.00	40
6	59	70.24	25	29.76	84
5	30	62.50	18	37.50	48
4	62	76.54	19	23.46	81
3	32	78.05	9	21.95	41
2	1	20.00	4	80.00	5
1	0	0.00	2	100.00	2
No Grade	2	25.00	6	75.00	8
	236	64.13	132	35.87	368

At the date of compilation of the spreadsheet data the College employed 368 employees, counting those with more than one contract as individual part-time staff for each contract, thus adopting the same approach as the 2011 audit. The 2013 data shows that 64% of the total is female and 36% are male. Grades 1 2 and 8 and staff without a grade are male-dominated, grade 9 has a 50/50 split, the remaining grades are female-dominated. There are now 2 employees currently in grade 1, which has changed from previous audits where there were none. The HESA Staff Record 12/13 shows of staff employed in HE Institutions on a full time of part time basis, women are in a light majority of 54%.

There are some jobs that on job evaluation fall outside of the Single Pay Spine (SPS) range; there are other jobs that are subject to other arrangements. These range from those on spot salaries above the range of grade 10 to employees outside the grading structure; these are set out below:

- 6 Senior Management Team members who are on spot salaries
- 2 Modern Apprentices; the level of pay is controlled by the Government.

TABLE 1.2: WRITTLE COLLEGE WORKFORCE BY GRADE AND ETHNICITY

Grade	White Ethnic Origin	% of total	Non White Ethnic Origin	% of total	Ethnic Origin Not Known	% of total	Total
9	17	94.44	1	0.00	0	0.00	18
8	38	92.68	3	7.32	0	0.00	41
7	38	95.00	1	2.50	1	0.00	40
6	83	98.81	1	1.19	0	0.00	84
5	47	97.92	1	0.00	0	0.00	48
4	79	97.53	1	1.23	1	1.23	81
3	41	100.00	0	0.00	0	0.00	41
2	5	100.00	0	0.00	0	0.00	5
1	1	0.00	1	0.00	0	0.00	2
No Grade	8	100.00	0	0.00	0	0.00	8
Total	357	97.01	9	2.45	2	0.54	368

NOTE: Those of Mixed Ethnic Origin are included under Non-White Ethnic Origin.

The analysis of those who have declared their ethnic origin, in Table 1.2, shows 9 employees of non-white ethnic origin spread across the grades. This is a low overall percentage of the total at 2.45%. In terms of the equal pay audit, the current low numbers mean that it is not possible to conduct any analysis by different non-white ethnic origins. This position has not changed since the last audit. The most recent HESA statistics indicate a 10.11% ethnic minority for Staff in HEI's within the UK [source – HESA 2012/13]. The most recent demographic information for the Chelmsford area indicates 3.27% ethnic minority population for the Borough of Chelmsford, with the Writtle area showing 1.85% [source – Chelmsford Borough Council website, Sept 2013]

TABLE 1.3: WRITTLE COLLEGE WORKFORCE BY GRADE AND AGE

Grade	16-25	% of total	26-44	% of total	45-65	% of total	Total
9	0	0.00	8	44.44	10	55.56	18
8	0	0.00	19	46.34	22	53.66	41
7	0	0.00	22	55.00	18	45.00	40
6	6	7.14	48	57.14	30	35.71	84
5	6	12.50	17	35.42	25	52.08	48
4	7	8.64	25	30.86	49	60.49	81
3	3	7.32	6	14.63	32	78.05	41
2	4	80.00	1	20.00	0	0.00	5
1	0	0.00	1	0.50	1	0.50	2
No Grade	2	25.00	1	12.50	5	62.50	8
Total	28	7.61	148	40.22	192	52.17	368

Table 1.3 shows that just over half of Writtle College's employees are in the oldest of the 3 age groups identified and less than 8% are in the youngest category. This is much the same as the 2011 audit. Broadly speaking, and as one would expect, grade increases with age.

Only 10 Writtle College employees have declared disabilities, compared to 351 who have not declared a disability and 7 who have not provided any information. In keeping with the 2011 audit, the number of employees with declared disabilities is again too small to allow for any reliable statistical analysis.

TABLE 1.4: WRITTLE COLLEGE WORKFORCE BY GRADE AND FULL-TIME/PART-TIME

Grade	F/T	% of F/T Within Grade	P/T	% of P/T Within Grade	Total
9	15	83.33	3	16.67	18
8	32	78.05	9	21.95	41
7	24	60.00	16	40.00	40
6	41	48.81	43	51.19	84
5	24	50.00	24	50.00	48
4	30	37.04	51	62.96	81
3	3	7.32	38	92.68	41
2	5	100.00	0	0.00	5
1	0	0.00	2	100.00	2
No Grade	7	87.50	1	12.50	8
Total	181	49.18	187	50.82	368

As indicated in Table 1.4, overall 50.82% of Writtle College employees work part time, treating those with more than one contract as part-time in relation to each contract, compared to just over 49.18% working full-time. However, the part-time employees are heavily concentrated in grades 3 and 4, where they form a majority, particularly at grade 3 where part time staff equates to more than 92% of employees within that grade. Of the part-time employees 20 in grades 2-6 have term time contracts.

At 50.82%, the number of part time employees has significantly increased since the last audit in 2011, when 45.38% of the total workforce were part time; this is a similar increase to 2011 as of number of full time employees in grades 4-7 have continued to reduced their hours.

2. Identification of Equal Work

In an equal pay audit, the identification of equal work is necessary in order to provide a basis for calculating average basic pay and total earnings for equal work by each of the identified diversity strands.

In the Equality Act 2010, equal work is defined in 3 ways:

‘Like work’, that is, the same or very similar work;

‘Work rated as equivalent’ under a fair and non-discriminatory job evaluation scheme;

‘Work of equal value’ when compared under headings such as effort, skill and decision.

The Equal Pay Review Model uses the same indicators of equal work. These are relevant to all the diversity strands.

a. 'Work Rated as Equivalent'.

Of the above identifiers of 'equal work', the most comprehensive, where an organisation has carried out a job evaluation exercise and applied it to all, or most, employees, is 'work rated as equivalent'. This allows for the identification of jobs which are 'equal work' under the Equal Pay Act by grade, because they have been 'rated as equivalent under a job evaluation study'.

It should be noted that this approach relies on an assumption that the job evaluation scheme is fair and non-discriminatory and has been implemented in a fair and non-discriminatory manner. This assumption will be checked in a following section of the equal pay audit, as part of the review of pay policies.

Writtle College undertook a job evaluation exercise in 2006, using the HERA system of evaluation developed to support pay modernisation in the higher education sector. The structure implemented in 2007 had 10 grades and these can each reasonably be taken as representing 'work rated as equivalent'.

b. 'Like Work'

Where job titles have been used consistently, these can be the basis for identifying those undertaking the same or very similar work.

c. 'Work of Equal Value'

As noted above, 8 employees are outside the evaluated grade structure, so are excluded from the gender pay gap analysis below.

As a result of the last Equal Pay Audit all jobs have been evaluated with the exception of SMT who have different terms and conditions and therefore are not comparable and Apprentices who are separately governed by legislation.

3. Calculation of Average Basic Pay for Equal Work for Each Diversity Strand

Work Rated as 'Equivalent'.

a. Gender

Table 3.1 shows average male and female basic full time equivalent (FTE) pay for each of the Writtle College grades.

The European Human Rights Commission's (formerly the EOC) advice on equal pay reviews is that gender pay gaps of 5% or more should be considered significant and the reasons for the differences investigated. Systematic pay gaps of 3% or more in favour of one gender or the other should also be investigated as potentially indicative of underlying pay discrimination.

Table 3.1 can be found over the page

TABLE 3.1: AVERAGE BASIC PAY BY GRADE AND GENDER FOR 'WORK RATED AS EQUIVALENT'

Grade	No		Average FTE Basic Pay (£)		F average FTE Basic Pay as a % of M
	M	F	M	F	
9	9	9	50882.78	53294.00	104.74
8	24	17	41140.96	41185.35	100.11
7	16	24	33142.44	33088.75	99.84
6	25	59	28249.48	27669.93	97.95
5	18	30	23000.83	22554.27	98.06
4	19	62	19269.79	19448.21	100.93
3	9	32	17634.11	17020.38	96.52
2	4	1	14808.75	14520.00	98.05
1	2	0	13839.00	0.00	0.00
Total	126	234			

On the basis of this advice, there are no Writtle College grades where the gender difference in pay is significant, at more than 5%. There are only two grades, 3 and 9, where the gap is between 3 and 5%. Further investigation is required for these grades.

b. Ethnic Origin

Numbers of those declaring an ethnic origin other than 'white' are too small to be able to do any reliable analysis so they have been treated as one group for statistical analysis purposes. Table 3.2 below shows average pay on a full-time equivalent basis for 'white' and "ethnic minority" employees for each of the grades. Employees whose ethnic origin is not known are excluded from this table, so the total numbers in each grade are different from those in the previous table.

TABLE 3.2: AVERAGE BASIC PAY BY GRADE AND ETHNIC ORIGIN FOR 'WORK RATED AS EQUIVALENT'

Grade	No		Average FTE Basic Pay (£)		Ethnic Minority Average FTE Basic Pay as a % of White
	Ethnic Minority	White	Ethnic Minority	White	
9	1	17	48729.00	52286.01	93.19
8	3	38	42128.21	43756.33	96.27
7	1	38	34223.00	33077.78	103.46
6	1	83	24776.00	27879.48	88.86
5	0	48	0.00	23205.17	0.00
4	1	79	19606.00	19421.56	100.94
3	0	41	0.00	17155.09	0.00
2	0	5	0.00	14751.00	0.00
1	1	1	13839.00	13839.00	100.00
Total	8	350			

2 employees refuses to give this information

Considerable caution is necessary when interpreting averages and percentages based on very small numbers. However, the overall pattern is of ethnic minority employees in grades 6, 8 and 9 are earning between 3.75% – 11% less than white employees. In grade 7 white

employees earn 3.5% less than ethnic minority employees. These figures require further investigation.

c. Disability

Of the 9 employees with declared disabilities, all jobs are paid within the scale range for the grade.

d. Part Time/Full Time

Table 3.3 shows average pay by grade for part time and full time employees calculated on a full time equivalent basis for comparability. There are no pay gaps of more than 5%, but there are gaps of between 3 and 5 % in favour of full time, for grades 5, 6 and 8. These figures require further investigation.

TABLE 3.3: AVERAGE BASIC PAY BY GRADE AND PART TIME/ FULL TIME FOR 'WORK RATED AS EQUIVALENT'

Grade	Nos		Average FTE Basic Pay (£)		P/T Average FTE Basic Pay as a % of F/T
	F/T	P/T	F/T	P/T	
9	15	3	52038.47	52338.00	100.58%
8	32	9	42554.56	41155.00	96.71%
7	24	16	33135.13	33072.88	99.81%
6	41	43	28380.95	27328.93	96.29%
5	24	24	23256.42	22187.04	95.40%
4	30	51	19214.10	19519.45	101.59%
3	3	38	17344.33	17140.16	98.82%
2	5	0	14751.00	0.00	0.00%
1	0	2	0.00	3061.27	0.00%
Total	174	186			

e. Age

TABLE 3.4: AVERAGE BASIC PAY BY GRADE AND AGE FOR 'WORK RATED AS EQUIVALENT'

GRADE	16-25	AVE BASIC FTE PAY (£)	26-44	AVE BASIC FTE PAY (£)	16-25 % of 26-44	45-64	AVE BASIC FTE PAY (£)	16-25 % of 45-64	26-44 % of 45-64
9	0	0	8	52,154	0.00	10	52,036	0.00	100.23
8	0	0	19	40,467	0.00	22	55,639	0.00	72.73
7	0	0	22	32,502	0.00	18	33,853	0.00	96.01
6	6	25,792	48	27,798	92.78	30	28,323	91.06	98.15
5	6	21,399	17	22,431	95.40	25	23,237	92.09	96.53
4	7	18,155	25	19,143	94.84	49	19,719	92.07	97.08
3	3	16,254	6	16,706	97.29	32	17,324	93.83	96.44
2	4	14,809	1	14,520	101.99	0	0	0.00	0.00
1	0	0	1	13839		1	13839	0.00	100.00
Total	26		147			187			

Table 3.4 shows average basic pay on a full time equivalent basis for each of the identified age ranges. It shows increasing basic pay, associated with grade of job and with increasing age range, as one might expect. The biggest differences are between the youngest and middle age groups

4. Analysis of Reasons for Significant Differences: Review of Pay Policies

a. Further Investigations

The next step is to investigate the reasons for the differences identified as significant in the 'work rated as equivalent'. Analysis of the data by scale point, grade and the various diversity strands indicates two explanations for this:

(i) There are 21 employees paid above the stated maximum scale point for their grade. This is because employees who take on additional duties but do not warrant a re-grade are placed in the contribution area (where their current and the next grade overlap) and do not receive any further increments unless sanctioned through College Review Panel (CRP) and these additional duties are reviewed annually.

(ii) Another factor is the distribution of employees within each grade. For example, none of the employees of ethnic minority origin are in the groups paid above the maximum stated scale point for the grade. In grades 7, 8 and 9 these employees are generally in the bottom half of the relevant scale range, (starting salaries are at the bottom of the grades) accounting for the grade pay gaps in favour of white employees. In grade 3 nearly 78% of the male employees are in the contribution area of grade. In grade 9 all the female employees are either at the top of the grade or in the contribution area. These factors contribute to the gender gaps in these grades.

These features explain the pay gaps, however, whether they provide objective justification needs to be considered. The fact that they contribute to some pay gaps in relation to most diversity strands suggests that they are not symptomatic of systemic pay discrimination.

All employees were originally assimilated to the national pay spine prior to job evaluation being conducted and thereafter the evaluated grade for their role confirmed (due to the pay model). This resulted in the salaries of some employees being within the contribution area of the relevant grades. All employees who are in the contribution area have taken on additional responsibilities which are over and above those normally required in that particular grade and these have been defined as Contribution Area Criteria, justifying their salary remaining at that level, unless such duties cease to be needed or fulfilled. These are regularly reviewed as part of the normal annual PDR process in line with the job description and requirements for each of these roles. These forms containing the Contribution Area Criteria form part of the employee records of those concerned, along with their job descriptions.

This additional information amplifies the explanation for the pay gaps and provides more detailed reasons. Undertaking additional responsibilities is likely to provide objective justification for these pay differences, as long as the system is administered in a fair and unbiased manner.

The next step is to consider whether any other aspects of pay policy might have contributed to the situation. Relevant pay policies are considered below.

b. Job Evaluation System and Grading Structure

Writtle College uses the HERA system of evaluation and has done so since the Higher Education National Framework Agreement on Pay Modernisation was implemented by the College in 2007.

As stated in the last Equal Pay Audit, the HERA (Higher Education Role Analysis) system meets the first two EPRM Job Evaluation Checklist criteria. This audit does not examine or consider this in detail as it was extensively covered in the first Equal Pay Audit conducted by an independent analyst in 2009, and nothing has changed since the first audit. New and Changing/Evolving roles continue to be evaluated using HERA.

The analyst commented in 2009 that *“The HERA system provides a sound basis for determining equal work in the higher education sector. There is no reason to think that it could have contributed to the identified gender and other pay gaps. Rather it should have narrowed historical pay gaps”*

c. Post Evaluation Grading and Pay Structure

Writtle College agreed a 10 grade structure plus spot salaries for the SMT members to implement the evaluation outcomes, in line with the National Framework Agreement.

The College does not currently have any employees in grade 10, so effectively it currently has a 9 grade structure. This as reported in 2011 is comparable with the grading structures developed elsewhere in higher education and other parts of the public sector.

Also as reported in 2011, the pay scales vary in length from 2 substantive scale points at grade 1 and 3 at grade 2 to 9 substantive scale points at grade 8. Government advice in relation to the Employment Equality (Age) Regulations 2006 is that scales with up to 6 incremental points (minimum plus 5) do not require specific justification; scales above that may require such justification.

Pay progression is through experience in post in relation to the substantive pay scale points. However, at the top of each pay scale there are between 1 and 4 contribution related points. As long as the contribution system is fair and non-discriminatory and applied in a fair and non-discriminatory manner, this will provide justification for differences in pay between employees correctly placed on the contribution points and those on the substantive pay scale points.

Assimilation onto the new pay spine took place before the completion of the role evaluations, but subsequent adjustments effectively followed standard practice in that:

- Those whose previous pay was within the new pay range for their job moved across at their current salaries;
- Those whose previous pay was below the minimum of the new pay range for their job, called ‘green circles’, moved to the minimum point of the new scale;
- Those whose previous pay was above the maximum of the new pay range for their job, called ‘red circles’, moved to the maximum point of the new pay range for their job, but the excess is subject to personal protection for an agreed period of time. (This protection has now ceased)
- Those whose previous pay was above the substantive pay scale but within the contribution range were assimilated to the nearest point within that range, to avoid ‘detriment’, in accordance with the national agreement.

From the above, it is possible to see that the gender pay gaps in grades 3 and 8, and the ethnicity pay gaps in all of the grades, are in large part attributable to the following:

- 78% of the male employees in grade 3 are in the contribution area and in grade 9 all the female employees are either at the top of the grade or in the contribution area.

- The length of the pay scales, especially towards the top of the structure, means that a slightly unbalanced distribution of men and women through the grade can result in significant pay gaps.

The key is whether these features can also provide objective justification. For a transitional period, this is likely to be the case, but less likely to be so in the medium term. It will therefore be important that the College:

- continues to undertake regular equal pay audits (e.g. biannually) to ensure that gender, ethnicity and part-time/full-time gaps continue to narrow. Since the last audit these gaps have narrowed again;
- continues to ensure that those assimilated on contribution points are meeting the criteria for those points, in order to provide individual justification for grade pay differences. These people in job roles are looked at annually as part of the appraisal (PDR) process by the line manager and are monitored annually by the HR department.

The 2009 Audit also suggested that consideration be given to the shortening of the longer pay scales over time, to prevent grade pay gaps from re-emerging. This has been considered but rejected on the grounds that it would take Writtle College out of the collective bargaining arrangements and the nationally agreed pay framework, which would require the college to individually consult regarding a proposed variation to contract agreement with each and every employee of the College.

d. Starting Salaries

The 2009 audit identified that Equal Pay Audits have found that starting salaries are a potential area of pay discrimination, particularly where justifications for differences are not monitored for their continued relevance over time.

As recommended in the 2009, starting salaries are usually at the minimum point of the grade unless it is identified that the new recruit meets the requirements for the higher point on the scale, or where there is a quantifiable need to apply the Market Pay Policy.

e. Market Payments

- It is justifiable to pay above the grade rate to recruit and retain even where the group with the payment is of predominately one gender and the group without the payment is predominantly of the opposite gender (source: Enderby vs. Frenchay Health Authority and the Secretary of State for Health 1993 IRLR 591 ECJ). In order for market payments to provide objective justification for differences in pay, they should be:
 - paid only where there is a demonstrable need for them from market data and/or evidence of inability to attract suitable candidates at the advertised rates;
 - subject to regular review in order to demonstrate an ongoing need and to adjust them to changes in market rates;
 - ideally paid as a separate supplement, rather than being consolidated into basic pay (it is easier for an organisation to justify and monitor market payments, where they can be separately identified);
 - paid to all those in the same circumstances. Non-payment to others in the group could lead to equal pay claims;
 - responsible for the whole of the difference in pay attributed to them.

Reliance on market data alone should be treated with caution, as the quality of the information depends entirely on how it is collected and collated. Information from a small number of recruitment advertisements is unlikely on its own to be sufficiently robust to justify a market supplement, as it is limited and partial. Further, internal and external jobs may not have been accurately matched for 'size' and specific content.

Once higher salaries have fulfilled their function of attracting more recruits into the particular role or changes in the labour market result in a reduction in the market rate, there is no longer a need for any additional payment and such payments lose their justification. In these circumstances, such payments should be subject to pay protection and phased out over time (unless the employee or their job has been subject to a development process to allow re-grading or appointment to a job commensurate with their historic salaries).

Writtle College does have a *Market Pay Policy and Conditions Supplements* but do not have any employee receiving this supplement at the present time.

f. Pay Protection

The justification for pay protection is to cushion the transition to a lower pay rate, not to maintain the enhanced pay for a lengthy or indefinite period. There is a risk that indefinite or lengthy pay protection agreements become discriminatory over time, so such arrangements are generally considered to be contrary to good practice. A pay protection policy should therefore provide for enhanced pay to be phased out over a short period of time (generally 3 to 5 years). There are a number of different ways by which this can be achieved, for example:

- those affected do not receive annual pay awards until such time as the maximum of the relevant pay scale 'catches up' with their salary;
- by stipulating a fixed time period for pay protection after which the salaries of those affected are adjusted to maximum of the relevant pay scales;
- by stipulating a fixed time period for pay protection and reducing the salaries of those affected by a set percentage every year during this period.

There is no prescribed legal time limit on pay protection. The issue is whether the protection arrangements can be justified in the circumstances of the particular case. With effect from 2014 Writtle College has reduced its level of Pay Protection and developed a statement within its Redundancy Policy & Procedures which offers protection for 3 months only.

At the present time we do not have any employees under pay protection.

g. Performance Related Payments

The College does not have performance related pay per se. The grading and pay structure includes provision for contribution increments above the substantive pay scales and this is assessed through the College Review Panel (CRP).

h. Holidays

Holiday entitlement varies. Historically HE academic staff are entitled to 42 days holiday although new starters receive 35 days in line with FE academic staff, and non academic staff receive 25 days holiday raising to 30 after 5 years service.

i. Benefits

It would be usual to calculate average total earnings for 'work rated as equivalent' in order to examine the impact of additional payments and benefits on top of basic pay. However, at Writtle College, the additional payments and benefits are specific to small numbers of

employees, so their impact on average total earnings would be very limited. In these circumstances, it is more useful to consider the impact of each additional payment separately.

Five members of SMT in the analysis benefit from **Private Medical Insurance** provision. All are on spot salaries.

There are 5 employees who have **accommodation** provided with the job. Justification for this relies on the nature of the work undertaken. The 2011 audit included 3 employees where the justification was unclear. This has now been clarified and these individuals now hold tenancy agreements with the College which are not related to their employment status. Of the total of those with accommodation provided, 3 are male and 2 are female. All are of white British ethnic origin, which is disproportionate to the ethnic composition of the workforce as a whole.

There are 12 employees in receipt of **childcare vouchers**, 4 males and 8 females, spread across the grades. The scheme is a salary sacrifice arrangement, open to all employees. This is therefore unlikely to be a potential source of challenge.

Most employees take advantage of the **pension scheme contributions** to one of the available pension schemes, the Teachers' Pension Scheme (TPS) or the Local Government Pension Scheme (LGPS). The government's pension reforms introduced a requirement to adopt "automatic enrolment" of new and existing employees who are not currently members of one of the schemes from November 2013. Numbers not taking advantage of this benefit or opting out after auto-enrolment are greater in the lower grades, so are female dominated. It is not considered that any particular conclusions can be drawn from this analysis except that the take up of the benefit amongst female employees is slightly lower than amongst male employees, this is likely to adjust due to auto-enrolment.

5. Summary Conclusions, Action Plan, Equal Pay Policy

a. Conclusions and Observations

In this Audit, 8 employees sit outside of the grade structure, so have been excluded from the gender pay gap analysis. At present there are 6 employees on spot salaries, where different terms and conditions apply. These 6 jobs have been evaluated but on evaluation, exceeded the SPS, point 51. These senior roles have decreased by 1 since the last audit. There are 2 apprentices whose salaries are governed by legislation. These employees are in roles that do not require evaluation.

The most recent Equal pay Audit shows that all pay gaps are decreasing and that if there are any significant gaps there is a valid reason for them as stated above. To ensure this trend continues Equal Pay Audits should be continued biannually and to continue to ensure, via the PDR system, that those assimilated on contribution points are meeting the criteria for those points, in order to provide individual justification for grade pay differences.

Overall this third audit shows the College's commitment to monitoring pay practice in order to equally reward work of equal value. Consideration should however be given in relation to the next EPA to the evaluation and inclusion of roles which currently fall outside of the Single Pay Spine (SPS) agreement to ensure that the report is as representative of the College's equal pay position as possible.