

# Diversity and Inclusion

## Equal Pay Audit, Gender and Ethnicity Pay Gap Reporting

2021

### Contents

<b>1. Introduction.....</b>	<b>2</b>
<b>2. Definitions .....</b>	<b>3</b>
<b>3. Scope .....</b>	<b>5</b>
<b>4. Equal Pay Audit 2021 .....</b>	<b>7</b>
<b>5. Insights and Analysis.....</b>	<b>10</b>
<b>6. Gender Pay Gap Reporting .....</b>	<b>17</b>
<b>7. Ethnicity Pay Gap Reporting .....</b>	<b>18</b>
<b>8. Action Plan / Priorities .....</b>	<b>20</b>
<b>Appendix 1: Pay Scale by Grade (effective as of 01/04/20) .....</b>	<b>22</b>



## 1. Introduction

The purpose of this report is to provide information relating to the Senedd Commission's 2021 Equal Pay Audit, Gender Pay Gap figures; and Ethnicity 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.<sup>1</sup>

### 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;

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<sup>1</sup> Equality and Human Rights Commission – Equal Pay Audit Toolkit

- median bonus gender pay gap;
- 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 BAME 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.

## **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.

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 Pay Gap
<b>Period of time taken into account</b>	31 March 2021 only	1-31 March 2021
<b>Definition of pay</b>	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
<b>Headcount</b>	480	462
<b>All staff on perm/temp contracts employed on 31 March were included except:</b>	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).
<b>Information source</b>	HR/Payroll IT System	

## Pay and Reward system

The applicable pay scales came into effect on 1 April 2020 (Appendix 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 Directors.

## 4. Equal Pay Audit 2021

### Group comparisons to the overall workforce

This year we have seen positive traction in 3 groups, with 2 groups where the pay gap has increased, and 1 group where the median has increased and the mean has broadly remained the same.

Group	Group which has pay lead (% of workforce)	Compared to (% of workforce)	% more pay for lead group (FTE Total salary)**	Change in pay difference since April 2020?***
Sex	Women = 51.0% (Actual number =235)	Men = 49.0% (Actual number =245)	<b>Median:</b> 8.9%	<b>Median:</b> Reduced (was 15.2%)
			<b>Mean:</b> 5.3%	<b>Mean:</b> Reduced (was 7.3%)
Age	46-50 = 10.8% (Actual number =52)	All other ages = 89.2% (Actual number =428)	<b>Median:</b> 11.72%	Pay lead group has changed from last year (41-45 / 46-50). Between 41-50 ages between this year and last year <b>Median</b> has increased (was 11.2%) and <b>Mean</b> has increased (was 15.3%)
			<b>Mean:</b> 14.98%	
Disability	Staff who don't identify with a disability = 83.4% (Actual number =401)	Staff who identify with a disability = 5% (Actual number =24)	<b>Median:</b> 0.0%	<b>Median:</b> Reduced (was 4.2%)
			<b>Mean:</b> 3.7%	<b>Mean:</b> Reduced (was 4.4%)
Sexual Orientation	Non-LGBQ+ staff = 81.5% (Actual number =391)	LGBQ+ staff = 4.6% (Actual number =22)	<b>Median:</b> 7.1%	<b>Median:</b> Increased (was 8.4%)
			<b>Mean:</b> 0.3%	<b>Mean:</b> Increased (was 2.1%)
Race/Ethnicity	Staff identifying as White= 91.7%* (Actual number =440)	BAME staff = 4.4%* (Actual number =21)	<b>Median:</b> 38.9%	<b>Median:</b> Increased (was 23.6%)
			<b>Mean:</b> 27.8%	<b>Mean:</b> Increased (was 20.9%)
Religion/Belief	Agnostic/Atheist/Christian/None/Other = 75.2%* (Actual number =361)	Muslim = 1.7%* (Actual number =8)	<b>Median:</b> 40.4%	<b>Median:</b> Slight increase (was 38.9%)
			<b>Mean:</b> 38.9%	<b>Mean:</b> Remained the same (was 39.0%)

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

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

\*\*\* Green = Reduced / Amber = Remained the same / Red = Increased

## Group comparisons within the same Grade

The nature of an Equal Pay audit means that we need to consider whether staff receive ‘**equal pay for equal work**’. Therefore, we have analysed certain groups of staff to identify if there is any difference between their pay within the same pay grade. This information is shown in the below table. A positive number means the rest of the workforce at that pay grade is paid more than the Group being assessed. A negative number means the Group being assessed is paid more than the rest of the workforce at that pay grade.

It should be noted, that across the groups not all pay grades are represented in this table. This results where the amount of representation of the group in a particular pay grade is too small (less than 5 people or less than 5% of the group is within that pay grade) to make any meaningful finding, and due to the low numbers may skew the figures.

Group	Pay Band	Number of staff	Representation as a % of the workforce	Representation as a % of the Group	Difference between this group and the rest of the workforce in Total pay (%)**	
					Mean pay	Median pay
<b>Women</b>	Apprentice/ TS	42	39.3%	17.3%	5.2%	0.0%
	EO / M3	29	43.9%	11.9%	4.1%	0.0%
	HEO / M2	91	59.5%	37.4%	-0.5%	0.0%
	SEO / M1	44	57.1%	18.1%	-0.8%	0.0%
	Grade 7 / E2	30	50.8%	12.3%	-1.7%	0.0%
<b>Age 30 and under</b>	Apprentice/ TS	39	36.4%	45.9%	9.1%	8.0%
	EO / M3	19	28.8%	22.4%	4.8%	0.0%
	HEO / M2	19	12.4%	22.4%	7.2%	13.2%



Group	Pay Band	Number of staff	Representation as a % of the workforce	Representation as a % of the Group	Difference between this group and the rest of the workforce in Total pay (%)**	
					Mean pay	Median pay
	SEO / M1	5	6.5%	5.9%	11.8%	13.0%
<b>Age 61+</b>	Apprentice/ TS	12	11.2%	66.7%	-4.3%	0.0%
<b>Staff identifying with a disability</b>	Apprentice/ TS	5	4.7%	20.8%	-0.2%	0.0%
	HEO / M2	12	7.8%	50.0%	-1.5%	0.0%
<b>LGBQ+ staff</b>	HEO / M2	9	5.9%	40.9%	4%	13.2%
	SEO / M1	5	6.5%	22.7%	-0.3%	0.0%
<b>BAME staff</b>	Apprentice/ TS	12	11.2%	57.1%	1.6%	0.0%
	EO / M3	5	7.6%	23.8%	-0.3%	-14.6%
<b>Muslim staff</b>	Apprentice/ TS	7	6.5%	87.5%	0.6%	0.0%

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

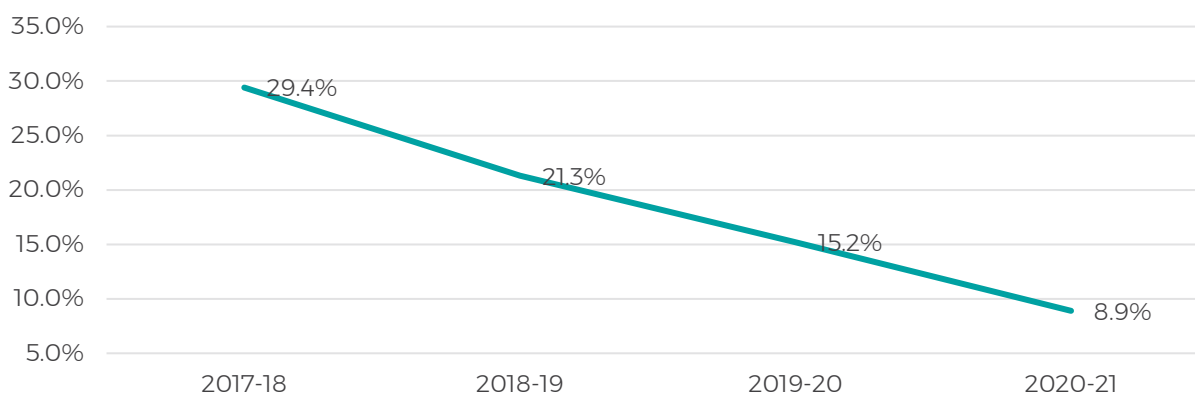
## 5. Insights and Analysis

### Sex

Group	Group which has pay lead (% of workforce)	Compared to (% of workforce)	% more pay for lead group (FTE Total salary)**	Change in pay difference since April 2020?***
<b>Sex</b>	Women = 51.04% (Actual number =245)	Men = 48.95 (Actual number =235)	<b>Median:</b> 8.9%	<b>Median:</b> Reduced (was 15.2%)
			<b>Mean:</b> 5.3%	<b>Mean:</b> Reduced (was 7.3%)

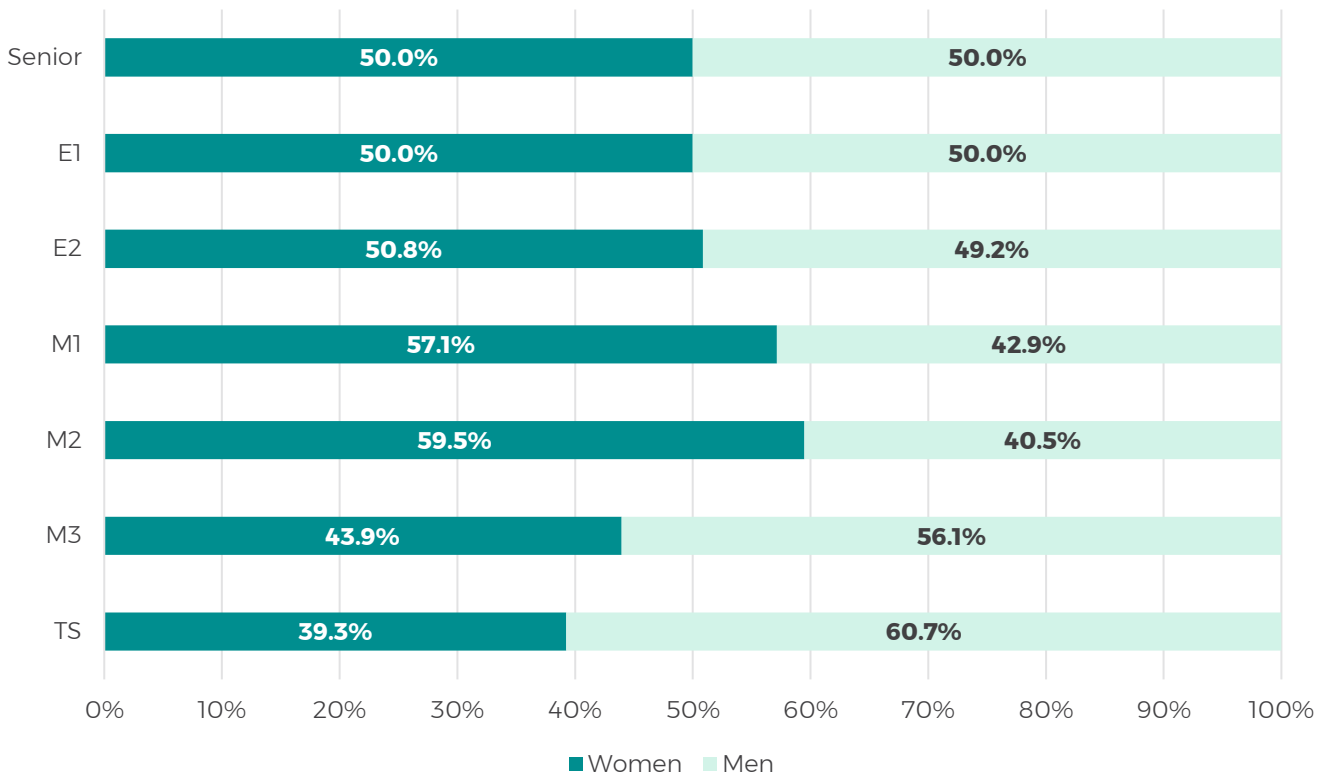
As we have seen over the last three years, the inverse equal pay gap has continued to decrease this year, which marks further progress towards neutralising the gender equal pay gap. (Graph 1)

**Graph 1: Comparison of Total Pay Median difference between men and women over time**



The Group comparisons within the same Grade table demonstrates that at all levels up to Grade 7, there is a zero median pay gap. The mean pay gap at an Apprentice/TS is 5.2% which is likely to be due to the higher representation of men (60.7%) at this level. At Grade 6 / Senior roles the numbers of staff are too small to make any significant pay grade findings. However, in terms of representation, at E1/Senior decision making level there is now a 50%/50% split. This means the ambition set out in the **50:50 by 2020 Campaign has been achieved.**

**Graph 2: Gender Split by Grade Structure**



**Part-time Employees by Grade and Service Area/Occupation/Gender**

	Part Time		Full Time	
	Male	Female	Male	Female
<b>Apprentice</b>	0.0%	0.0%	0.4%	0.2%
<b>TS</b>	1.7%	2.3%	11.5%	6.3%
<b>EO /M3</b>	0.6%	0.8%	7.1%	5.2%
<b>HEO /M2</b>	0.6%	6.9%	12.3%	12.1%
<b>SEO /M1</b>	0.2%	2.3%	6.7%	6.9%
<b>Grade 7 / E2</b>	0.0%	1.7%	6.0%	4.6%
<b>Grade 6 / E1</b>	0.0%	0.2%	1.5%	1.3%
<b>Senior</b>	0.0%	0.0%	0.4%	0.4%
<b>Total</b>	3.1%	14.2%	45.8%	36.9%

## Age

Group	Group which has pay lead (% of workforce)	Compared to (% of workforce)	% more pay for lead group (FTE Total salary)**	Change in pay difference since April 2020?***
Age	46-50 = 10.8% (Actual number =52)	All other ages = 89.2% (Actual number =428)	<b>Median:</b> 11.72% <b>Mean:</b> 14.98%	Pay lead group has changed from last year (41-45 / 46-50) /Between 41-50 ages between this year and last year <b>Median</b> has increased (was 11.2%) and <b>Mean</b> has increased (was 15.3%)

The Median Total pay has increased since last year in all age brackets except the 41-45 and 61-65 age brackets. Last year, the lead pay groups were both 41-45 and 46-50. As a result of the slight decrease in Median pay for the 41-45 group, 46-50 group is now the lead group. However, for age groups between 36 – 60 the Median total may has neutralised significantly, with the Median pay for 36-40, 41-45 and 51-55 now exactly the same (£38,362). The age groups with a significant lower variance against the median are the >21, 21-25, 61-65 and >65. To some extent this is due to the smaller numbers of staff within these groups, which accounts for some skewing of the median pay.

When considering Group comparisons within the same Grade, for staff age 30 and under, there is a mean and median pay gap against all grade where there are 5 or more staff in this age group. This is most evident at a HEO level (mean difference 7.2% / median difference 13.2%) and SEO level (mean difference 11.8% / median difference 13%.) However, these pay differences are to be expected due to the fact that progression through the pay grade is linked to length of service. Staff ago 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. This is further demonstrated by the fact that the mean difference between staff age 61+ and all other age groups is -4.3%.

**Graph 3: Median salary and headcount for all age brackets**



## Disability

Group	Group which has pay lead (% of workforce)	Compared to (% of workforce)	% more pay for lead group (FTE Total salary)**	Change in pay difference since April 2020?***
<b>Disability</b>	Staff who don't identify with a disability = 83.4% (Actual number =401)	Staff who identify with a disability = 5% (Actual number =24)	<b>Median:</b> 0.0%	<b>Median:</b> Reduced (was 4.2%)
			<b>Mean:</b> 3.7%	<b>Mean:</b> Reduced (was 4.4%)

There has been an overall reduction in both the median and mean difference between staff identifying with a disability and staff who state they do not identify with a disability, and the Median difference is now 0%. Due to the small numbers involved, the data is sensitive to even small changes in the cohort, and this year, 11.6% of staff either did not reply or stated 'prefer not to say' when recording their disability status. This has increased since last year (9.2%).

The Group comparisons within the same Grade table demonstrates that, across the pay grades with more than 5 staff identifying with a disability, there is 0% difference in median pay, and for mean pay, staff identifying with a disability are paid very slightly more (-0.2% at Apprentice/TS level and -1.5% at an HEO level).

We will continue to encourage all staff who identify as having a disability to record their disability on the HR system and to work to ensure members of staff undertake the definition of a disability are, as we believe that many people with hidden disabilities, mental ill health, dyslexia and other long term health conditions, who could identify with this definition of disability on our system, are not reflected in this data.

We will also consider whether it is feasible to do a pay audit based on different types of disability, as part of the mid-year review, although it is noted that due to low overall numbers of reporting, this may not provide clear insight.

## Sexual Orientation

Group	Group which has pay lead (% of workforce)	Compared to (% of workforce)	% more pay for lead group (FTE Total salary)**	Change in pay difference since April 2020?***
Sexual Orientation	Non-LGBQ+ staff = 81.5% (Actual number =391)	LGBQ+ staff = 4.6% (Actual number =22)	<b>Median:</b> 7.1%	<b>Median:</b> Increased (was -8.4%)
			<b>Mean:</b> 0.3%	<b>Mean:</b> Increased (was -2.1%)

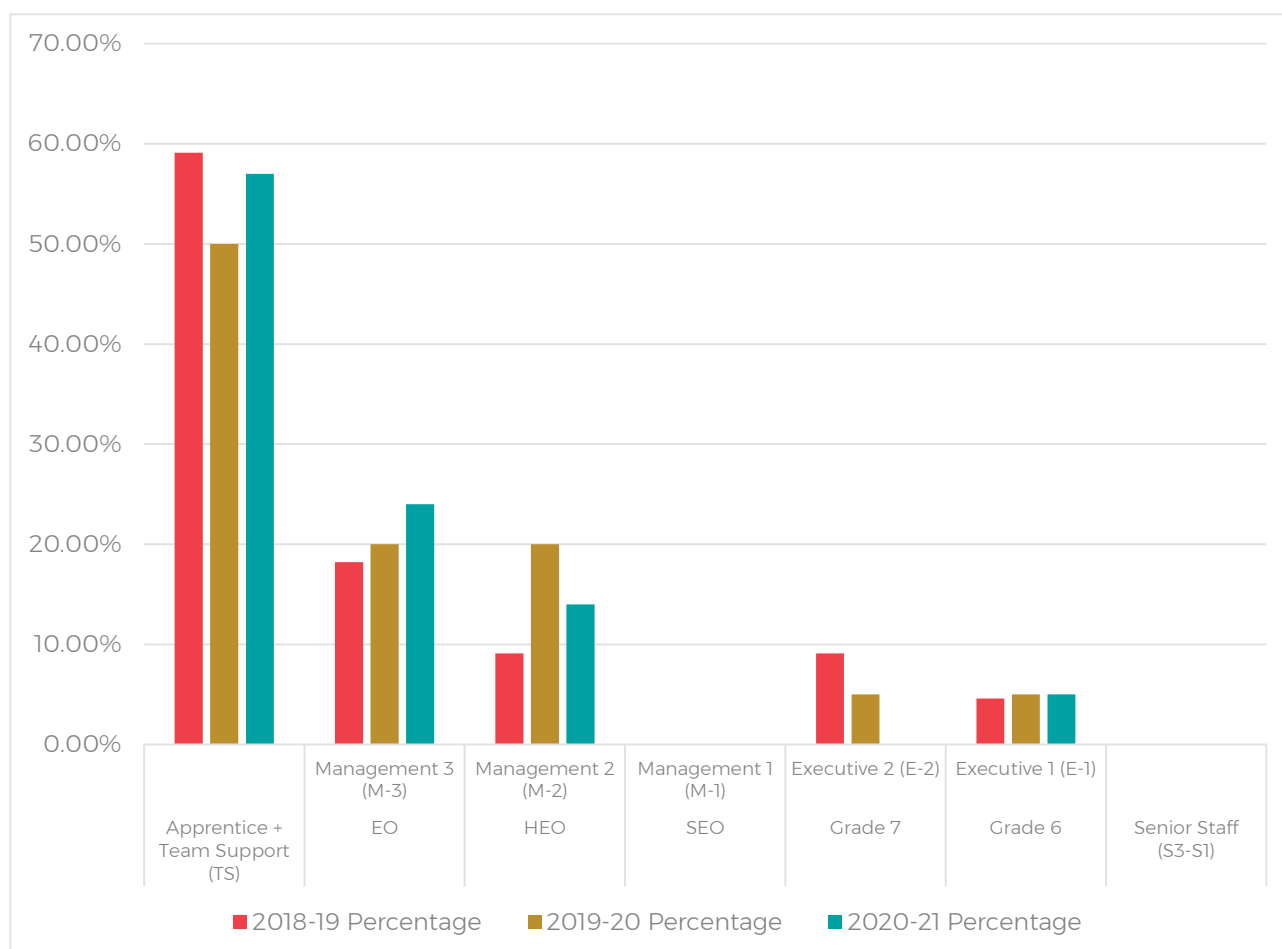
In last year's equal pay audit, there was an inverse sexual orientation pay gap. This year there has been an increase in the number of staff declaring that they consider themselves to be LGBQ+ - from 3.99% last year to 4.6% (an additional 3 staff, who are in pay grades at a Apprentice/TS level). As the number of staff declaring themselves to be LGBQ+ is still very small overall (22), any small changes here can have a significant impact on the overall figures, and this has led to a median pay gap this year of 7.1%, and a mean of 0.3%.

## Race / Ethnicity

Group	Group which has pay lead (% of workforce)	Compared to (% of workforce)	% more pay for lead group (FTE Total salary)**	Change in pay difference since April 2020?***
<b>Race/ Ethnicity</b>	Staff identifying as White= 91.7%*	BAME staff = 4.4%*	<b>Median:</b> 38.9%	<b>Median:</b> Increased (was 23.6%)
	(Actual number =440)	(Actual number =21)	<b>Mean:</b> 27.8%	<b>Mean:</b> Increased (was 20.9%)

The number of people identifying as White and BAME this year is broadly the same as last year (91.8% and 4% respectively). However, since last year there has been a significant increase in both the median and mean pay gaps against the workforce as a whole at all pay grades. Due to the small numbers of staff identifying as BAME, the data is sensitive to even small changes in these cohorts, and the increase in the pay gap is attributed to BAME staff leaving, which has resulted in a change in BAME representation across the different pay bands, as shown in Graph 5:

**Graph 4: % of staff identifying as BAME in each Pay Grade:**



The Group comparisons within the same Grade table demonstrates that, across the pay grades with more than 5 staff identifying as BAME, there is no significant pay difference at an Apprentice/TS level (mean difference 1.63% / median difference 0%). At a EO level, the numbers are very small (5 staff / 7.6% of the workforce) but looking at the mean and median for these staff they are actually paid more than the rest of the workforce (mean: -0.3% / median: -14.6%). 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 equal pay for equal work.

## Religion / Belief

Group	Group which has pay lead (% of workforce)	Compared to (% of workforce)	% more pay for lead group (FTE Total salary)**	Change in pay difference since April 2020?***
<b>Religion/ Belief</b>	Agnostic/ Atheist/ Christian/ None/Other = 75.2%* (Actual number =361)	Muslim = 1.7%* (Actual number =8)	<b>Median:</b> 40.4%	<b>Median:</b> Slight increase (was 38.9%)
			<b>Mean:</b> 38.9%	<b>Mean:</b> Remained the same (was 39.0%)

Across most religions and beliefs there was no significant pay difference – the religions and beliefs which are included in this are: Agnostic, Atheist, Christian, None and Other. This group makes up 75.2% of the workforce. There are 8 staff who have identified their religion as Muslim (compared to 5 staff last year identifying as Muslim), which marks a positive increase in staff self-declaring as Muslim. However, there has also been an increase in staff stating they preferred not to say, or who did not reply – 23.1% compared to 21.6% last year. This is a significantly higher non-disclosure rate than for the other characteristics, so further analysis is needed to understand any barriers for staff declaring this.

7 of the 8 Muslim staff are employed at an Apprentice/ Team Support Level and considering the pay for Muslim staff at this level compared to the rest of the workforce at an Apprentice/Team support level, there is 0% difference in median pay and no significant difference in median pay (0.6%). 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. Further work is needed to encourage Muslim staff to support their development within the organisation, which may offer more potential for promotion.



## 6. Gender Pay Gap Reporting

### Gender Pay Gap - Hourly Pay

	2020-21	2019-20	2018-19	2017-18
<b>Mean Gender Pay Gap</b>	-5.3%	-6.7%	-8.5%	-5.7%
<b>Median Gender Pay Gap</b>	-9.8%	-15.2%	-21.3%	-23.2%

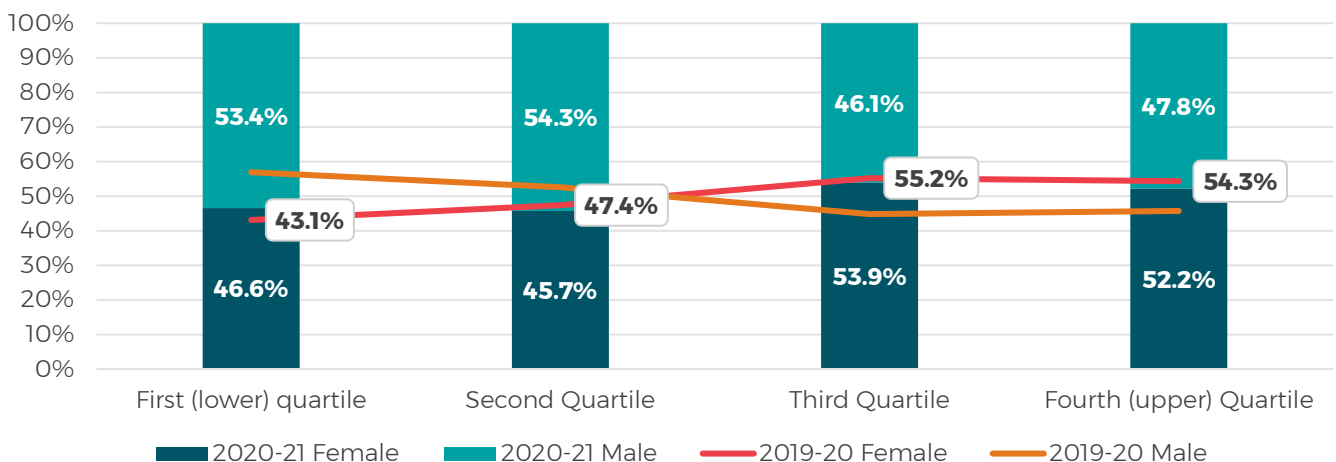
### Bonus Pay

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.

**Graph 5: 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 2020 was 15.5%<sup>2</sup>. However, the pay gap for the Commission has continued to reduce this year (as with last year), which is positive traction towards neutralising the pay gap between men and women.

<sup>2</sup> [Gender pay gap in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/peopleinwork/earningsandincome/articles/genderpaygapintheuk/2020)

## 7. Ethnicity Pay Gap Reporting

### Ethnicity Pay Gap – Hourly Pay

	2020-21	2019-20	2018-19
<b>Mean Ethnicity Pay Gap</b>	28.1%	20.4%	25.6%
<b>Median Ethnicity Pay Gap</b>	38.9%	21.7%	38.9%

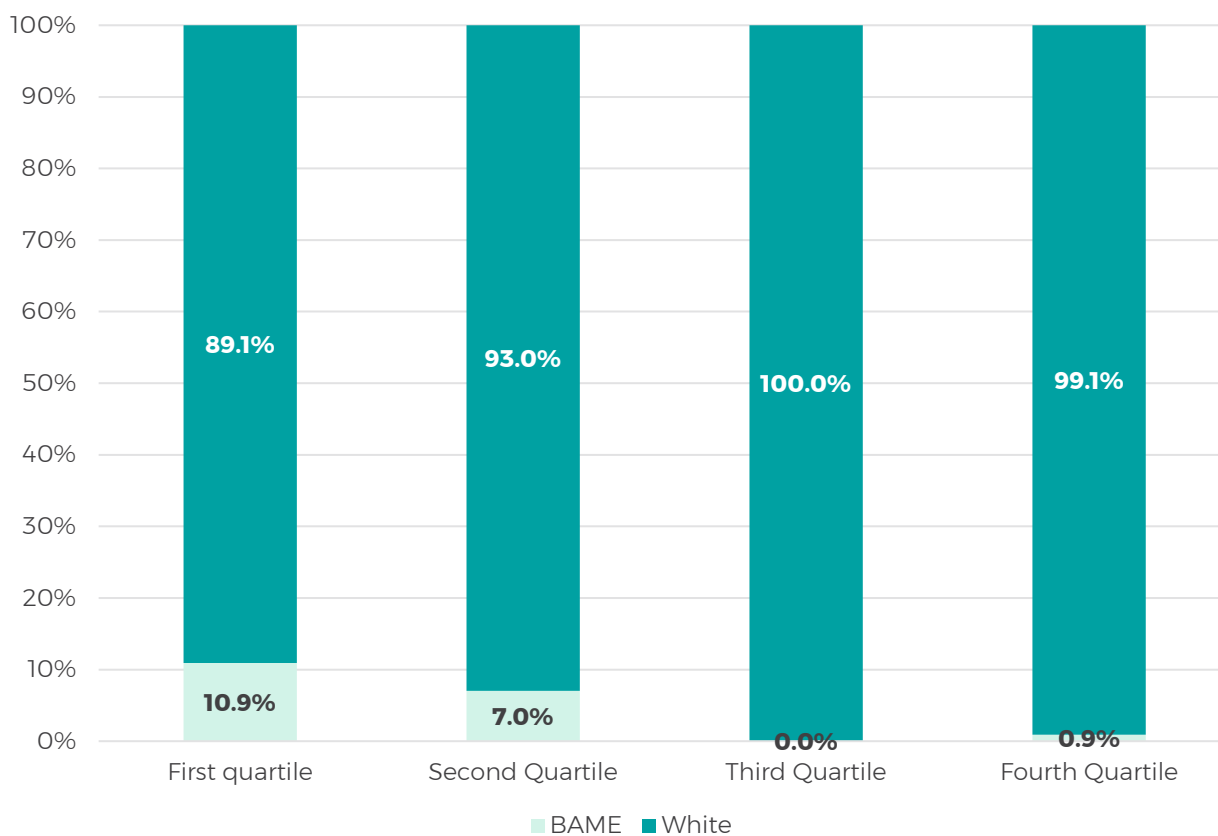
### Bonus Pay

We do not pay bonuses to any of our employees.

### Proportion of BAME 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.

**Graph 6: BAME and White Employees Split against the pay quartiles in numbers**



## Analysis

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

- A limited number of BAME staff employed by the Commission as an overall percentage of the overall workforce; and
- BAME staff mainly being employed at lower bands on the pay scale (57% of BAME staff are at the Apprentice / Team Support level).

## 8. Action Plan / Priorities

We have retained a number of diversity related accreditations, and will seek to continue to retain these:



The Prince's Responsible Business Network  
Race at Work Charter signatory



**INVESTORS IN PEOPLE™**  
We invest in people Platinum  
Rydym yn buddsoddi mewn pobl Platinwm



We are the Stonewall #1 employer in Wales

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## Future Focus

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We will undertake another mid-year pay audit in September / October 2021 to identify progress with regards to equal pay



Representation across the workforce, and especially at more senior pay bands, continues to be a key issue for staff from a non-white ethnic background, and for Muslim employees. We have a **race/ethnicity action plan** in place and will continue to seek to encourage people from these groups to apply for roles with the Commission, and work with existing staff from these groups to ensure equal opportunity to development and progression



We will continue to review and improve our support for staff experiencing disability as a result of a mental health condition. Particularly following the Covid-19 pandemic, the impact of poor mental health may be experienced more acutely, and we want to ensure that staff remain able to develop and progress in these circumstances.



We have begun a review of our pre employment medical health checks, to encourage better discussions with staff from the start of their employment regarding disability / underlying health conditions, to help reduce stigma / concern around reporting of disability, and better enable us to identify and make reasonable adjustments.



We will continue to work with existing staff regarding recognition of what disability in the workplace means, to improve our reporting levels and understanding of our disability representation, and better enable us to support their progression / make reasonable adjustments.



We will continue to address the 60/40 male/female split at TS level by attempt to attract more women to apply for roles at this pay grade, particularly within the Security Team.

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## Appendix 1: Pay Scale by Grade (effective as of 01/04/20)

Grade		Minimum	Maximum
<b>Apprentice</b>		£17893.00	£17893.00
<b>Team Support (TS)</b>		£19,681	£23,450
<b>Executive Officer (EO)</b>	<b>Management 3 (M-3)</b>	£24,623	£29,550
<b>Higher Executive Officer (HEO)</b>	<b>Management 2 (M-2)</b>	£31,636	£38,362
<b>Senior Executive Officer (SEO)</b>	<b>Management 1 (M-1)</b>	£40,494	£48,531
<b>Grade 7</b>	<b>Executive 2 (E-2)</b>	£52,424	£62,858
<b>Grade 6</b>	<b>Executive 1 (E-1)</b>	£66,001	£77,184
<b>Senior Staff (S-3)</b>		£80,951	£103,272
<b>Senior Staff (S-2)</b>		£101,050	£128,958
<b>Senior Staff (S-1)</b>		£129,179	£158,337