

Equal Pay Audit 2021-2022



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1.0 INTRODUCTION

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

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

Devolved Public Bodies in Wales must have equality objectives in place that address the causes of pay difference between our employees, including those relating to gender. This Equal Pay Audit identifies those pay gaps, explains the reasons for them and suggests, in the form of an action plan, ways in which we can work towards reducing or removing those gaps.

Job evaluation of all NJC Green Book jobs has been carried out using the Greater London Provincial Council (GLPC) job evaluation scheme to ensure all employees are rewarded fairly for the work they do. The GLPC job evaluation scheme is analytical, factor-based and has been reviewed at a national level to ensure it meets equality standards.

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

The NJC Green Book pay structure and local terms and conditions were subject to an Equality Impact Assessment prior to being introduced in April 2012. This was carried out by an independent consultant.

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

We continue to encourage employees to update their information on protected characteristics as described in the Equality Act 2010. This is a voluntary declaration process and we aim to continue to improve the quality and quantity of equal opportunities data held.

As the level of data held for some of the protected characteristics is currently low, this Equal Pay Audit focuses on the protected characteristics of sex and age only. We hope that by encouraging employees to declare more information, the availability of data will improve and other protected characteristics, such as ethnicity, can be included in future analyses.

2.0 OBJECTIVES

The primary objective of completing an Equal Pay Audit is to identify the overall pay gap for the Authority between men and women. In addition, any pay gaps in individual grades, or any other areas which may require further analysis or action, are highlighted.

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

The “outcomes” section of the Audit identifies actions we can take, and these form part of an ongoing action plan. We will review changes resulting from the action plan as part of future Equal Pay Audits.

3.0 EQUAL PAY AUDIT – A 5 STEP PROCESS

An Equal Pay Audit involves:

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

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

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

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

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

Where jobs have been rated under a job evaluation scheme, “work rated as equivalent” is the most appropriate way in which equal work can be

measured. This is the method used to measure equal pay for equal work in this Audit.

4.0 SCOPE

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

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

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

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

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

5.0 METHODOLOGY

During 2021-2022 Carmarthenshire County Council employed around 6,276 people across five departments and in a wide variety of roles. 12.76% of our employees hold more than one job with the Authority. Where people hold multiple posts, each job has been evaluated separately and the employee is paid at the relevant rate for each job.

The data used in the Audit includes anyone who was in post on 31st March 2022 and covers pay and allowances received for the period 1st April 2021 to 31st March 2022. Where an employee started in post after 1st April 2021 and before 31st March 2022 their pay and allowances have been calculated as a full year's equivalent to allow for accurate comparison with other employees.

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

6.0 PAY STRUCTURES

The Authority's NJC pay structure consists of 15 basic grades and remained linked to the national rates of pay during 2021-2022.

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

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

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

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

7.0 ADJUSTMENT PERIODS

When an employee is deemed "at risk", for example, if their post is being made redundant, and they transfer to a lower graded post via the Redeployment Policy, other than through them actively applying for that post, they remain in their substantive post for a period of up to 12 weeks as an adjustment period whilst undertaking a work trial in the new post. During that period they remain on the salary for their substantive post. The adjustment period is carefully monitored and ceases at the end of the agreed period or when the employee's salary reaches, or exceeds, its former level, whichever happens first.

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

During the year 2021-2022 six employees remained on their substantive salary for a period of adjustment as a result of a reduction to their grade.

8.0 MARKET SUPPLEMENTS

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

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

During the period 2021-2022, 190 employees received market supplement allowances across a range of social care roles. 31 (16%) of the employees were male and 159 (84%) female. Where market supplements are being paid, business cases evidencing recruitment and retention difficulties for specific job roles have been agreed. The market supplement business cases are reviewed after a maximum of 12 months to ensure the business case is still relevant or to decide that the payment should cease.

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

9.0 OUTCOME

The staff groups covered by the Equal Pay Audit consist of 75% women and 25% men. This is broken down in **Table 1** below to show the percentages of women and men in the various groups.

Table 1: Gender analysis per staff group

Grade Group	Female	Male	Total	Female	Male
NJC (green book) plus locally agreed grades	5349	1773	7122	75.1%	24.9%
Soulbury Advisers/Inspectors	45	11	56	80.4%	19.6%
Teaching Pay Scales	67	27	94	71.3%	28.7%
Chief Officer Grades	5	18	23	21.7%	78.3%
Miscellaneous Grades	7	2	9	77.8%	22.2%
Grand Total	5473	1831	7304	74.9%	25.1%

Table 1 – men and women within staff groups

98% of the workforce is currently covered by NJC terms and conditions and the Single Status Agreement.

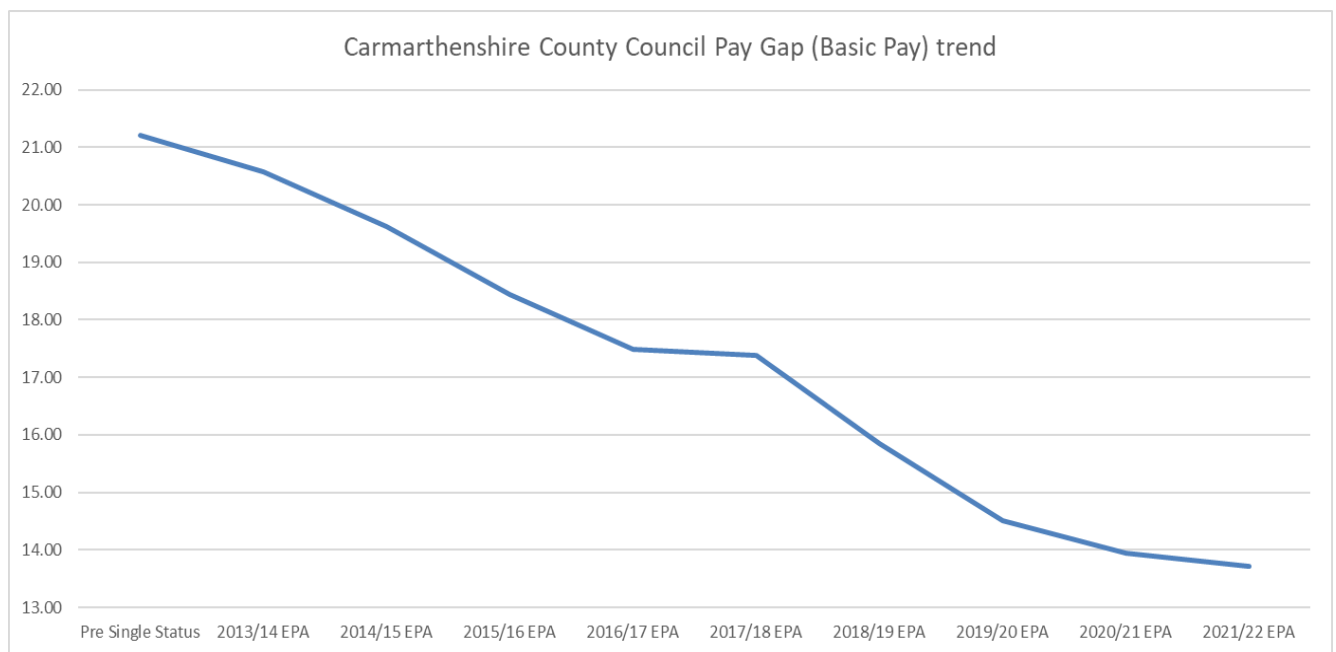
61.2 % of the workforce works part time (less than 37 hours per week) of which 88% is female. 42% are term time only workers, as denoted by their job, of which 91.2% is female.

The overall pay gap for the Authority is -13.72 % on basic pay only. The overall pay gap for total pay (basic pay plus the allowances included in Appendix A) is -13.95 . A breakdown of the grades that have a pay gap of 3% or more on either basic pay or total pay follows below.

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

Year	Basic pay gap	Year on year Difference	% Change	Cumulative change
Pre-single status	21.20	-	-	
2013/14 EPA	20.58	0.62	2.92%	2.92%
2014/15 EPA	19.63	0.95	4.62%	7.41%
2015/16 EPA	18.44	1.19	6.06%	13.02%
2016/17 EPA	17.48	0.96	5.21%	17.55%
2017/18 EPA	17.39	0.09	0.51%	17.97%
2018/19 EPA	15.84	1.55	8.91%	25.28%
2019/2020 EPA	14.50	1.34	8.46%	32.56%
2020/2021 EPA	13.94	0.56	3.86%	34.25%
2021/2022 EPA	13.72	0.22	1.58%	36.35%

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



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

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

Grade	Number of women in Post	Average FTE Basic Pay	Number of men in Post	Average FTE Basic Pay	% difference
Leadership Teacher	2	57728.50	1	48571.00	18.85%
Grade H + 4%	9	33592.32	1	31298.38	7.33%
Educational Psychologist	5	51558.20	1	48727.00	5.81%
Soulbury 8-12	16	49919.75	3	51507.33	-3.08%
Grade E + 8%	42	23030.72	26	24171.83	-4.72%
Associate School Improvement Officer	4	56473.25	1	59371.00	-4.88%
Soulbury Advisers/Inspectors	2	46035.00	1	48849.00	-5.76%
Grade L + 8%	2	49299.95	1	52519.73	-6.13%
Main Pay Scale Teacher	27	28431.07	9	30985.33	-8.24%

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

Pay gaps in favour of women

Pay gaps for the Leadership Teacher and Grade H+4% grades are as a result of women having, on average, longer service in their posts than men, resulting in them having progressed further through the grades.

Women in the Educational Psychologist grade have plussages against their salary, the one man in the group does not.

Pay gaps in favour of men

All the pay gaps can be accounted for by men having, on average, longer services in the grades than women resulting in them having progressed further through the grades.

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

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

Grade	Number of women in Post	Average FTE Total Pay	Number of men in Post	Average FTE Total Pay	% difference
Leadership Teacher	2	57,728.50	1	48,571.00	18.85%
Grade D + 8%	456	21,665.22	79	21,840.07	8.64%
Grade H + 4%	9	33,592.32	1	31,298.38	7.49%
Educational Psychologist	5	51,558.20	1	48,727.00	6.27%
Grade F + 8%	93	26,936.22	21	27,605.89	6.21%
Grade E + 8%	42	23,030.72	26	24,171.83	3.47%
Grade G	256	28,747.40	142	28,929.68	-3.04%
Grade G + 4%	32	30,017.66	6	29,370.16	-3.27%
Grade C + 8%	24	21,066.87	25	21,024.15	-4.62%
Associate School Improvement Officer	4	56,473.25	1	59,371.00	-4.88%
Grade E	178	22,459.82	142	22,505.04	-4.97%
Grade D	279	20,261.20	229	20,266.47	-5.49%
Soulbury Advisers/Inspectors	2	46,035.00	1	48,849.00	-5.76%
Grade F	224	25,302.86	168	25,529.80	-6.44%
Main Pay Scale Teacher	27	28,431.07	9	30,985.33	-7.81%
Grade L + 8%	2	49,299.95	1	52,519.73	-16.40%

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

Pay gaps in favour of women

The total pay gap for **Leadership Teachers** is the same as for basic pay only (see above for explanation).

Grade H+4% has reduced from 9.06% last year to 7.49% this year, most of which is explained by the basic pay gap. The average allowance payment to women was slightly more than to the one man in this group. .

The **Educational Psychologist** pay gap has increased from 3.86% last year to 6.27%% this year. The basic pay gap accounts for most of the difference with the remainder being a result of some women in the group receiving allowance payments.

The remaining differences result from higher numbers and values of allowance payments being made to posts currently occupied by women, mainly due to a higher percentage of women in care related roles which tend to attract more additional payments.

Pay gaps in favour of men

Associate School Improvement Officers and Soulbury Advisors/Inspectors – the pay gap is entirely as a result of basic pay differences. See above for explanation.

Grade L+8% has a pay gap of -6.13% on basic pay (see above) and the balance results from the one man in the group being in a role that attracts both allowances and a market supplement payment.

Main Pay Scale Teachers have a basic pay gap of -8.24% in favour of men. When looking at total pay this reduces to -7.81% in favour of men due to women on the pay grade receiving higher amounts of allowance payments on average.

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

10. ANALYSIS CONCLUSION

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

11.0 AGE PAY ANALYSIS

Organisation distribution by age

Distribution of Employees by Grade & Age			
Grade	Number job holders per grade	Average Age @ 31/3/22 (Mean)	Difference from Overall Average age
TUPE- Dyffryn Taf Catering 1	5	58.40	11.51
Grade A	140	53.54	6.66
TUPE - Cartrefi Hafod 1	1	59.00	12.11
Grade A + 4%	1414	49.17	2.28
TUPE- Dyffryn Taf Catering 2	1	54.00	7.11
Grade A + 8%	53	53.06	6.17
Grade B	15	57.27	10.38
Grade B + 4%	469	43.97	-2.92
Grade B + 8%	24	43.79	-3.09
Grade C	179	46.79	-0.09
Grade C + 4%	42	51.33	4.45
Grade C + 8%	49	43.88	-3.01
Grade D	508	46.96	0.07
Grade D + 4%	249	44.53	-2.36
Grade D + 8%	535	46.02	-0.86
Grade E	320	45.87	-1.01
Grade E + 4%	547	47.20	0.31
Grade E + 8%	68	44.78	-2.11
Grade F	392	46.28	-0.60
Grade F + 4%	322	45.57	-1.32
Grade F + 8%	114	46.68	-0.20
Grade G	398	44.58	-2.31
Grade G + 4%	38	44.95	-1.94
Grade G + 8%	42	46.57	-0.31
Grade H	249	46.60	-0.28
Unqualified Teacher	8	52.00	5.11
TUPE - Cymryd Rhan Point 32	1	63.00	16.11
Grade H + 4%	10	46.60	-0.29
TUPE - Cartrefi Hafod 2	1	54.00	7.11
Grade H + 8%	32	43.75	-3.14
Grade I	395	44.16	-2.72
Main Pay Scale Teacher	36	30.39	-16.50
Qualified Teacher with TLR	1	46.00	-0.89
Grade I + 8%	3	49.00	2.11

Grade J	155	46.69	-0.20
Grade J + 4%	2	33.00	-13.89
Grade J + 8%	1	54.00	7.11
Upper Pay Scale Teacher	38	47.21	0.33
Grade K	154	50.16	3.27
Upper Pay Teacher & TLR	6	53.17	6.28
Grade K + 4%	1	54.00	7.11
Grade L	113	47.85	0.96
Grade L + 4%	1	45.00	-1.89
Grade L + 8%	3	48.67	1.78
Grade M	33	53.33	6.45
Grade N	42	51.60	4.71
Grade O	10	52.50	5.61
Youth & Comm Service Off.	3	50.67	3.78
Community Learning Manager	1	53.00	6.11
Soulbury 8-12	19	48.74	1.85
Soulbury Advisers/Inspectors	3	51.67	4.78
Leadership Teacher	3	42.67	-4.22
Associate School Improvement Officer	5	51.80	4.91
Educational Psychologist	6	49.33	2.45
Soulbury 15-19	1	56.00	9.11
Senior Educational Psychologist	4	56.25	9.36
Principle Youth Support Service Mgr	1	58.00	11.11
SOULBURY 20-23	4	54.50	7.61
Principal Educational Psychologist	1	57.00	10.11
School Improvement Officer	6	51.00	4.11
Senior Challenge Advisor	2	49.50	2.61
Principal School Improvement Officer	1	51.00	4.11
Head of Service (1)	18	53.17	6.28
Deputy Head Teachers	1	50.00	3.11
Assistant Chief Executive	1	60.00	13.11
Directors (JNC)	3	55.33	8.45
Chief Executive	1	49.00	2.11

Grand Total	7304	46.89
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12.0 OVERALL CONCLUSION

The Equal Pay Audit confirms there is no evidence of systemic pay discrimination in the employee groups covered by the review. It also shows a progressively shrinking pay gap between men and women year on year. However, it is important that the Authority strives to maintain this position so regular reviews of the pay structure, the terms and conditions and all policies in relation to how we manage pay will continue and, where improvement can be made, recommendation will be made to the Corporate

Management Team and Executive Board. The application of payment of allowances is regularly monitored to ensure fairness and consistency of application .

13.0 ACTION PLAN

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

- 1) We continue to gather data from staff, and better HR / Payroll systems, together with more accessible self-service systems, are expected to continue to improve the availability of data going forwards.
- 2) We will continue to monitor the pay gap and report on it by publishing an annual equal pay audit.
- 3) We will continue to review allowances to ensure they are a) paid in a fair and consistent manner and b) remain relevant as the economic climate changes. Recruiting managers and Heads of Service are responsible for reviewing the payment of allowances within their service area and considering new ways of working (for example, standby, weekend working).
- 4) We will continue to review gender segregation across job types and the People Strategy Group have been asked to develop strategies to tackle this.
- 5) The NJC pay structure underwent a fundamental change in 2019 following the national review of pay scales and we will continue to make improvements where opportunities arise. Spinal column point one will be removed from the pay structure from 1st April 2023 in line with the nationally agreed pay award.
- 6) We will continue to check and monitor the use of 'gender neutral' language in job profiles, job adverts and the recruitment process. Recruitment training continues to be rolled out across the Authority and revised guidance has been circulated to all managers. A new recruitment system will be rolled out to recruiting managers in 2023 and will assist managers with ensuring gender neutral language is used in adverts as well as providing better management information tools for monitoring purposes.

- 7) Part of the Strategic Equality Plan and one of the workstreams for the People Strategy Group is to work towards a more gender balanced mix of staff in what have traditionally been gender stereotyped roles such as carers, caterers, refuse loaders etc. Where departments have had success in this area, best practice to be shared and rolled out to other areas. HR Advisers to consider options at all stages of recruitment.
- 8) Ensure development and training opportunities are available for staff at all levels within the Authority whether this is to improve skills in their existing roles, open up opportunities for career progression within a chosen field of work or consider opportunities which employees may wish to take in different fields.

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APPENDIX A

Allowances included as part of Equal Pay Audit

- Acting up allowances
- Additional pay
- Bank holiday pay
- Call out including Winter Maintenance payments
- Holiday hours
- Honoraria
- Market Supplements
- Night duty pay
- Overtime
- Pay protection
- Plussages on basic pay
- Sleep in allowance
- Standby payments