

Equal Pay Audit 2023-2024



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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 eleventh 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 continue to 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 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 2023-2024 Carmarthenshire County Council employed around 6,547 people across five departments and in a wide variety of roles. 12.31% 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 2024 and covers pay and allowances received for the period 1st April 2023 to 31st March 2024. Where an employee started in post after 1st April 2023 and before 31st March 2024 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 2023-2024.

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.

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.

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 2023-2024 nine employees remained on their substantive salary for a period of adjustment as a result of a reduction to their grade. Six (67%) of these were female and three (33%) were male.

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 2023-2024, 228 employees received market supplement allowances across a range of social care roles and pension roles. 38 (17%) of the employees were male and 190 (83%) 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.

9.0 OUTCOME

The staff groups covered by the Equal Pay Audit consist of 74% women and 26% 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	5,482	1,917	7,399	74.1%	25.9%
Soulbury Advisers/Inspectors	42	14	56	75%	25%
Teaching Pay Scales	52	23	75	69.3%	30.7%
Chief Officer Grades	7	15	22	31.8%	68.2%
Miscellaneous Grades	3	2	5	60%	40%
Grand Total	5,586	1,971	7,557	73.9%	26.1%

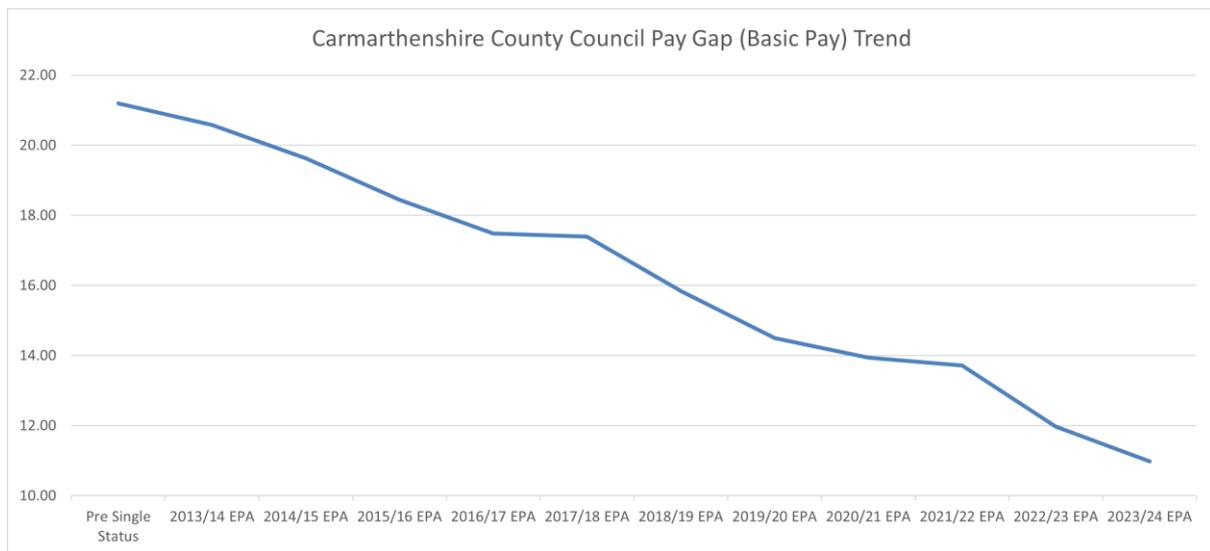
Table 1 – men and women within staff groups

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

58.5% of the workforce works part time (less than 37 hours per week) of which 88% is female. 40% are term time only workers, as denoted by their job, of which 91.3% is female.

The overall pay gap for the Authority is -10.98 % on basic pay only. The overall pay gap for total pay (basic pay plus the allowances included in Appendix A) is -12.10%. 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 graph below.



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

The analysis of our pay data has identified eleven significant pay gaps resulting from average FTE basic pay only. Five 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
Head Teacher	2	57,064.00	1	35,512.00	60.69
Educational Psychologist	4	57,805.25	1	54,609.00	5.85
Grade H + 4%	11	37,735.73	3	35,926.00	5.04

School Improvement Officer	2	71,971.00	5	69,558.80	3.47
Grade G + 4%	42	33,616.29	8	32,531.75	3.33
Grade C + 4%	30	23,530.34	5	24,359.80	-3.41
Main Pay Scale Teacher	7	39,999.00	4	41,496.25	-3.61
Grade I + 8%	3	41,433.00	1	43,438.00	-4.62
Soulbury 8-12	12	54,511.58	3	57,420.00	-5.07
Unqualified Teacher	4	30,892.50	7	32,696.00	-5.52
Grade G + 8%	8	33,923.13	7	36,017.00	-5.81

Table 2 – pay gaps of 3% and more, on average FTE basic pay, between men and women

Pay gaps in favour of women

All pay gaps in this category are a result of progression through the grades due to length of service or due to plussages applied to the salary.

Pay gaps in favour of men

All pay gaps in this category are a result of progression through the grades due to length of service.

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

The analysis of our pay data has identified twenty 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. Seven of these pay gaps are in favour of women and thirteen 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
Head Teachers	2	61,658.84	1	35,512.00	73.63%
Grade D + 8%	206	29,845.19	50	27,271.87	9.44%
Educational Psychologist	4	57,911.12	1	54,609.00	6.05%
Grade H + 4%	11	37,927.98	3	35,926.00	5.57%
Grade F + 8%	82	35,991.25	20	34,386.97	4.67%
School Improvement Officer	2	71,971.00	5	69,558.80	3.47%
Grade G + 4%	42	33,608.41	8	32,586.31	3.14%
Grade C + 4%	30	23,629.99	5	24,373.76	-3.05%
Grade I + 8%	3	42,174.24	1	43,625.60	-3.33%

Upper Pay Scale Teacher	28	48,637.34	7	50,741.26	-4.15%
Grade F	249	28,931.67	258	30,264.72	-4.40%
Grade B + 8%	20	25,429.69	10	26,661.16	-4.62%
Grade D	275	24,321.44	339	25,528.15	-4.73%
Grade B + 4%	445	21,877.44	63	23,012.44	-4.93%
Soulbury 8-12	12	54,511.58	3	57,474.80	-5.16%
Unqualified Teacher	4	30892.5	7	32807.99	-5.84%
Grade A + 8%	49	25,597.82	6	27,825.02	-8.00%
Grade E	197	26,472.81	105	28,819.10	-8.14%
Grade G + 8%	8	34,244.96	7	37,708.47	-9.18%
Main Pay Scale Teacher	7	41,515.60	4	46,374.68	-10.48%

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

Pay gaps in favour of women

The pay gap for School Improvement Officers is entirely basic pay. Head Teachers, Educational Psychologists and Grade H+4% are a mix of basic pay and allowances. The remaining pay gaps of 3% and over result from payment of allowances.

Pay gaps in favour of men

The pay gap for Grade C+4% and Grade I+8% is less on total pay compared to basic pay as allowances paid to women in the grades helps to reduce the gap. The pay gap for Soulbury 8-12, Unqualified Teachers, Grade G+8% and Main Pay Scale Teachers are a mix of basic pay and allowances. The remaining pay gaps of 3% and over result from payment of allowances.

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 @ 31/3/24 (Mean)	Difference from Overall Average age
Grade A	125	54.54	7.93
TUPE - Cartrefi Hafod 1	1	61.00	14.39
Grade A + 4%	1414	49.00	2.38
Grade A + 8%	55	55.22	8.61
Grade B	22	41.05	-5.57
Grade B + 4%	478	43.69	-2.92
Grade B + 8%	30	48.13	1.52
Grade C	117	48.15	1.54
Grade C + 4%	35	49.77	3.16
Grade C + 8%	43	39.16	-7.45
Grade D	614	44.19	-2.42
Grade D + 4%	308	43.85	-2.76
Grade D + 8%	256	47.23	0.62
Grade E	302	45.25	-1.36
Grade E + 4%	476	47.60	0.99
Grade E + 8%	340	46.09	-0.52
Grade F	507	44.81	-1.80
Grade F + 4%	324	45.70	-0.91
Grade F + 8%	102	47.82	1.21
Grade G	496	44.60	-2.01
Grade G + 4%	50	44.70	-1.91
Grade G + 8%	15	48.47	1.86
Assistant Educational Psychologists	4	37.25	-9.36
Unqualified Teacher	11	46.00	-0.61
Grade H	280	46.86	0.25
TUPE - Associated 5	1	62.00	15.39
TUPE - Cymryd Rhan Point 33	1	65.00	18.39
Grade H + 4%	14	48.21	1.60
TUPE - Cartrefi Hafod 2	1	56.00	9.39
Grade H + 8%	32	45.47	-1.14
Grade I	376	45.07	-1.54
Grade I + 4%	1	51.00	4.39
Main Pay Scale Teacher	11	43.82	-2.79
Grade I + 8%	4	51.00	4.39

Grade J	192	45.04	-1.57
Grade J + 8%	3	44.67	-1.94
TUPE - Associated 6	1	34.00	-12.61
Upper Pay Scale Teacher	35	48.34	1.73
Grade K	163	50.39	3.78
Upper Pay Teacher & TLR	6	52.33	5.72
Grade K + 4%	1	56.00	9.39
Grade K + 8%	1	35.00	-11.61
Head Teachers	3	51.33	4.72
Grade L	136	47.97	1.36
Grade L + 8%	1	61.00	14.39
Grade M	29	54.03	7.42
Grade N	47	52.83	6.22
Grade O	10	54.30	7.69
Principal School Improvement Officer	1	53.00	6.39
Community Learning Manager	1	55.00	8.39
Soulbury 8-12	15	49.40	2.79
Soulbury Advisers/Inspectors	7	52.86	6.25
Leadership Teacher	7	46.14	-0.47
Associate School Improvement Officer	4	57.00	10.39
Educational Psychologist	5	50.40	3.79
Youth & Comm Service Off. Soulbury	1	52.00	5.39
Principal Youth Support Service Mgr	1	60.00	13.39
Senior Educational Psychologist	4	61.00	14.39
SOULBURY 20-23	3	54.33	7.72
Principal Educational Psychologist	1	49.00	2.39
School Improvement Officer	7	48.00	1.39
Senior Challenge Advisor	1	50.00	3.39
Strategic Lead for School Imp	1	53.00	6.39
Head of Service	17	51.82	5.21
Deputy Head Teachers	1	52.00	5.39
Assistant Chief Executive	1	62.00	15.39
Directors (JNC)	4	57.50	10.89
Chief Executive	1	51.00	4.39

Grand Total	7557	46.61
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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, Cabinet and the Pay Advisory Panel. 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.
- 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.
- 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 was rolled out to recruiting managers in 2024 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 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 is to be shared and rolled out to other areas. The Human Resources Business Partner should 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