

Equality, Diversity & Inclusion Annual Report 2020-21

Appendix – Equal Pay Audit as of 30th June 2021

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EXECUTIVE SUMMARY

The annual Equal Pay Audit builds on the University's commitments to Sustainable Development goals, in particular Gender Equality and Reduced Inequalities.

An equal pay review is an analysis of an organisation's pay structure in order to identify and eliminate any gaps that cannot satisfactorily be explained on objective grounds other than gender. The overall gender pay gap is reflective of the distribution of men and women across pay grades as well as any pay discrimination [*Equality Challenge Unit: Promoting Equality in Pay, April 2010*]. In the context of a Higher Education Institution that has undertaken pay modernisation, as Westminster has, there are few significant pay gaps within grades, and the overall ratio of female to male pay will be determined largely by the gender distribution across grades. This may raise issues in relation to equality and diversity, which are important and require action, but are outside the scope of the equal pay review itself.

This audit is undertaken in line with JNCHES guidance "Equal Pay Reviews: Guidance for Higher Education Institutions" as revised in 2018. This guidance notes that there will be practical constraints on what is possible, with regard to known data on all equality considerations and also recommends that HEI reviews should address equal pay, in respect of part-time employees to reflect legislation on prevention of less favourable treatment for such colleagues.

The main conclusion from carrying out this Equal Pay Audit is that the University does not have any significant need for concern over equal pay issues when comparing employees within current grades.

The UCEA Employment Bulletin in August 2016 noted "*The existence of a gender pay gap should not be conflated with unequal pay, as legally defined...a company can have a large gender pay gap and no equal pay problems while another can have no gender pay gap but have vulnerability to equal pay challenges.*" It is therefore important to remain vigilant to any possible challenges to equal pay.

Data was extracted from HR SAP system and reports produced indicated the percentage value of any pay gaps, shown as a **-% if females are paid less** than males, and a **+% if females are paid more than males**.

Ethnicity: **-%** means gap in favour of white group, **+%** means gap in favour of BME group.

Disability: **+%** means gap in favour of Non-Disabled group, **-%** means gap in favour of Disabled group.

We have taken a "traffic light" approach to highlight data;



NB: this review does not look at bonus payments. This is covered by Gender Pay Report as published.

1. Gender - Where pay gaps were identified in respect of gender, further investigation and analysis showed that there were justifiable reasons for these. The main reason for any pay differential can be attributed to the position of individuals within a grade, as determined by automatic incremental progression, which is primarily based on length of service.

The audit has also reviewed criteria for appointing senior colleagues in particular to certain fixed salaries e.g. for Professors. This audit did not highlight starting salaries to be a significant factor in relation to any gender-based pay differentials, which is a positive indicator of observance to the Human Resources guidance on starting salaries. A business case is required to be submitted to the Deputy Director of HR (Resourcing and Reward) / HR Director for their consideration, for any case that is made to offer a salary above the salary minimum for the grade.

Additionally, for Professors the University has routinely advertised the salary at the start of the grade, rather than the full range from Prof C to Prof A, to strengthen adherence to this policy and to ensure fairness and consistency in appointment procedures for new starters.

2. **Ethnicity** - Although there may be a small number of variances in relation to ethnicity, there were legitimate explanations for the variances and in most cases we are dealing with very small numbers of colleagues in certain ethnic groups; it is therefore very difficult to make reasonable and statistically significant comparisons on pay. In most cases Westminster's average pay for BME colleagues is more favourable than the sector average based on benchmark data available, but the under representation in more senior positions has been noted.
3. **Disability** - The number of colleagues who have declared a disability is low. Where there was a significant variance in pay, this could be down to just one individual declaring a disability within a particular colleague group.
4. **Age** – Salary differentials reflect length of service and career progression. Where incremental scales apply they have been limited to a maximum number of five, with one exception that is limited to six points.
5. **Senior Colleagues**- It became evident that in respect of some senior colleagues in Professorial and Head of College posts, a proven track record in research and scholarly activities were key factors in determining salaries at the appointment stage. Where colleagues have published high quality and high profile research which was valuable for the University's research profile, this was more significant than factors such as age in respect of salaries.
6. **Other equality areas** - We continue to collect sensitive information in the areas of 'sexual orientation' and 'religion and belief'. Disclosure rates although improving, remain lower than we would like (approximately 68%) and therefore any analysis would not be statistically significant. We will continue to capture this data with the aim to reduce the number of 'unknowns'. The University is not aware of any reason why colleagues choose not to disclose this data, and it is now regularly disclosed by new starters as part of the standard onboarding process. We have also this year, in conjunction with the launch of a new Self-Service system, encouraged existing colleagues to review their data. This could be built on further in partnership with the EDI Committee and Colleague Network groups.

2021 Audit Recommendations

November 2021
<p>1. To ensure the Senior Colleague Salary Review process being introduced in Autumn 2021 is appropriately monitored via Equality Impact Assessment exercise, and any pay gaps identified as a result are flagged to the EDI Committee.</p>
<p>2. Equality impact assessment of University pension schemes and whether they provide appropriate options for a diverse range of colleagues</p>
<p>3. Continue to work with the EDI Committee and Colleague Networks as appropriate, to build on improving data held on protected characteristics.</p>

Progress on recommendations from 2020 Audit

Recommendation	2021 Update on recommendation	Further action required
November 2020		
<p>Continue to review and monitor use of agency colleagues, and those paid off payroll, in line with University policies on equal pay and recruitment and selection, on a cyclical 6 monthly basis. Extend this to include consultants and contract colleagues.</p>	<p>Regular monitoring suggests the use of agency colleagues continues to be small. Consultants and contract colleagues regularly reviewed via Finance processes.</p>	<p>Complete</p>
<p>Monitor use of overtime to ensure work is being allocated and paid appropriately, ensuring equity in availability of work and University funds.</p>	<p>A lot of work was undertaken towards the end of 2019 and the beginning of 2020 to review overtime payments being issued and identify any areas of possible concern. This work was paused due to Covid-19 and the large-scale remote working of the majority of our colleagues. This had an impact on overtime, for example overtime associated with running events on campus was not necessarily required. We have recently picked up reviewing overtime working again to monitor any changes with remote working and return to larger scale on site-working in 2021.</p>	<p>On-going</p>
<p>Continue to encourage and embed people planning processes to ensure career pathways and promotional opportunities are available to relevant colleagues, and recruitment can be undertaken with a considered approach, particularly in areas that have been identified as difficult to recruit to.</p>	<p>Work to be undertaken this academic year supporting the People Charter with key objectives supporting this area of work, including clarifying and coordinating action plans for desired profile of academic and PS colleague structures to deliver on key University objectives, and assessment of current gaps and what roles are needed to achieve University objectives and are affordable relative to College budgets</p>	<p>On-going</p>
<p>To ensure that analysis undertaken for the Equal Pay Audit is linked into the newly formed EDI Committee, and can be used to support and give focus to any actions and commitments agreed as part of that Committee.</p>	<p>Equal Pay Audit now presented to EDI Committee upon completion to highlight any areas of concern and ensure these are linked to key objectives and activities being undertaken within EDI Committee scope of work.</p>	<p>Complete</p>

ANALYSIS

All data was taken on the snapshot date of **30 June 2021**.

1. Gender- Technical analysis

Gender Headcount

Row Labels	Headcount	Percentage
Female	1012	54.6%
Male	841	45.4%
Grand Total	1853	100.00%

Gender pay gaps (base mean salary %)

Payscale Grouping	Gender Pay Gap within Group 2020
L9	-
L7	-13.28%
L5	-
L4	0.00%
L3	2.17%
L2	-0.95%
L1	-0.48%
Heads of College	-9.67%
Associate Heads of College	-2.12%
Head of School	6.33%
Assistant Heads of School	-0.06%
PROFA	1.28%
PROFB	2.13%
PROFC	-3.02%
PL/Reader/PRF	-1.06%
SL/SRF/NG7 & NG8	-0.39%
L/RF/NG6	-1.30%
RA/NG5	-3.02%
NG4	1.47%
NG3	2.80%
NG2	1.39%
NG1	-

Gender Narrative

The overall results for all colleagues (full and part time) based on gender identified that female colleagues are paid less on average than male colleagues, by 9.50%. This represents a small improvement on last year's pay gap of 9.72% The pay gap can be attributed to there being fewer female colleagues in more senior roles.

In Level 9, Level 5 and NG1 there are no female colleagues to compare pay against.

Within Level 7 there are only three individuals, so the pay gap can be explained by one individual salary being larger, supported by a business case at the time of appointment.

Within Heads of College, again there are only three individuals, with one a more recent starter so the pay gap can be explained by two individuals having higher salaries due to having more experience within the role and market forces.

Within Heads of School, there is one interim appointment on a fixed term contract with a higher salary that explains the pay gap above 5%.

There are fewer female colleagues in higher grade groups (From PL/Reader/PRF upwards). Overall, 42% of colleagues in these groups are female. Within the combined groups of Head of College, Associated Head of College and Head of School only 36.8% are female, however if you include Assistant Heads of School this figure changes to 50% female, suggesting that female talent is coming through the career pathway pipelines. It will be useful to monitor over the next few years whether that female talent progresses further up the career pathways.

Within Professors and PL/Reader/PRF groups, female representation is below 40% for each group (38.2% of professors are female and 39.1% of PL/Reader/PRF group are female). Initiatives are being put into place to provide support and mentoring for potential applicants for Professors and Readers and UEB has agreed to prioritise recruitment to early career academics, as and when PL vacancies become available. It will be useful to monitor what impact these initiatives have on female representation within those groups in future audits. When we breakdown Professors into Prof C, Prof B and Prof A we can see that females are again coming through the career pathways pipelines with 47.5% of Prof C being female colleagues, in comparison to 20% at Prof A. Again it will be useful to monitor over the next few years whether that female talent progresses further up the career pathways.

There is no female representation in Level 5 or Level 9 (represents 5 colleagues in total).

2. Ethnicity– Technical Analysis

Ethnicity Headcount

Asian/Asian British	Black/African /Caribbean/ Black British	Mixed/ Multiple Ethnic Groups	Other Ethnic Background	White	Unknown	Prefer not to say	Total
250	144	66	55	1256	59	23	1853

As of 2021, the University is moving towards the more inclusive and varied categories detailed above as opposed to only using the category of BME. This is in line with HESA and Advance HE guidance.

Overall, the University has a BME colleague population of **27.79%**. Our figures broken down into academic and non-academic compare favorably with the latest HESA data;

	Westminster	HESA*
Academic	22.2%	18%
Non-Academic	33.5%	12%

*Source- <https://www.hesa.ac.uk/news/19-01-2021/sb259-higher-education-staff-statistics>
<https://www.hesa.ac.uk/news/23-01-2020/sb256-higher-education-staff-statistics>

Ethnicity pay gaps

The table below shows the difference in average salary of all BME colleagues in comparison to all White/Non- BME colleagues.

Payscale Grouping	Ethnicity pay gap
L9	-
L7	-
L5	-
L4	-
L3	-
L2	-
L1	-2.45%
Heads of College	-
Associate Heads of College	-
Head of School	+0.22%
Assistant Heads of School	+0.24%
PROFA	-3.63%
PROFB	-2.68%
PROFC	-1.88%
PL/Reader/PRF	-0.47%
SL/SRF/NG7 & NG8	-1.4%
L/RF/NG6	-0.86%
RA/NG5	+0.32%
NG4	+0.04%
NG3	-1.49%
NG2	0.26%
NG1	-1.73%

Ethnicity narrative

The average Ethnicity pay gap across the University is **14.8%** and this is attributable to lack of representation in senior grades.

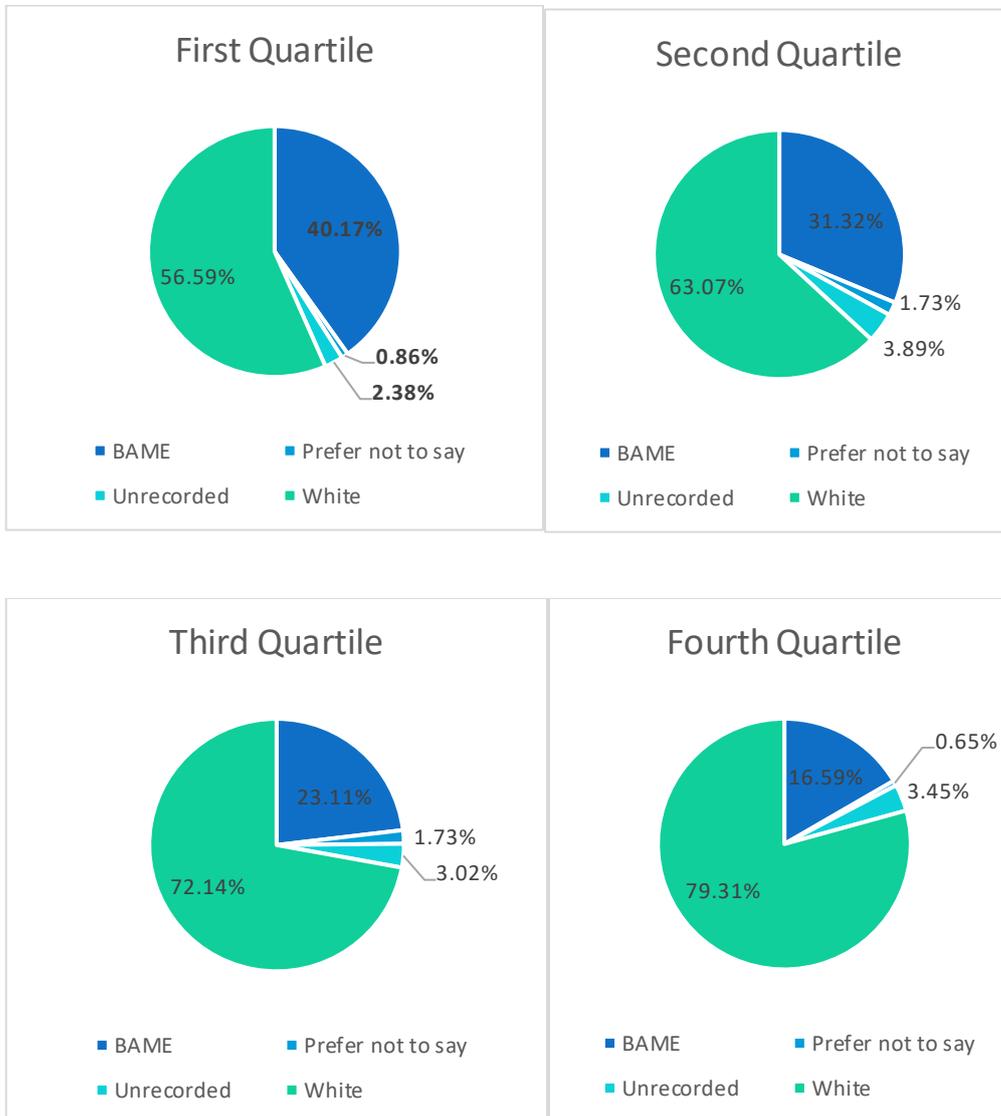
This is a slight improvement on the pay gap of 15.02% in last year's Equal Pay Audit.

It should be noted that there is no disclosed representation in Level 2 to Level 9, Heads of College or Associate Heads of College. Collectively there are **38 colleagues** in these groups.

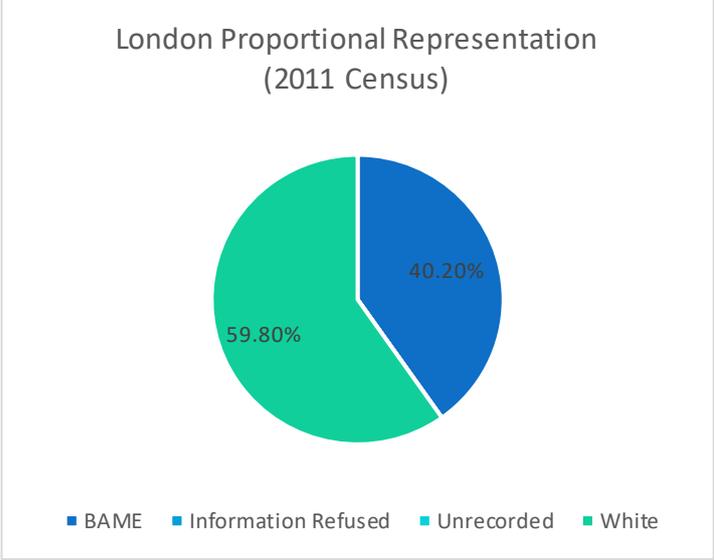
If you remove the senior roles, the ethnicity pay gap falls to **11.02%** across the rest of the University.

Both figures compare favorably on the reported ethnicity pay gap within London of **23.8%** (Office for National Statistics 2019).

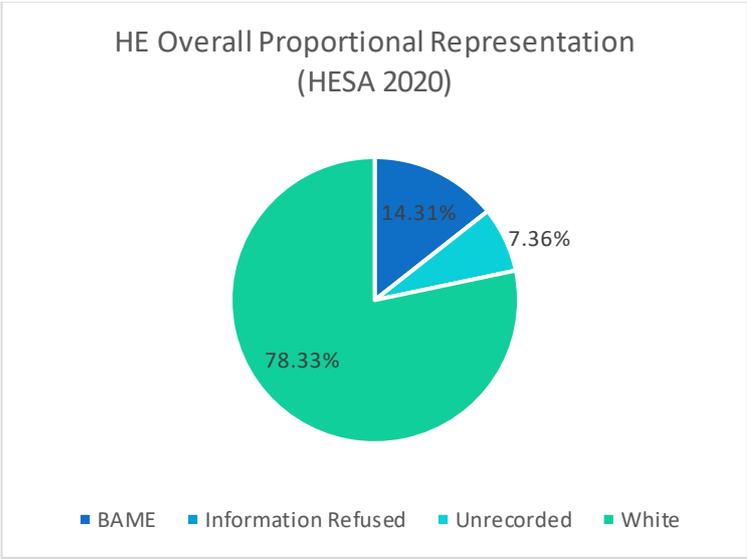
The lack of diverse representation at senior levels is demonstrated when we split the data into quartiles. This means we split the workforce into four groups, the first quartile representing the lower end of the salary scales and the fourth quartile representing the highest end of the salary scales. The proportion of BME colleagues gets steadily smaller higher up the quartiles/salary scales.



Our first quartile data mirrors BME representation within London, as at the 2011 Census (latest information available)



All of our quartiles compare favorably with overall HE representation, as detailed by HESA 2020 figures.



3. Disability – Technical Analysis

Disability Headcount

Yes	No	Prefer not to say	Total
104	1745	2	1853

Disability pay gaps (base mean salary)

The table below shows the difference in average salary of all disabled colleagues in comparison to all non-disabled colleagues.

Payscale Grouping	Disability Pay Gap
L9	-
L7	-
L5	-
L4	-
L3	-
L2	+0.15%
L1	+0.75%
Heads of College	-
Associate Heads of College	-8.64%
Head of School	-0.20%
Assistant Heads of School	-0.19%
PROFA	-
PROFB	-
PROFC	-
PL/Reader/PRF	-0.85%
SL/SRF/NG7 & NG8	-1.67%
L/RF/NG6	-1.80%
RA/NG5	-4.30%
NG4	1.13%
NG3	-0.09%
NG2	2.17%
NG1	-1.28%

Disability: +% means gap in favour of Non-Disabled group, -% means gap in favour of Disabled group.

Disability Narrative

There is no disclosure/representation in Level 3, Level 4, Level 5, Level 7, Level 9, Heads of College or Professors. Collectively there are 90 colleagues in these groups.

One colleague within the Associate Heads of College group has reported a disability, out of a total group of 6 colleagues. That one colleague had a higher starting salary than other colleagues, supported by a business case at the time of appointment.

Overall, disabled colleagues are paid less on average than non-disabled colleagues by **3.08%**. This is attributable to less disclosure in senior roles. Overall Westminster reflects well against the national disability pay gap of 12.2% as identified in the Office for National Statistics 2018 report; this figure is not limited to the HE sector.*

* Source:

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilitypaygapsintheuk/2018>

4. Age- Technical Analysis

Age Headcount

Age	Less than 25	26 to 35	36-45	46-55	56-65	66+	Total
Headcount	40	358	475	520	381	79	1853

Age pay gaps (base mean salary)

Payscale Grouping	25 and under pay gap	26-35 pay gap	36 to 45 Pay Gap	46 to 55 Pay Gap	56 to 65 Pay Gap	66+ Pay Gap
L9	-	-	-	-	0.00%	-
L7	-	-	-	9.71%	-4.86%	-
L5	-	-	-	4.29%	-4.29%	-
L4	-	-	-	0.00%	-	-
L3	-	1.71%	3.73%	-0.63%	-0.89%	-
L2	-	-	-0.47%	0.47%	-	-
L1	-	-2.67%	-1.71%	1.88%	0.65%	3.36
Heads of College	-	-	-	-1.82%	0.91%	-
Associate Heads of College	-	-	-1.42%	2.84%	-1.42%	-1.42%
Head of School	-	-	-3.08%	-4.79%	0.82%	0.48%
Assistant Heads of School	-	-	0.18%	-0.17%	0.05%	0.18%
PROFA	-	-	9.86%	-1.43%	-3.84%	3.70%
PROFB	-	-	-5.21%	-0.03%	2.36%	-0.68%
PROFC	-	-	-0.66%	-0.31%	0.41%	0.16%
PL/Reader/PRF	-	-	-4.85%	-0.11%	0.65%	1.86%
SL/SRF/NG7 & NG8	-	-5.34%	-2.13%	0.81%	2.23%	2.20%
L/RF/NG6	-	-2.18%	0.54%	1.74%	-0.42%	3.02%
RA/NG5	-4.73%	-5.63%	2.96%	2.81%	7.75%	8.34%
NG4	-5.96%	-2.59%	0.63%	4.36%	1.88%	4.61%
NG3	-4.77%	-2.62%	1.98%	3.07%	4.09%	4.46%
NG2	-4.10%	-2.73%	-0.52%	0.86%	4.34%	-
NG1	-	-4.96%	-	1.17%	1.17%	-0.27%

Age Narrative

In a context of salary progression based upon continuous service and length of time in a grade, with annual incremental progression for colleagues in groups up to Level 1/PL/Reader/PRF, the results show salary increases that reflect length of service in a grade for the different age categories. The largest numbers of colleagues fall within the '36-45' and '46 to 55' age grouping.

Where the results have identified some pay gaps of more than 5%, further investigation and analysis has revealed that the pay gaps were attributed to salaries increasing with length of service, age in respect of experience and seniority, complexity of roles and market forces in the wider economic context. In addition, in some cases, we are again dealing with a very small group of colleagues. It is therefore very difficult to make statistically significant comparisons on pay, and we run the risk of identifying individuals. Market forces are also a prime consideration when recruiting to senior level posts and these vary over time. Sometimes where a pay gap has been identified there is only one individual in that age group in that pay band, or a small number of individuals with many years of service.

5. Part Time – All Colleagues

The University applies the same pay and grading structures and policies to part-time colleagues. Analysis

Gender, Ethnicity and Part-time colleagues

62% of part time roles are undertaken by female colleagues and there are no part time roles in senior roles

Disability and Part-time colleagues

Analysis of the differences in average salary of part-time disabled colleagues showed no significant

Age and Part-time colleagues

Analysis of the difference in average salary of part-time colleagues compared to full-time colleagues

Visiting Lecturers (Hourly paid / part time)

The results showed no significant pay differences between Visiting Lecturer colleagues with respect to

6. Sexual Orientation and Religion & Belief

Data analyses in respect of sexual orientation and religion or belief has raised some practical difficulties, due to the lack of systematic data in respect of most colleagues. The number of responses to this information has been increasing but, the available data collected could not yet be regarded as 'statistically significant', as any analysis would only represent approximately **68%** of the workforce. The University is considering methods of improving the available data to find a solution and more efficient way of collecting information securely via employee self-service, working within the challenges of appropriate methods from an information security perspective. We continue to work with the colleague LGBTQ+ network to also encourage greater disclosure.

7. Part time Visiting Lecturers

From 1st October 2017 all part time Visiting Lecturers are issued with permanent contracts, except for a handful of recognised exceptions e.g. PhD student or limited funding.

GENDER	Headcount	Percentage
Female	395	51.01%
Male	387	48.99%
Grand Total	782	100.00%

ETHNICITY	Headcount	Percentage
Asian/ Asian British	78	10.53%
Black/ African/ Caribbean/ Black British	38	4.92%
Mixed/ Multiple Ethnic groups	28	3.63%
Other Ethnic Background	21	2.78%
Prefer not to say	27	3.32%
Unrecorded	86	11.24%
White	504	63.56%
Grand Total	782	100.00%

DISABILITY	Headcount	Percentage
Has (or previously had) a Disability	40	4.89%
No Disability	732	93.86%
Prefer not to say	5	0.62%
Unrecorded	5	0.62%
Grand Total	782	100.00%

AGE GROUP	Headcount	Percentage
25 and under	5	0.62%
26 to 35	156	19.31%
36 to 45	197	24.33%
46 to 55	184	23.51%
56 to 65	151	19.91%
66 and over	89	12.32%
Grand Total	782	100.00%

SEXUAL ORIENTATION	Headcount	Percentage
Heterosexual	476	59.52%
LGBTQIA+	44	5.43%
Prefer not to say	119	14.67%
Unrecorded	143	20.37%
Grand Total	782	100.00%

RELIGION	Headcount	Percentage
No Religion	247	30.81%
Prefer not to say	104	12.77%
Religious Belief	276	34.57%
Unrecorded	155	21.85%
Grand Total	782	100.00%

