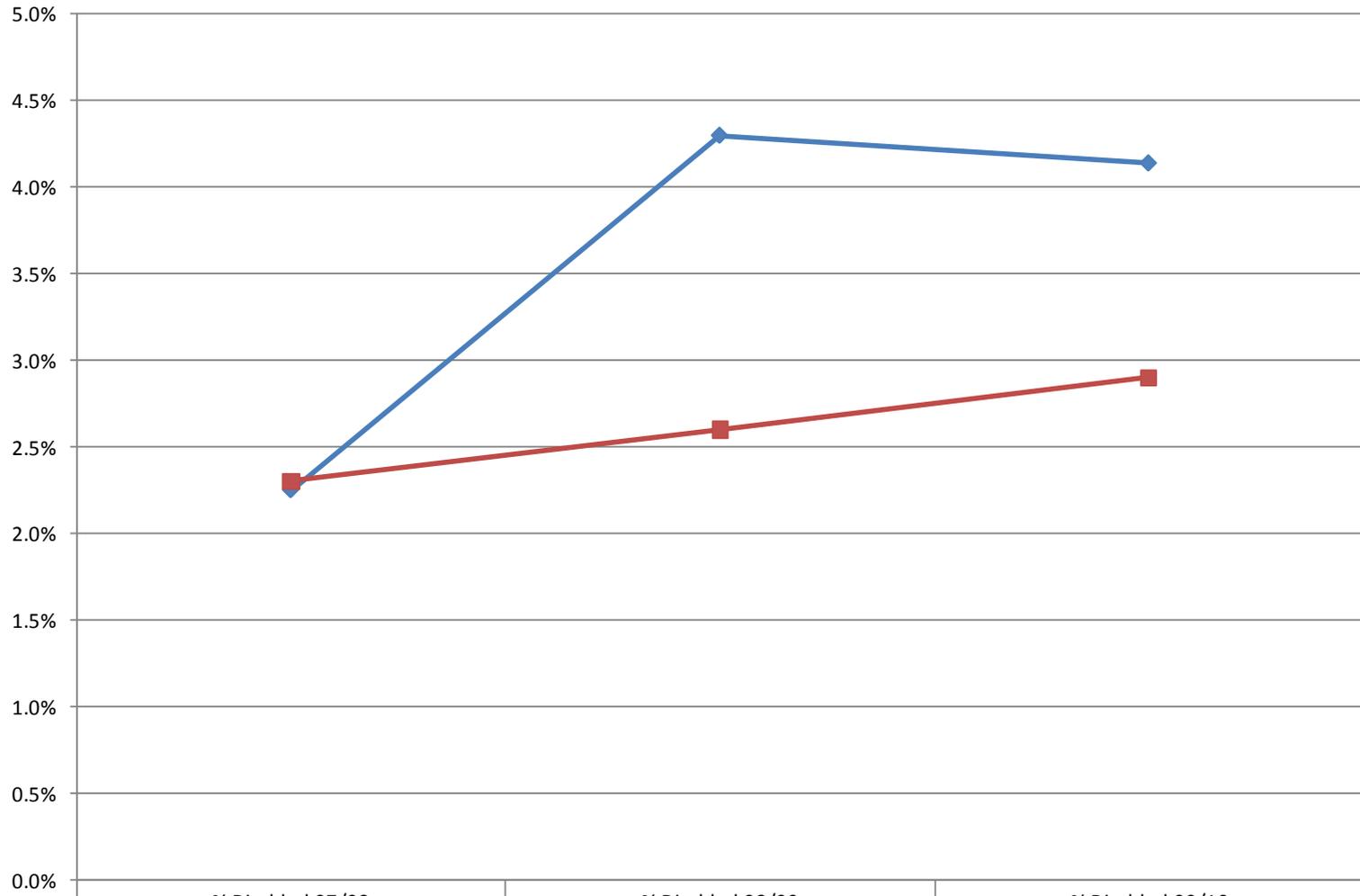


Staff Equality, Diversity & Inclusion Annual Report 2009-10

Appendices

Appendix 1: Staff Profile by Disability (1st May 2009 to 30th April 2010) - 3 year trend analysis

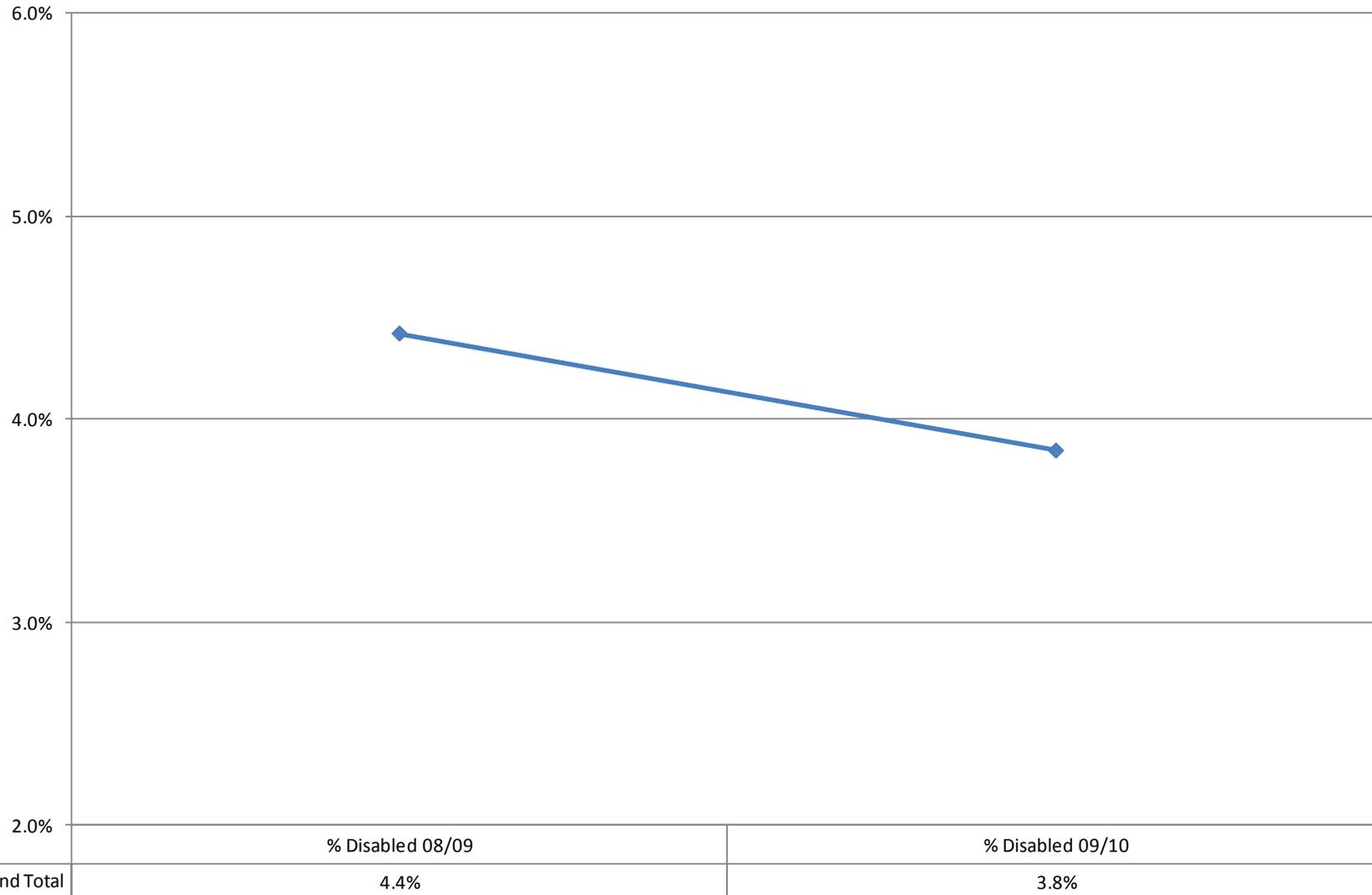
Staff Disability in comparison to HE Average



	% Disabled 07/08	% Disabled 08/09	% Disabled 09/10
University of Westminster	2.3%	4.3%	4.1%
HE Average	2.3%	2.6%	2.9%

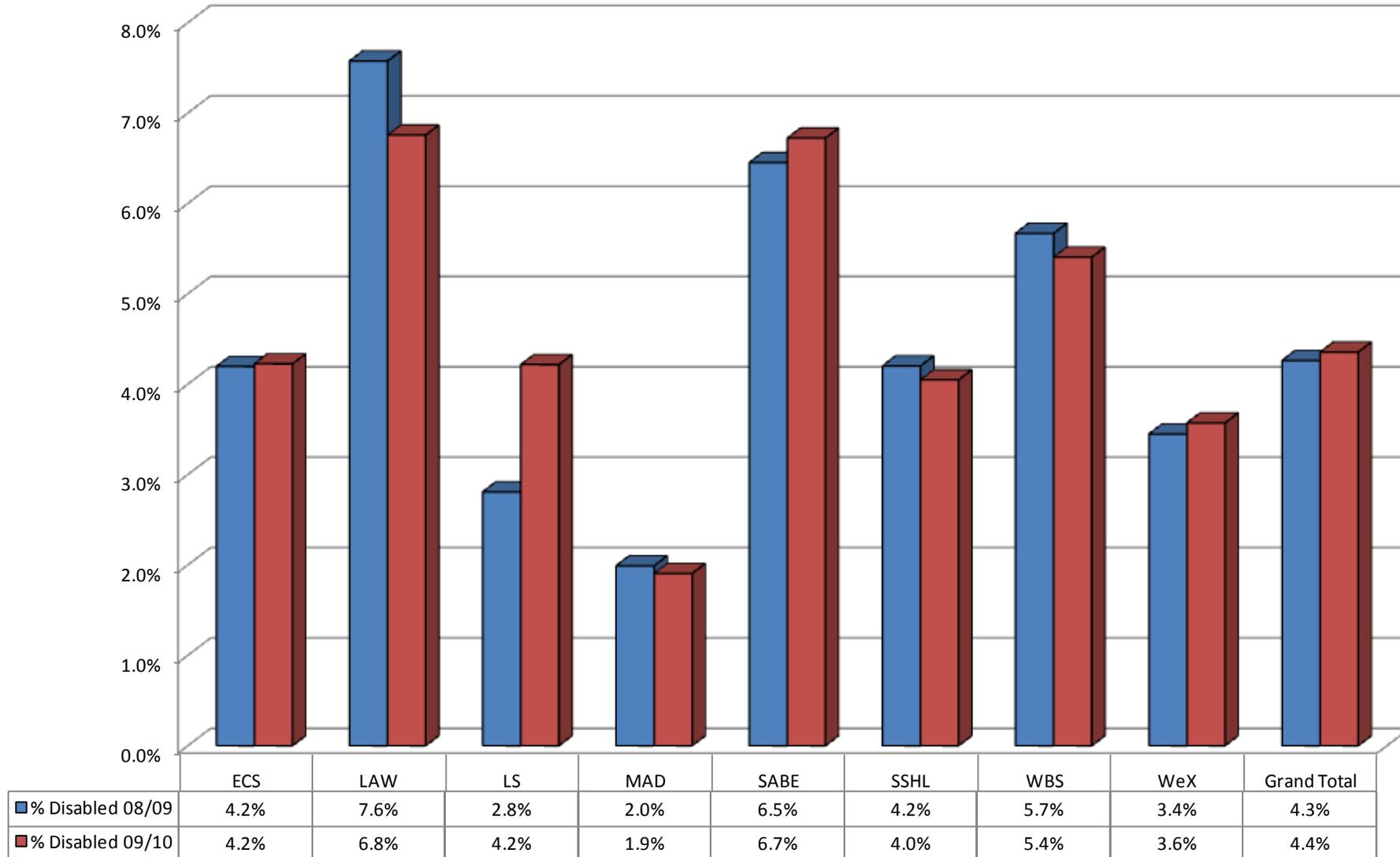
Appendix 1a: Staff Profile by Disability

Disability % - Corporate Services as at 30 April 2010



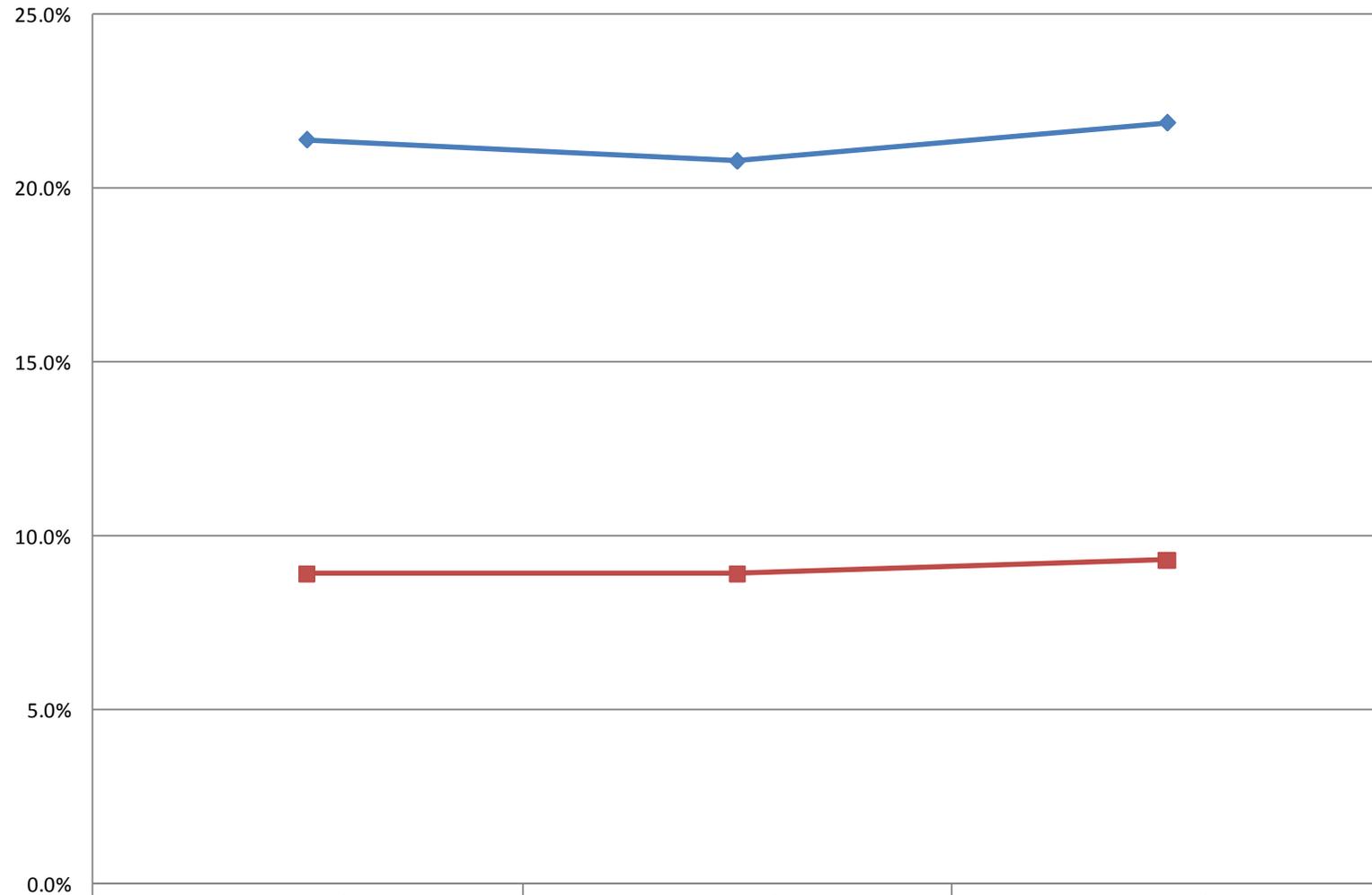
Appendix 1b: Staff Profile by Disability

Disability % - Schools & Westminster Exchange as at 30 April 2010



Appendix 2: Staff Profile by Ethnicity (1st May 2009 to 30th April 2010) - 3 year trend analysis

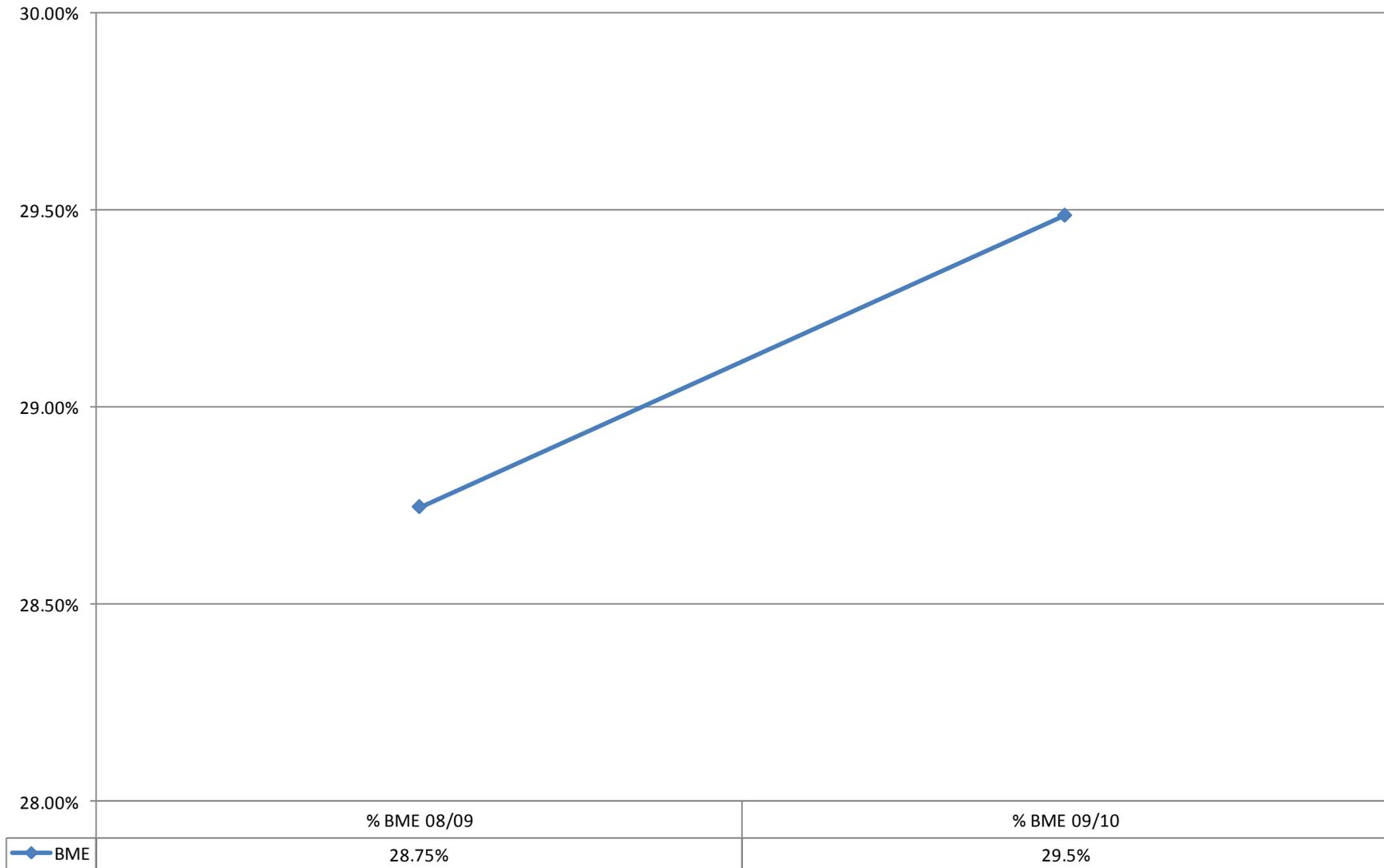
Staff Ethnicity in comparison to HE Average



	% BME 07/08	% BME 08/09	% BME 09/10
University of Westminster	21.4%	20.8%	21.9%
HE Average	8.9%	8.9%	9.3%

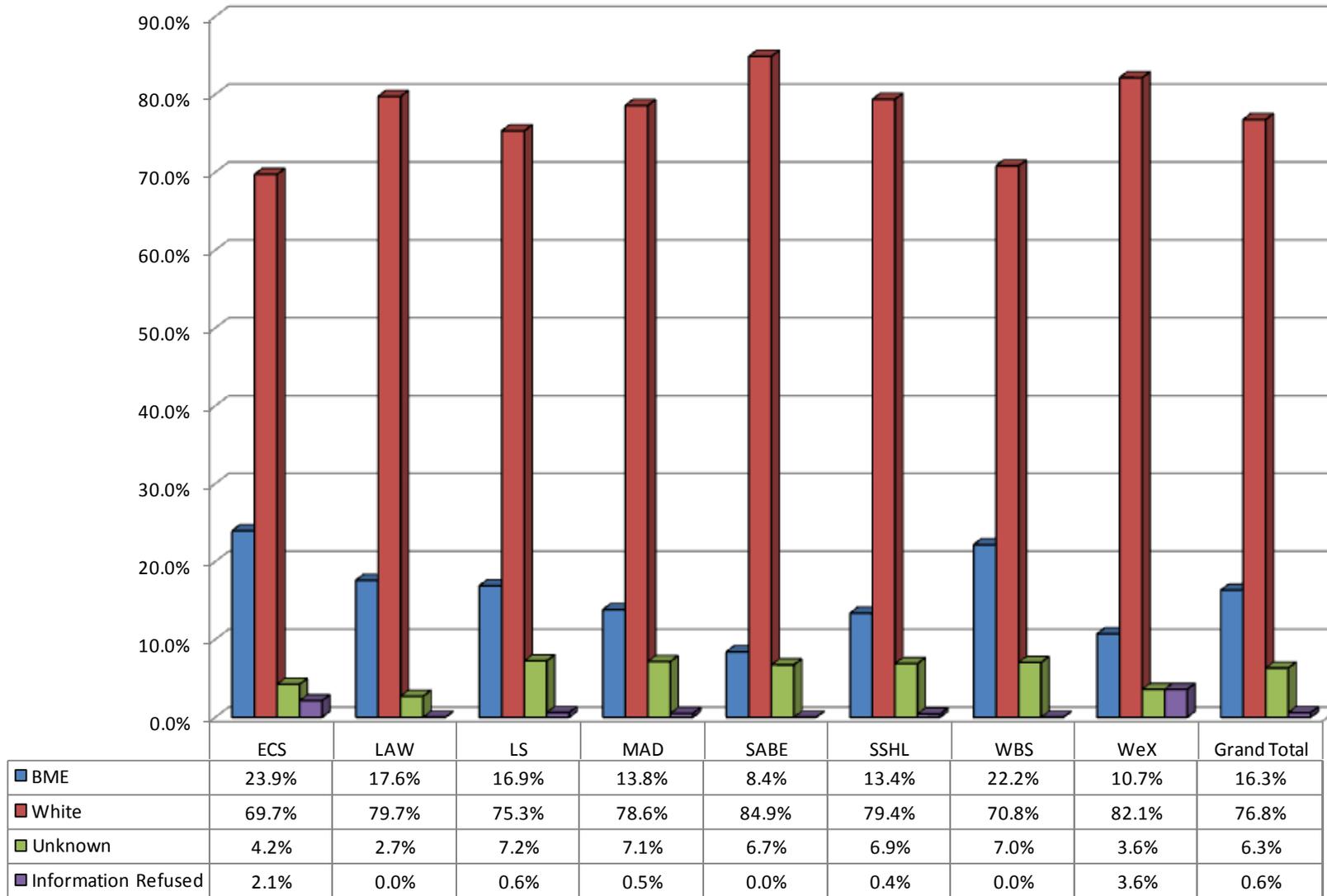
Appendix 2a: Staff Profile by Ethnicity

Ethnicity % - Corporate Services as at 30 April 2010



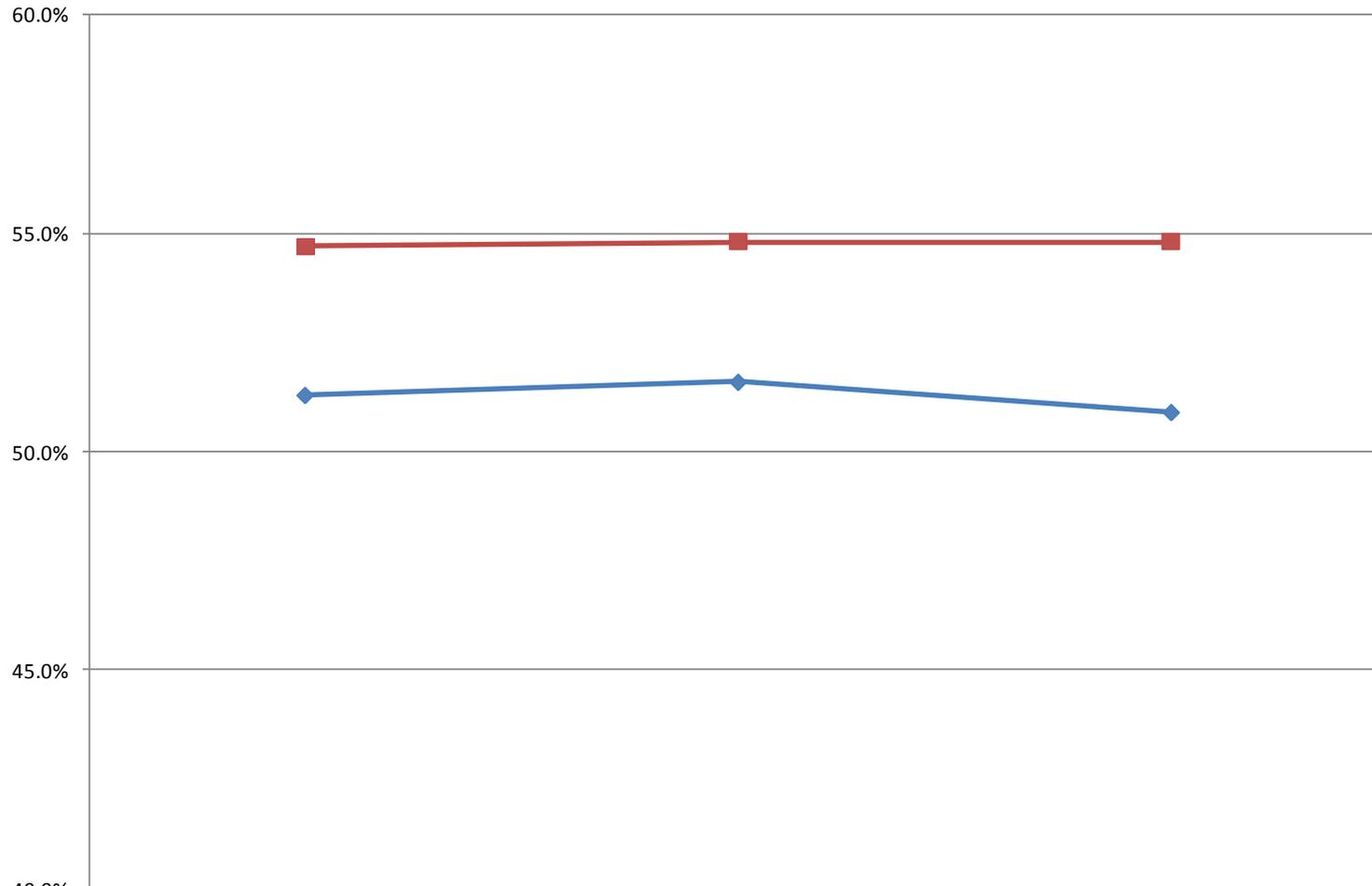
Appendix 2b: Staff Profile by Ethnicity

Ethnicity % - Schools & Westminster Exchange as at 30 April 2010



Appendix 3: Staff Profile by Gender (1st May 2009 to 30th April 2010) – 3 year trend analysis

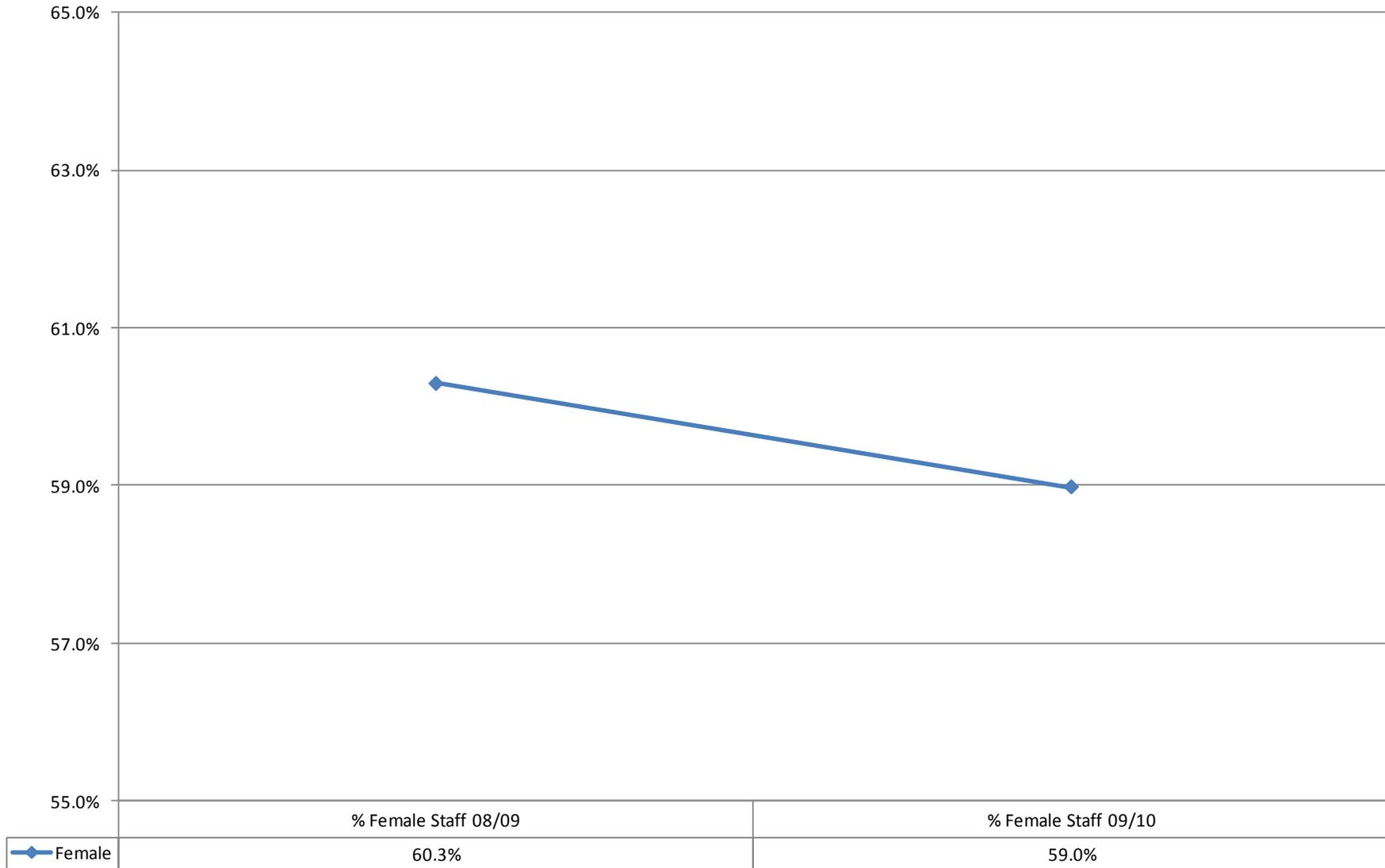
% Female Staff in comparison to HE Average



	% Female Staff 07/08	% Female Staff 08/09	% Female Staff 09/10
◆ University of Westminster	51.3%	51.6%	50.9%
■ HE Average	54.7%	54.8%	54.8%

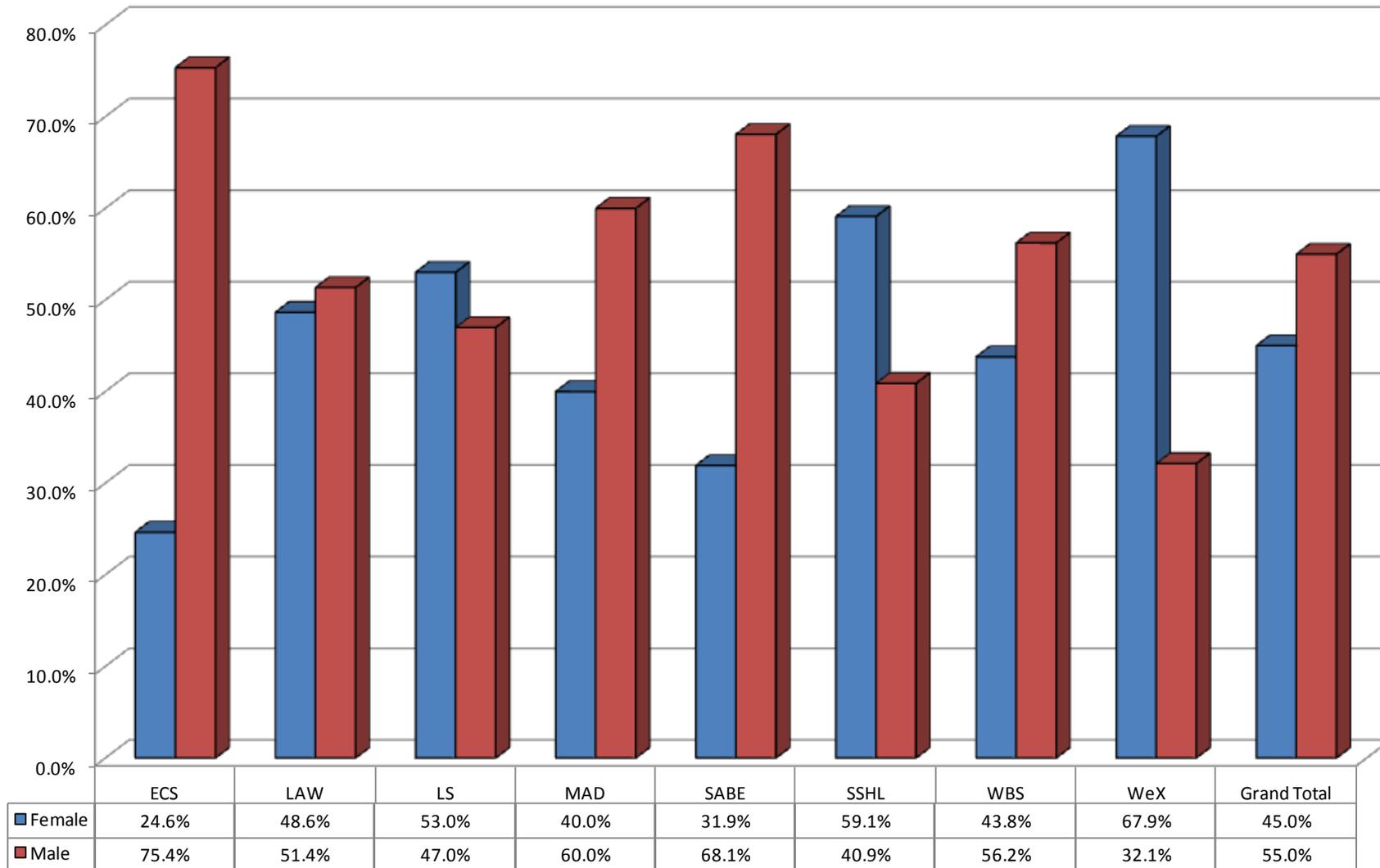
Appendix 3a: Staff Profile by Gender

Gender % - Corporate Services as at 30 April 2010



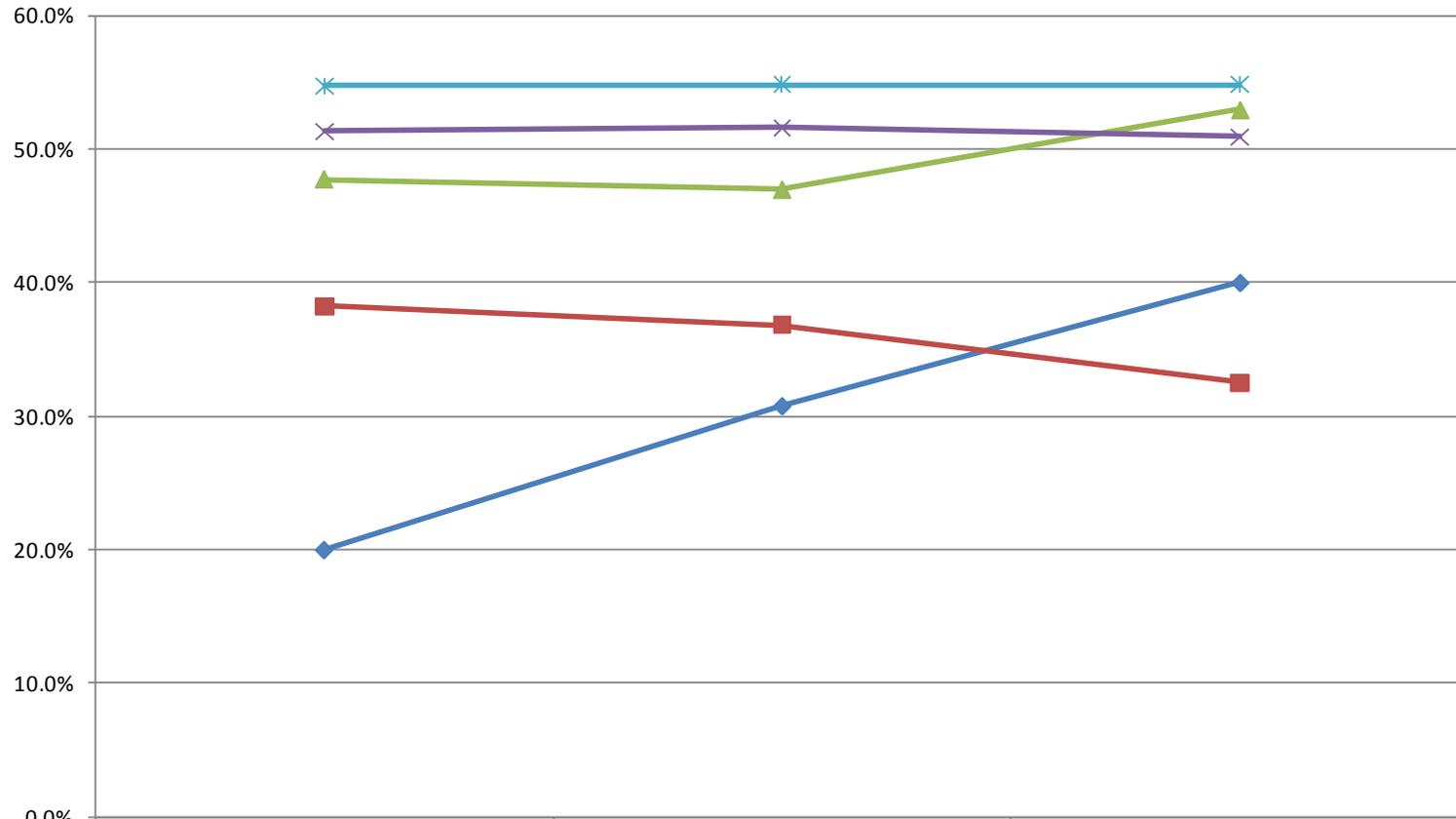
Appendix 3b: Staff Profile by Gender

Gender % - Schools & Westminster Exchange as at 30 April 2010



Appendix 3c: Staff Profile by Gender

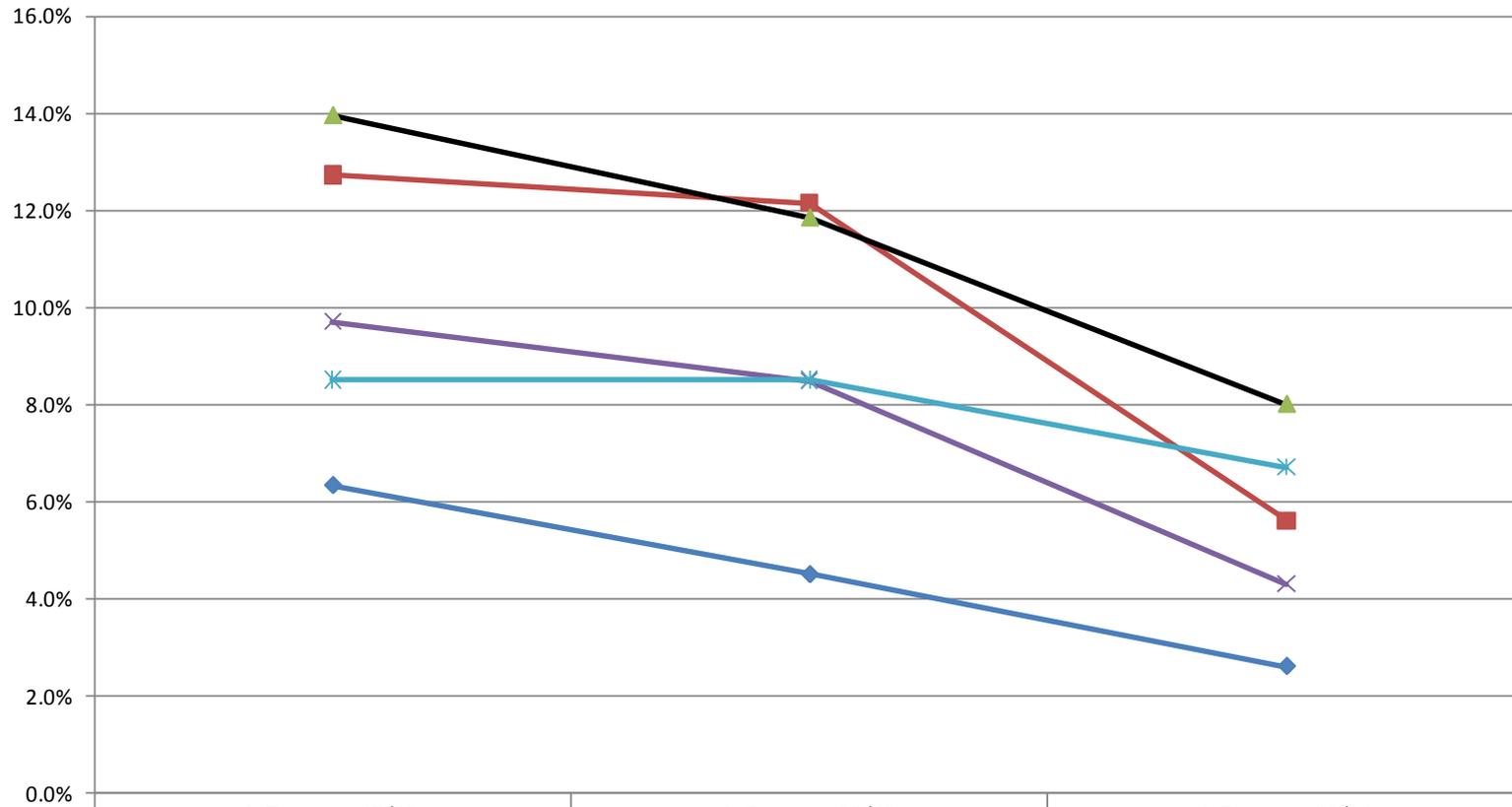
% Female staff - Senior Grades



	% Female Staff 07/08	% Female Staff 08/09	% Female Staff 09/10
Deans	20.0%	30.8%	40.0%
Heads of Departments	38.2%	36.8%	32.5%
Levels 1 - 5 (Admin Heads)	47.7%	46.9%	52.9%
University of Westminster	51.3%	51.6%	50.9%
HE Average	54.7%	54.8%	54.8%

Appendix 4: Staff Profile by Turnover/Employment Type (1st May 2009 to 30th April 2010) - 3 year trend analysis

Voluntary Staff Turnover in comparison to HE Average

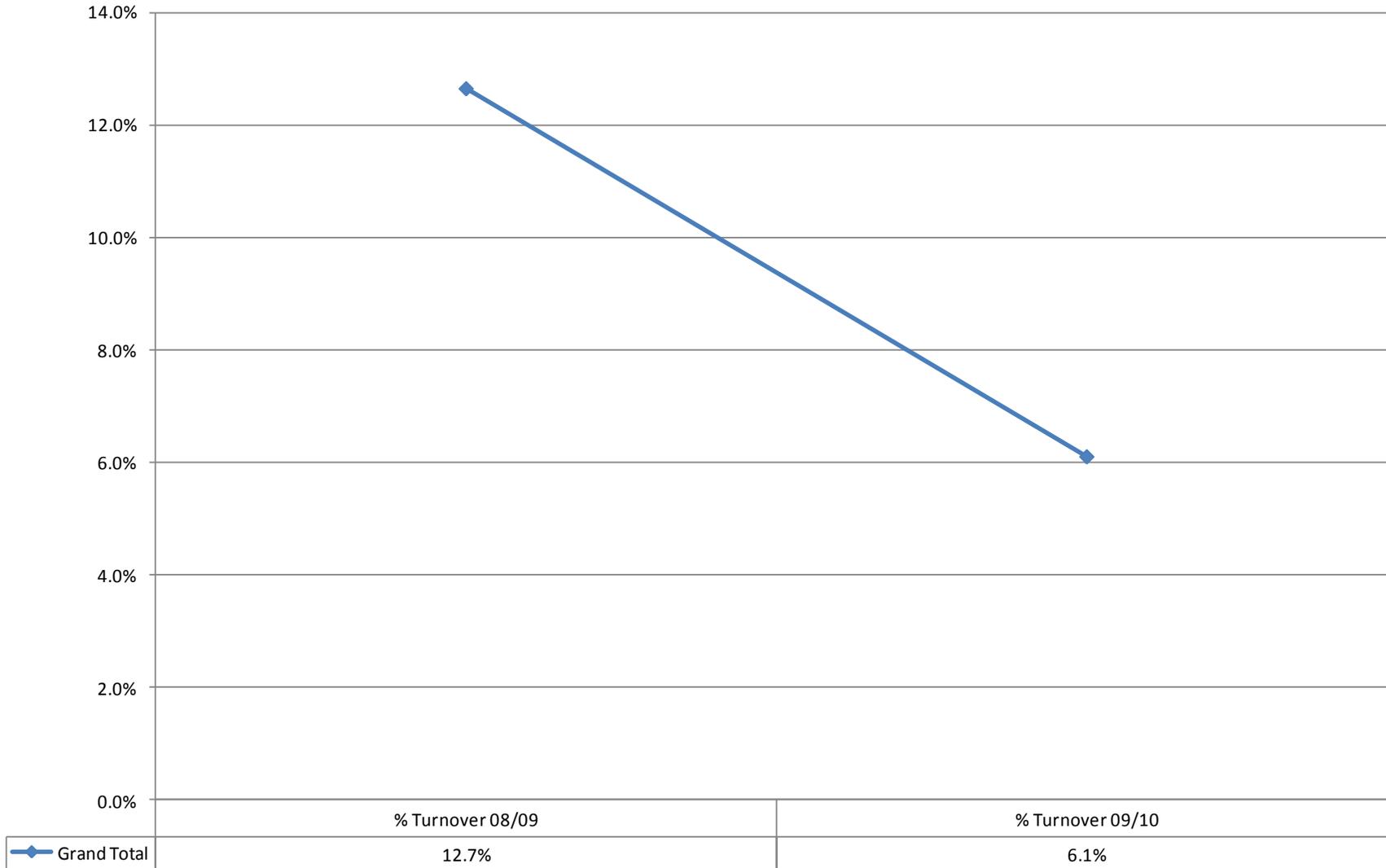


	% Turnover 07/08	% Turnover 08/09	% Turnover 09/10
Academic	6.3%	4.5%	2.6%
Professional Support	12.7%	12.1%	5.6%
Researchers	14.0%	11.8%	8.0%
Grand Total	9.7%	8.5%	4.3%
HE Average	8.5%	8.5%	6.7%

Note: The chart above shows voluntary turnover; this includes resignations only.

Appendix 4a: Staff Profile by Voluntary Turnover/Employment Type

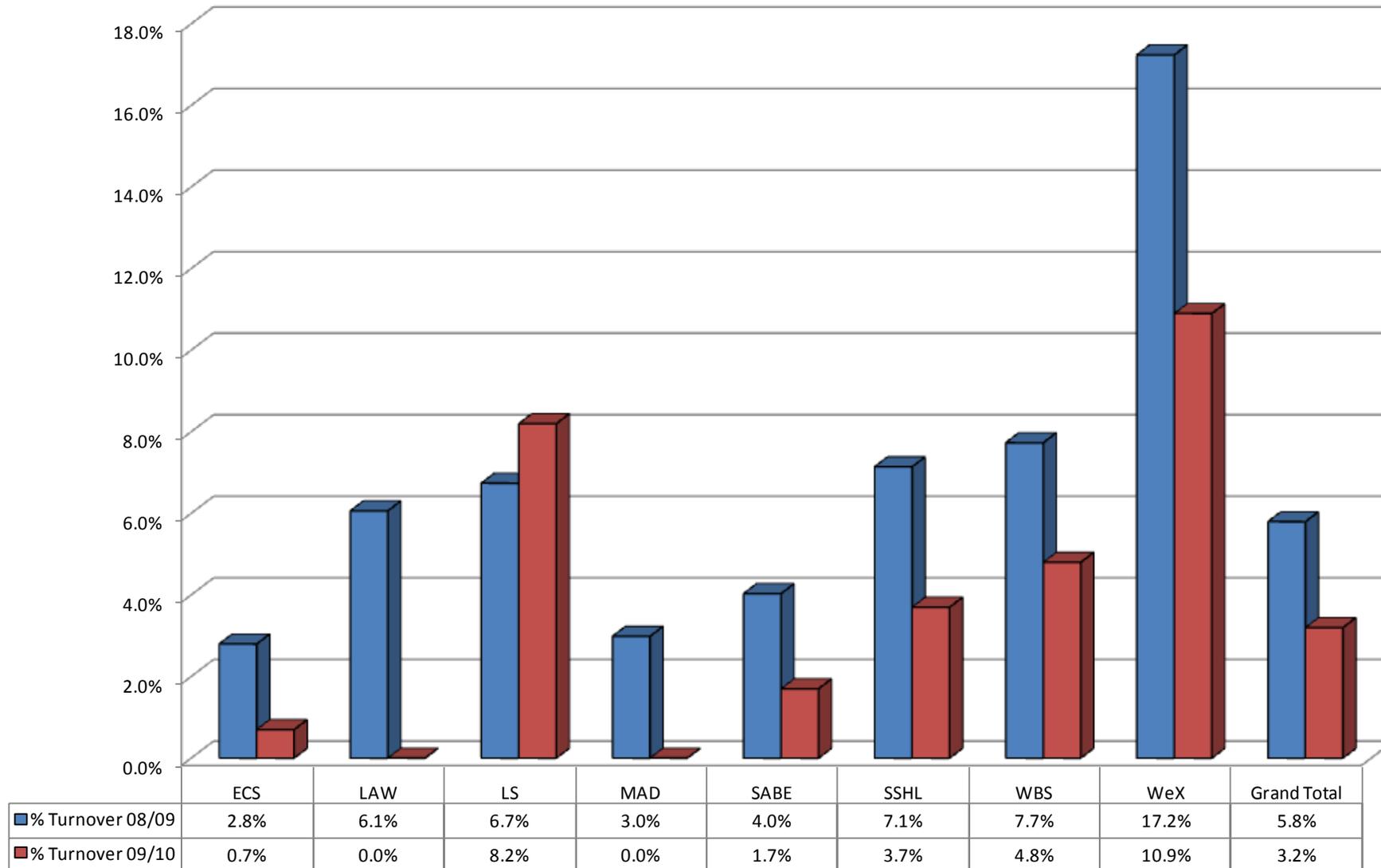
Voluntary Staff Turnover - Corporate Services



Note: The chart above shows voluntary turnover; this includes resignations only.

Appendix 4b: Staff Profile by Voluntary Turnover/Employment Type

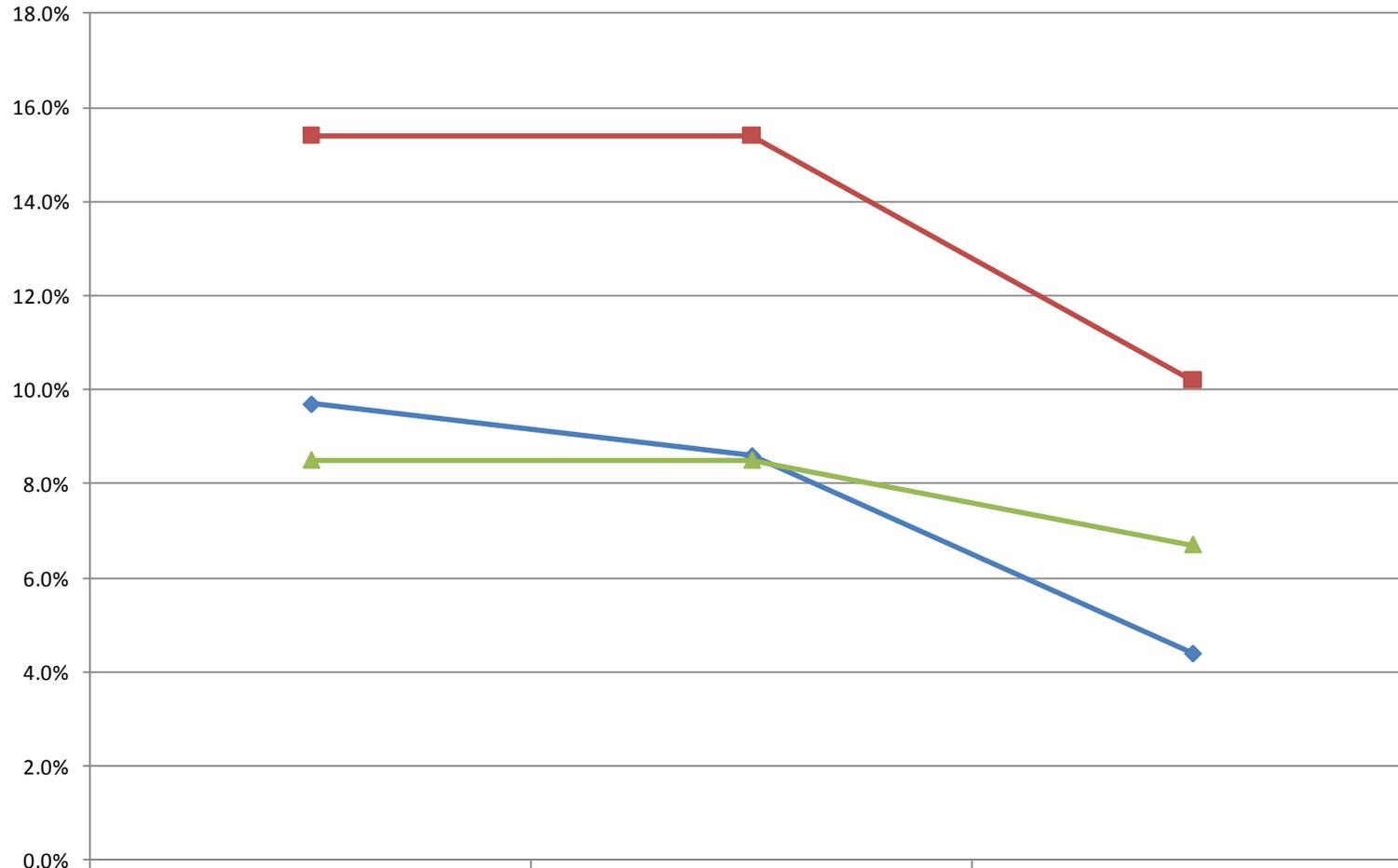
Staff Turnover - Schools & Westminster Exchange



Note: The chart above shows voluntary turnover; this includes resignations only.

Appendix 4c: Staff Profile by Voluntary Turnover vs All Turnover

Staff Turnover - Voluntary Leavers Vs All Leavers

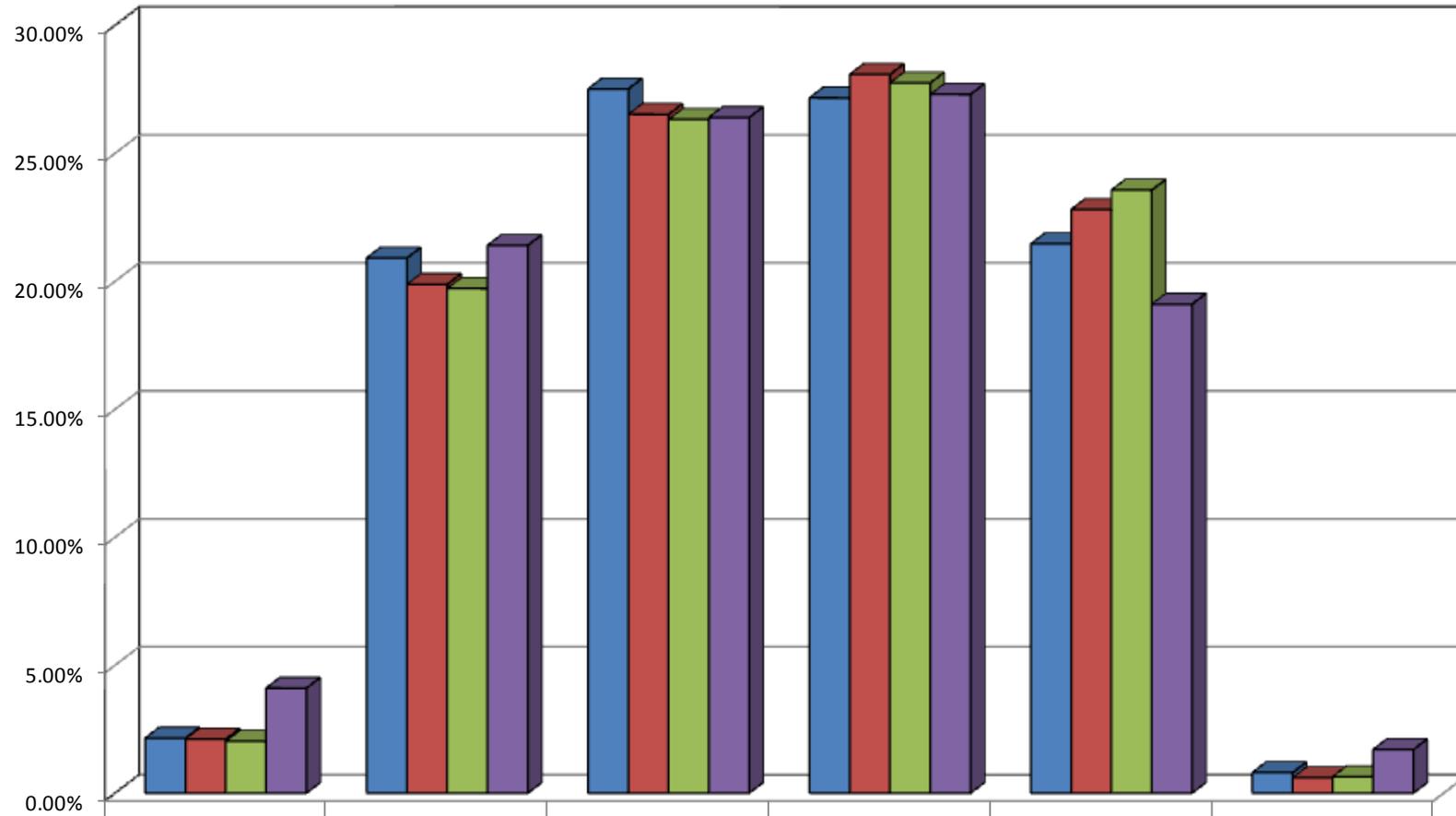


	% Turnover 07/08	% Turnover 08/09	% Turnover 09/10
UoW Voluntary Turnover	9.7%	8.6%	4.4%
UoW All Turnover	15.4%	15.4%	10.2%
HE Average	8.5%	8.5%	6.7%

Note: Includes managed activities such as voluntary redundancy, dismissals, retirements and end of fixed term contracts.

Appendix 5: Staff Profile by Age (1st May 2009 to 30th April 2010) – 3 year trend analysis

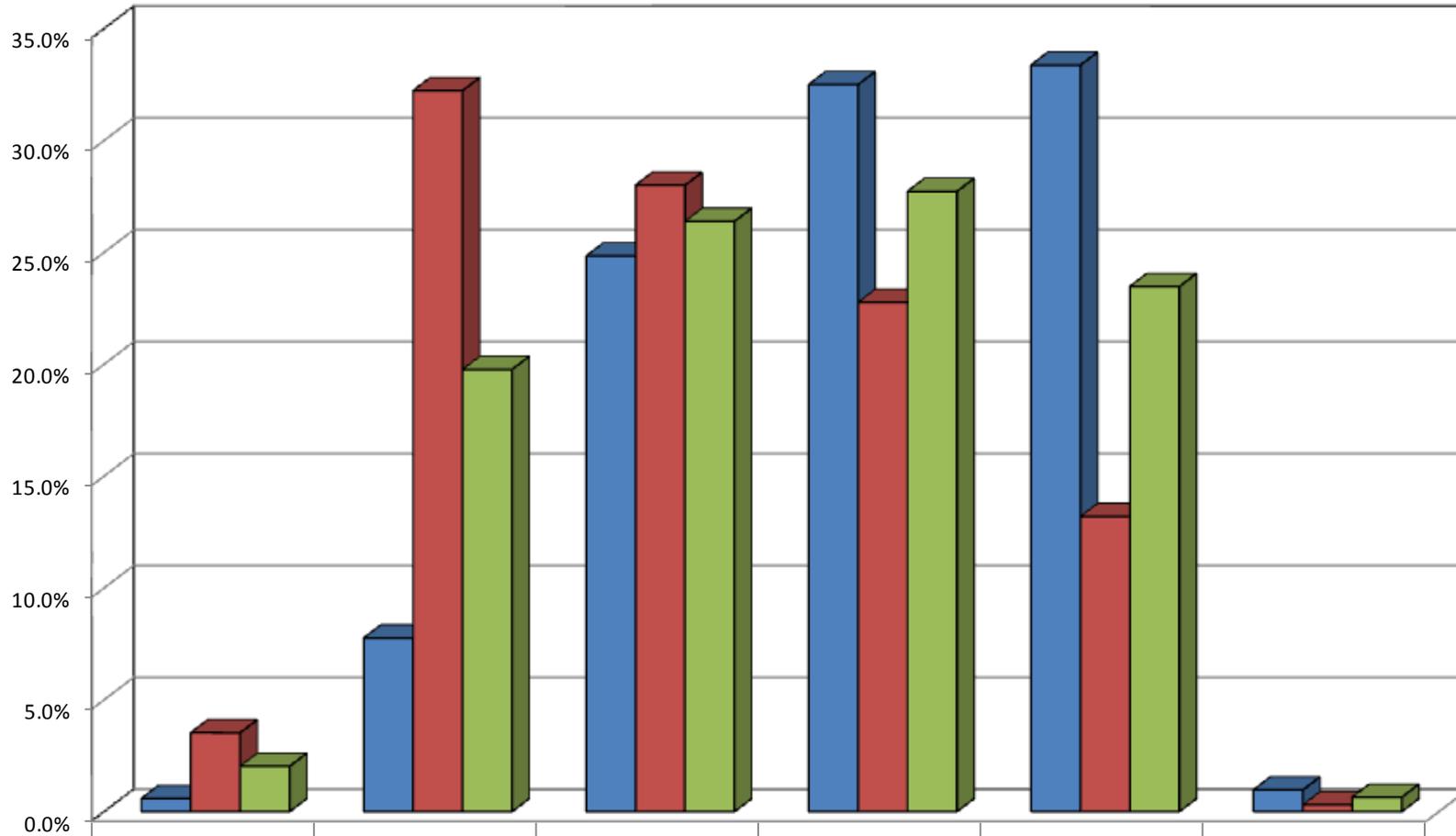
Staff Age profile in comparison to HE Average



	16-24	25-34	35-44	45-54	55-64	65 and over
% Age Profile 07/08	2.15%	20.91%	27.51%	27.16%	21.46%	0.80%
% Age Profile 08/09	2.1%	19.9%	26.5%	28.1%	22.8%	0.6%
% Age Profile 09/10	2.0%	19.7%	26.3%	27.7%	23.6%	0.6%
HE Average 2009	4.1%	21.4%	26.4%	27.3%	19.1%	1.7%

Appendix 5a: Staff Profile by Age

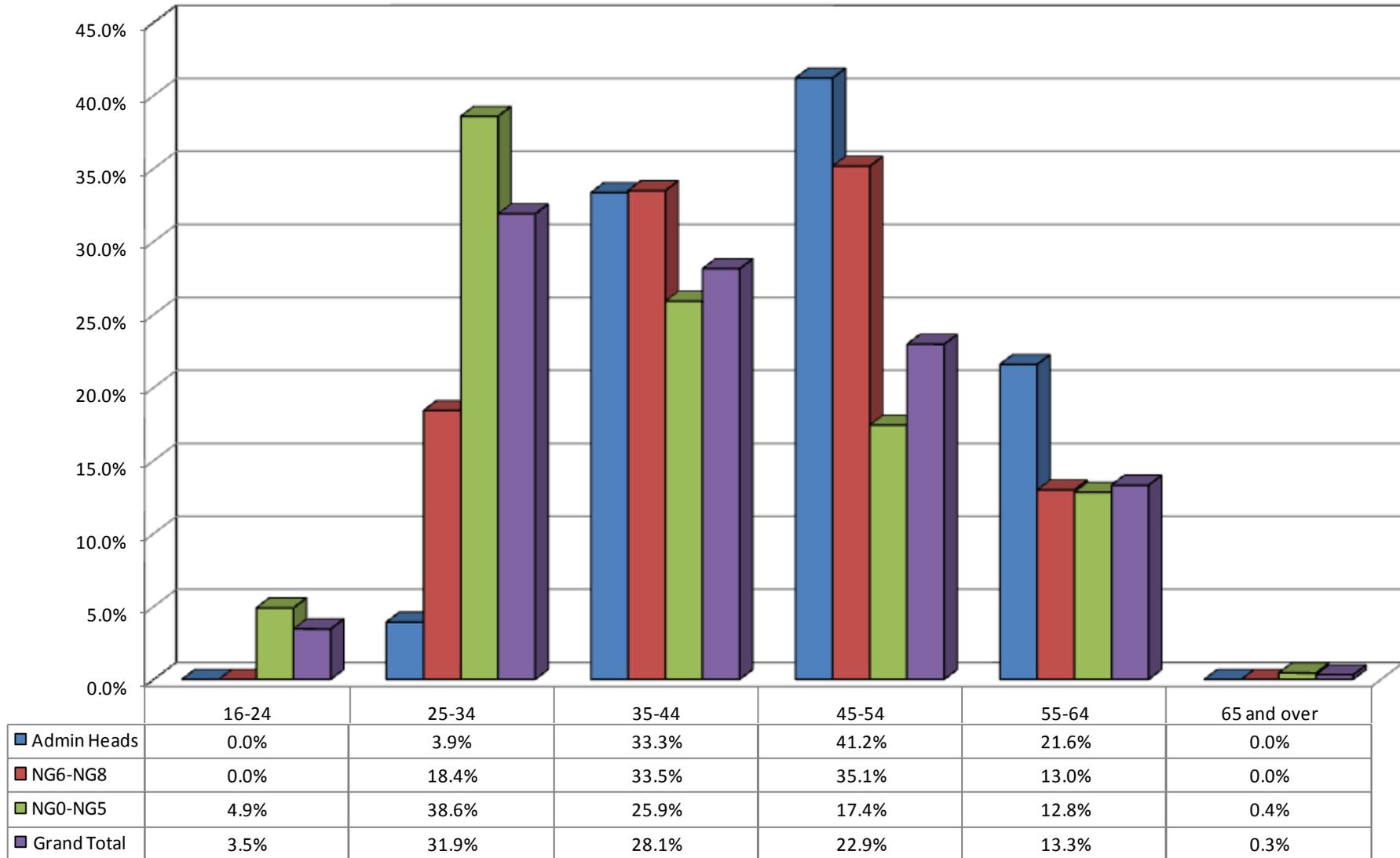
Age Profile % - By staff group at 30 April 2010



	16-24	25-34	35-44	45-54	55-64	65 and over
Academic	0.6%	7.8%	24.8%	32.5%	33.4%	1.0%
Professional Support	3.5%	32.2%	28.0%	22.8%	13.2%	0.3%
Grand Total	2.0%	19.8%	26.4%	27.7%	23.5%	0.6%

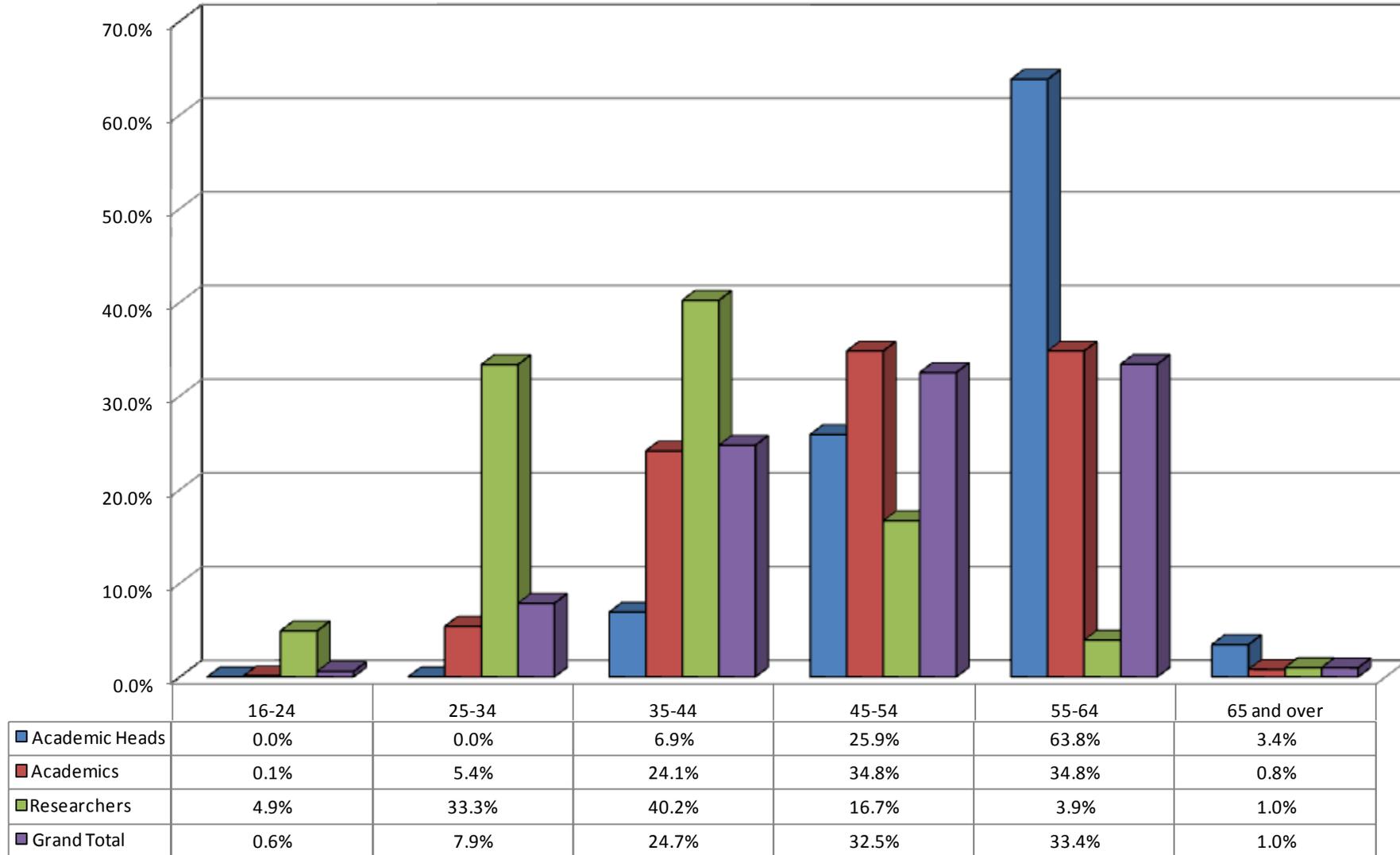
Appendix 5b: Staff Profile Information by Age

Age Profile % - by Professional Support grades as at 30 April 2010



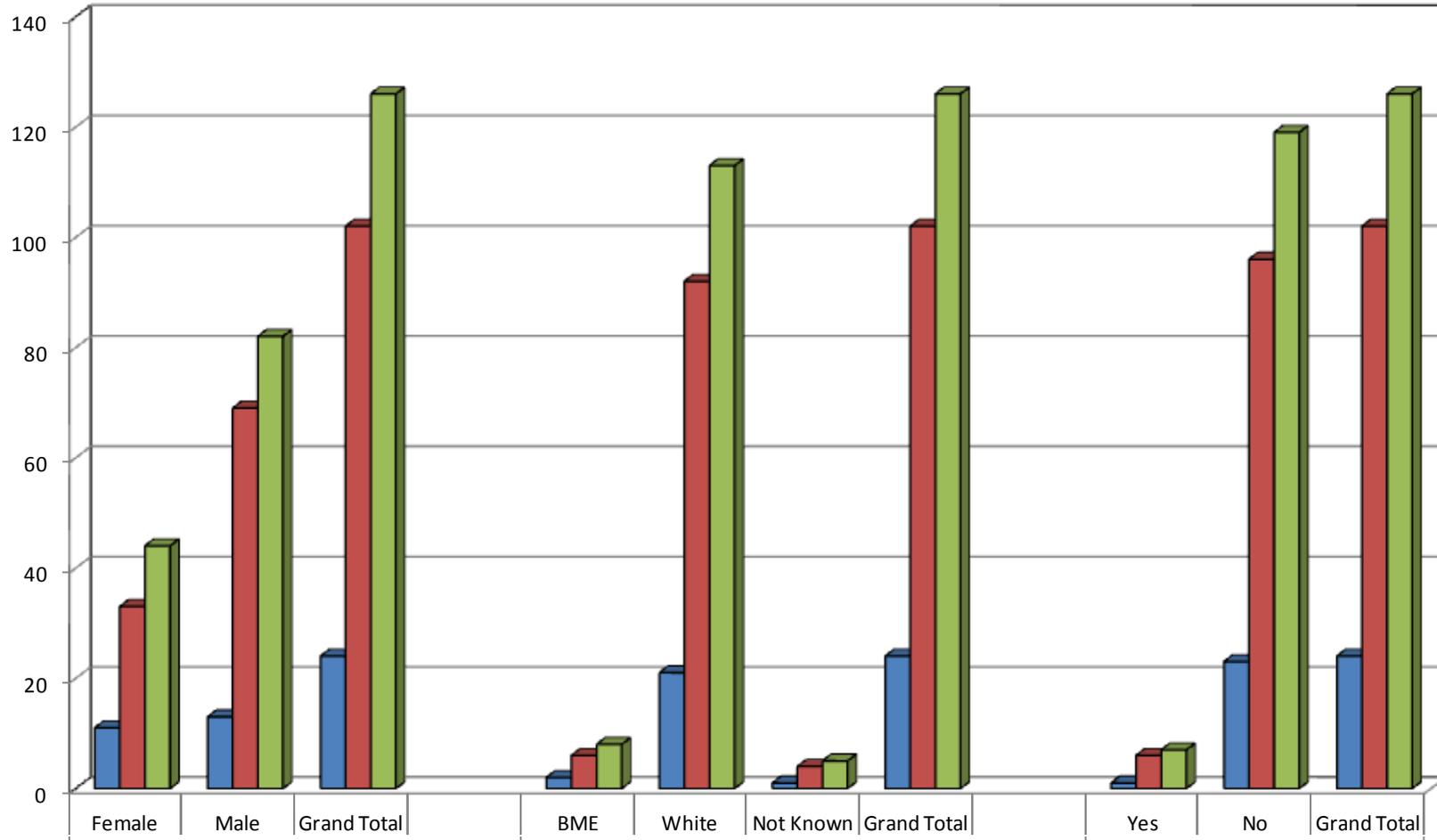
Appendix 5c: Staff Profile by Age

Age Profile % - by Academic grades as at 30 April 2010



Appendix 5d: Retirement Profile against current Default Retirement Age

Retirement Profile - 01 May 2010 to 30 April 2013



	Gender			Ethnicity				Disability		
	Female	Male	Grand Total	BME	White	Not Known	Grand Total	Yes	No	Grand Total
Corporate Services	11	13	24	2	21	1	24	1	23	24
Schools	33	69	102	6	92	4	102	6	96	102
Grand Total	44	82	126	8	113	5	126	7	119	126

Appendix 6: Equal Pay Report 2010

Introduction

Equal Pay is firmly part of the social and political agenda. The University's Gender Equality Scheme (in response to the Equality Act 2006) and Equal Pay Policy reinforce our commitment to equal pay and require us to carry out an Equal Pay Audit every two years. The new Equality Act 2010 replaces all existing equality legislation, including the Equal Pay Act (1970), and introduces a range of specific measures, including the publication of gender pay gap data by individual HEIs, and will place a significant emphasis on closing the gender pay gap, where it exists.

The University supports the principle of equal pay for work of equal value. Legislation allows an individual to claim Equal Pay with a member of the opposite sex on the grounds that they are doing:

- Like work.
- Work rated as equivalent under a job evaluation scheme.
- Work of equal value – in terms of demands made under headings e.g. effort, skill and decision making.

Additionally, we are committed to making the same comparisons in respect of ethnicity, disability and age.

The Equal Pay Audit has three main aims:

- 1 To compare the pay of University staff undertaking equal work.
- 2 To investigate the causes of any gender, ethnicity, disability and age pay gaps.
- 3 Take action to close gaps that are based on the grounds of gender, ethnicity, disability and age.

The 2010 Equal Pay Audit is the third one to be carried out by the University. The first audit was undertaken in the summer of 2006. A formal Equal Pay Policy was developed and approved as a result. The 2006 and 2008 audits were carried out using the UCEA Equal Pay Toolkit. This toolkit was specifically designed to support the production of equal pay reports and aid any investigation into ensuring equal pay for work of equal value. In order to get further detailed reports, some level of customisation to the toolkit was also undertaken. The UCEA Equal Pay Toolkit is focused primarily on gender-based equal pay gaps. Our audit has been extended to include ethnicity, disability and age. The remainder of the audit was carried out using data in the SAP system, extracted onto bespoke Excel spreadsheets, to produce combined statistical reports showing pay gaps and variance actions which form the basis of the audit.

Background Information

The audit looked at pay data, since the University implemented the JNCHES Framework Agreement and offered a new pay and benefit package to staff covered by this Framework from 1st August 2009. Overall 68% of the University's staff opted in to the new package. This audit also included comparison with the 2006 and 2008 audit outcomes.

The new benefits addressed a number of harmonisation issues between the academic and professional support staff groups and included a higher London weighting allowance for academic staff and higher starting salaries on Lecturer, Senior Lecturer and Principal Lecturer pay grades as well as higher salaries at the top of all three grades as well.

For professional support staff the package offered a higher annual leave allowance and two grades were merged to match the academic Senior Lecturer grade, allowing for incremental

progression to a higher salary. Over a two year phased period this longer grade of eight increments will be reduced to six. Government advice in relation to the Employment Equality (Age) Regulations 2006, is that, in general, differences in pay between men and women resulting from pay progression within a grade by traditional annual increments, may be justified by the benefits to the organisation of increased experience, competence or performance ensuring greater expertise. This is sufficient for systems providing payments up to five years. In practice this means anything up to a six-point pay scale (minimum point on the scale plus five incremental points). After this period specific justification may be required. This has become regarded as good practice in relation to other equality areas and one to which Westminster adheres.

The University employs a large number of casual staff, including Visiting Lecturers who are not included in this audit due mainly to the casual nature of their employment. It is important to note that Visiting Lecturers (VLs) are paid on the same scale as Lecturer grade staff (pro rata) and, as for all staff on appointment, they start at the bottom of the pay grade and are entitled to annual incremental progression, dependent upon meeting continuous service requirements. This has been applied consistently since the implementation of the single 51 point pay scale in 2005, for all University staff.

Where the nature of the work indicates that these hourly paid staff should be placed more appropriately on to a fractional contract with the University, a conversion to a fractional contract at the appropriate grade is undertaken, following a successful application for Grade Review. To date, approximately 250 Visiting Lecturers have converted to a fractional contract, reflecting their more notable commitment in terms of the hours of work they undertake for the University and their length of service. They are included in the Audit.

Job Evaluation

The University's pay and grading structure is underpinned by using the Hay Job Evaluation methodology. Job evaluation is a method of comparing different jobs through a process that seeks to objectively measure the different elements of a job resulting in a total score for each job. A single, analytical job evaluation scheme is a prerequisite for developing a common salary structure which meets the requirements of equal pay legislation and is therefore a key factor in ensuring fairness and consistency of treatment for all staff. It provides the only consistent basis for assessing the relative size of all jobs within an organisation. Jobs are placed in a rank order, according to their size, and placed within appropriate grades, providing a basis for a fair pay and grading structure. Only the job is evaluated, not the person doing the job.

Audit Process

An Equal Pay Audit involves:

- The comparison of pay of men and women doing equal work, those from different racial groups, those who are disabled and those in different age groups.
- The identification of equal pay gaps.
- The explanation and justification of gaps using objective criteria.
- The addressing of any gaps that cannot be satisfactorily explained on the grounds of work content.
- On-going monitoring.

A three stage review process was adopted for the University's audits in 2006 and 2008 and applied again in 2010 for consistency:

STAGE 1 = data analysis, comparing pay data

STAGE 2 = establish the nature & cause & diagnosis of any pay gaps

STAGE 3 = developing a remedial equal pay action plan

This is in line with JNCHEs guidance “Equal Pay Reviews: Guidance for Higher Education Institutions” published in March 2002. In addition, as a reference guide, the EOC advocates that where a pay differential related to sex is less than 3%, no action is necessary. Where the difference is greater than 3% but less than 5%, the position should be regularly monitored and for gender pay gaps of more than 5%, action is needed to address the issue and close the gap.

STAGE 1: A basic analysis of the relative rates of pay for men and women, people from different racial groups, those with or without disabilities and those in different age groups carrying out work perceived to be of “equal value”. The aim is to establish any pay gaps which are more than 5%, so that action can be taken in subsequent stages to address any issues and to ultimately close any pay gaps.

Pay Gap Analysis:

- In terms of base pay for each group of staff in terms of work rated as equivalent.
- The pay gap for staff in each occupational group as a whole.
- The pay gap between members of different racial groups, male and female staff and those with or without disabilities and those in different age groups.

All staff are “grouped” in terms of:

- Working arrangements – e.g. full/part time.
- Work rated as equivalent e.g. identifying the jobs that have been evaluated in the same grade at the University, as follows:-

The table below introduces a different grouping to those used in the 2006 and 2008 Equal Pay Reports. The Pay Framework has now been implemented. All roles at the University were evaluated and placed in an applicable grade. The report does not comment on academic groups and professional support staff groups separately, but across the two groups as “work rated as equivalent”. In order to make meaningful comparisons with previous data, the 2006 and 2008 data was re-categorised in these new groupings. The pay of part-time staff is expressed on the same basis as full-time staff (fte).

Groupings	Titles of Roles (work rated as equivalent)
1	Level 5
2	Level 4
3	Level 3
4	Level 2
5	Level 1
6	Dean of School
7	Directors – Academic/Associate Deans
8	Head of Department (academic)
9	Professors
10	Senior Academics
11	PL Ac5 / Principal Lecturer / Principal Research Fellow / Reader
12	Senior Lecturer / Senior Research Fellow / NG7-NG8
13	Lecturer / Research Fellow / NG6
14	Research Associate / NG5
15	NG4
16	NG3
17	NG2
18	NG1
19	NG0

STAGE 2: To establish the nature of any inequities in pay gaps, their causes and diagnosis of any likely factors. The review has sought:

- Why the gap exists.
- Extent to which the gap can be objectively justified.
- Identify any remedial action.

STAGE 3: Remedial action to remove pay gaps, specified, planned and implemented. For example:

- Ensuring that HR reward structures, policies and practices are effectively in place to deliver equal treatment and opportunity. It is also essential that we have consistency in pay practices as well as justifiable and transparent criteria.
- Identifying the steps required to remove causes of pay gaps as identified.
- A programme for implementing agreed actions with timescales.
- Agreeing the arrangements for monitoring the plan and evaluating the outcomes.

Data collection

Data was extracted from SAP 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. Pay gap reports were produced based on the new grouping and individual grades for the following:

- All staff, Gender
- All staff, Disability
- All staff, Ethnicity
- All staff, Age
- Full time staff compared to Part time staff, Gender
- Full time staff compared to Part time staff, Disability
- Full time staff compared to Part time staff, Ethnicity
- Full time staff compared to Part time staff, Age

Key results

Processing and disclosure of personal information is protected by the Data Protection Act 1998 and any data from which individuals can be identified are considered personal data. Where pay gaps were identified, as highlighted in previous audits, we are often dealing with a small number of people. In addition to making it difficult to get statistically significant comparisons, we also run the risk of identifying individuals. In order to protect the credibility and confidentiality of this exercise, we needed to ensure complete anonymity and compliance with Data Protection principles in the way that information is presented in this report. In accordance with the recommendation made by the Equality Challenge Unit in its April 2010 publication (“Promoting Equality in Pay”), in circumstances where small numbers of individuals may be identifiable, having determined whether they are undertaking equal work, their pay will be described in relative as opposed to absolute terms. (i.e. more / less / equal to counterparts, without providing actual figures).

GENDER:

	Female	Male	Total
Gender 2006	960	982	1942
Gender 2008	1047	976	2023
Gender 2010	1027	990	2017

Although the ratio of male and female members of staff is fairly evenly split, the overall number of female staff has increased since 2006. It is important to note that where there are senior grades with more male staff, these higher salaries will dominate lower grades with a more even distribution of male and female staff and higher average female salaries.

The table below shows the difference in average salary of all female staff in comparison to all male staff. Overall, female staff continue to be paid less on average than male staff, this can be attributed to there being less female staff in more senior roles. There are significantly less females in grade groups 8 to 11 (Head of Department, Professors, Principal Lecturers and Principal Research Fellows).

Gender pay gaps

	2006	2008	2010
1. Level 5	-1.3%	0.0%	-0.6%
2. Level 4	-7.1%	-10.6%	-
3. Level 3	0.0%	-5.1%	2.3%
4. Level 2	0.4%	1.8%	1.3%
5. Level 1	1.0%	-0.7%	-0.8%
6. Deans	4.3%	-4.0%	5.6%
7. Directors - Academic/ Associate Deans	9.8%	-3.7%	0.7%
8. Heads of Departments	-4.7%	0.9%	1.1%
9. Professors	-1.4%	-2.2%	-2.1%
10. Senior Academics	-0.6%	1.6%	1.5%
11. Principal Lecturer (Ac4/Ac5)/Principal Research Fellow/Reader	-0.4%	0.5%	0.0%
12. Senior Lecturer/Senior Research Fellow/NG7/NG8	-0.1%	-0.7%	-1.6%
13. Lecturer/Research Fellow/NG6	-0.9%	-1.9%	-0.9%
14. Research Associate/NG5	-2.0%	-2.4%	-0.9%
15. NG4	0.2%	1.0%	0.4%
16. NG3	0.1%	0.0%	-0.4%
17. NG2	-4.1%	-1.8%	-2.8%
18. NG1	4.0%	0.9%	2.4%
19. NG0	-	-	-

The analysis reveals the following significant differences, in more detail:

- Grade Group 6, Deans of School - The female members of staff in this category are paid 5.6% more on average than the male staff. This is due to a combination of a higher starting salary for both an internal and external appointee, and a longer serving member of staff at this grade.
- Part-time - The difference in average salary of part time female staff were compared to part time male staff. The results showed a significant difference:
 - Grade Group 9, Professors – On further investigation we identified that part-time female staff on the Professorial Grade only form 11% of part-time Professors which is already a very small group of people. Therefore, it is very difficult to make statistically significant comparisons on pay, and we also run the risk of identifying individuals.

Background to the Professorial appointment process

Professors are placed on a fixed salary at appointment which is reviewed at the annual Professorial Salary Review Committee. Professors are placed on a 9 fixed point scale. Their position is dependent upon the “quality” of research and esteem factors that a Professor can bring to the University to enhance its reputation in their field of excellence in line with the

University's strategic vision. Following successful appointment to the title of Professor, further salary advances are dependent on meeting and exceeding, on a sustained basis, performance-related criteria. The evidence required to demonstrate this includes; number of research students, MPhil/PhD completed by students; research income generated; research contracts obtained; research papers published; books published; actual teaching load; student projects supervised (subdivided into undergraduate and postgraduate projects); external committee work; consultancy income generated, and any other responsibilities, for example, Course Leader.

- Grade Group 15, NG4 – The average salary for part time female staff is 6.5% greater than part-time male members of staff on this grade. This is attributable to length of service and more female staff having reached the top of their pay for grade.

However, the overall results for all staff (full and part time) based on gender identified that female staff are paid less on average than male staff, by 10.9%, which is attributed to there being less female staff in more senior roles as there are significantly less females in grade groups 8 to 11 as shown above.

Comparison with 2006 and 2008 data

The average pay gap between male and female staff has decreased by 1.6% since 2008.

ETHNICITY:

	BME	White	Unknown	Total
Ethnicity 2006	340	1339	263	1942
Ethnicity 2008	424	1418	181	2023
Ethnicity 2010	441	1459	117	2017

The number of BME staff has been increasing since 2006 and the number of staff recorded as "unknowns" has been reducing. Overall the University has a BME staff population of 21.9%, which compares very favourably with the HE sector average of 8.9%.

Ethnicity pay gaps

The table below shows the difference in average salary of all BME staff in comparison to all White/Non-BME staff. As there is an under-representation of BME in the most senior positions, pay analysis can be misleading due to the small numbers involved. Overall, the results show no significant differences of greater than 5%.

The groupings of work rated as equivalent identified two groups greater than 3%. The results show a difference in:

- Grade Group 9, Professors - BME staff are paid less on average than their white counterparts. As the difference in pay is less than 5%, this will be monitored in future audits to ensure the gap does not widen.
- Grade Group 17, NG2 – the average salary is higher for all BME staff in this grade. As the difference in pay is less than 5%, this will be monitored in future audits to ensure the gap does not widen.

The difference in average salary of part-time BME staff compared to white staff shows the following significant difference:

- Grade Group 15, NG4 - Part-time BME staff are paid higher on average than part time white staff (6.4%). On further investigation, this was attributed to the length of service in this grade.
- The data also highlights the following differences that require monitoring (less than a 5% pay gap):

- Overall, BME staff are paid less on average than white staff by 18%. This is attributed to the significantly lower number of BME staff in all roles, but particularly visible in senior grade groupings 1 to 12. The proportion of staff that are BME and the number of staff in the grades is a major contribution to the difference overall.
- Further investigation revealed that the pay gap was related to a significantly shorter length of service in post in respect of the BME staff in this category.

Ethnicity pay gaps	2006	2008	2010
Level 5	-	-	-
Level 4	-	-	-
Level 3	-	-	-
Level 2	-	-	-
Level 1	-0.3%	-	-1.2%
Deans	-	-8.7%	-
Directors - Academic/ Associate Deans	-	-	-
Heads of Departments	4.1%	2.6%	-0.7%
Professors	-2.9%	-4.5%	-3.4%
Senior Academics	-0.9%	0.0%	0.2%
Principal Lecturer (Ac4/Ac5)/Principal Research Fellow/Reader	-1.4%	-2.3%	-0.2%
Senior Lecturer/Senior Research Fellow/NG7/NG8	-2.2%	-2.0%	-1.0%
Lecturer/Research Fellow/NG6	1.3%	0.3%	0.7%
Research Associate/NG5	-2.4%	-2.2%	0.9%
NG4	-0.1%	-0.5%	0.8%
NG3	0.2%	0.0%	0.5%
NG2	2.6%	3.0%	3.9%
NG1	2.4%	1.7%	0.5%
NG0	-	-	0.0%

Comparison with 2006 and 2008 data

It is positive to note that there has been a decrease by 2% in the pay gap between BME and white staff since 2008. It is also notable that there has been an increase in the pay gap which is more favourable for female BME staff on the NG2 grade, since 2006. This is less than 5% and will continue to be monitored.

DISABILITY:

	Yes	No	Total
Disability 2006	44	1898	1942
Disability 2008	46	1977	2023
Disability 2010	84	1933	2017

The table below shows the difference in average salary of all disabled staff in comparison to all non-disabled staff. The disclosure rate of disabled staff has doubled due to a successful data capture exercise. Overall there are no significant differences at 5% or above, however there are two pay groupings where the difference is 3% or greater:

- Grade group 14, Research Associates and NG5 - disabled staff are paid 3.7% more on average than their non-disabled counterparts. As the difference in pay is less than 5%,

this will be monitored in future pay audits to ensure that the gap does not widen, and it is important to note that this has steadily decreased since the 2006 and 2008 audits.

- Grade Group 16, NG3 - disabled staff are paid 3.0% more on average than their non-disabled counterparts. As the difference in pay is less than 5%, this will be monitored in future pay audits to ensure that the gap does not widen, and it is important to note that this has decreased since the 2008 audits.

Overall, disabled staff are paid more on average than non-disabled staff by 4.3%. This is attributed to a higher disclosure rate in more senior roles. This is particularly visible in grade L1 and L2 in terms of the proportion of staff that have disclosed a disability and the number of staff in the grades. As the difference in pay is less than 5%, this will be monitored, as noted previously.

Disability pay gaps

	2006	2008	2010
1. Level 5	-	-	-
2. Level 4	-	-	-
3. Level 3	-	-	-
4. Level 2	-	-	0.2%
5. Level 1	0.3%	0.5%	0.7%
6. Deans	-	-	-
7. Directors – Academic / Associate Deans	-	-	-
8. Heads of Departments	-1.8%	3.0%	0.3%
9. Professors	-0.7%	-0.5%	0.5%
10. Senior Academics	-	-	1.6%
11. Principal Lecturer (Ac4 / Ac5) / Principal Research Fellow / Reader	-1.2%	5.1%	2.7%
12. Senior Lecturer/Senior Research Fellow / NG7 / NG8	-2.7%	0.2%	0.9%
13. Lecturer / Research Fellow / NG6	-0.9%	-0.9%	1.1%
14. Research Associate / NG5	-5.4%	4.1%	3.7%
15. NG4	2.4%	1.4%	-1.3%
16. NG3	-1.1%	3.9%	3.0%
17. NG2	2.6%	-4.2%	-
18. NG1	-	-	1.3%
19. NG0	-	-	-

Comparison with 2006 and 2008 data

Overall, there is a positive picture, with a decrease in the pay gap since 2006 of 13.4%, and this pay gap is in favour of disabled people.

AGE:

	34 and under	35 - 49	50 - 65	66 and over	Total
Age 2006	481	786	671	4	1942
Age 2008	461	819	736	7	2023
Age 2010	435	820	758	4	2017

In accordance with the recommendation made by the Equality Challenge Unit in its April 2010 publication (“Promoting Equality in Pay”), we have adopted the Higher Education Statistics Agency (HESA) age groupings (e.g. Group 1 covers staff aged 34 and under, group 2 covers 35 to 49, group 3 covers 50 to 65 and group 4 covers staff aged 66 and over. This chart shows an increase in the number of staff in the age groupings of 35 to 65 since 2006 and a decrease in the number of staff aged 34 and under.

This is the second time that Age has been analysed as a factor in the context of equal pay, and therefore the second time it has been included in the Equal Pay Audit. Overall, as expected in a context of salary progression based upon continuous service and length of time in a grade, with annual incremental progression for staff in groups 11 to 19, the results show salary increase that reflects length of service in a grade for the different age categories. The largest number of staff falls within the 35 to 49 age grouping and are at an earlier stage in their career within these grades.

The following significant differences were identified:

- Grade Group 2, L4 – further investigation showed this represented one of the smallest groups of staff. It is not possible to make statistically significant comparisons on pay and there is a risk of identifying individuals.
- Grade Group 3, L3 - this is largely due to the length of service of those in age group 35-49.
- Grade Group 6, Deans of School – further investigation showed this represented a small group of staff. It is not possible to make statistically significant comparisons on pay and there is a risk of identifying individuals.

Where the results have identified some pay gaps of more than 5% for senior staff in 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 and complexity of roles. In addition, in some cases, we are again dealing with a very small group of senior academic 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 these senior level posts and these vary over time.

The difference in average salary of part time staff based on age shows the following significant difference:

- Grade Group 9, Professors - this is due to the salary range in this group and also mainly due to the length of service in grade, as noted under previous sections, professorial staff salary progression is based upon annual review of evidenced based performance related criteria. Where colleagues have published high quality and high profile research which is valuable for the University’s research profile, this was more significant than factors such as age in respect of salaries.
- Grade group 11 (Principal Lecturer / Principal Research Fellow / Reader) – this is due to the salary range in this group and also mainly due to length of service in grade.

Overall investigation showed that salary increases with regard to age and length of service in grade combined.

Age Comparison with 2006 and 2008 data

In overall terms the University’s age profile is higher than the sector average at 23.6% (55 to 64), compared to 10.1% (55 to 64). The number of staff aged 34 and under has decreased since 2006 (481 in 2006 to 435 in 2010). The other two age groupings have increased by 1 person in the 35 to 49 age grouping, and by 22 in the 50 to 65 age grouping, since the 2008 Audit.

Conclusions/Recommendations

It is important to note the following from the Equality Challenge Unit (Ref: April 2010 publication "Promoting Equality in Pay"), that the overall gender pay gap is reflective of the distribution of men and women across pay grades as well as any pay discrimination. In an HEI 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.

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 implementation of the Pay Framework and new pay and benefit package offered to staff from 1st August 2009, has not impacted adversely on any of the staff groupings that this audit has looked at.

Gender - Where pay gaps were identified in respect of gender, further investigation and analysis showed that there were justifiable reasons for these. The main reasons for pay differences were the positions of individuals within a grade, as determined by automatic incremental progression, which is primarily based on length of service. Also, whilst there may be legitimate reasons for appointing senior staff in particular to certain fixed salaries, there were a small number of instances where staff may not be receiving comparable salaries upon entry at senior level to the University; this could be linked to the amount of discretion that appointing managers and selection panels have in relation to starting salaries and consideration of current salary when offering a new salary. The matter of starting salaries was highlighted as a relatively small issue in the 2008 Audit and consequently, through the implementation of the Pay Framework at Westminster, to be more compliant with Age regulations, the University is reducing the length of the one remaining long grade previously attributable to age-related salary differences, over a period of two years, however this audit did not highlight starting salaries to be a significant factor in relation to gender-based pay differentials. Additionally for Professional support staff the University now advertises the salary at the start of the grade, rather than the full range, to strengthen adherence to the policy on starting salaries and to ensure fairness and consistency in appointment procedures for new starters.

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 staff in certain ethnic groups; it is therefore very difficult to make reasonable and statistically significant comparisons on pay. In most cases Westminster average pay for BME staff is more favourable, but the under representation in more senior positions has been noted.

Disability - The number of colleagues who have declared a disability is low; it equates to less than 5% of *all* staff at the University. Where there was a significant variance in pay which was actually in favour of the disabled colleagues; this was attributed to longer lengths of service.

Senior Staff - It became evident that in respect of some senior staff in Professorial and Dean of School 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.

Taking into consideration all of the above and whilst recognising that there may be legitimate reasons for pay gaps; we will continue to ensure that we have HR policies and practices in place that will help to close the gaps rather than widen them. Areas that we will monitor and work to strengthen include:

- Continue to promote pay transparency and consistent application of pay practices by embedding equal pay principles in all relevant HR policies and procedures and ensuring that measures are in place to minimise the risk of unequal pay practices. For example, having published salary scales, job evaluation and ensuring the effective implementation of the University's Equal Pay Policy. In August 2009 the University widely circulated its policy on starting salaries as introduced through the implementation of the Framework Agreement, aiding managers in applying a more robust and consistent process in determining starting salaries for new employees.
- Development programmes for managers and staff - The achievement of Investors in People in 2008, for the University's Corporate Services departments highlighted areas of particular strength or practice which included; Flexible working arrangements which support staff to achieve work life balance, and can provide a valuable retention tool and the Corporate Services Management Programme which has had a positive impact on skills and behaviours across managers in all departments. Its impact in generating a consistent understanding of management, consistency and coherence to University policies have been invaluable outcomes, which will enable the University to retain and develop high calibre members of staff and support those looking for work life balance in employment.
- Other equality areas – we have started to explore the possibility of collecting sensitive information in the areas of sexual orientation and religion and belief. Work has commenced on this in terms of developing a data capture form but due to the current financial challenge and staff reductions leading to a difficult climate, we have decided to delay carrying out a data capture exercise on these areas until the results of the 2010 Staff Engagement Survey have been analysed and the current restructuring and voluntary severance activities have been completed, this equality area will be reviewed again at the time of the next audit in 2012 and will consider the results of any data collection exercise that has been carried out and the comprehensive / accuracy of any data collected.
- Mandatory recruitment and selection briefing for all those involved in appointment processes supported by clear guidance on good recruitment and selection practices. HR Managers have increased their participation in interview panels, including academic appointment panels with the aim of embedding good practice and will continue to do so, within resource and practical constraints.
- Continuing to ensure our commitment to embracing diversity and promoting equality and working to ensure that there are no perceived barriers to progression for all staff. Three examples of this have been; the *Springboard* developmental programme for women, *Springforward* development programme for both men and women aspiring to be a manager and *Fresh Steps* for older male and female workers, designed to address their development needs and aims to enable participants to reassess their lives in order to identify and take steps that will help them to become the best they can be.
- Continue to promote flexible working and family friendly policies practices for *all* staff.
- Review reward and remuneration policies and procedures in line with legislation and best practice.

Prepared by:

Nicola Davies – HR Manager, Reward & Benefits
Fehmeeda Riaz – HR Manager, Equality & Diversity
Kapila Pindoria – HR Systems Officer

Appendix 7: Leadership Foundation for Higher Education - Key Indicators for Diversity Champions

A Visible commitment and involvement of the champion

1. Responsibilities of the Champion are to:

- 1 Ensure that the member of staff who has operational responsibility for equality and diversity at the highest level is appropriately trained, experienced and supported and is sufficiently senior to command respect within the institution. If she/he is not a member of the senior management team, provides regular opportunities for her/him to report to the team on initiatives and progress.
- 2 Ensure that the promotion of equality and diversity is made explicit in the overall institutional strategy and that the benefits of equality to the institution are underlined in the strategy.
- 3 Actively show personal commitment to equality and diversity through involvement in diversity events including giving presentations, chairing conferences, committees and steering groups.
- 4 Through knowledge of equality and diversity issues and confidence in dealing with them be able to brief current and potential supporters on the institution's equality and diversity strategy as well as gain and sustain their support in moving forward the equality agenda.
- 5 Win support from senior management for any workforce-related targets that might be set and for the means of monitoring them. Actively support initiatives aimed to target recruitment of under-represented groups.
- 6 Through on-going dialogue with staff groups note that staff feel that the senior management team is actively promoting equality.
- 7 Model good practice in equality and diversity, providing clear leadership to other managers.
- 8 Use language with due regard for the sensitivities of minority groups and shows zero tolerance of remarks by members of the institution that may be sexist, racist, homophobic, ageist or offensive to disabled people, people from religious minorities and other groups.
- 9 Be familiar with broad patterns within the staff profile, for example, have awareness of proportions of women/men, minority/majority ethnic staff on short-term contracts.
- 10 Ensure funding is available to support diversity initiatives.
- 11 Ensure that best practice is celebrated, rewarded and disseminated.

B Delegated responsibility

2. The Champion requires the Equality and Diversity Manager (or equivalent) to provide assurance that the following are in place, are adequately resourced and operationally effective:

- 1 The equality and diversity strategy.
- 2 Equality and diversity policies and procedures developed in line with current legislative requirements.
- 3 Staff induction programmes and printed and web-based information on equality and diversity matters.
- 4 Training programmes for members of interview panels and promotion committees.
- 5 Effective measures to eliminate bullying and harassment and other negative forms of behaviour.
- 6 Staff development programmes (especially for managers) and staff appraisal systems that incorporate equality and diversity matters.
- 7 Staff and student networking groups for diversity, including religious and LGBT groups with meaningful communication routes to senior managers.

- 8 Facilities and activities to support diverse groups such as disability access, flexible working patterns and special leave such as maternity and paternity leave.
- 9 Regular equal pay audits and the monitoring of pay decisions.
- 10 Links with relevant organisations including Equality Challenge Unit, Higher Education Academy, Equality and Human Rights Commission.

3. The Champion requires the Clerk to the Governors (or equivalent) to:

- 1 Ensure that the governors are well-briefed as regards the strategic direction of the institution in terms of equality and diversity and that they are appropriately trained and supported in this area;
- 2 Ensure that the agenda of the Board of Governors' meetings regularly includes items of the institution's initiatives with regard to equality and diversity and that there is an annual report on progress made in relation to both staff and students;

4. The Champion requires the Head of Management Information Systems (or equivalent) to:

- 1 Collect, analyse, interpret, present and report on demographic data on job applications, appointments and promotions;
- 2 Monitor and report on student recruitment, retention and progression by demographic groups;
- 3 Review management information systems and, where these are not fit for equality and diversity purposes, revise and develop them accordingly;
- 4 Provide information on the incidence of bullying and harassment related to gender, race, disability, sexual orientation, religion or belief and age.

5. The Champion requires the Heads of Faculties, Schools, Administrative Divisions (or equivalent) to:

- 1 Report annually on progress made in the implementation of the institution's equality and diversity strategy.