

Report to the NHS Somerset Clinical Commissioning Group on 23 September 2021

Title: Gender Pay Gap Narrative Somerset CCG: 31 March 2020	Enclosure H
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Version Number / Status:	1
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Clinical Lead:	N/A
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Summary and Purpose of Paper –

This paper has been produced to provide the data and accompanying narrative for the 2020 Gender Pay Gap submission.

The gender pay gap is the difference between the average (mean or median) earnings of men and women across a workforce and all organisations who have a headcount of 250 or more must comply with gender pay gap reporting by law.

The supportive narrative is not a legal requirement but is a recommendation to ensure that those who are reading the report understand the employer’s view of why a gender pay gap is present and what the employer has already done to analyse and close it.

Recommendations and next steps

The Governing Body is asked to approve the Gender Pay Gap Narrative for Somerset CCG for 2020 ahead of the data submission.

Impact Assessments – key issues identified

Equality	An Equality Impact Assessment has been produced and attached, however no negative impacts are expected.			
Quality	N/A			
Privacy	N/A			
Engagement	N/A			
Financial / Resource	N/A			
Governance or Legal	It is a legal requirement to publish the organisation’s gender pay gap data and this report supports compliance with this statutory duty.			
Risk Description	N/A			
Risk Rating	Consequence	Likelihood	RAG Rating	GBAF Ref

Somerset Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes – available from your Equality Officer

Organisation prepared for

Somerset CCG

Version

1

Date Completed

23 August 2021

Description of what is being impact assessed

Gender Pay Gap Narrative Report

Evidence

What data/information have you used to assess how this policy/service might impact on protected groups? Sources such as the [Office of National Statistics](#), [Somerset Intelligence Partnership](#), [Somerset's Joint Strategic Needs Analysis \(JSNA\)](#), Staff and/ or [area profiles](#), should be detailed here

The provision of gender pay gap data is a requirement for all organisations with a headcount of 250 or more. The aim of this reporting is to reduce the Gender Pay Gap across the UK and supports accurate assessment of this gap over time by the Office of National Statistics.
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/bulletins/genderpaygapintheuk/2020#main-points-april-2020>

The action plan and measures recommended within the report are supportive of the reduction in the gender pay gap for Somerset CCG.

Who have you consulted with to assess possible impact on protected groups? If you have not consulted other people, please explain why?

No, as the reporting of the Gender Pay Gap is a statutory duty, the organisation is required to make this submission in addition, the actions proposed in the gender pay gap are supportive of the reduction of the gap and do not negatively impact any protected group.

Analysis of impact on protected groups

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, make an assessment of the likely outcome, before you have implemented any mitigation.

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Age	<ul style="list-style-type: none"> No impact anticipated 	□	⊗	□
Disability	<ul style="list-style-type: none"> No impact anticipated 	□	⊗	□
Gender reassignment	The actions recommended to reduce the gender pay gap will benefit both cis and trans women. The full list of actions can be seen within the 'sex' section of this assessment.	□	□	⊗

Marriage and civil partnership	<ul style="list-style-type: none"> No impact anticipated 	□	⊗	□
Pregnancy and maternity	<ul style="list-style-type: none"> No impact anticipated 	□	⊗	□
Race and ethnicity	<ul style="list-style-type: none"> No impact anticipated 	□	⊗	□
Religion or belief	<ul style="list-style-type: none"> No impact anticipated 	□	⊗	□
Sex	<p>The impact of the Gender Pay Gap action plan is supportive to positive outcomes for women. The specific actions taken are:</p> <ul style="list-style-type: none"> to introduce a staff inclusion champion (whose remit will be supportive for the inclusion of all protected groups) to continue the offers of flexibility and remote working which positively support women (who are more likely to work part time https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/bulletins/genderpaygapintheuk/2019) to find suitable employment opportunities within positions at Somerset CCG Somerset CCG has joined the Women’s Network (which is open to people of all gender identities) and now have several colleagues within the network. We will continue to promote this network in our internal communications. To increase transparency in recruitment of senior posts, by ensuring that all roles at an 8a level and above are advertised externally, this ensures that all roles are open to both internal and external candidates such that the best candidate possible is 	□	□	⊗

	<p>appointed to our roles.</p> <ul style="list-style-type: none"> Increased requirements of our recruitment agencies, to ensure that there is a commitment to Equality and Diversity in their provision. To increase transparency in recruitment of very senior posts, including NED posts through the transition to the ICB arrangements. 			
Sexual orientation	<ul style="list-style-type: none"> No impact anticipated 	☐	☒	☐
Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.	<ul style="list-style-type: none"> No impact anticipated 	☐	☒	☐

Negative outcomes action plan

Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
No negative outcomes against any of the protected groups are anticipated	N/A	N/A	N/A	

If negative impacts remain, please provide an explanation below.

N/A

Completed by: Sophie Wainwright

Date 23 August 2021

Signed off by: Marianne King

Date 23/08/2021

Equality Lead/Manager sign off date: 23/08/2021

To be reviewed by: (officer name) N/A- a new EIA will be produced for each Gender Pay Gap report and action plan

Review date: N/A- a new EIA will be produced for each Gender Pay Gap report and action plan

GENDER PAY GAP NARRATIVE SOMERSET CCG 31 MARCH 2020

What Is The Gender Pay Gap?

Gender Pay Gap (GPG) legislation requires all employers of 250 or more employees to publish their gender pay gap information each year. The aim of GPG reporting is to show the difference between what women get paid at a workplace and what men get paid at the same organisation, irrespective of their jobs.

Gender pay reporting isn't the same as an equal pay audit. Where an equal pay audit compares like roles to one another, gender pay reporting looks at the average earnings of men and women across the organisation in all types of roles. It is therefore possible to have genuine pay equality but still have a pay gap between the genders.

What Information Needs To Be Published?

All public sector organisations with a headcount of 250 employees or more are required to publish gender pay gap information annually, both on their own website and on the government Gender Pay Gap portal: www.gov.uk/genderpaygap

In order to comply they must calculate and publish the following information:

- Their **mean gender pay gap**, which is the difference between the average hourly earnings of men and women
- Their **median gender pay gap**, which is the difference between the midpoints in the pay bands of hourly earnings of men and women.
- **Their proportion of males and females in each pay quartile pay**, where a list is drawn up of employee's earnings, from the highest to the lowest, and split it into four even groups, or pay quartile.

Where bonuses are awarded, organisations must also share:

- Their **mean bonus gender pay gap**, which is the difference between the average bonus awarded to men and women
- Their **median bonus gender pay gap**, which is the difference between the midpoints of bonuses awarded to men and women.
- **Their proportion of males and female receiving a bonus payment**

Somerset CCG's 2020 Gender Pay Gap Results

Our employees

80% of employees of Somerset CCG are female

20% of employees of Somerset CCG are male

Gender pay gap based on hourly rates of pay

Mean Gender Pay Gap: 29.64%

This means women in the CCG earn 70.36 pence for every £1 earned by men.

Median Gender Pay Gap: 16.45%

This means women in the CCG earn 83.55 pence for every £1 earned by men.

Pay Quartiles- Hourly Rate

Quartile	Female	Male	Female %	Male %
Lower	61	7	89.7%	10.3%
Middle Lower	59	9	86.8%	13.2%
Middle Upper	51	17	75%	25%
Higher	47	20	70.2%	29.8%
Overall	218	53	80.4%	19.6%

Gender pay gap based on bonuses

Somerset CCG does not have a bonus gender pay gap as no male or female staff are in receipt of bonus payments.

Results Analysis

In order to explore the causes of the gender pay gap within Somerset CCG, we are able to explore two additional factors to gain insight:

- The employment of men and women within pay bands, which will supplement the information provided in indicator 6.
- The proportion of men and women undertaking part time working, as part time workers have been found to have a larger pay gap than full time workers (Office for National Statistics, 2020)

Role Banding and Gender

Somerset CCG has an employee base which is predominately female, with 80% of all employees being women, by examining the percentage of men and women in each NHS Agenda for Change band with this in mind, we can highlight pay bands in which women are over or under represented.

Band	Female	Male	Total	Female %	Male %	% Difference from Organisational Distribution
Apprentice	2	0	2	100%	0%	+20%
3	1	1	2	50%	50%	-30%
4	37	3	40	93%	8%	+13%
5	22	2	24	92%	8%	+12%
6	70	11	81	86%	14%	+6%
7	30	8	38	79%	21%	-1%
8a	19	7	26	73%	27%	-7%
8b	14	5	19	74%	26%	-6%
8c	9	3	12	75%	25%	-5%
8d	6	2	8	75%	25%	-5%
VSM	3	1	4	75%	25%	-5%
Medical	9	7	16	56%	44%	-24%
NEDS & Chair	2	5	7	29%	71%	-51%

Key:

	Women are underrepresented in this band
	Women are overrepresented in this band

Note: where the difference is +/- 5%, this has not been considered to be indicative of an over or under representation of women

From this table, we can see that broadly women are overrepresented in a Band 6 and below roles (with the exception of those at Band 3), meaning that women are more commonly employed than men in these lower paid bands.

Looking at Band 7 and above, we can see that women are broadly underrepresented in these positions, however it is positive that the difference in representation is small (-7% or smaller) for those working under Agenda for Change (Band 7- Band 8d).

This said, women make up only 29% of those working in Non-Executive Director (NED) and Chair roles and 56% of GP roles, that women are more significantly underrepresented in these specific highly paid roles.

Part-Time Working Impact

Of those staff who work part time, 92 part-time workers are female and 22 part-time workers are male.

This means that 41% of the female workforce is part time, as compared to 40% of the male workforce.

As the percentage of staff working part time is broadly equitable between male and female members of staff, this indicates that the gendered distribution of part time working is not a significant contributor to the gender pay gap with Somerset CCG.

Conclusion

From the data examined in our banding analysis, occupational segregation, where women are more likely to work in low paid roles and men in high paid roles is likely to be the biggest driver of the Gender Pay Gap within Somerset CCG.

This understanding is added to by the difference seen in the median and mean gender pay gap figures. The median figure is considered to be the most representative figure for the gender pay gap, at 16.45%, with the mean more easily skewed by a small number of highly paid individuals.

As the median gender pay gap (29.64%) is larger than the median gender pay gap (16.45%) we can conclude that the gender pay gap is most influenced by the pay of highly paid individuals within the organisation.

What have we done so far?

Somerset CCG has made improvements on our Gender Pay Gap data from 2019, as seen below:

	March 2019	March 2020
Average Gender Pay Gap- Mean Average	37.36%	29.64%
Average Gender Pay Gap- Median Average	35.61%	16.45%

This is positive and suggests that initial measures to improve the Gender Pay Gap are supporting the reduction of this gap within the organisation.

This said, Somerset CCG commits to continue to:

- Offer shared parental leave and flexible working arrangements to all staff
- Ensuring that family friendly policies are up to date and accessible for staff
- Use an anonymised application processes to reduce unconscious bias in recruitment
- Ensure that all recruitment opportunities are advertised in a range of locations, including NHS jobs, Twitter, Facebook and LinkedIn and the NHS Executive Jobs page for specific board-level opportunities.
- Advertise all roles as open to flexibility with regard to hours, except in scenarios where this would be detrimental to the performance of the role itself
- Share opportunities for training with all staff through our staff communications
- Provide workplace equality and diversity training as part of our mandatory training requirements
- Support equality and diversity in all aspects of our work through our Equality Steering Group

Future Actions and Next Steps

Action	How	Progress	Completed by	Completion Date
Introduction of a staff inclusion champion to support the work of equality, diversity and inclusion across the organisation.	High Performing Organisation Team to support the introduction of this champion	This action has been achieved and a member of staff is now acting as the organisation's inclusion champion	HPO Team	1 July 2021
Continuation of support offered to staff to allow a continuation of remote working, to support flexibility for staff.	A 'new ways of working' survey has been provided to all staff to gain views as to how staff wish to work going forward.	The survey has been completed in July 2021 and the data is currently being analysed to commence planning to ensure that the new ways of working are supportive for all.	Corporate Business	1 January 2022
Somerset CCG to join the system networks, including the Women's Network	Somerset CCG's Equality and Diversity Officer to lead on this work through linking with system colleagues	This has been achieved and all CCG staff are now able to join system networks, including the Women's Network	Equality and Diversity Lead	1 June 2021
Further development of transparent recruitment practice for senior roles	All roles which are at Band 8a and above must be advertised externally to ensure that both internal and external candidates are able to compete for our more senior positions and supports the organisation in attaining the best talent available, supporting our aims for diversity and inclusion.	This process is now in place.	Recruitment Team	1 April 2021

<p>Increased requirement of recruitment agencies, when used, to demonstrate their position on improving Equality and Diversity</p>	<p>The use of recruitment agencies is limited within Somerset CCG, however, for very specific roles, executive agencies have supported recruitment practices. Where such engagements occur, details of the organisation's Equality and Diversity practices and policies will be reviewed ahead of commencement of work, to ensure a commitment to equal opportunities employment.</p>	<p>This process is now in place</p>	<p>Recruitment Team</p>	<p>1 July 2021</p>
<p>Further development of transparent recruitment for board level vacancies.</p>	<p>The transition to the Integrated Care System in April 2022 may present (depending on the regulations and guidance provided in respect of this transition) a further opportunity to consider specific fair advertising and recruitment of board vacancies.</p>	<p>Not yet commenced</p>	<p>HR and Recruitment Team</p>	<p>1 April 2022</p>