

EQUALITY ANALYSIS

This Equality Analysis considers the effect of Bury Council/ Bury CCG activity on different groups protected from discrimination under the Equality Act 2010. This is to consider if there are any unintended consequences for some groups from key changes made by a public body and their contractor partners organisations and to consider if the activity will be fully effective for all protected groups. It involves using equality information and the results of engagement with protected groups and others, to manage risk and to understand the actual or potential effect of activity, including any adverse impacts on those affected by the change under consideration.

For support with completing this Equality Analysis please contact corporate.core@bury.gov.uk / 0161 253 6592

SECTION 1 – RESPONSIBILITY AND ACCOUNTABILITY	
<i>Refer to Equality Analysis guidance page 4</i>	
1.1 Name of policy/ project/ decision	Pay Policy Statement 2021
1.2 Lead for policy/ project/ decision	Caroline Schofield, Strategic HR Lead
1.3 Committee/Board signing off policy/ project/ decision	<ul style="list-style-type: none"> • CCMT • JET • HR Portfolio • JCC • HRA • Council
1.4 Author of Equality Analysis	<i>Name:</i> Caroline Schofield <i>Role:</i> Strategic HR Lead <i>Contact details:</i> 01612535157 c.j.schofield@bury.gov.uk
1.5 Date EA completed	25 January 2021
1.6 Quality Assurance	<i>Name:</i> Chris Woodhouse <i>Role:</i> Strategic Partnerships Manager <i>Contact details:</i> c.woodhouse@bury.gov.uk <i>Comments:</i> The Pay Policy Statement is a statutory requirement. This EA should be kept live to show the impact of activity to mitigate any issues this highlights as requiring improvement.
1.7 Date QA completed	26/01/2021
1.8 Departmental recording	<i>Reference:</i> <i>Date:</i>
1.9 Next review date	Pay Policy Statement is an annual report – review therefore will be Dec 2021

SECTION 2 – AIMS AND OUTCOMES OF POLICY / PROJECT	
<i>Refer to Equality Analysis guidance page 5</i>	
2.1 Detail of policy/ decision being sought	In accordance with section 112 of the Local Government Act 1972, the Council has the “power to appoint officers on such reasonable

	<p>terms and conditions as the authority thinks fit". This Pay Policy Statement sets out the Council's approach to pay policy in accordance with the requirements of Section 38 of the Localism Act 2011.</p> <p>This policy statement will be subject to review on an annual basis. This year's Pay Policy Statement (2020-21) will be taken to Corporate Core Management Team on the 28th January 2021, Joint Executive Team on 1st February 2021, HR Portfolio on the 1st February 2021; JCC on 11th February 2021 and be agreed at Human Resources and Appeals Panel on 25th February 2021 and full Council on the 17th March 2021.</p>
<p>2.2 What are the intended outcomes of this?</p>	<p>The purpose of the statement is to provide transparency with regard to the Council's approach to setting the pay of its employees (excluding teaching staff working in local authority schools) by identifying:</p> <ul style="list-style-type: none"> • the methods by which salaries of all employees are determined; • the detail and level of remuneration of its most senior staff i.e. 'Chief Officers', as defined by the relevant legislation; • the constitutional arrangements in place for ensuring the provisions set out in this statement are applied consistently throughout the Council and recommending any amendments to the full Council.

SECTION 3 – ESTABLISHING RELEVANCE TO EQUALITY & HUMAN RIGHTS		
<i>Refer to Equality Analysis guidance pages 5-8 and 11</i>		
Please outline the relevance of the activity/ policy to the Public Sector Equality Duty		
General Public Sector Equality Duties	Relevance (Yes/No)	Rationale behind relevance decision
3.1 To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by Equality Act 2010	Yes	Pay Policy Statement reports on processes for ensuring that all employees are paid in a fair and transparent manner.
3.2 To advance equality of opportunity between people who share a protected characteristic and those who do not.	Yes	Pay Policy Statement reports on processes for ensuring that all employees are paid in a fair and transparent manner.
3.3 To foster good relations between people who share a protected characteristic and those who do not	No	
3.4 Please outline the considerations taken, including any mitigations, to ensure activity is not detrimental to the Human Rights of any individual affected by the decision being sought.		

N/A

SECTION 4 – EQUALITIES DATA

Refer to Equality Analysis guidance page 8

Protected characteristic	Outcome sought	Base data	Data gaps (to include in Section 8 log)
4.1 Age	Fair and equal pay for all employees		Data not currently reported upon in relation to pay
4.2 Disability		From 2021 we will be completing a Disability Pay Gap Report, and have run backdated data to 2018 for comparison purposes	
4.3 Gender		We have produced a Gender Pay Gap Report annually for many years	
4.4 Pregnancy or Maternity		Pay arrangements are in accordance with pregnancy/maternity leave guidance	N/A
4.5 Race		From 2021 we will be completing a Race Pay Gap Report, and have run backdated data to 2018 for comparison purposes	
4.6 Religion and belief			Too high a proportion of unknown data to make analysis effective – Trent data cleanse planned
4.7 Sexual Orientation			
4.8 Marriage or Civil Partnership			
4.9 Gender Reassignment			
4.10 Carers			
4.11 Looked After Children and Care Leavers			Data not collected
4.12 Armed Forces personnel including veterans			Data not collected – categories due to be added to Trent
4.13 Socio-economically vulnerable			Data not collected

SECTION 5 – STAKEHOLDERS AND ENGAGEMENT

Refer to Equality Analysis guidance page 8 and 9

	Internal Stakeholders	External Stakeholders
5.1 Identify stakeholders	Staff	Potential Employees

5.2 Engagement undertaken	Trade Unions Employees (and in future the Inclusion Group)	
5.3 Outcomes of engagement	Pay spine agreed nationally, and local pay arrangements in place.	
5.4 Outstanding actions following engagement (include in Section 8 log)	Potential review of Council's position re Foundation Living Wage. Gender pay gap data will be reported on and shared with stakeholders in the future to develop an action plan to address any discrepancies/inequalities identified.	

SECTION 6 – CONCLUSION OF IMPACT

Refer to Equality Analysis guidance page 9

Please outline whether the activity/ policy has a positive or negative effect on any groups of people with protected inclusion characteristics

Protected Characteristic	Positive/ Neutral Negative/	Impact (include reference to data/ engagement)
6.1 Age		
6.2 Disability	Neutral (some positive and some negative data)	<p>2018: Disabled employees are paid 4.9% more than the median and 1.60% less than mean salary for the Council as a whole</p> <p>2019: Disabled employees are paid 3.96% more than the median and 3.11% less than mean salary for the Council as a whole</p> <p>2020: Disabled employees are paid 1.98% more than the median and 3.66% less than mean salary for the Council as a whole</p> <p>Disability median is converging with that of the workforce as a whole, but the disability mean is diverging away which is a concern. One factor of note, is that disability declaration rates are higher for more senior staff, and are small in number, so a senior level appointment or resignation can have a significant impact on the figures. Gender pay gap data will be reported on and shared with stakeholders in the future to develop an action plan to address any discrepancies/inequalities identified.</p>
6.3 Gender	Negative	<p>2018: Female employees are paid 0.16% less than the median and 1.75% less than mean salary for the Council as a whole</p> <p>2019: Females are paid 2.41% less than the median and 1.50% less than mean salary for the Council as a whole</p> <p>2020: Females are paid 4.30% less than the median and 1.52% less than mean salary for the Council as a whole</p> <p>Bottom loading of the pay award accounts for the reduction in the mean figures, however further investigation is needed in respect of the increase in the median difference, especially as</p>

		many catering/cleaning staff are TUPE transfers away. Gender pay gap data will be reported on and shared with stakeholders in the future to develop an action plan to address any discrepancies/inequalities identified.
6.4 Pregnancy or Maternity	Neutral	Pay as per policy – employees included in gender pay gap figures
6.5 Race	Negative	<p>2018: BAME employees are paid 4.49% less than the median and 6.23% less than mean salary for the Council as a whole</p> <p>2019: BAME employees are paid 3.71% less than the median and 6.85% less than mean salary for the Council as a whole</p> <p>2020: BAME employees are paid 5.50% less than the median and 5.32% less than mean salary for the Council as a whole</p> <p>These figures consistently show that BAME staff are on average paid less than White British staff, although the figure has improved since 2019. However the fluctuations exist due to the relatively small number of BAME staff. Gender pay gap data will be reported on and shared with stakeholders in the future to develop an action plan to address any discrepancies/inequalities identified.</p>
6.6 Religion and belief	Neutral	
6.7 Sexual Orientation	Neutral	
6.8 Marriage or Civil Partnership	Neutral	
6.9 Gender Reassignment	Neutral	
6.10 Carers	Neutral	
6.11 Looked After Children and Care Leavers	Neutral	
6.12 Armed Forces personnel including veterans	Neutral	
6.13 Socio-economically vulnerable	Neutral	
6.14 Overall impact - What will the likely overall effect of your activity be on equality, including consideration on intersectionality?		Using data to develop action plans to improve equality across all protected characteristics, particularly race, disability and gender

SECTION 7 – ACTION LOG

Refer to Equality Analysis guidance page 10

Action Identified	Lead	Due Date	Comments and Sign off (when complete)
7.1 Actions to address gaps identified in section 4			
Complete Race, Disability and Gender Pay Gap Reports annually.	CS		

Take steps to reduce the amount of unknown data held on Trent across all protected characteristics	CS		
7.2 Actions to address gaps identified in section 5			
7.3 Mitigations to address negative impacts identified in section 6			
WRES action plan			
Adopting the WDES and develop an action plan			
Investigating discrepancies in areas with negative impact; Consult with stakeholders; Develop actions/plan			
7.4 Opportunities to further inclusion (equality, diversity and human rights) including to advance opportunities and engagements across protected characteristics			

SECTION 8 - REVIEW			
<i>Refer to Equality Analysis guidance page 10</i>			
Review Milestone	Lead	Due Date	Comments (and sign off when complete)
12 months	CS	April 2021	

Please make sure that every section of the Equality Analysis has been fully completed. The author of the EA should then seek Quality Assurance sign off and departmental recording.

SECTION 9 – QUALITY ASSURANCE		
<i>Refer to Equality Analysis guidance page 10</i>		
Consideration	Yes/ No	Rationale and details of further actions required
Have all section been completed fully?	No	<p>Section 4 – data to be included where available. If gaps that require addressing timescales for these to be identified.</p> <p>Section 5 – detail to be included on timescales and approach of engagement undertaken to date and that still to take place. Potential to engage with Inclusion Working Group</p> <p>Section 6 6.1 Not completed 6.3 Clear action in terms of median difference to be</p>

		<p>outlined and detailed in section 7</p> <p>6.5 Mitigations to address negative impact to be identified.</p> <p>Section 7</p> <p>Leads and timescales required for each action</p>
Has the duty to eliminate unlawful discrimination, harassment, victimization and other prohibited by the PSED and Equalities Act been considered and acted upon?	Partial	Reporting of Pay Policy Statement is in adherence with statutory regulation and provides data with which to inform future activity. EA to evolve to detail how this data will inform policies, procedures and decisions to act upon statement.
Has the duty to advance equality of opportunity between people who share a protected characteristic and those who do not been considered and acted upon	Partial	Reporting of Pay Policy Statement is in adherence with statutory regulation and provides data with which to inform future activity. EA to evolve to detail how this data will inform policies, procedures and decisions to act upon statement.
Has the duty to foster good relations between people who share a protected characteristic and those who do not, been considered and acted upon	Yes	Adherence with statutory requirement across protected characteristics.
Has the action log fully detailed any required activity to address gaps in data, insight and/or engagement in relation to inclusion impact?	Partial	Some gaps in identifying leads, timescales and actions as a result of data findings.
Have clear and robust reviewing arrangements been set out?	Partial	Review in 12 months scheduled but interim update on mitigations would be beneficial.
Are there any further comments to be made in relation to this EA	No further comment	