

BANES, WILTSHIRE AND SWINDON CLINICAL COMMISSIONING GROUP

GENDER PAY GAP REPORT 2021



1. Executive Summary

This report provides BSW CCG's statutory disclosure on the gender pay gap. It includes figures as of 31 March 2021, and reviews the gender pay gap figures for September 2020. A comparison of the progress in addressing the BSW CCG's gender pay gap is reported on from the position in September 2020 to the current position as of 31 March 2021.

An analysis of the gender pay gap report is presented looking at the mean and median gender pay gap, and the proportion of males and females in each quartile pay band. BSW CCG do not pay staff bonuses; therefore, reporting on bonuses does not apply to the CCG and this is not covered in this report. An analysis has been carried out in relation to the difference in the hourly pay rate between males and females for each pay band and ad hoc pay scales across BSW CCG.

We are pleased to report that the mean hourly rate for females has improved from £19.76 in September 2020 to £21.66 as of 31 March 2021. The mean hourly rate for males has decreased from £39.92 in September 2020 to £35.90 as of 31 March 2021. This is a mean hourly rate difference of £14.24 as of 31 March 2021, compared to a mean hourly rate difference of £20.16 in September 2020.

Therefore, the overall mean gender pay gap has decreased from 50.52% to 39.67% as of 31 March 2021.

A narrative is provided for the results of the mean and median gender pay, and the proportion of males and females in each quartile pay band, to explain the possible reasons for the pay gap within each of these areas, and to discuss what the data means to BSW CCG.

Benchmarking data against the 2011 census and NHS Workforce figures for gender has been undertaken and the female composition of the BSW CCG workforce is significantly higher compared to the percentage of females within the BSW population and 3.58% higher than the whole NHS workforce in relation to females. The number of females within the BSW workforce has increased by 0.38% since September 2020 and was 80.58% as at 31 March 2021.

A summary is presented to identify the main areas where BSW CCG needs to focus, and a discussion on the next steps that the CCG needs to take to further close the gender pay gap.

Some of these actions include reviewing BSW CCG's recruitment, selection and appointment process to ensure there is no gender bias, to continue to hold training on unconscious bias and Equality, Diversity and Inclusion training, and mandatory recruitment training is in place for all line managers to attend. We will also continue to monitor applicants by gender to ensure our recruitment campaigns appeal to both male and female

candidates. A further review will be undertaken on the CCG's gender pay gap against national trends and to highlight where additional actions are required. Benchmarking is underway against other CCG's gender pay, amongst other key actions to continue to address the gender pay gap at BSW CCG.

BSW CCG is committed to further addressing the gender pay gap and to improve on the organisation's position. An action plan has been agreed and is in place, with a range of initiatives and key actions that have been identified, to enable BSW CCG to further close the gender pay gap.

2. Introduction

Organisations with more than 250 employees are required by law to publish their gender pay gap every year. The gender pay gap shows the difference in the average pay between men and women in an organisation.

3. Definitions and Scope

The Equality Act 2020 (Gender Pay Gap Information) Regulations 2017 (the act) requires public authority employers to base their employee data on the 'snapshot' date of 31 March each year. It is required to be published on the 30 March of the following year. BSW CCG welcomes the opportunity to publish this information and to take a collaborative approach beyond compliance to promote gender equality across the organisation and within all policies, procedures, and practices. Equal pay means that men and women in the same employment who are performing equal work must receive equal pay, as set out in the Equality Act 2010 (equal pay for work of equal value).

The gender pay gap should not be confused with equal pay, which is covered in the Equal Pay Act 1970. The gender pay act prohibits less favourable treatment between men and women in relation to their terms and conditions of employment. Equal pay is about work of equal value receiving equal pay. If an employer has a gender pay gap this does not necessarily mean that there is an equal pay issue. A gender pay gap might show that there are less women in higher paid jobs, but not that they are being paid less for doing the same or equivalent roles as men.

The gender pay gap is a measure that shows the difference in average earnings between men and women across an organisation or the labour market. There are six steps to gender pay gap reporting these include: -

1. Step one: Planning the report
2. Step two: Use ESR reports to produce the figures
3. Step three: Enter the data into the government website
4. Step four: Analyse the reasons behind the figures
5. Step five: Write a narrative

6. Step six: Create an action plan to the narrative

This will be BSW CCGs first Gender Pay Gap report which is based on data as at 31 March 2021. The BSW CCG must report and publish gender pay gap information by 30 March of the following year. Due to Covid-19 publishing requirements for the Gender Pay Gap 2020 were put on hold but have recently been re-instated. The report will be published on the CCGs external Equality and Diversity webpage and the CCG intranet site.

Since 31 March 2017, all public sector organisations in England employing more than 250 staff have been required to publish annually their gender pay gap information.

NHS bodies such as the CCGs must follow the Equality Act 2020 (Specific Duties and Public Authorities) Regulations 2017 to calculate and publish the following information:

1. Mean gender pay gap
2. Median gender pay gap
3. Their mean bonus gender pay gap (CCGs do not pay staff bonuses)
4. Their median bonus gender pay gap (CCGs do not pay staff bonuses)
5. Their proportion of males receiving a bonus payment (CCGs do not pay staff bonuses)
6. Their proportion of females receiving a bonus payment (CCGs do not pay staff bonuses)
7. Their proportion of males and females in each quartile pay band

The CCG will therefore be reporting on the mean gender pay gap, the median gender pay gap and the proportion of males and females in each quartile pay band. The CCG do not pay staff bonuses; therefore, reporting on bonuses does not apply to the CCG. (Reporting on 1, 2 and 7 above).

A mean¹ average and a median² average. Using these two different types of average is helpful to give a more balanced overview of an employer's overall gender pay gap. The gender pay gap shows the difference between the average (mean or median) earnings of men and women in an organisation. It is expressed as a percentage of earnings. Mean averages are useful because they give a good overall indication of the gender pay gap, but very large or small pay rates can 'dominate' and /or distort the results. For example, a median average might show a better indication of the 'middle of the road' pay gap whereas a mean average might be distorted by very highly paid specific employees and board members, but it could also fail to pick up as effectively where the pay gap issues are most pronounced, for example in the lowest paid or highest paid employees

4. Gender Pay Gap Data

¹ Mean average - add up all the numbers, then divide by how many numbers there are.

² Median average is the middle number in a sorted, ascending or descending, list of numbers

TABLE BELOW SHOWS HEADCOUNT & FTE FOR THE YEAR APRIL 2020 – MARCH 2021

Please note the headcount figures do not include bank colleagues.

CCG	Apr 20	May 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21
Headcount	376	381	383	380	390	394	392	392	396	406	413	412
FTE	323.43	329.13	331.27	325.98	330.53	330.90	332.16	331.54	334.33	344.66	351.44	353.08

The table and graph below highlight that the biggest increases from April 20 to March 21 in relation to FTE have been within the Medical Directorate by 31.82 FTE and the Nursing and Quality Directorate by 12.64 FTE. Within the Medical Directorate 12 Clinical Leads were recruited during August and October 2020 and several new colleagues joined the Prescription Ordering Department and Medicines Management Team which also sit under the Medical Directorate.

Within the Nursing and Quality Directorate there were 8 new recruits who joined the Continuing Healthcare team, 4 new recruits to the Nursing and Quality Programme and new colleagues also joined the Safeguarding, Exceptions and Prior Approval, and Mental Health and Individualised Commissioning Teams.

Directorate	Headcount (Mar 21)	FTE (Mar 21)	FTE (Apr 20)
983 Corporate Services Directorate	26	24.24	27.09
983 Executive Directorate	28	15.61	17.12
983 Finance Directorate	60	56.87	49.56
983 Locality Directorate - BaNES	11	9.96	9.56
983 Locality Directorate - Swindon	10	10.00	12.64
983 Locality Directorate - Wiltshire	11	10.44	7.00
983 Medical Directorate	110	84.34	52.52
983 Nursing & Quality Directorate	83	77.49	64.85
983 Strategy & Transformation Directorate	68	60.83	70.15
983 Workforce & OD Directorate	5	3.30	16.08
Total	412	353.08	326.57

5. BENCHMARKING DATA AGAINST 2011 CENSUS AND NHS WORKFORCE FIGURES FOR GENDER

The table below shows how the CCG workforce compares to the BSW population it serves and the NHS workforce in relation to gender.

The table highlights that the female composition of the CCG workforce is significantly higher compared to the percentage of females within the BSW population and 3.58% higher than the whole NHS workforce in relation to females. The number of females within the BSW workforce has increased by 0.38% since September 2020.

With regards to the male composition of the BSW CCG workforce, this is significantly lower compared to the percentage of males within the BSW population and slightly lower compared to the NHS workforce in relation to males, 2.58%. The number of males within the BSW workforce has decrease by 0.38% since September 2020.

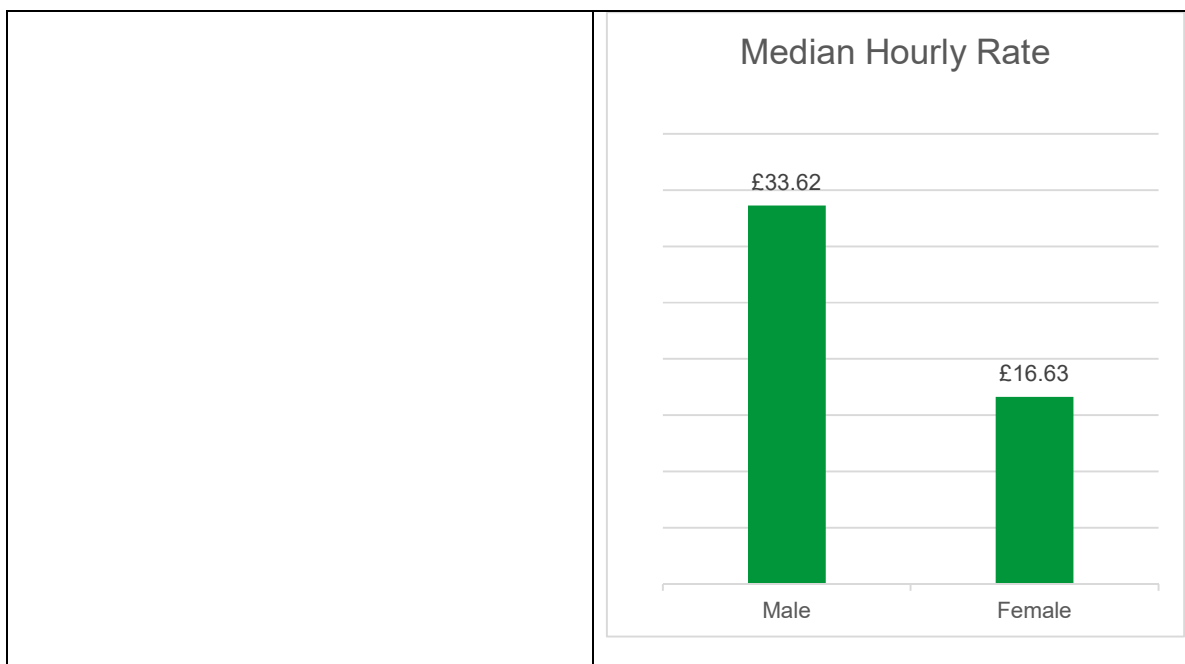
Female				Male			
2011 Census statistics (England) of population	% of NHS workforce who are female	CCG (30 Sept 20)	CCG (31 March 21)	2011 Census statistics (England) of population	% of NHS workforce who are male	CCG (30 Sep 20)	CCG (31 Mar 21)
50.82%	77%	80.20%	80.58%	49.18%	22%	19.80%	19.42%

The data above shows that there are considerably more female staff employed in the NHS - 77% females and 22% males. As shown above within the CCG as at 31 March 2021 females equated for 80.58% of the workforce compared to 19.42% of the workforce being males. So females employed in the CCG is slightly more than the NHS as a whole.

6. The Gender Pay Gap for BSW CCG as at 30 September 2020

The chart below shows that the mean hourly rate of pay for males is £20.17 higher than that of females, a gender pay gap of 50.52%.

The second chart shows that the median pay for males is £16.98 higher than females, a gender pay gap of 50.52%.



As at 30 September 2020

The mean pay gap is the difference between the pay of all male and all female colleagues when added up separately and divided respectively by the total number of males and the total number of females in the workforce.

The median pay gap is the difference between the pay of the middle male and middle female when all employees and then all female employees are listed from the highest to the lowest paid.

7. BSW CCG'S GENDER PAY GAP AS AT 31ST MARCH 2021

The gender pay gap is defined in the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 and means the difference between the average hourly earnings of men and women. It is unlawful to pay people inequitably because of gender. The gender pay gap highlights any disparity of average pay across an organisation. BSW CCG is required by law to report on and publish their gender pay gap on a yearly basis based on a snapshot from 31st March each year. Previously the legacy CCGs were not required to do this as they had less than 250 employees. BSW CCG will be required to publish their gender pay gap report by 30 March of the following year on both the government website and the CCG website.

The majority of BSW CCG colleagues are on Agenda for Change pay scales, which provide a clear process of paying employees equally, irrespective of their gender. CCG job descriptions for roles (excluding VSM and ad hoc roles) are evaluated using the national NHS job evaluation system and from this evaluation process a band is identified for the role based on the skills and experience required to undertake the role and the duties and responsibilities that make up the role.

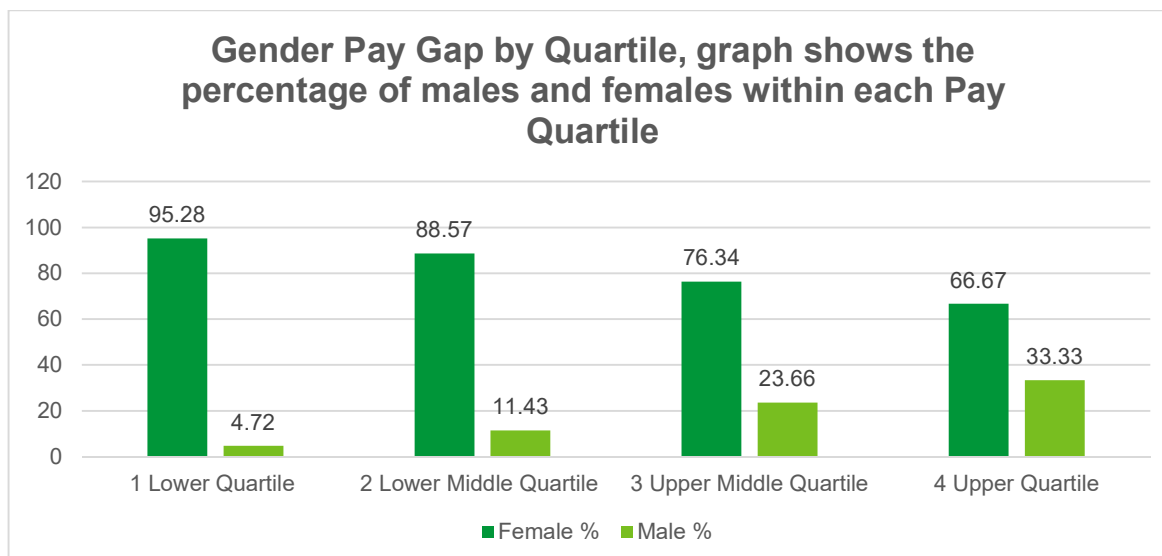
The table below shows that the *mean* hourly rate of pay for males is £12.90 higher than that of females within the CCG, a gender pay gap of 39.67%. This has significantly reduced since the CCG reviewed its gender pay gap in September 2020 where the gender pay gap based on average hourly rate was 50.52% and a difference of £20.17 between males and females' average hourly rate.

The data also demonstrates that the *median* pay for males is £7.81 higher than females, a gender pay gap of 28.73%. Again, this has significantly reduced since the gender pay gap was reviewed in September 2020, where the gender pay gap based on the median pay was 50.52% and a difference of £16.98 between males and females' median hourly rate.

Gender	Mean Hourly Rate £	Median Hourly Rate £
Male	35.90	27.19
Female	21.66	19.37
Difference	14.24	7.81
Pay Gap %	39.67%	28.73%

As at 31 March 2021

The pay gender data has also been split into pay quartiles (blocks of 25%) and show the proportion of males and females in each quartile. The results of the split are shown below, as at 31st March 2021.



Analysis has been carried out in relation to the difference in the hourly pay rate between males and females for each pay band and ad hoc pay scales and the table below shows:

- Females earn more than males in the lower pay bands, bands 2 to 5 and band 7 and 8b.
- Males earn more than females in band 6 and 8a and the highest pay bands, 8c to 9 and ad hoc salaries
- There are no males in band 4, compared to 34 females.
- There are 36 females in band 6, compared to only 5 males but the males earn more per hour than the females
- The male hourly rate is higher at band 6 - £18.47, compared to £17.54 for the female hourly rate.
- The female hourly rate at band 7 is slightly higher at £21.56, comparative to the male hourly rate of £20.92.
- The male hourly rate at band 8a is slightly higher at £24.41, compared to £24.32 for female staff.
- The female hourly rate at band 8b is slightly higher at 28.84, compared to the male hourly rate of £27.59, a difference of £1.24.
- Males earn £2.27 more per hour within pay band 8c compared to females.
- Males earn £6.68 more than females within the ad hoc salaries & VSM pay scales.

	Quartile	Female Headcount Less than 10	Female Headcount more than 10	Male Head count Less than 10	Male Head count More than 10	Female Average Hourly rate £	Male Average Hourly rate £	Difference £ Female V Male Hourly rate
Band 2	1 Lower Pay Quartile	Yes		Yes		9.89	0.00	NA
Band 3			Yes	Yes		10.47	10.38	+£0.09
Band 4			Yes	Yes		11.95	0.00	NA
Band 5	2 Lower Middle Quartile		Yes	Yes		14.24	13.32	+£0.92
Band 6			Yes	Yes		17.54	18.47	-£0.93
Band 7			Yes	Yes		21.56	20.92	+£0.64
Band 8a	3 Upper Middle Quartile		Yes		Yes	24.32	24.41	-£0.09
Band 8b			Yes	Yes		28.84	27.59	+£1.24
Band 8c			Yes	Yes		34.12	36.39	-£2.27
Band 8d		Yes		Yes		42.22	42.35	-£0.13
Band 9		Yes		Yes		51.36	51.75	-£0.39
Ad Hoc & VSM	4 Upper Quartile		Yes		Yes	58.13	64.81	-£6.68

Therefore, in reviewing the above information, and considering the differences in the male and female hourly rates there are various factors which may be causing this pay gap, including length of service as traditionally the rate of pay has increased with length of service.

Women taking on childcare commitments or taking a career break may be a factor that has caused them to have shorter length of service and has contributed to the gender pay gap.

8. Proportion of Males and Females by Quartile Pay Bands

The above figures can be used to establish if the quartiles are representative of the CCGs workforce profile by gender.

Lower Quartile Pay Band (Bands 2, 3 & 4)

- Female staff are overrepresented in this quartile when compared to the combined workforce by female or a male.

Lower Middle Quartile Pay Band (Bands 5, 6 & 7)

- Female staff are overrepresented in this quartile when compared to the combined workforce by female and male. Through the overrepresentation is slightly lower in this quartile compared to the Lower Quartile Pay Band.

Upper Middle Quartile Pay Band (Bands 8a, 8b, 8c, 8d & 9)

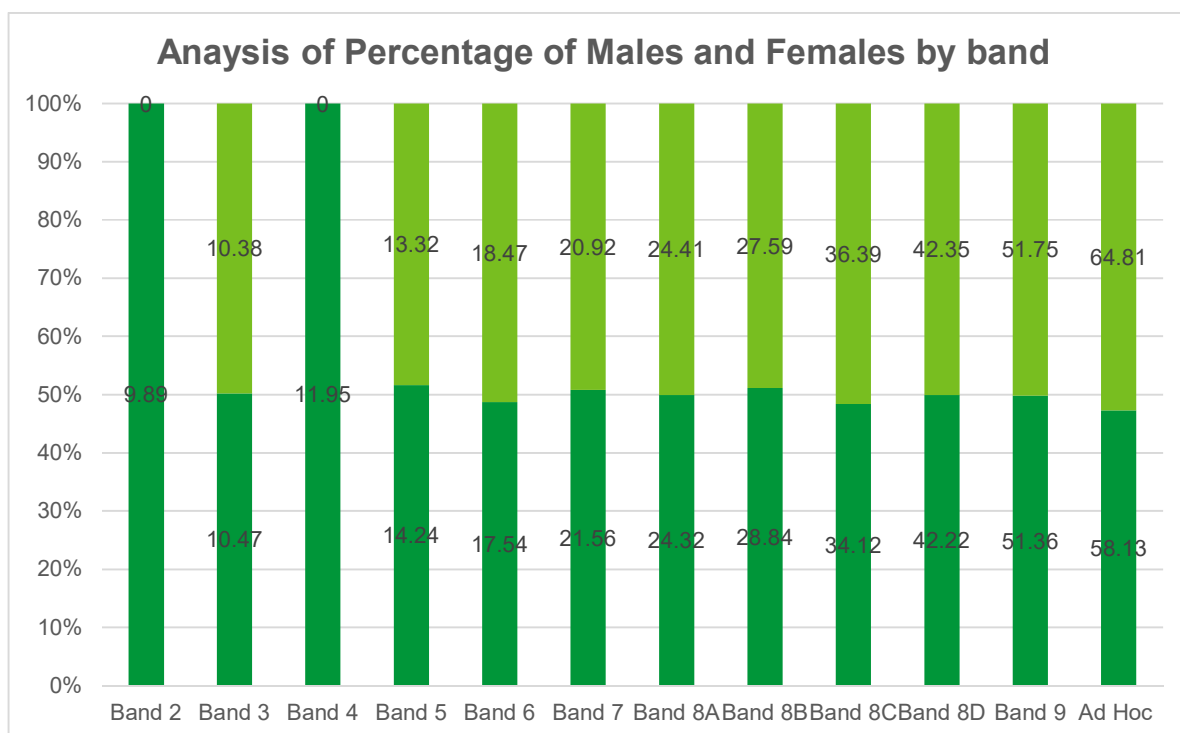
- There are more females than males represented when compared to the overall workforce, however the hourly pay rate for males is £2.27 per hour higher than females in band 8c. Further work is required to reduce this pay gap and to ensure parity. Next steps are detailed within the action plan, to address this.

Upper Quartile Pay Band (Ad hoc salary scales & VSM)

- Female staff are overrepresented in this quartile when compared to the combined workforce by female or male, however males earn £6.68 per hour more than females. This demonstrates that there is further work to be undertaken to reduce this pay gap within the more upper pay quartile pay bandings.

The reasons for overrepresentation in the lower and lower middle quartile may be attributed to historical factors such as preferred part time working arrangements for women with families or who have carer commitments. It is important to consider the various types and roles available as well as other considerations within the organisation and the different gender profiles that occur within specific roles.

This graph below shows the percentage of males and females by banding and shows that within the lower pay bands females occupy a higher percentage of Bands 2 and 4, and males occupy a slightly higher percentage from Bands 8b upwards.



Dark Green – Females

Lighter Green - Males

9. Next steps regarding Gender Pay Gap

This full gender pay gap report as required by law and is based on the workforce composition as at 31st March 2021. This report provides an in-depth analysis to examine the gender composition within each pay band. The findings of this first report will be shared with the Executive Team, Governing Body and Colleague Partnership Forum for their input, with a view to developing further reporting and monitoring and to work towards the gender pay gap action plans in 2021/2022.

The 2021 Gender Pay Gap Report will be published both internally and in the public domain. Following this report an action plan will be developed, which will aim to address any inequalities experienced by men or women in the workforce and to enhance the experiences for both genders within BSW CCG.

10. Summary

The gender pay gap at BSW CCG has reduced since 2020. The overall mean gender pay gap has decreased from 50.52 % to 39.67% as of 31 March 2021 and there has been an increase to the mean hourly rate for females from £19.76 in September 2020 to £21.66 as of 31 March 2021. This shows that improvements are being made and the pay gap is being reduced for BSW CCG.

The reasons for the overrepresentation of females in the lower and lower middle quartile may be attributed to historical factors such as preferred part time working arrangements for women with families or who have carer commitments. Therefore, it is important to consider the various types and roles available within the organisation and that all roles should be available on a part time or flexible working pattern.

In order to understand what may have contributed to the difference in the rates of pay between males and females, we will complete a deep dive analysis for all colleagues that currently occupy Band 6, Band 8c and Ad Hoc & VSM to review all factors in the determination of pay to identify which factors have impacted on the mean hourly pay gap.

Further work will also be undertaken to benchmark the gender pay gap variance against like for like organisations in the NHS, and to review the gender pay gap of BSW to other similar organisations, this is further outlined within the recommendations section of this report.

11. Recommended Actions for the CCG:

Recommendation	Actions Underway	Action Required	Target Date	Responsible for Action
To review all roles that are advertised and ensure that there is consideration to roles being available on a part time/flexible working basis.	The HR Framework has been published and asks all organisations to review flexible working options	Review of roles due to advertisement. Review of appointments made to less than full time	April 2022	CSU HR
To check for any gender bias within the CCGs recruitment, selection and appointment process.	We have held training on unconscious bias and EDI and have plans in place for mandatory recruitment training for all line managers.	To review the Recruitment, Selection and appointment process documentation and policies.	April 2022	CSU HR
To further monitor applicants by gender and to report on the outcome in the 2022 gender pay gap report.	To continue to monitor applicants by gender.	To monitor the applications received by gender and provide reporting for this.	April 2022	CSU HR
To complete a deep dive analysis for all colleagues in Band 6	Currently reviewing all colleagues in Band 6 to identify the factors that have influenced a higher mean average rate of pay for males	Review all factors in the determination of pay to identify which factors have impacted the mean hourly pay gap.	May 2022	CSU HR / CCG People Team
To complete a deep dive analysis for all colleagues in Bands 8c and Ad Hoc & VSM	Recommendations in the CCG GPG report	Review all factors in the determination of pay to identify which factors have	May 2022	CSU HR / CCG People Team

Recommendation	Actions Underway	Action Required	Target Date	Responsible for Action
		impacted the mean hourly pay gap.		
To benchmark the GPG variance to like for like organisations in the NHS	Currently collecting this data	To review the GPG gap of BSW to other similar organisations	May 2022	CSU HR