

BSW CCG GENDER PAY GAP REPORT

MARCH 2022

1. What is the gender pay gap?

The **gender pay gap**...

...is the difference between the average earnings of men and women, expressed relative to men's earnings.

The **mean pay gap**...

...is the difference between average hourly earnings of men and women.

The **median pay gap**...

...is the difference between the midpoints in the ranges of hourly earnings for men and women.

2. What about equal pay?

Equal pay deals with the pay differences between men and women who carry out the same or similar jobs. It has been a statutory entitlement since the Equal Pay Act was introduced in 1970.

Paying men and women differently for the same or like work is unlawful, however it is possible to have pay equality at the same time as having a gender pay gap.

The gender pay gap differs from equal pay as it is concerned with the differences in the average pay between men and women over a period of time no matter what their role is.

Gender pay gap analysis does not look at whether there are differences in pay for men and women in equivalent posts. Neither does it take into consideration the differences in the numbers of people in each role. Therefore, results will be affected by differences in the gender composition of different professional groups and job grades.

The national NHS terms and conditions 'Agenda for Change' pay system introduced in October 2004 ensures that pay in the NHS is consistent with the requirements of equal pay law.

The data collected for this report was collected on 31st March 2022 and is almost a year old. It was collected prior to the transition of BSW CCG to BSW ICB, for the purposes of this report BSW ICB will be referred to as BSW CCG which was formed on 1st April 2020.

It should be noted that a fresh set of gender pay gap data will be downloaded the week commencing 3rd April 2023 for the snapshot period 31st March 2023. Due to the data within this report being nearly a year old; the then BSW CCG having being abolished and BSW ICB being established; and national changes having been made to the AfC pay scales from 1st April 2022, it is proposed that recommendations and actions moving forward are based on the data reported as at 31st March 2023 rather than in this report. In addition, there have been

significant internal changes during the last year that may have also impacted on current results. However, it is still noted that some activity to address the gender pay gap is already underway or scheduled for completion by April 2023 based on the this 31st March 2022 gender pay gap data. Further information is detailed in section 7 of this report.

3. Gender Pay Gap Reporting Requirements

Gender Pay Gap reporting is a requirement for all organisations with more than 250 staff.

The specific requirements of the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 are to publish information for **six specific measures** (calculations).

- a) Average gender pay gap as a mean average
- b) Average gender pay gap as a median average
- c) Proportion of men and women when divided into four groups ordered from lowest to highest pay
- d) Average bonus gender pay gap as a mean average
- e) Average bonus gender pay gap as a median average
- f) Proportion of men receiving a bonus payment and proportion of women receiving a bonus payment

Bonus payments are not paid to BSW CCG colleagues and therefore we have not presented any information for these measures (d, e, f).

4. Our Gender Pay Gap 2022

Background

BSW ICB was formed on the 1st July 2022.

This is the CCG's second Gender Pay Gap Report following the headcount reaching over 250 colleagues. BSW CCG was established on 1st April 2020 and we collected our data for this report on 31st March 2022 (the snapshot date) for the reporting period 2021/22.

Tables 1 & 2 compares data from 2021 to 2022, the tables below show a headcount increase from 372 in 2021 to 430 in March 2022 and an increase of 1 on the VSM/Ad Hoc pay scale, the Ad Hoc PayScale is predominately used for Clinical Leads/Medical Grade

Table 1 – March 2022 Data

Pay Band	Headcount	By %
Very Senior Manager (VSM)	17	3.51%
Ad Hoc	36	7.45%
Pay Band 2-9	430	89%

Table 2 – March 2021 Data

Pay Band	Headcount	By %
Very Senior Manager (VSM) /Ad Hoc	52	12.26%
Pay Band 2-9	372	87.74%

Beyond Band 9, the framework for the remuneration of VSM's is set by the Department of Health, through the VSM Pay Framework.

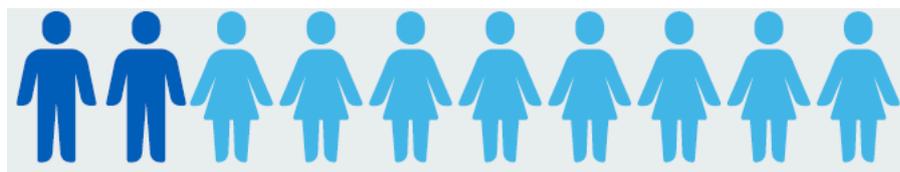
The remaining 89% of the workforce is covered by the NHS Agenda for Change contract, and 7.45% (36) on local terms and conditions (Ad hoc) developed for Clinical Leads which also adheres to the principles of equal pay.

In table 3, the number of females in BSW workforce had increased from 344 in March 2021 to 389 in March 2022, an overall increase of 44 headcount.

The number of males in BSW workforce had increased from 80 in March 2021 to 94 in March 2022.

Table 3

Year	Workforce	Male	Female
2021	424	80 (18.87%)	344 (81.13%)
2022	483	94 (19.46%)	389 (81.72%)



In common with the NHS as a whole, the BSW CCG workforce was predominately female. Given 81.72% of our colleagues are women, it is also the case that women outnumber men in every quartile.

The NHS workforce (circa 1.3 million staff) as stated by NHS Employers, is made up of 77% women and 23% men. The female composition of the BSW CCG workforce was therefore a little higher than the composition of the overall NHS workforce, whilst the male composition was lower.

An overview of our Gender Pay Gap is provided below

BSW CCG recognises although there is some progress, there is a gender pay gap in the organisation.

Based on the Government's calculation methodology, table 4 shows the mean gender pay gap for BSW decreased in March 2022 by 4.76% compared to the data of March 2021.

The median gender pay gap of March 2022 also decreased by 2.09% compared to the data of March 2021.

Table 4

Year	Mean	Median
2021	35.74%	28.75%
2022	30.98%	26.66%

This means that at the time of the report our average male salary (mean or median) was higher than our average female salary.

Women earned 73p for every £1 that men earned when comparing median hourly pay. Their median hourly pay is 7.25% lower than men's.

Table 5

	Women's earnings are:
Mean gender pay gap in hourly pay	30.98% lower
Median gender pay gap in hourly pay	26.66% lower
Women earn 73p for every £1 earned by men	

Table 6

Gender	Mean Hourly Rate	Median Hourly Rate
Male	33.8951	27.2164
Female	23.3913	19.9586
Difference	10.5039	7.2579
Pay Gap %	30.9893	26.6672

Proportion of men and women in each pay quartile (%)

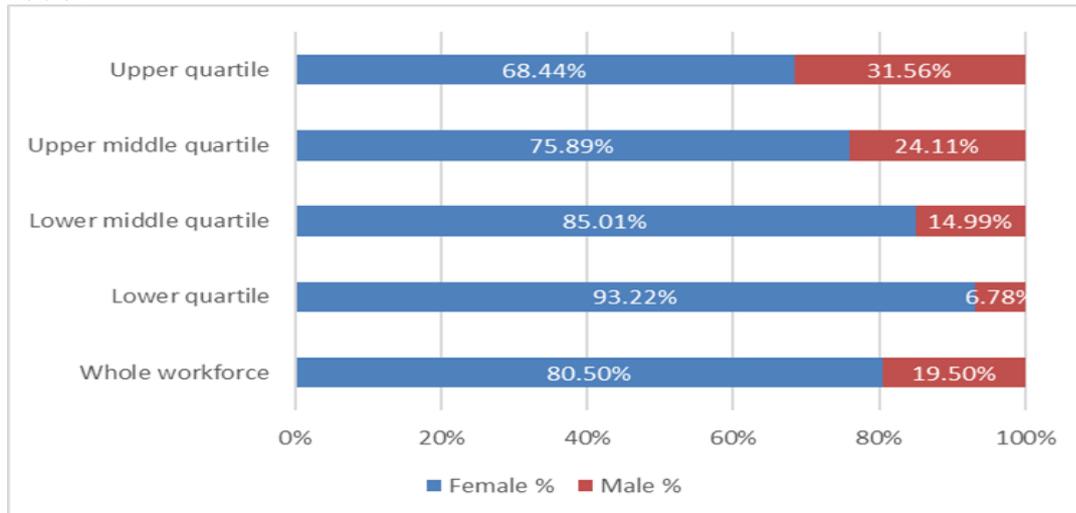
Pay quartiles are calculated by splitting all colleagues in BSW into four even groups according to their level of pay. Looking at the proportion of men and women in each quartile gives an indication of the gender representation at different levels throughout BSW CCG.

Table 7 shows women occupied 93.22% of the lowest paid jobs and 68.44% of the highest paid jobs. Compared to the GPG data of March 2021, women occupied 95.24% of the lowest paid jobs and 66.67% of the highest paid jobs.

Women outnumbered men in every quartile. They were overrepresented against the % composition of women in the workforce in the lower and lower middle quartiles, and slightly underrepresented in the upper middle quartile. By the time you reached the upper quartile, there was a higher level of underrepresentation at just 68.44% against the 80.50% composition of women in the BSW CCG workforce.

The % representation of women decreased as you moved through the pay quartiles. This distribution is a key factor contributing to our mean and median pay gaps since it serves to bring down the average pay of females.

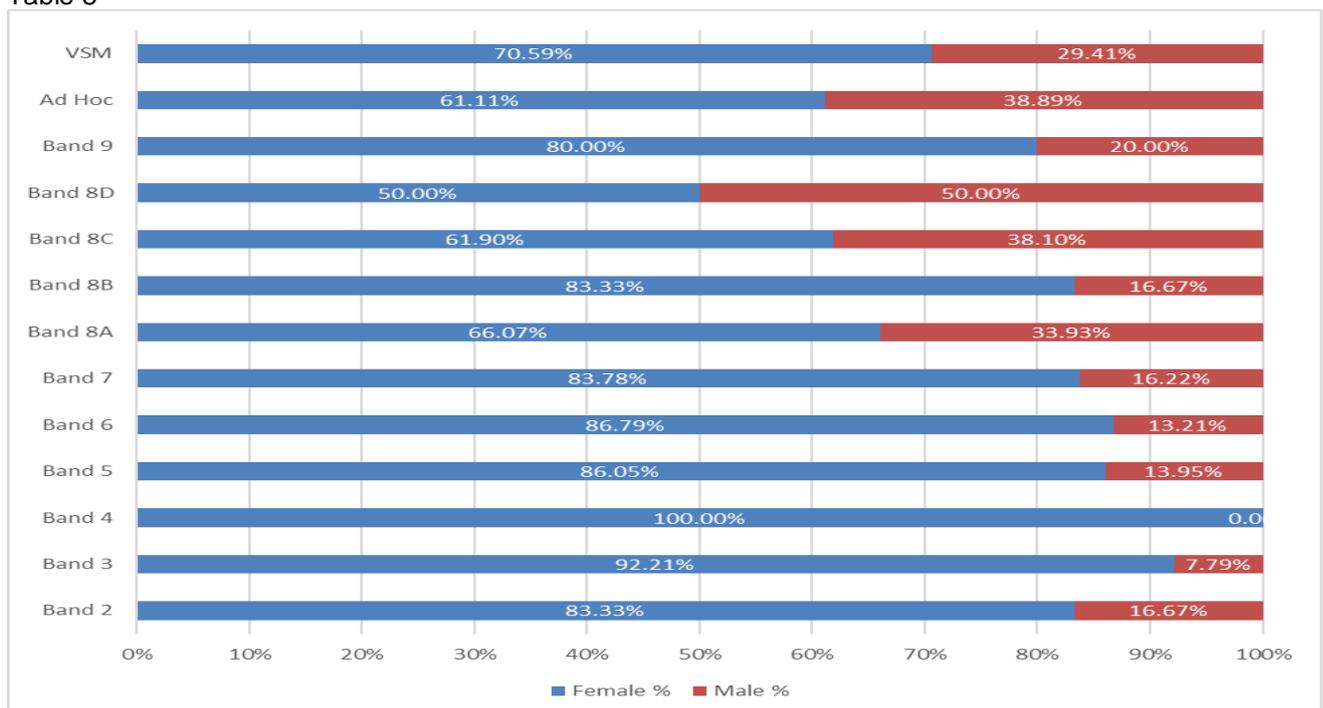
Table 7



Proportion of men and women in each pay band (%)

Table 8 further illustrates the gender distribution of BSW CCG colleagues by presenting the percentage of female and male employees in each pay band.

Table 8



This data shows that our gender pay gap was affected by differences in the gender composition of different pay grades.

Female colleagues constituted the majority in all pay bands except pay band 8d which showed an even distribution of male and female colleagues. Further to this, female colleagues were overrepresented against both the overall BSW CCG workforce composition (female 71.84%), and the overall NHS workforce composition (female 77%) in Bands 2 – 7 and Band 8a, 8b, 8c & band 9.

5. Deep Dive Analysis

Further analysis of the data was conducted to explore whether any particular segments of the workforce were contributing to the Gender Pay Gap.

In addition to the deep dive analysis, new recruits may have been placed higher up the Agenda for Change pay scales based on their individual circumstances. For example, if they were joining the organisation from outside of the NHS, they may have negotiated starting at a higher spine point due to their salary outside of the NHS and their relevant experience for the role. Individuals joining the organisation may also have had relevant years of NHS service that will have been taken into account when placing them on a spine point within the Agenda for Change band. Progression through the spine points within a band is based on years' service within that band, therefore someone joining the organisation already having 7 years' service within that band will have been placed at the top of the band.

Table 9 below presents the difference in **average** hourly pay rates between male and female colleagues in each pay band.

Table 9

Pay Band	Female		Male		Average Hourly Rate Difference between Male and Female
	Headcount	Average Hourly Rate	Headcount	Average Hourly Rate	
Band 2	Redacted*	£10.31	Redacted*	£10.63	-£0.32
Band 3	71	£10.87	6	£10.98	-£0.11
Band 4	38	£12.30		N/A	N/A
Band 5	37	£14.16	6	£14.35	-£0.19
Band 6	46	£18.07	7	£19.25	-£1.18
Band 7	62	£21.95	12	£21.65	£0.30
Band 8A	37	£25.50	19	£25.39	£0.11
Band 8B	30	£29.97	6	£29.23	£0.74
Band 8C	13	£35.67	8	£36.87	-£1.19
Band 8D	8	£43.71	8	£45.72	-£2.00
Band 9	8	£53.09	Redacted*	£52.30	£0.79
Ad Hoc	22	£56.02	14	£65.34	-£9.33
VSM	12	£64.98	Redacted*	£58.23	£6.75

*Where the headcount is 5 or less the figure has been redacted for data protection reasons.

Female average hourly rate is lower than male average hourly rate

Female average hourly rate is higher than male average hourly rate

This analysis shows that:

- In pay bands 7, 8a and 8b and band 9 & VSM the female average hourly rate was higher than the male average hourly rate.
- In pay bands 2, 3, 5, 6, 8c, 8d and Ad Hoc, the female average hourly rate was lower than the male average hourly rate.
- The largest differences where the female average hourly rate was lower than the average male hourly rate is shown in Ad Hoc, Band 6, 8c & 8d so these segments of the workforce have been further analysed to consider what factors could be contributing to our gender pay gap.

Salary sacrifice contributions

As part of the deep dive analysis consideration was given to exploring which colleagues sacrificed part of their salary for childcare vouchers, lease cars and the cycle scheme. It has been established 14 colleagues in March 2022, contributed to the salary sacrifice scheme, 9 women and 5 men. The salary sacrifice contributions made by individual colleagues range from £20 to £700 per month.

Band 3 and 4

The majority of colleagues in band 3 are female and all colleagues in band 4 are female. One of the reasons these roles are likely to be held by women is due to nearly 50 of the roles being available on a part-time basis which may make them more attractive to women if they have caring responsibilities.

Band 6

Female colleagues earned an average of £1.18 per hour less than those male colleagues in band 6.

Further analysis showed Band 6 being made up of women 86.79% compared to male colleagues 13.21%, the average hourly rate for male colleagues was £1.18 higher than the female colleagues' average hourly rate in this band, this was because the majority of female colleagues in this band were paid on the lower middle quartile compared to the male colleagues of this band, predominately due to the length of service recorded for those women in this band. In addition to this there was one female colleague who contributed part of her salary to the salary sacrifice scheme.

Band 8c

Female colleagues were paid an average of £1.19 per hour less than male colleagues in Band 8c

Despite Band 8c being predominately made up of women 61.9% compared to male colleagues 38.1%, the average hourly rate for male colleagues was £1.19 higher than the female colleagues' average hourly rate in this band. This was because there were fewer female colleagues paid at the top of Band 8c compared to male colleagues at the top of this band. 46% of the female colleagues within this band were on the lower section of this band. Within the 8c band there were four colleagues who contributed to the salary sacrifice scheme, two females and two males, contributing between £30 and £674 per month.

Band 8d

The gender composition of this pay band was more balanced, with 50% females and 50% males. However, females within this band were paid on average £2.00 per hour less.

The majority of males in Band 8d were paid at the top of this pay band, compared to women in this band who were paid on the lower section of this band, compared to the percentage of the males. Retention of female colleagues in this pay band as they transition up the pay band will reduce the pay gap in this pay band. In band 8d there was one male colleague who contributed to a salary sacrifice scheme.

Ad Hoc

Within this category there were a range of paid colleagues which also included Clinical Leads. Due to the nature of the pay band the hourly rate ranges from £6.56 per hour (Government kick start scheme) to £74.79 which was why this pay scale had the greatest difference in the average hourly rate between females and males. Some colleagues in this cohort were high earners so it is important to consider the impact this has on the gender pay gap.

Further generic analysis and updates

The mean gender pay gap excluding the Ad Hoc category of colleagues, has reduced to 30.98% compared to 35.74% last year so the gender pay gap is reducing, this could potentially be following the cleanse of the pay bands 2-9 and VSM, ensuring all colleagues are recorded correctly on ESR.

It is recognised that shortly after this data was captured BSW CCG transitioned to BSW ICB. However, on the basis that the majority of staff transferred to the ICB on 1st July 2022, it is envisaged the data on 31st March 2022 continues to be representative of the workforce of the ICB, noting there has been some changes to staff in the Ad Hoc category in this transitioning year.

To understand differences that may have taken place in terms of the gender pay gap further analysis has taken place, a snapshot of data as of 30th September 2022 – six months after this report data was captured to understand if there are any positive differences as a result of the recruitment into the ICB Board.

Comparing the data of 31st March 2022 with 30th September 2022 in table 11, the outcome of this exercise shows further improvement in most of the pay bands in terms of the gender pay gap.

September 2022 Data

Table 11

Pay Band	Female		Male		Average Hourly Rate Difference between Male and Female
	Headcount	Average Hourly Rate	Headcount	Average Hourly Rate	
Band 2	Redacted*	£10.63	0	N/A	N/A
Band 3	65	£11.59	6	£11.61	-£0.02
Band 4	38	£12.81	0	N/A	N/A
Band 5	40	£14.98	7	£15.01	-£0.03
Band 6	53	£19.05	9	£20.05	-£1.00
Band 7	56	£22.69	16	£22.61	£0.08
Band 8A	38	£25.85	16	£26.11	-£0.27
Band 8B	28	£30.98	Redacted*	£31.19	-£0.22
Band 8C	13	£35.67	8	£37.58	-£1.91
Band 8D	9	£43.87	7	£45.79	-£1.92
Band 9	7	£54.39	Redacted*	£53.31	£1.08
Ad Hoc	16	£58.12	11	£59.67	-£1.55
VSM	15	£65.47	7	£60.52	£4.95

*Where the headcount is 5 or less the figure has been redacted for data protection reasons.

Female average hourly rate is lower than male average hourly rate

Female average hourly rate is higher than male average hourly rate

For band 2 and 4 in the table above the average hourly rate difference between males and females is not shown, this is because there were no males for those 2 bands therefore there is not an average hourly rate to calculate and therefore no difference in the hourly rate between male and female to calculate.

6. Summary

This gender pay gap report has limitations in that it is based on a single snapshot of the pay data taken some months ago (31st March 2022). The data must be published within 12 months of the snapshot data of 31st March 2022. Therefore, the data for BSW CCG is required to be published on the BSW ICB internet site by 30th March 2023.

As stated at the outset of this report, it should be noted that the situation may have moved on and improved since 31st March 2022, following the transition to the ICB and the change in the AfC pay scales as a result of the annual pay rise.

The data identified a gender pay gap in the then BSW CCG that may benefit from further interrogation and action, depending on the results of the snapshot of gender pay gap data that is downloaded as at 31st March 2023.

Table 10

Gender	Avg. Hourly Rate	Median Hourly Rate
Male	33.8951	27.2164
Female	23.3913	19.9586
Difference	10.5039	7.2579
Pay Gap %	30.9893	26.6672

The calculations in table 10 showed that when comparing average hourly rate (mean rate) the women’s rate was 30.98% lower than men. Women’s median hourly pay was 23.39% lower than men, which means in the CCG, women earned 73p for every £1 that men earned.

Both the average hourly rate (mean) and the median gender pay gaps had reduced compared to last year. Women earned 73p for every £1 that men earned, compared to 71p last year. The median hourly pay gap in March 2022 was 26.67% compared to 28.26% last year, this provides evidence that the gender pay gap is reducing.

We know that 81.72% of colleagues in BSW CCG were female (389) with 18.27% (87) male. Female colleagues were significantly overrepresented both overall in the workforce and in the lower quartile which was a contributing factor for the gender pay gap in BSW CCG.

This report has explored 4 key lines of enquiry to better understand how the gender composition of the workforce in Band 6, 8c, 8d and Ad Hoc pay bands impacted the gender pay gap.

The next snapshot date is 31st March 2023 ready for the 2023/2024 reporting period.

Data comparison from 2021 to 2022 within this report provides evidence that the gender pay gap was reducing however it is acknowledged there is more work to do to reduce the gap further. A number of recommendations have been proposed to look to address this in 2023.

BSW ICB understands the importance of tackling discrimination and promoting equality between different groups of people, whilst addressing the diverse needs of individuals. That is why working hard to understand why there is a gender pay gap, make improvements, and reduce the gap overall wherever possible is key.

7. Recommendations

Further reducing the gender pay gap implies either increasing the proportion of men in lower grades or increasing the proportion of women occupying the more senior roles in BSW ICB. Effective policies for closing the gender pay gap not only seek to address factors and barriers common to all women (such as the number in lower grade jobs with lower pay), they target the inequalities faced by women belonging to specific groups, based on characteristics such as ethnicity, age and profession.

There are actions recommended in the Governments guidance on reducing the gender pay gap, which consider a focus on the transparency, promotion pay and reward process. Work has already commenced on some of these actions recommended during 2022 or time has been scheduled to do so in 2023. However, within the context of the next snapshot of data for the gender pay gap being pulled on 31st March 2023, it is recommended that the actions listed below are reviewed in line with what the new set of gender pay gap data tells us and new actions are set as appropriate. Following an analysis of the 31st March 2023 data during April 2023, recommendations and actions will be proposed to the BSW ICB Executive Team in May 2023 so that progress to address any gender pay gap can be expediated during July to September 2023.

The actions below detail the work that has already been undertaken or is scheduled to be undertaken by April 2023 to support the ICB with developing and implementing future good practice.

- **A review of the Flexible and Homeworking policy**; work has already commenced as part of the policy review and it is proposed that the policy is also reviewed by the new Director of People to check for any barriers for groups of colleagues in April 2023.
- **Review the makeup of shortlisting and interview panels** for recruitment and promotion to minimise any gender bias.
- **Review guidance within the recruitment and selection management guide** to ensure interview questions support gender-neutral approaches by February 2023.
- **Review recruitment and selection training** to ensure it is inclusive and encourages a gender-neutral approach to selection by February 2023
- **Ensure oversight via the Director of People** in terms of transparency and consistency when considering promotion and when starting salaries on appointment are agreed outside of AfC guidelines. It is recommended that additional scrutiny is undertaken from April 2023 when managers request to appoint above the bottom of the pay band (this currently sits purely with the finance team). This process is currently being developed.
- **Ensure all leadership opportunities** are promoted to all but **uptake is monitored through a gender lens** via the People Team capturing who is applying for opportunities/training.

- **Review of the Ad Hoc pay scale** to ensure colleagues are placed within the correct pay band to potentially reduce the gender pay gap further. The CSU Workforce team are reviewing this by March 2023.
- **A future review of the demographics of the workforce** against the population we serve to identify any actions the ICB can take to address the gender imbalance. This work will be completed based on the 31st March 2023 snapshot data.

8. Next Steps

BSW ICB Executive Team are asked to note the context of the gender pay gap as at 31st March 2022 and to confirm if there are any additional recommendations, not listed above, that they wish to take forward prior to the next gender pay gap snapshot as at 31st March 2023.