

Equality Impact Assessment (EIA) Report – 2017/8

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

Please refer to the 'EIA Report Form Guidance' while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area: HR&OD
Directorate: Resources / Transformation

(a) This EIA is being completed for a:

Service/ Function	Policy/ Procedure	Project	Strategy	Plan	Proposal
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) Please name and describe here:

Implement the new pay structure for 2019 (as nationally agreed between Local Government Employers and Trades Unions). This affects our workforce, not service users.

(c) It was initially screened for relevance to Equality and Diversity on: ADD DATE

August 2018

(d) It was found to be relevant to...

Children/young people (0-18)	<input checked="" type="checkbox"/>	Sexual orientation	<input type="checkbox"/>
Older people (50+).....	<input checked="" type="checkbox"/>	Gender reassignment	<input checked="" type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	Welsh language	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Poverty/social exclusion.....	<input checked="" type="checkbox"/>
Race (including refugees).....	<input checked="" type="checkbox"/>	Carers (including young carers).....	<input checked="" type="checkbox"/>
Asylum seekers	<input checked="" type="checkbox"/>	Community cohesion	<input checked="" type="checkbox"/>
Gypsies & Travellers.....	<input checked="" type="checkbox"/>	Marriage & civil partnership	<input checked="" type="checkbox"/>
Religion or (non-)belief	<input checked="" type="checkbox"/>	Pregnancy and maternity	<input checked="" type="checkbox"/>
Sex.....	<input checked="" type="checkbox"/>		

(e) Lead Officer

Name: Linda Phillips

Job title: OD Project Officer

Date: 21 November 2018

(f) Approved by Head of Service

Name: Adrian Chard

Date: 21 November 2018

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

We are required by **national** UK negotiations between local government employers and trades union representatives to implement the new pay spine in order to bring our pay structure in line with the application of Living Wage for all employees by 1 April 2019

Who has responsibility?

All Councils must comply – HR&OD have lead responsibility for Pay matters, therefore this is being led by Adrian Chard (Strategic HR&OD Manager), in conjunction with the Section 151 Officer (Finance).

Who are the stakeholders?

The new pay structure affects ALL employees grades 1-12 (Job Families Allocated posts)

Section 2 - Information about Service Users (See guidance):

Please tick which areas you have information on, in terms of service users:

- | | |
|--|--|
| Children/young people (0-18)x <input type="checkbox"/> | Sexual orientationx <input type="checkbox"/> |
| Older people (50+).....x <input type="checkbox"/> | Gender reassignmentx <input type="checkbox"/> |
| Any other age groupx <input type="checkbox"/> | Welsh languagex <input type="checkbox"/> |
| Disabilityx <input type="checkbox"/> | Poverty/social exclusion.....x <input type="checkbox"/> |
| Race (including refugees).....x <input type="checkbox"/> | Carers (including young carers).....x <input type="checkbox"/> |
| Asylum seekersx <input type="checkbox"/> | Community cohesionx <input type="checkbox"/> |
| Gypsies & Travellers.....x <input type="checkbox"/> | Marriage & civil partnershipx <input type="checkbox"/> |
| Religion or (non-)beliefx <input type="checkbox"/> | Pregnancy and maternityx <input type="checkbox"/> |
| Sex..... X <input type="checkbox"/> | |

Please provide a snapshot of the information you hold in relation to the protected groups above:

There is very little information held in ORACLE on the protected characteristics of our workforce, as outlined in the annual Equality Plan. There are less than 100 staff who have declared a disability, and there are very few that have declared religion or race information.

However, the implementation of the new pay structure must ensure that Equal Pay is maintained for men and women employed by the Council. We do have slight differences according to the current Gender Pay Gap analysis, but we do not have issues over EQUAL PAY. Therefore the main focus of this proposal is on GENDER, but other protected characteristics are unlikely to be directly or indirectly affected.

Any actions required, e.g. to fill information gaps?

We must continue to encourage staff to update their personal information on Oracle, but as this is voluntary, we must work with what we have available.

The HR information system relies on managers to keep the Employee Services data team updated and managers are reminded regularly to support employees in updating their personal information including equality data.

Gender information is currently 99.9% accurate. It is within the purview of the Employee Services team to ensure that employees are encouraged to update this information. The HR&OD Service reminds managers to encourage staff to update their employment records when appropriate.

Section 3 - Impact on Protected Characteristics (See guidance):

Please consider the possible impact on the different protected characteristics.

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18) →	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Older people (50+) →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including refugees) →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Asylum seekers →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gypsies & travellers →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or (non-)belief →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sex →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Welsh Language →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers) →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community cohesion →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity →	x <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case.

The implementation of the new pay structure affects all men and women, grades 1 – 12. The initial assessment on the gender pay gap shows that there is a positive impact on ALL staff as there is an increase for staff across the pay spectrum of 2%, but for those in lower grades, there is an additional pay award equating to up to 8% for some roles. The overall pay award is 2% for all staff, including the Chief Officers. Generally as we have a significant segmentation of part time working, and a significant proportion of part time workers are women, there is a greater impact on women than men when this new pay structure is implemented, but overall there is a 2% improvement (reduction) on the gender pay gap.

Therefore, the implementation of the proposed new structure has a **positive impact** on the gender pay gap, and it is therefore recommended that the proposal is implemented as planned on 1 April 2019.

Section 4 - Engagement:

Please consider all of your engagement activities here, e.g. participation, consultation, involvement, co-productive approaches, etc.

What engagement has been undertaken to support your view? How did you ensure this was accessible to all?

We have engaged with Trades Unions, as required, on our proposal for implementing the new pay spines into our current grade structure. We have met all of the criteria outlined in the formal guidance provided by the JNC – and implemented the pay scale to have the lowest impact on all staff. The Unions requested that a full EIA be carried out, even though this is not required and a screening has indicated that a full EIA is unnecessary.

The outcome of the EIA indicates that the proposed new structure will have a positive impact on all grades and all staff.

What did your engagement activities tell you? What feedback have you received?

Awaiting formal agreement to the proposal. The TU have raised issues unrelated to the proposal and have no relevance to the implementation of the new pay structure as we have put before them. The TU representatives have other concerns relating to future pay that are not related to the proposal, as this was already agreed at a national level.

How have you changed your initiative as a result?

What you need to say here is how your engagement with the unions has changed the proposal (if it has)?

We have offered the best possible option to ensure that men and women are not in ANY DETRIMENT as a result of the implementation, and we will be having a positive impact on the current gender pay gap (the difference between men and women FULL time workers, based on average and median figures). In this case, in April 2019, the difference between men and women is being reduced by 2%, **therefore there has been no change to the proposal as this more than meets the obligations of the Council in implementing the new pay spine.**

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.):

Communication/engagement plan with staff will be taken forward and implemented at the appropriate time. Implementation has to occur on 1 April 2019 to meet our legal obligations to staff.

Section 5 – Other impacts:

Please consider how the initiative might address the following issues - see the specific Section 5 Guidance

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

Please explain any possible impact on each of the above.

The proposed new pay spines have been tested for Gender Pay Gap issues and it seems that there is a positive impact on the current OVERALL gender pay gap – it is reduced by 2%. The impact is positive for all staff, as everyone will get a pay increase, no matter the grade. Some grades will see a significant increase, thus bringing lower paid staff up to the new 2020 living wage of £9.00 per hour a year early.

There will be an impact on all employees, regardless of the protected characteristic definitions that may apply, as the implementation will not change the current grade structure.

What work have you already done to improve any of the above?

We have tested many options but the current proposal provides the best implementation of the new national pay spine model as it does not change the existing pay structure, which has been in place since 2014.

Is the initiative likely to impact on Community Cohesion? Please provide details.

No – there is no direct impact on community cohesion.

How does the initiative support Welsh speakers and encourage use of Welsh?

There is no specific impact on this group.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Not applicable as there is no specific impact on any protected characteristic, including gender, as the pay model does not change the current pay structure.

Section 6 - United Nations Convention on the Rights of the Child (UNCRC):

Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests. Please read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)? If not, please briefly explain your answer here and proceed to Section 7.

Not applicable in this instance, as only the workforce allocated to our main pay structure are affected, and no employee is under 18.

All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for

children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

Not applicable

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

Not applicable

Section 7 - Monitoring arrangements:

Please explain the monitoring arrangements for this initiative:

Monitoring arrangements: There is a statutory requirement to report on the Gender Pay Gap, this will form the monitoring arrangements

Actions: We provide an annual statement on .GOV and the Swansea Council websites, and this is a regulatory requirement.

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern

Outcome 2: Adjust the initiative – low level of concern

Outcome 3: Justify the initiative – moderate level of concern

Outcome 4: Stop and refer the initiative – high level of concern.

For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

The current suggested proposal is the best possible application of the new pay spine, and causes least issues for men and women currently allocated to the main JFA pay structure, regardless of any other protected characteristic that may apply to individuals or groups of staff.

This is the only option being put forward due to the timescales and the inherent wish of the Council to ensure there is no detriment to the workforce, for any reason, as a result of this requirement for change.

Section 9 - Publication arrangements:

On completion, please follow this 3-step procedure:

1. **Send this EIA report and action plan to the Access to Services Team for feedback and approval – acesstoservices@swansea.gov.uk**
2. **Make any necessary amendments/additions.**
3. **Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.**

EIA Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Implement the new Nationally agreed Pay Spine on 1 April 2019	Strategic Manager HR&OD/Section 151 Officer	In time to implement on 1 April 2019	First payroll run will show the new data	Currently informing TU of the new proposed structure
Communicate change to staff	Strategic Manager HR&OD / Section 151 Officer	In time to implement on 1 April 2019	As above	Awaiting final comments from the TU, then we will commence comms with staff.

* Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).