

Integrated Impact Assessment (IIA)

Part 1 Scoping

1 Details of the Proposal

Title of Proposal:	Equal Pay Policy
What is it?	A new Policy/Strategy/Practice <input type="checkbox"/> A revised Policy/Strategy/Practice <input checked="" type="checkbox"/>
Description of the proposal: (Set out a clear understanding of the purpose of the proposal being developed or reviewed (what are the aims, objectives and intended outcomes, including the context within which it will operate)).	<p>The purpose of this Policy is to state and publicise the Council's commitment to equal pay for work of equal value for all employees, ensuring they are paid fairly and that the Council operates pay and reward systems which are transparent, based on objective criteria and free from bias.</p> <p>The scope of the policy extends to all Council employees, irrespective of their employment status and length of service.</p> <p>The main aim of the policy is to state and publicise the Council's commitment to the principles of equal pay for work of equal value and to enable the management of equal pay at a corporate and service level.</p> <p>Specifically this includes:</p> <ul style="list-style-type: none"> • To commit to the principle of equal pay for work of equal value for all employees

	<ul style="list-style-type: none"> • To eliminate any unfair discrimination, unjust or unlawful practices that impact on pay equality • To reward fairly the skills and experience of all employees • To operate pay and reward systems which are transparent, based on objective criteria and free from bias • To secure the future together with our employees by attracting and retaining employees who are committed to delivering excellent public service and making us a dynamic and innovative Council by supporting equality of opportunity and valuing diversity within our workforce. <p>The policy has been reviewed and developed in line with the Equality and Human Rights Commission (EHRC) Statutory Code of Practice on Equal Pay, the non-statutory guide for Scottish Public Authorities (Scotland) and the Coalition for Racial Equality and Rights publication Equality Pay Duties - Race and Disability.</p> <p>The figures used throughout this assessment are from employee data for the period January – December 2018.</p>
Service Area: Department:	Human Resources
Lead Officer: (Name and job title)	Iain Davidson Employee Relations Manager
Other Officers/Partners involved: (List names, job titles and organisations)	Simone Doyle HR Equality & Diversity Officer
Date(s) IIA completed:	25 th February & 26 th March 2020

2 Will there be any cumulative impacts as a result of the relationship between this proposal and other policies?

Yes
<p>If yes, - please state here:</p> <p>The Policy provides information about general good practice and legislative duties and is to be used in conjunction with the complete range of HR Policies, Procedures and Guidelines. These policies include but are not limited to:</p> <ul style="list-style-type: none"> • Equality, Diversity and Human Rights • Recruitment and Selection • Training and Development

3 Legislative Requirements

3.1 Relevance to the Equality Duty:	
<p>Do you believe your proposal has any relevance under the Equality Act 2010? <i>(If you believe that your proposal may have some relevance – however small please indicate yes. If there is no effect, please enter “No” and go to Section 3.2.)</i></p>	
Equality Duty	Reasoning:
<p>Elimination of discrimination (both direct & indirect), victimisation and harassment. <i>(Will the proposal discriminate? Or help eliminate discrimination?)</i></p>	<p>This Policy serves to meet the equality duty of eliminating discrimination, victimisation and harassment</p>
<p>Promotion of equality of opportunity? <i>(Will your proposal help or hinder the Council with this)</i></p>	<p>This Policy will promote equality of opportunity as it sets out the Council’s commitment to equal pay for work of equal value for all employees, ensuring they are paid fairly and that the Council</p>

	operates pay and reward systems which are transparent, based on objective criteria and free from bias.
Foster good relations? <i>(Will your proposal help or hinder the council's relationships with those who have equality characteristics?)</i>	<p>The Policy has a positive impact as the job evaluation methodologies that are applied are about the post and not about a individual. Additionally, the Policy is readily accessible and jargon free.</p> <p>As the Policy is readily available, widely publicised and promoted to all staff this should assist in fostering good relations ' between groups with different protected characteristics.</p>

3.2 Which groups of people do you think will be or potentially could be, impacted by the implementation of this proposal? (You should consider employees, clients, customers / service users, and any other relevant groups)				
Please tick below as appropriate, outlining any potential impacts on the undernoted equality groups this proposal may have and how you know this.				
	Impact			Please explain the potential impacts and how you know this
	No Impact	Positive Impact	Negative Impact	
Age (Older or younger people or a specific age grouping)	X			<p>Workforce data shows that only 9.53% of employees are aged 16 – 29 years, whilst there are 67% of employees aged over 45. Consequently, there is a relatively high amount of older employees.</p> <p>However the principles contained in the policy contribute to the promotion of equal pay for work of equal value.</p>
Disability e.g. Effects on people with mental, physical, sensory impairment, learning disability, visible/invisible, progressive or recurring		X		The Policy includes factors that may contribute to a differential in pay for this protected characteristic group.

			<p>However only 2.60% employees have disclosed that they have a disability. Consequently, this is too small a number to provide any meaningful analysis of pay gap for employees who are disabled and those who are not.</p> <p>The principles contained in the policy contribute to the promotion of equal pay for work of equal value.</p>
Gender		x	<p>Of our 5769 employees, 73% are female and 27% male.</p> <p>The gender pay gap is the difference between men and women's hourly earnings.</p> <p>Using guidance and the standard calculation that is set out by the Equality and Human Rights Commission, the Council's equal pay gap was calculated using data as at 31 December 2018.</p> <p>Chief Officers and Single Status Staff The average hourly rate for women is £ 11.4527</p> <ul style="list-style-type: none"> • The average hourly rate for men is £ 13.1515 • The difference in hourly pay is £1.6988 • This means that on average women earn 12.92% less than men <p>Teaching Staff The average hourly rate for women is £23.0133</p> <ul style="list-style-type: none"> • The average hourly rate for men is £24.3475 • The difference in hourly pay is £1.3342 • This means that on average women in teaching roles earn 5.48% less than men. <p>The policy includes a commitment to undertake regular equal pay audits and conduct appropriate analysis. This will allow appropriate action to be taken to address the gender pay gap.</p>

<p>Race Groups: including colour, nationality, ethnic origins, including minorities (e.g. gypsy travellers, refugees, migrants and asylum seekers)</p>		<p>X</p>	<p>The Policy includes factors that may contribute to a differential in pay for this protected characteristic group.</p> <p>An Analysis of Employee data indicates that approximately 77.60% of employees have declared their ethnic origin.</p> <p>The overwhelming majority are White Scottish or White British.</p> <p>0.47% define themselves as Black and Minority Ethnic. Approximately 21% of employees have not declared their ethnic origin.</p> <p>In view of the small numbers it is not possible to undertake a meaningful analysis of the pay gap between employees who are members of a minority racial group and those who are not.</p> <p>The principles contained in the policy contribute to the promotion of equal pay for work of equal value.</p>
<p>3.3 Fairer Scotland Duty</p> <p>This duty places a legal responsibility on Scottish Borders Council (SBC) to actively consider (give due regard) to how we can reduce inequalities of outcome caused by socioeconomic disadvantage when making <u>strategic</u> decisions.</p> <p>The duty is set at a strategic level - these are the key, high level decisions that SBC will take. This would normally include strategy documents, decisions about setting priorities, allocating resources and commissioning services.</p>			

Is the proposal strategic?

No

If No go to Section 3.4

It is deemed that this policy is not relevant to the Fairer Scotland Duty. This assessment has been in respect of an internal policy. The main aim of the policy is to state and publicise the Council's commitment to the principles of equal pay for work of equal value and to enable the management of equal pay at a corporate and service level.

If yes, please indicate any potential impact on the undernoted groups this proposal may have and how you know this:

	Impact			State here how you know this
	No Impact	Positive Impact	Negative Impact	
Low and/or No Wealth – enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future.				
Material Deprivation – being unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies				
Area Deprivation – where you live (e.g. rural areas), where you work (e.g. accessibility of transport)				
Socio-economic Background – social class i.e. parents' education, employment and income				
Looked after and accommodated children and young people				

Carers paid and unpaid including family members				
Homelessness				
Addictions and substance use				
Those involved within the criminal justice system				

4 Full Integrated Impact Assessment Required

Select No if you have answered “No” to all of Sections 3.1 – 3.3.

No.

If a full impact assessment is not required briefly explain why there are no effects and provide justification for the decision.

Ultimately the Policy should have many positive impacts for the Council’s employees. The key is the declaration of commitment to the principle of equal pay for work of equal value and to enable the management of equal pay at a corporate and service level.

The review of this policy has found that the impact of this policy is positive. Awareness and implementation of the policy will greatly reduce the risk of discrimination, harassment or victimisation for all potential and existing employees of SBC. In order to ensure that the policy remains relevant and fit for purpose the policy will be reviewed at least every two years in accordance with the Council’s HR Policy Review Programme and the following actions will be undertaken:

- Continue to encourage the collection of equal opportunities monitoring data of all employees to allow meaningful analysis for employees who are disabled and those who are not and employees who fall into a minority racial group and those who do not.
- Formulate an action plan with set objectives that will help ensure Equal Pay requirements are implemented
- Continue to conduct Equal Pay Audits for all employees and to monitor the application of the Equal Pay Policy using appropriate resources

Signed by Lead Officer:	Iain Davidson
Designation:	Employee Relations Manager
Date:	26th March 2020
Counter Signature Service Director	Clair Hepburn
Date:	31 st March 2020