



**NOTTINGHAMSHIRE**  
**Fire & Rescue Service**  
*Creating Safer Communities*

Nottinghamshire and City of Nottingham  
Fire and Rescue Authority  
Human Resources Committee

# **EQUAL PAY AUDIT**

Report of the Chief Fire Officer

**Date:** 05 November 2021

**Purpose of Report:**

To provide Members with the findings of the Equal Pay Audit, gender pay gap reporting and ethnicity pay gap information.

**Recommendations:**

That Members note the content of the report

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## 1. BACKGROUND

- 1.1 The Service has recently undertaken its annual Equal Pay Audit 2020-21, demonstrating commitment to promote equality and address pay disparities across the organisation.
- 1.2 Further to this, the Service has, in line with the Gender Pay Gap Regulations, otherwise known as the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017, undertaken a review of its Gender Pay Gap. The government introduced the duty on employers with 250+ employees to calculate and publish six specific measures in relation to the pay gap between men and women in their organisation in 2017.
- 1.3 Pay data is collected on a specific pay date – 31 March 2021 – and must be published on the national register by 31 March 2022.
- 1.4 The Service has also recently been approached by Nottingham City Council to participate in collective pay gap reporting to promote pay transparency. This work is also highlighted.

## 2. REPORT

### EQUAL PAY AUDIT

- 2.1 In April 2021, the Service engaged consultants to undertake an Equal Pay Audit (EPA) of its current pay systems and practice. The purpose of the audit is to identify any areas of equal pay concern and make recommendations in order to correct any inequality that is found.
- 2.2 The EPA is conducted in two parts. The first part includes all support staff at the Fire and Rescue Service covered by the National Joint Council for Local Government Services (NJC LGS) and the second part includes all Wholetime and On-Call Firefighters.
- 2.3 The Equal Pay Act covers the protected characteristics of gender, ethnicity, and sexual orientation. The key findings and recommendations of the audit are as follows.

Concerning the pay arrangements for Uniformed Firefighters:

- There are no average base pay differences between men and women that exceed the Equality & Human Rights Commissions' threshold of +/- 5%;
- There are only three instances of unequal pay under the analysis of sexual orientation. All are lower. All instances are satisfactorily explained by the normal operation of the pay structure;

- There were three instances under the analysis of race. All instances are satisfactorily explained by the normal operation of the pay structure.

Concerning the pay arrangements for Support Staff:

- The job evaluation scheme and method of operation should provide the FRS with a reliable and robust means of determining the relative worth of jobs within the organisation. Continue to use the NJC JES and method of operation;
- The design of the pay structure and method of pay progression meets current legislation and best practice. Continue to use the pay structure;
- There are no average base pay differences between men and women that exceed the Equality & Human Rights Commissions' threshold of +/- 5%;
- There are only two instances of unequal pay under the analysis of sexual orientation. One is higher and the other lower – there is no pattern. Both instances are satisfactorily explained;
- There were four 'red' and seven 'amber' instances under the analysis of race. All are satisfactorily explained by length of service.

2.4 In summary, no significant issues were evident within the audit. The Service's pay arrangements work in the way they are intended. It should be noted that the Equal Pay Audit and Pay Gap reporting measure different things.

## **GENDER PAY GAP**

2.5 The Service has completed a Gender Pay Gap report.

The six specific measures collated are:

- The difference in the mean hourly rate of pay;
- The difference in the median hourly rate of pay;
- The difference in the mean bonus pay;
- The difference in the median bonus pay;
- The proportion of male and female employees who were paid bonus pay;
- The proportion of male and female employees according to quartile pay bands.

2.6 The outcomes from the audit are a mean hourly pay gap of 15.3%, and a median gender pay gap of 8.2%. This compares with a mean of 18.29% and a median average of 9.8% for 2019-20 – a reduction in both average and median pay between male and female employees i.e. the pay gap has reduced during 2020-21. Differences in hourly pay are set out in the table below:

	Female	Male	Grand Total	% Difference
<b>On-Call</b>	41.54	32.94	33.47	20.71
<b>Dual</b>	16.71	18.02	17.96	7.25
<b>Support</b>	16.15	17.62	16.79	8.31
<b>Wholetime</b>	16.4	17.47	17.39	6.14
<b>Grand Total</b>	18.06	21.31	20.72	15.25

- 2.7 It can be seen that for all work groups, with the exception of On-Call, average male pay is higher than average female pay. It should be noted that On-Call pay represents a 12-week average. This may therefore reflect a short-term increase during the reference period rather than a long-term pattern of higher hourly pay.
- 2.8 It should be noted that the pay gap between men and women does not indicate a disparity in hourly rate for the same job, which is the same for male and female employees, but rather reflects the gender balance within the workforce (83.9% male) and the proportion of male employees in higher graded operational and managerial roles.
- 2.9 To provide some context to the figures: the public-sector average rate is 14.5% and the median 15.8%. The private-sector average rate is 22.1% and the median 18.1%. The Service is therefore above the public sector average and significantly below the median figure, and below the private sector and median figures. These figures reflect figures for 2019-20.
- 2.10 Overall, the Service is below the national average rate of 15.5%. In terms of reducing the gender pay gap, the Service already has in place policies and pay structures that are reflective of best practice outlined in guidance documents. However, the lack of women in operational supervisory and senior management roles is a perennial issue and work continues to encourage more women to apply for higher graded roles. The gender pay gap will only be closed by appointing more women to supervisory and managerial roles, and this requires more women to apply at entry level to Wholetime and On-Call roles.
- 2.11 The focus of actions to improve upon the gender pay gap are:
- Undertake positive action to encourage more women to apply for Wholetime and On-Call Firefighter roles;
  - Identify the reasons why more female fire-fighters do not apply for promotion and address any barriers/concerns;
  - Engage with the NFCC Direct Entry workstream;
  - Be pro-active in identifying those with the potential to progress to more senior roles and provide support and development;

- Review any barriers for women to be appointed to senior roles across all work groups
- Review the requirements of the On-Call duty system to make it more attractive to female applicants
- Provide opportunities for women to gain experience in higher level roles through temporary appointments, involvement in projects, development roles;
- A mentoring scheme to be introduced to enable women in leadership roles within the service to provide advice to women who are interested in future development – mentoring and reverse mentoring is a part of this and should be extended to all female employees over time
- Any additional flexible working arrangements that can be put in place, such as agile working.
- Maintain engagement with the Nottingham City Future Leaders programme and encourage women to apply

## **ETHNICITY PAY GAP REPORTING**

- 2.12 The Service has recently been approached by Nottingham City Council to participate in collective pay gap reporting to promote transparency and commitment across the public sector locally. As a result of this approach the Service is publishing information regarding the Ethnicity Pay Gap including the work being undertaken to reduce disparities and plans for the future. This can be found in Appendix A. The Service is currently considering signing up to the Race at Work Charter following this work.
- 2.13 Analysis has shown an average pay gap of 6% and a median pay gap of 0%. Please note that these figures do not take into account On-Call pay rates.
- 2.14 It should be noted that the pay gap between white and BAME employees does not indicate a disparity in hourly rate for the same job, which is the same, but rather reflects the ethnic balance within the workforce (5.17% BME employees) and the lower proportion of BME employees in higher graded operational and managerial roles.
- 2.15 There are currently no national comparators for pay gap data based on ethnicity.

## **3. FINANCIAL IMPLICATIONS**

There are no financial implications arising from this report.

## **4. HUMAN RESOURCES AND LEARNING AND DEVELOPMENT IMPLICATIONS**

Human resources implications are addressed throughout the report.

## **5. EQUALITIES IMPLICATIONS**

An equality impact assessment has not been undertaken because this is not a policy, function or service. However, it should be noted that this information is used to analyse equality outcomes and inform changes to working practices and positive action.

## **6. CRIME AND DISORDER IMPLICATIONS**

There are no crime and disorder implications arising from this report.

## **7. LEGAL IMPLICATIONS**

- 7.1 The Gender Pay Gap Regulations, otherwise known as the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 came into force in the UK in April 2017. The regulations require all private and voluntary-sector employers with 250 or more employees to publish data on their gender pay gap.
- 7.2 Employers that fail to report by statutory reporting deadline, or report inaccurate data, will be in breach of the regulations and risk facing enforcement from the Equality and Human Rights Commission (EHRC), leading to court orders and fines.
- 7.3 In addition to the statutory requirement to publish gender pay gap data, the case for ensuring that pay systems are not intrinsically gender biased is important to defend any claim for equal pay brought under the Equality Act, which includes work of equal value.

## **8. RISK MANAGEMENT IMPLICATIONS**

It is important to ensure that pay and progression processes are fair and robust in order to defend potential equal pay claims of gender or race bias. However, notwithstanding this, the Service is committed to promote equality in all its employment policy and practice and, by undertaking regular pay audits, the Service is able to review and address any disparity in pay systems.

## **9. COLLABORATION IMPLICATIONS**

There are no collaboration implications arising from this report.

## **10. RECOMMENDATIONS**

That Members note the content of the report.

**11. BACKGROUND PAPERS FOR INSPECTION (OTHER THAN PUBLISHED DOCUMENTS)**

None.

John Buckley  
**CHIEF FIRE OFFICER**

## ETHNICITY PAY GAP SUMMARY



**NOTTINGHAMSHIRE**  
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Nottinghamshire Fire and Rescue Service is committed to equal pay, and we work hard to ensure that we address under-representation across our workforce. We do this through positive action initiatives for recruitment campaigns, but we also develop our existing employees and managers through initiatives like the Future Leaders of Nottingham programme. Black, Asian and Minority Ethnic (BAME) employees currently represent 5.17% of the workforce. Please note, this does not include those categorised as White Other.

The figures are as follows<sup>1</sup>.

Mean White pay (includes White Other, white British and white Irish) £17.55 per hour

Mean BAME pay £16.50 per hour

Median White pay £15.77 per hour

Median BAME pay £15.77 per hour

Therefore, the **mean** gap is £1.05 per hour (6.0%) and the **median** gap is £0 (0.0%)

It should be noted that the mean pay gap does not indicate a disparity in hourly rate paid to BAME and White employees doing the same job, which is the same, but rather reflects the diversity of the workforce in terms of ethnic background and the lower proportion of BAME employees in higher graded operational and managerial roles.

### What we are doing

- Regular positive action initiatives working with community organisations to promote employment opportunities and encourage applications from BAME candidates.
- Partnership with Radio Dawn to promote fire safety in homes and businesses and careers in the Fire and Rescue Service.
- BAME employee forum established in 2020.
- Community Engagement Plan developed to improve engagement with BAME communities in Nottingham and Nottinghamshire.
- Annual celebration of Black History Month.
- Training our staff – not just in EDI generally but new faith training, e-learning and podcasts to improve understanding and development.

<sup>1</sup> The data does not include On-Call Firefighter earnings due to the variability of the earnings in-role.

- Reverse Mentoring pairing employees with members of our Strategic Leadership Team to share and learn about experiences regarding background and identity.

#### What we will do next

- Improve the diversity of our chaplaincy.
- Launch our EDI Plan.
- Work harder to identify and develop talent – encourage under-represented groups and BAME employees to step forward for promotion.
- Improve the representation of our recruitment panels.