

Appendix E



Equality Impact Assessment (EqIA)

Name of Policy or Practice	Pay Deal 2019/20		
Head of Service responsible for the Policy or Practice	Phil Davies; Corporate HR & Andrew Kirkham; Strategic Director Finance & Resources		
Name of officer (s) completing impact assessment form	Donna Roberts & Tracey Pardoe		
Service	Corporate HR	Date of Assessment	16.8.2018

EqIA Completed by :		EqIA Agreed by Head of Service :	
Date	16.8.2018	Date	30/11/18
Name(s)	Donna Roberts & Tracey Pardoe	Name	Phil Davies
Signature(s)		Signature	

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1. What is being assessed? *(Please double click on the box and select 'checked' as appropriate to cross X)*

- New and revised policies or practices
- New procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year
- Decisions affecting service users, employees or the wider community
- New project proposals affecting staff, communities or accessibility to the built environment, eg, new construction work or adaptations to existing buildings
- Other please explain in the box below:

Consideration of the new Pay Deal awarded for 2019/20 and specifically consideration of local amendments. Current grades G07 to G12 have no proposed local amendments and will receive the nationally agreed 2% pay increase which CCBC has no control over. In grades G01 to G06 there are % increases from 2% and above to reflect the nationally agreed pay increases and to reflect future proofing for the National Living Wage, again there is no control for CCBC on this. What is proposed is the non-adoption of 8 SCP's in Grades G01, G04, G05 and G06 to provide a fair SCP progression across grades reflective of the length of time to become proficient in grade. This will result in some staff reaching the top of grade sooner than if no local amendments were considered.

2. What are the overall aims and objectives of the policy or practice?

To implement the new pay deal and pay award for 2019/20 into the existing Conwy County Borough Council Single Status Pay Structure with local amendments to provide a fair and equal pay structure.

3. Who is the policy or practice intended to help or benefit (stakeholders) ?

The proposal will be directly to the benefit to employees of Conwy County Borough Council.

4. Who are the main consultative groups or communities of interest ?

Trade Unions, Senior Leadership Team, Corporate HR, Scrutiny and Cabinet

STEP 2 - Consider Existing Information and What This Tells You

When completing this section, you need to consider if you have sufficient information with which to complete your EqIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the EqIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions**. This needs to be proportionate to the policy or practice being Equality Impact Assessed. You may have already recently undertaken consultation specifically on this policy or practice. Other officers within CCBC may have carried out engagement work which will be relevant to this EqIA and you can review the Community Involvement Database to find out what engagement activities have taken place in Conwy and establish if this is relevant. If you have very little or no information from previous engagement that is relevant to this EqIA, you should consider undertaking some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group.

5. What do you already know about the impact on each protected characteristic from your experience of current service delivery or previous engagement or consultation? You could refer to the Initial Equality Impact Assessment Screening Form and the Community Involvement Database.

Protected Group	Relevance of the policy / practice by protected characteristic
Race	<p>Of the 6197 employees who are on Single Status G01-G12, 72 have declared they are from a BME and White Other background. 59 of the 72 (82%) are in grades G01-G06 which is where the greater % gains are to be received in terms of pay increase as a result of the proposals which are to remove/non adopt some SCP's in G01-G06 and also the future proofing of salary structure for the National Living Wage. There are 5607 staff overall in G01 to G06 which is 90% of the workforce. The % increases have been agreed nationally by the NJC and Unions and is out of the control of CCBC. Grades G07-G12 will also receive an increment of 2% and there is no change to the current grading structure proposed as a result for these grades.</p> <p>For nationality 2367 employees (38%) declared themselves as British or Irish compared to 41 for</p>

	European and rest of the world. Interestingly 2444 have preferred not to state their Nationality 2283 (93%) of which are in G01-G06. 1958 of the British/Irish workforce (31.6%) in the G01-G06 bracket (83%). There are 1345 (21.7%) of the workforce we hold no data on.
Disability	There are 99 employees (1.6%) who have declared a disability across all grades and 2608 who have stated they do not (42.1%) however 3490 (56.3%) employees have not provided this information. Of the 99 who have declared a Disability there are 82 who are in grades G01-G06 (83%) who will be benefitted, compared to 90% of the whole workforce in these grades. There are 17% of our disabled employees sit in grades G07 and above compared to the overall workforce figure which is 10% which could be viewed as proportionately positive for disabled people.
Sex	<p>Of the 6197 employees there are 4564 females (73.6%) and 1633 males (26.4%). 4180 females were in G01-G06 which is 91.6% and 1427 males 87% compared the overall workforce of 90% in this bracket. There are more females than males in post for the G01-G06 grades as shown below, the distribution is related to the type of work undertaken and an ongoing issue with gender segregation in lower graded posts.</p> <p>G01 87% female and 13% male G02 64% female 36% male G03 68% female 32% male G04 76% female 24% male G05 72% female 28% male G06 55% female 45% male</p> <p>However as highlighted above these grades will benefit from a higher pay % increase due to the NJC pay deal and local amendments. So for example in G01 if we applied the NJC SCP's there would be 3 increments in this grade. The proposal to remove 1 SCP in G01 will escalate employees to the top of grade sooner i.e. in 1 year opposed to 2 years if the 3 SCP's remained which is more beneficial to as they reach the top of grade 1 year sooner. This would also make it consistent to G02 and G03 in the new pay deal.</p> <p>In G04 the proposal is to remove 1 SCP in years 2 and 3 which is reflective of our current structure and results in 3 SCPs and staff escalating to top of grade after 2 years opposed to 3. In the proposal where 1 SCP is removed the impact would be a potential 4% increase rather than 2% which is the increase between SCP's which is more beneficial to those staff.</p> <p>In G05 the proposal is to delete 4 SCP's resulting in the steps between bottom and top being 4 increments to be consistent with G07 and above to get to top of grade in a maximum of 4 years and G06 again for the same reason will remove 2 SCP's to achieve a 4 SCP grade.</p> <p>When looking at the gender split for these grades (G04-G06) which it will affect the most 1214 females (71%) and 503 males (29%) which is broadly reflective of our workforce. This is a positive impact rather than a negative one.</p>

Age	<p>Workers aged under 25 will see the largest increase in a decade in their statutory minimum wage in April 2018, the Low Pay Commission explains. An indicative rate from April 2019 is cited as £8.20 and £8.57 from 2020, the 2019/20 pay structure would provide a lowest hourly rate of £9.00 offering some flexibility.</p> <p>Of the 6197 we have 586 who are under 25 and almost 100% of these sit in G01-G06 which is not surprising with the bulk in G01 and G02 as this will reflect the amount of experience which comes from age. For 25-44 age group of the 2413 there are 90% are in G01-G06. For 45-64 there 89% are of the 2990 employees in the G01-G06 band and of the 208 over 65's there are 96% in G01 to G06 with the majority in G01 and G02 who again are positively impacted.</p> <p>As a note there are 20 Modern Apprentices as at March 2018 who are not affected or included in this data as they are not on G01-G12.</p>
Religion & Belief	<p>Of the 2056 (33% of workforce) who have specified a Religion or declared they have no Religion, 1200 (58%) of these employees have stated they are Christian. 4085 (66% of workforce) have not declared their Religion or belief.</p> <p>1675 of the 2056 (81%) who have specified a Religion or belief are in G01 to G06 and again would be positively impacted by the proposals which is broadly reflective of the workforce distribution.</p>
Sexual Orientation	<p>Of the 2046 who stated they were Heterosexual, 1161 (81%) are in G01-G06. The figures for Bisexual, Gay and Lesbian were similar (53 in total) and were loaded in grades G01-G06 at 79%. 134 employees of which 107 (80%) were in grades G01-G06 preferred not to say. There were 3964 employees who have not stated or provided this data.</p>
Gender Reassignment	<p>The numbers in this category are so small it is difficult to draw any meaningful conclusions.</p>
Marriage & Civil Partnership	<p>89% of the 3014 who have stated they are Married or in a Civil Partnership are in Grades G01-G06 which is where the positive impact will be and is reflective of the overall workforce profile.</p>
Pregnancy & Maternity	<p>In the Employment Monitoring at 31st March 2017 there were 162 staff which was 4% of the workforce at that time who were declared Pregnant or on Maternity Leave. This is largely covered under the category of Sex above and in addition they are protected by Maternity Law and Employment regulations. Staff on Maternity Leave who are receiving a proportion of the pay will receive the increments applied to earnings as applied to all other staff and will continue to attract increments during any Maternity period and would benefit on their return as if there had not been a break. Therefore there is not considered to be any negative impact.</p>
Welsh Language	<p>There is no perceived impact on the Welsh Language as a result of this policy implementation any new pay and grading structure would be translated once agreed.</p>

	According to the Welsh Language Annual Monitoring Report 2017-2018 it states that they have collected data from the 1813 members of permanent staff of whom 30% are considered fluent in Listening/Speaking and Understanding and 27% for written Welsh. There are approximately 44% who are considered learners and approx 26% who have no Welsh Language speaking/listening skills.
Other (please state)	N/A

6. Summarise the additional relevant data, research and performance management information you already have:

Data / Information	Examples
<p>We have not received any complaints on the current pay and grading or the proposals to date through SLT and Trade Unions.</p> <p>The application of our Pay and Grading Structure closely involves Trade Unions who represent staff. The pay scales and changes to SCP's and % increases have been negotiated and agreed Nationally and we are unable to influence these.</p> <p>The proposed approach is consistent and similar to how the current structure (including non-adoption of SCP's in some grades) implemented to 2009/10 which was Equality Impact Assessed at the time.</p> <p>Work on Equal Pay Audits in recent years has actioned a policy that new employees are appointed to the bottom SCP in grade as the default position with any deviation requiring agreement by local Management and Corporate HR to ensure a fair and consistent process is applied.</p>	<p>Initial EqIA Screening</p> <p>Complaints</p> <p>Compliments</p> <p>Service User data</p> <p>Service User Feedback</p> <p>Inspections or Audits</p>
Research or Comparative Information	Examples
<p>Conwy's pay and grading structure is unique to Conwy so whilst the pay and grading structures will be adopted across Local Government there is scope for local agreements on how this is adopted and applied to local pay structures such as Job Evaluation.</p> <p>Is Wales Fairer 2015 (EHRC) identifies key challenges around closing pay gaps and reducing poverty especially amongst disabled people and ethnic minority people.</p>	<p>Service User Surveys</p> <p>Studies by Government departments or professional bodies</p> <p>Census data</p> <p>Service based projects and research</p> <p>How Fair Is Wales (EHRC data)</p>

7. Have you complied with the duty to Engage as described at the start of this section and are you sufficiently informed to proceed?

Yes No *(please cross as appropriate X)* If Yes, please proceed to Step 3

If No, you may wish to consider pausing at this point while you undertake engagement activities (which you should add to your action plan – Step 6). Please incorporate any information you have obtained from this additional activity in the box below and state what the key findings were :

STEP 3 - Procurement and Partnerships

The public sector General Duty means all public authorities need to consider the needs of different groups when designing and delivering public services. This duty also applies to private sector organisations who deliver a public function on our behalf and we need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty.

8. Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes No *(please cross as appropriate X)* If No, please proceed to Step 4

9. If yes, how will you comply with Equality, Human Rights and Welsh Language Legislation? Think about :

Procurement

- Setting out clear equality expectations in Tendering and Specification documentation
- On what you based your decisions in the award process
- That contract clauses cover legislative equality requirements
- Performance and Monitoring measures are included to monitor

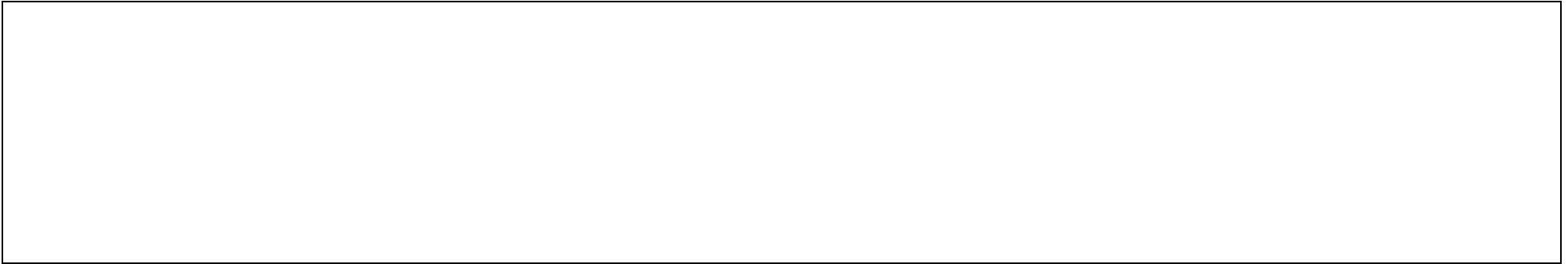
Partnerships

Who is responsible for :

- Equality Monitoring relevant data
- Equality Impact Assessment
- Delivering the actions from the EqIA
- Ensuring that equality, human rights and Welsh Language

compliance

legislation is complied with by all partners



STEP 4 - Assessing the Impact

10. Is there any evidence of higher or lower take-up or satisfaction by any group(s), and if so, how is this explained?

As evidenced above the largest impact (positive) from the proposal is in Grades G01-G06 which includes 90% of our workforce of whom 75% are women, 1.5% are disabled, 1% are from a BME and White Other background. These figures are reflective of the overall workforce profile and will not change as a result of this proposal. Indeed it has been highlighted that those in G01-G06 are most affected but this is a positive impact due to reaching the top of grade sooner that if we had done nothing and simply applied the NJC default position.

11. Does the geography or demography of any groups reveal anything?

See data in section 5 above in regards to the groups affected we have little control over who applies for which jobs but we ensure a fair and transparent recruitment process. The number of staff we need in each grade is dependent on service need.

12. Do any rules or requirements or the way the policy or practice is delivered prevent or reduce the likelihood of any groups from use or access or are any other barriers created for them?

Eg: due to limited income, location, times of availability, access to buildings, information or language, eligibility rules, dress code, cultural issues

The pay and grading structure has been weighted towards lower graded staff by the NJC and the local proposal will also positively impact on those grades in G01-G06 as described above as they will reach the top of grade sooner.

13. Can any of these limitations be justified on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not?

We do not believe there are any limitations as a result of the proposals.

14. Do any of these limitations amount to unlawful discrimination?

Yes No Not Sure
(please cross as appropriate X)

If you answered Yes or Not Sure, please state on the table below, which protected group(s) it applies to and if possible explain why (including likely impact or effects of this proposed change):

Race	Black Minority Ethnic groups Gypsies / Travellers Language
Disability	Mobility Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities
Sex	Men Women
Age	Older People Children Young People
Religion & Belief	Faith communities
Sexual Orientation	Gay Lesbian Bi-sexual Heterosexual
Gender Reassignment	A person who proposes to, starts or has changed his or her gender
Marriage & Civil Partnership	
Pregnancy & Maternity	

Human Rights	Right to Education, Private and Family Life, Protection of property, etc
Welsh Speaking Communities	
Other socially excluded groups or communities (please state)	

15. If you answered No to Question 14, do the barriers and limitations amount to a differential impact for certain groups?

Yes No Not Sure
(please cross as appropriate X)

16. If you answered Yes or Not Sure to Question 15, please give details in the box below and explain why

17. Do you have enough information to make an informed judgement?

Yes No **(please cross as appropriate X)**

If you answered Yes, please justify:

We have undertaken some pay modelling to understand the impact these proposals will have and they are reflective of the current pay and grading structure which has been in place since 2009/2010 which has received no challenge during that time.

Again, any impact on any groups is perceived as positive.

If you answered No, what information do you require about protected groups?

18. Is it possible to get the information needed quickly and easily, or should data collection be included in the action plan? Please give details below:

STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

In this section, you will consider whether there are any measures to reduce or remove any adverse impact. You should also explore other ways of achieving the same goal and / or alternative means of delivering a service to meet the needs of different groups.

19. What measures can you introduce to the policy or practice which could reduce or remove any unlawful impact or disadvantage?

The measures proposed do remove the unlawful impact i.e non-adoption of several incremental steps to provide an equal pay progression across scales within grades G01, G04, G05 and G06:

JE Grade	2018/19 No. of SCP in Band	2019/20 No. of SCP in Band	2019/20 if proposed change applied
G01	3	3	2
G02	3	2	2
G03	3	2	2
G04	3	4	3
G05	4	8	4
G06	4	6	4
G07	4	4	4
G08	4	4	4
G09	4	4	4
G10	4	4	4
G11	4	4	4
G12	4	4	4

20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?

The proposed changes and new structure once approved will be communicated via Team Brief, Team meetings and through Trade Unions to ensure staff understand the impacts.

21. What actions could you take to achieve the same goal by an alternative means?

The only other considered option would be to review where the SCP's fall and correspond to our existing Single Status scheme and this would require considerable resources and create significant disruption to the whole workforce over a number of years. This is not seen as a realistic or practical option due to limited resources and detrimental impact on staff and cost association.

STEP 6 – Action Plan

Please outline below the actions you will take to progress your proposal. These might involve carrying out additional Engagement/Involvement activities, collecting Equality data where this was not readily available to help with this EqIA, undertake data analysis from future data obtained to monitor the impact of this policy/practice on an ongoing basis, any actions you need to take to ensure procurement complies with the General Duty, any arrangements you need to put in place to monitor and review the impact of this policy/practice in future, and so on.

Action	Measure of Success	Timeframe	Lead Responsibility	Add to Service Plan (✓)
Actions to be taken before EqIA and policy/practice can be signed off				
Consultations with Trade Unions, SLT and Senior Management	Approval to proceed to Council approval	September 2018	Donna Roberts (HR)	✓
Consultations with Finance/HR		September 2018	Donna Roberts (HR)	
Approval via Scrutiny and Cabinet	Approval to Proceed	October 2018	Phil Davies (HR)	
Actions after EqIA and policy/practice signed off				
Communication with Trade Unions, staff and Payroll/Finance	Full awareness and understanding	Jan-April 2019	Donna Roberts (HR)	
Details confirmed to Payroll to implement work in iTrent in readiness for 1 st April 2019	Payment of new rates from 1 st April 2019	November 2018	Donna Roberts (HR)/Tony Walter	

STEP 7 – Decision To Proceed

22. Using the information you have gathered in steps 1 – 5 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(please cross as appropriate X)

Decision		Action
<input type="checkbox"/> Yes	Continue with policy or practice in its current form	Complete the Monitoring and Review section (Step 8) to ensure the outcomes are monitored and regularly reviewed
<input checked="" type="checkbox"/> Yes	Continue with policy or practice but with amendments for improvement	Complete Action Plan and Monitor and Review sections (Steps 6 & 8) to continually assess impact
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments to remove any areas of adverse impact as identified in Step 5	Complete Action Plan (Step 6) to address any areas of adverse impact and Monitor and Review (Section 8) to continually assess impact
<input type="checkbox"/> No	Abandon this policy or practice as it is not possible to address the adverse impact, and consider alternative ways of addressing the issues	Complete Action Plan to address any issues resulting from abandoning policy and to deal with the adverse impact identified

STEP 8 – Arrangements for Monitoring Outcomes and Reviewing Data

The EqIA process is an ongoing one that doesn't end when the policy/practice and EqIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced this new policy or practice.

23. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice :

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)
Monitored through annual Equal Pay Audit	Annual	Tracey Pardoe (HR)	✓

STEP 9 – Publishing the Equality Impact Assessment

Please arrange for this completed EqIA to be agreed by your Head of Service, refer to the EqIA Policy regarding publishing arrangements and return a copy to the HR and Equality Officer.