

## **EQUAL PAY AUDIT**

2022 Report Summary





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### **FOREWORD**

I am pleased to present our 2022 Equal Pay Audit which is part of the continually expanding portfolio of work we do at Kent to further our equality, diversity and inclusion agenda. The 2022 audit showed that there were no gender pay gaps, by grade, across the institution which is great progress since the last audit in 2015.

For this audit, we extended the scope of work to encompass other protected characteristics which, although extending the timeline of the project, has provided a baseline to benchmark future progress and an increased understanding of the targeted actions required to address the audit conclusions.

We continue to carry out annual equality pay gap monitoring which provides an important tool for us to assess our journey. Our gender pay gap has decreased since statutory reporting began In 2017 and whilst positive progress is encouraging, we also recognise that work remains to be done to maintain all of our pay gaps on the same trajectory. Ethnicity and disability reporting have been added to the annual cycle, going beyond our statutory obligations, demonstrating Kent's commitment to this goal.

Clearly there is still much to be done, and we, as an institution, are committed to creating a wholly inclusive environment that attracts, develops and retains staff and students from all backgrounds, and across the world.

#### Martin Atkinson

Director of Human Resources and Organisational Development



### INTRODUCTION

This summary sets out the 2022 Equal Pay Audit (EPA) methodology, journey and outcomes which was informed by input from a sub-JSNCC (Joint Staff Negotiating and Consultation Committee) working group, approved by Executive Group and consulted on with the JSNCC before final sign off in January 2024.

The 2022 EPA was based on an extended specification covering multiple protected characteristics including gender, disability, ethnicity, sexuality, and intersectional analysis<sup>1</sup>, on the snapshot date of 1 November 2021, across a range of contract types. Kent's previous 2015 EPA looked only at gender for open-ended and fixed term contracts and excluded all timesheet-paid staff, Graduate Teaching Assistants and Hourly Paid Lecturers. The significant expansion of the specification resulted in far more analysis being required, thereby delaying the publication of this report.

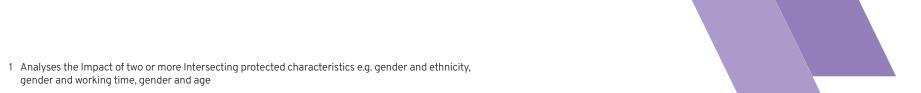
An EPA compares the pay data of men and women (or other protected characteristics) to establish if there are significant pay gaps between those undertaking similar or equal work, by job grade, determined by job evaluation. This is distinct from the <u>annual equality pay gap report</u> which compares the overall average pay between men and women (or other protected characteristics) across the organisation as a whole and is based on a snapshot date of 31 March each year.

The 2022 Equal Pay Audit found that there were no significant gender pay gaps by job grade, which is a considerable achievement and step forward. This was in distinct contrast to the 2015 EPA which found a number of significant gender pay gaps for staff paid on the Professorial and Senior Management pay scale and demonstrates the success of the measures taken to address this issue, with a positive, quantifiable outcome.

Pay gaps were identified using the  $\geq$ 5% significance threshold set by the Equality and Human Rights Commission (EHRC) and  $\geq$ 3-5% for monitoring purposes. After thorough analysis and investigation to determine and explain the underlying reasons, an action plan has been put in place.

The University uses a holistic approach to further equality In the workforce and is committed to creating an inclusive community. Addressing equality pay gaps Is part of this important work and recommendations made as part of this audit will work in tandem with the significant work already happening In this space. This includes commitment towards Athena SWAN re-accreditation, working towards Race Equality Charter accreditation, Advance HE programmes to foster leadership skills for women in the workforce, StellarHE and 'Brilliant Leaders' focussing on leadership for racially minoritised staff, work with the EDI networks and work towards the achievement of the Antiracism strategy action plan and the 2025 People and Culture Strategy KPIs which underpin this work, including the delivery of a Professional Services Career Framework.

Annual equality pay gap reporting will continue to provide year-on-year scrutiny of overall pay gaps, although the next full EPA will take place in 2029, to allow sufficient time to gauge the success of the action plan. Interim monitoring of data will be conducted in 2025.



## METHODOLOGY AND DATA SPECIFICATION

The working specification was agreed with the sub-JSNCC EPA working group, comprising members of JSNCC and our EDI networks:

- The 2022 audit scope included protected characteristics, gender, ethnicity, disability and sexuality
- The census date was 1 November 2021
- Staff in scope included those on open-ended and fixed-term contracts, Graduate Teaching Assistants (GTAs), Hourly Paid Lecturers (HPLs), timesheet research and clinical consultant contracts
- Out of scope for analysis included apprenticeship and timesheet professional services contracts, contracts based at international sites and Marie Curie researcher contracts
- Pay gaps were identified using the ≥5% significance threshold set by the EHRC and ≥3-5% for monitoring purposes. Pay gaps <3% are within accepted tolerance
- Mean, median and standard deviation analysis was conducted by grade, determined by job evaluation, for all equality categories in scope in order to look at pay equity for same or like work
- Analysis was split into two parts, grade analysis and occupational analysis. Grade analysis was undertaken for equality categories in scope. Where grade analysis indicated areas of concern, occupational analysis was undertaken in order to determine which occupational groups were affected as a basis for investigation.
- Additional analysis examined pay distribution within grade by spine point and gender, numbers and proportions of contracts paid on discretionary pay points by gender, payment of market supplements and allowances by gender, direct hires by gender and grade and length of service by gender and grade
- Intersectional analysis compared gender with ethnicity, disability, sexuality, age group and working time (full-time and part-time)
- For confidentiality reasons, low numbers <8 were masked to prevent identification and were considered statistically insignificant. Statistical analysis was therefore not conducted. For this reason, only higher level analysis has been possible in some categories, particularly ethnicity, disability and sexuality
- · Gender categories used were female, male, non-binary, other and prefer not to say
- Two ethnicity categories were used for analysis global level, White, Racially Minoritised and Not Known and basic level to allow analysis of sub-categories, Asian or Asian British, Black or Black British, Chinese, Mixed Background and Other Ethnic Group.
- Disability categories were no known disability, disability declared, not known
- Age groups used for intersectional analysis, <25, 25 to 24, 35 to 44, 45 to 54, 55 to 64, 65 and over</li>
- Sexuality the global terms Hetero-sexual and Non-Heterosexual were used.



# SIGNIFICANT PAY GAP FINDINGS

Table 1: Summary of significant findings remaining after both grade and occupational analysis.

	Mean	Median
Protected Characteristic	Mean pay gaps by occupational grouping in favour of comparator group: These findings require further investigation.	Median pay gaps by occupational grouping in favour of comparator group: These findings require further investigation.
Ethnicity		
Ethnicity – Basic Level Comparator: White		<ul> <li>Grade 8 Academic staff, All and Without HPLs, Chinese (7.11%)</li> <li>Grade 5 Clerical staff, All, No Declared Ethnicity (5.67%)</li> </ul>
Gender and Ethnicity – Global Level Comparator: White man		<ul> <li>Grade 8, All and Without HPLs, Racially Minoritised Academic Men (7.09%)</li> <li>Grade 8, All, White Administrative Women, (8.46%)</li> <li>Grade 10, All, Racially Minoritised Academic Women (5.73%)</li> </ul>
Gender and Ethnicity – Basic Level Comparator: White man		Grade 8, All, White Administrative Women (8.46%)
Disability		
Disability Comparator: No disability declared		<ul> <li>Grade 6, Disability Declared, Without GTAs and HPLs, Clerical staff, (5.71%)</li> </ul>
Gender and Disability Comparator: No disability declared man		<ul> <li>Grade 8, All and Without HPLs, Disability Declared Academic Women, (5.72%)</li> <li>Grade 8, Without GTAs and HPLs, Disability Declared Clerical Women, (8.44%)</li> </ul>

	Mean	Median
Working time		
Full-time staff v. part-time staff Comparator: Full-time	Grade 6, All, Timesheet Paid Research staff (9.18%)	<ul> <li>Grade 6 Research - All and Without GTAs, Part-time (5.71%)</li> <li>Grade 6 Research - All, Timesheet paid (11.09%)</li> </ul>
Full-time man v. full-time by gender Comparator: Full-time man		Grade 6 Full-Time Clerical Women (5.71%)
Full-time man v. part-time by gender Comparator: Full-time man		<ul> <li>Grade 6 Part-time Clerical Men, All and Without GTAs (7.07%)</li> <li>Grade 6 Part-time Technical Men, All and Without GTAs (5.63%)</li> </ul>
Part-time man v. part-time woman Comparator: Part-time man		• Grade 8, Part-time Academic Women, All (5.72%)
Full-time man v. timesheet paid by gender Comparator: Full-time man	<ul> <li>Grade 6, All, Timesheet paid, Research Men (9.7%)</li> <li>Grade 6, All, Timesheet paid, Research Women (8.8%)</li> </ul>	<ul> <li>Grade 6, All, Timesheet paid Research Men (9.78%)</li> <li>Grade 6, All, Timesheet paid Research Women (9.78%)</li> </ul>
Gender and age		
Gender and Age Comparator: Man		• Grade 9, Age Group 46-55, All and Without HPLs, Academic Women (5.72%)



## INVESTIGATION AND FINDINGS

Following analysis by grade, occupational analysis was conducted in order to determine which staff groupings were affected as a basis for further in-depth investigation. Following occupational analysis, in many cases, no further investigation was required because the pay gap fell below the 5% significance threshold. Table 1 above shows the pay gaps that remained which were fully investigated to understand the causes and any policy implications.

It should be noted that this summary report largely focuses on negative findings, however, the audit is supplemented by an extensive range of data tables presenting a balanced picture with many pay gaps in favour of protected characteristics. The purpose of the audit was to measure movement since 2015 and potentially diagnose any new areas of concern for the future to be tackled through an action plan.

Investigations, as applicable to the pay gap, included:

- Analysis of starting spine points and current salary points
- Research into background of individual records including salary and experience prior to recruitment at Kent, origin (UK/non-UK/non-EU/other institutions), multiple contract history
- Academic disciplines/schools (market rates)
- Time taken to progress through grade
- Effect of 2020 Reward Strategy changes/pay freeze (moving bar point, removing skip points, shortening standard progression range, one year delay to standard progression and additional/discretionary increments and promotion-related salary increase)
- Over and under 5 years' service analysis
- Duration of timesheet contracts
- Salary award and promotion rates
- Sickness absence rates
- · Parental leave rates.

**Table 2** below summarises the principal reasons for the pay gaps that could be deduced from the analysis conducted. In some cases no principal reason was identified. Outcomes can be summarised as:

- 1 Imported pay gaps at the point of recruitment. This finding relates specifically to grade 8, Chinese academic staff and grade 8, racially minoritised academic staff (there is a cross-over between the two categories). In these specific categories, although the recruitment policy had been correctly applied, racially minoritised academic staff typically joined Kent at a higher spine point than in a previous external roles, however, in some cases, this was lower than their White academic counterparts who evidenced a higher salary elsewhere. The standard progression range of the pay scale will close these gaps over time.
- 2 Reward strategy pay scale changes and the effect of the 2020 pay freeze. In grades 6 and 8 for some categories of staff, changes to the pay scale structure and the pay freeze has delayed the closing of pay gaps by a year, although the standard progression has the effect of equalising pay over the space of five years or reducing the gaps.
- 3 The pay freeze was consistently applied across all groups of staff and, at the time, had to be balanced against the risk of no action on the financial sustainability of the institution. Changes to the pay spine were also designed to remove historic pay anomalies, benchmark the pay spine to market pay and remove long standard progression ranges in line with EHRC recommendations. The Equality Impact Assessment (EIA) carried out before the 2020/2112-month pay freeze acknowledged that there would likely be a disproportionate impact on staff members with protected characteristics and that it would slow the work of closing pay gaps.
- 4 The legitimate use of part-time, fixed-term and timesheet contracts to maintain flexibility in the workforce and fulfil a business need or to provide opportunities for the student workforce. This particularly affects grade 6 timesheet-paid researchers.
- 5 Lack of personal data disclosure by staff, particularly long-serving staff who have not updated records, could mask issues which are not possible to determine. This directly affects one pay gap relating to grade 5 clerical staff with no declared ethnicity, but may also be affecting disability pay gap data where there is known under-reporting both at Kent and across the sector.
- 6 Static contracts in grades 6, 8 and 9 either due to a handful of professional service roles where there is no natural progression route filled by long-serving members of staff, or academic staff who it appears have chosen not to progress through academic promotion opportunities. As with other gaps, the movement of staff coming up through the grades will reduce the pay gap over the next five years.

## FACTORS UNDERLYING PAY GAPS

Table 2: Summary of factors attributing to significant pay gaps

Significant Pay Gap (identified after occupational analysis)	Imported pay gaps	Reward Strategy changes or effect of 2020 pay freeze	Use of part-time, fixed-term and timesheet contracts	Lack of data disclosure	Static contracts	No principal factor found
Mean						
Grade 6, All, Timesheet Paid Research staff (9.18%)			✓			
Grade 6, All, Timesheet paid, Research Men (9.7%)			✓			
Grade 6, All, Timesheet paid, Research Women (8.8%)			✓			
Median						
Grade 8 Academic staff, All and Without HPLs, Chinese (7.11%)	✓					
Grade 5 Clerical staff, All, No Declared Ethnicity (5.67%)				✓		
Grade 8, All and Without HPLs, Racially Minoritised Academic Men (7.09%)	✓					
Grade 8, All, White Administrative Women, (8.46%)		✓			✓	
Grade 10, All, Racially Minoritised Academic Women (5.73%)						✓
Grade 6, Disability Declared, Without GTAs and HPLs, Clerical staff, (5.71%)						✓
Grade 8, All and Without HPLs, Disability Declared Academic Women, (5.72%)					✓	

Significant Pay Gap (identified after occupational analysis)	Imported pay gaps	Reward Strategy changes or effect of 2020 pay freeze	Use of part-time, fixed-term and timesheet contracts	Lack of data disclosure	Static contracts	No principal factor found
Mean (cont)				,		,
Grade 8, Without GTAs and HPLs, Disability Declared Clerical Women, (8.44%).					✓	
Grade 6 Research - All and Without GTAs, Part-time (5.71%)		✓				
Grade 6 Research - All, Timesheet paid (11.09%)			✓			
Grade 6 Full-Time Clerical Women (5.71%)						✓
Grade 6 Part-time Clerical Men, All and Without GTAs (7.07%)		✓			✓	
Grade 6 Part-time Technical Men, All and Without GTAs (5.63%)						✓
Grade 8, Part-time Academic Women, All (5.72%)		✓			✓	
Grade 6, All, Timesheet paid Research Men (9.78%)			✓			
Grade 6, All, Timesheet paid Research Women (9.78%)			✓			
Grade 9, Age Group 46-55, All and Without HPLs, Academic Women (5.72%)					1	

### RECOMMENDATIONS

Tackling the underlying issues is complex and requires a multi-faceted approach. Recommendations for action often overlap with other institutional EDI action plans, therefore the recommendations made here relate specifically to this audit where action is not happening elsewhere and will complement other projects and Initiatives in this area.

1 Imported pay gaps. Significant work has already been done to remove bias from our recruitment and selection processes, including inclusive statements in job adverts, anonymous shortlisting, working to Disability Confident standards, EDI training for panel members, and the requirement to provide explanation and evidence when appointing above the top of the scale. The role of People Services Advisors, specialising in recruitment and talent acquisition, has been created within HR.

Specific recommendations from this audit are:

- a The development of new recruitment and selection modules to include equality training around salary setting;
- b Production of EDI data at the point of recruitment for recruiting managers to understand the impact of recruitment decisions on the demographic within the employing area including mean and median salary information. Market salary data will continue to be supplied to recruitment panels appointing at the Professorial and Senior Management pay grades;
- c Revised bite-size information provided to managers at relevant points in the recruitment process to ensure better engagement with the process and increase accessibility. Panel Chair guidance will also be reviewed to ensure responsibilities are clear;
- d Change the practice of verbal offers to ensure offers are not made without first consulting a People Services Adviser. This will ensure that any equality-related issues are considered prior to offer and to challenge decisions.

- 2 Timesheet research staff. A recommendation to:
  - a Equalise the terms of employment for grade 6 timesheet paid researchers to allow standard progression which matches the conditions of employment for grade 6 research staff on fixed-term contracts:
  - b Treat this group of staff In line with HPLs and discount any break in service over the term/holiday periods;
  - c Review contract types for timesheet staff which would Include professional services timesheet roles which were out of scope for the Equal Pay Audit.
- 3 Non-disclosure of personal data. A recommendation to:
  - a Reinstate the annual data audit, working with the EDI networks to publicise and encourage staff to disclose Information:
  - b In the longer-term, Investigate the barriers which prevent staff from disclosing the information.
- 4 Future audit improvement. A recommendation that:
- a Low number thresholds are investigated and a new threshold above 8 ls used for analysis to improve the quality of the audit and ensure that the analysis ls statistically significant. Some of the numbers in this report, flagged as statistically significant are just above the threshold and were queried as relevant during consultation;
- b Consider other types of further analysis to determine statistical significance of data and to verify causality;
- c Investigate further data fields for inclusion including 'Country of Origin', 'Nationality' and provenance of staff, for example, whether recruited from the external market or an internal appointment;
- d Investigate<sup>2</sup> the inclusion of a question related to socio-economic background In order to improve the quality of analysis, based on government guidance with a 'prefer not to say' option which would mirror the information collected from students. Information would be used to underpin Interventions to boost socio-economic diversity and inclusion initiatives and to develop strategies to promote equal opportunities for all employees.



### **ACTION PLAN**

EPA 2022	Action plan					
Area of work	Action required	Accountable	Responsible	Timescale		
1 Leadership and Support for Equal Pay principles	Demonstrate leadership and support for equal pay and closing pay gaps through their actions including support for HR in enforcing pay policy.	Executive Group	Executive Group	Immediate and ongoing		
2 Recruitment and Selection	Recruitment and Selection Training modules including EDI guidance	Assistant Director, Talent and Organisational Development	Talent & Digital Learning	Initial review complete		
	Production of relevant EDI-related salary data for recruitment panels on Staff Connect	Head of People Services, HR	HR MI & Systems Manager	Prototype report completed by the end of Academic Year 23/24 with a live report by the end of Academic Year 24/25		
	Review of recruitment information provided to recruiting panels/managers	Head of People Services, HR	People Services Manager	By end of Academic Year 24/25.		
	Transition from verbal salary offer to formal written offer	Head of People Services, HR	People Services Manager	By end of Academic Year 24/25.		
3 Timesheet Research contracts	Equalisation of terms and conditions of employment with HPL contracts	Head of People Services, HR	People Services Manager	By end of Academic Year 24/25.		
	Wider review of timesheet contracts	Head of People Services, HR	People Services Manager	By end of Academic Year 25/26. Start 2024 through to 2025 completion		

EPA 2022	Action plan					
Area of work	Action required	Accountable	Responsible	Timescale		
4 Non-disclosure of personal information	Analyse and investigate reasons for non-disclosure	HR Reward and Recognition Manager & HR MI & Systems Manager	HR Reward and Recognition Manager/HR Systems Team	Initial analysis complete, further analysis by end of Academic Year 24/25		
	Audit of HR systems and processes to increase data disclosure	HR Reward and Recognition Manager and Head of People Services, HR	Reward and Systems Team	Complete for 23/24		
5 Consideration and amendment of data collection requirements for next audit including information on socioeconomic background as recommended in government guidelines.	Add additional data fields as required	HR Reward and Recognition Manager & HR MI & Systems Manager	HR Reward and Recognition Manager/HR Systems Team	Complete		
6 Ongoing monitoring of Equality Pay Gaps	Ongoing monitoring	HR Reward and Recognition Manager & HR MI & Systems Manager	HR Reward and Recognition Manager/HR Systems Analyst	2025 follow up of EPA. Annual monitoring of overall pay gaps (gender, ethnicity and disability)		



## CONCLUSION AND NEXT STEPS

A positive outcome of the 2022 EPA is the absence of all gender pay gaps, by grade, which demonstrates very real progress since the 2015 EPA. This is the first Equal Pay Audit conducted at Kent which includes protected characteristics other than gender demonstrating Kent's commitment to go beyond the minimum reporting requirement. Moving forward, the University now has a deeper understanding against which to measure the equality implications of its pay practice across the wider range of protected characteristics. Tackling these issues will be complex and, as such, implementing equal pay is not likely to be a one-off exercise and needs to be kept under review.

It is important that the recommendations included in this report are systematically addressed with oversight from the Executive Group to ensure that progress is made and there is shared accountability for securing improvements.

Whilst significant progress has been made since 2015, an Equal Pay Audit, whilst a valuable tool, is a retrospective indicator and comes after the fact. The University favours a proactive and preventative approach which it provides through its other many EDI initiatives. The action plan coming out of this audit will sit alongside and supplement this work.

Equal pay Is long-term issue, recognising that time is needed for staff to move through the progression pipeline and that developing and bringing talent through the organisation takes time. An interim review will be undertaken in 2025, and the next full audit in 2029, by which time it will be possible to measure the effects of the latest EPA action plan. We will continue annual equality pay gap reporting in order to provide year-on-year scrutiny of overall pay gaps and to measure progress against specific KPIs in our People Strategy around career advancement for women and racially minoritised staff.

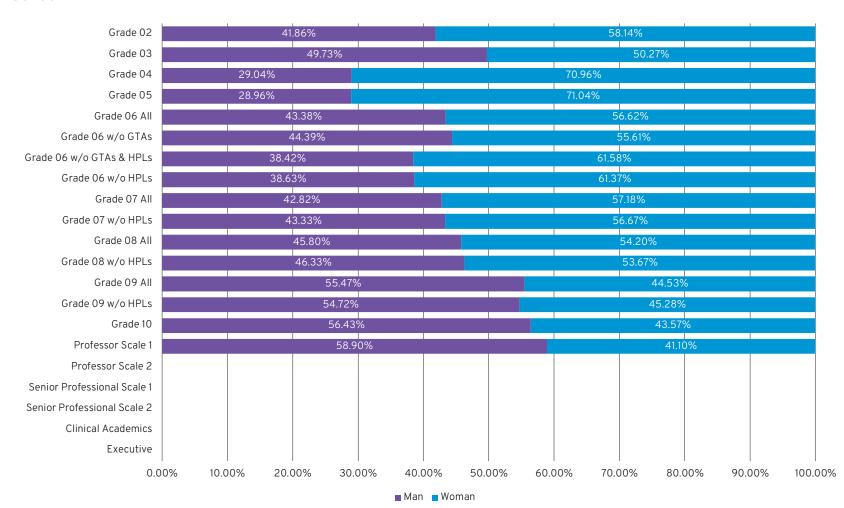




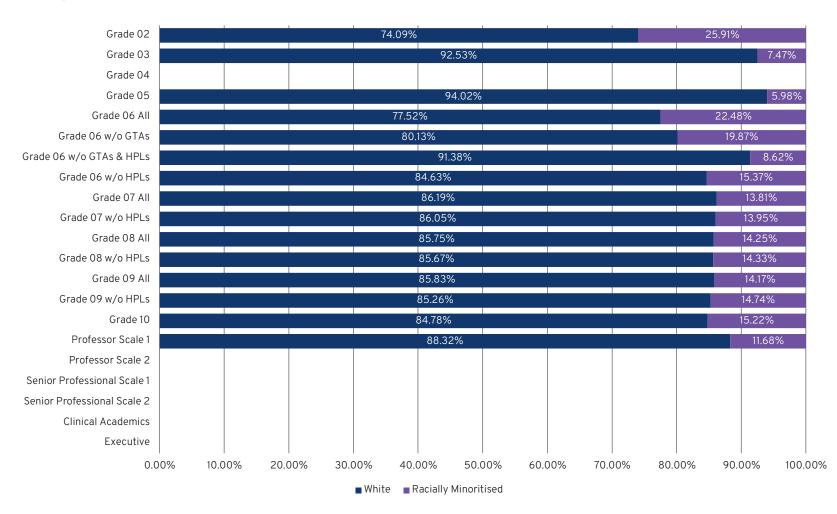
### STAFF BREAKDOWN BY GRADE

Note: low numbers are removed from these charts as these numbers were statistically insignificant.

#### Gender

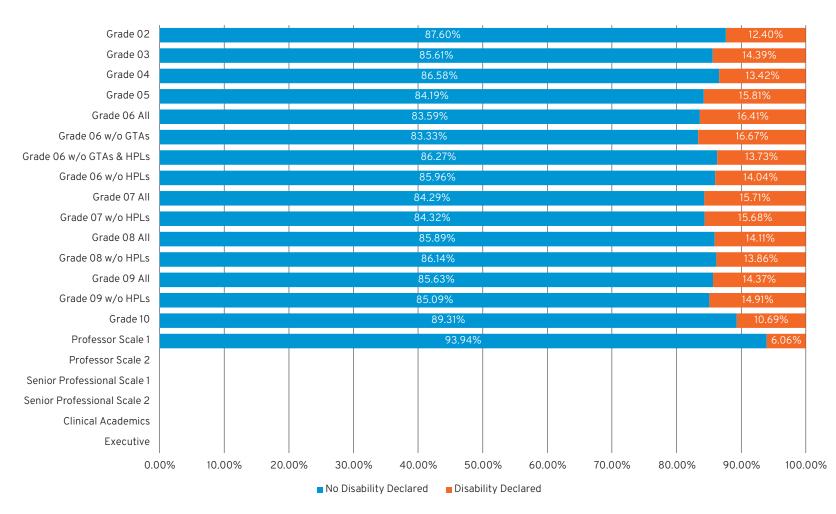


#### **Ethnicity (Global)**

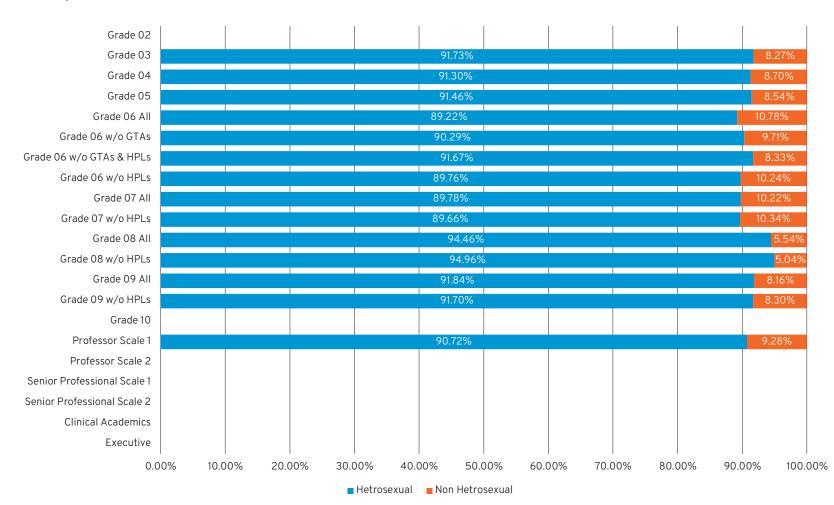




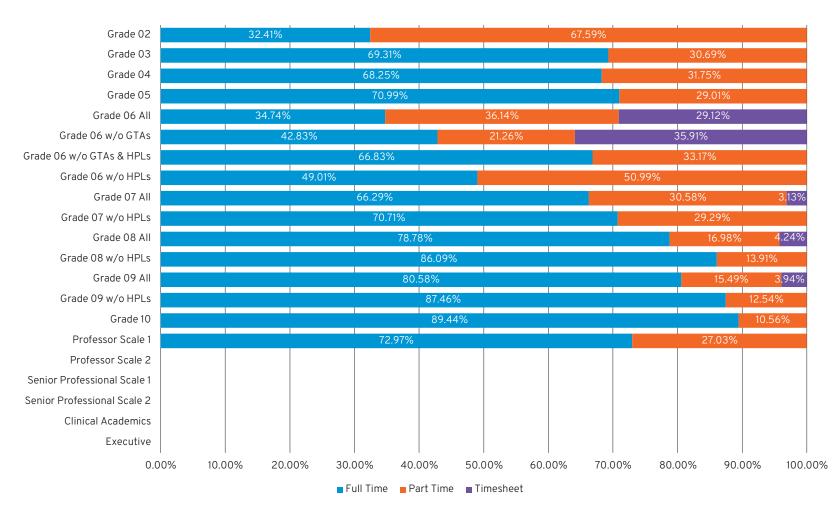
#### **Disability**



#### Sexuality

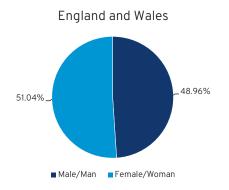


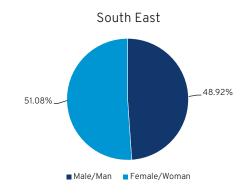
#### Working time



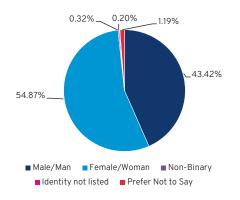
## KENT EPA AUDIT POPULATION AND ENGLAND AND WALES 2021 CENSUS DATA

#### Gender

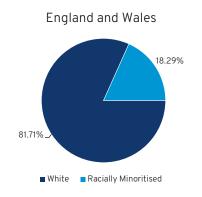


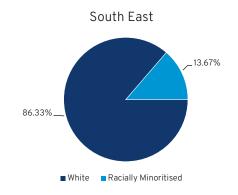




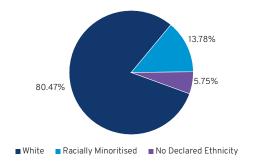


#### Ethnicity(Global)

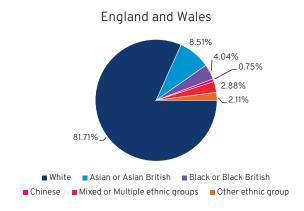


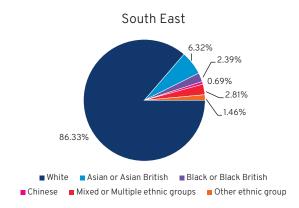


#### University staff population included in the EPA 2022

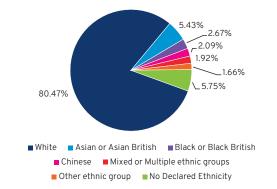


#### **Ethnicity (Basic Level)**

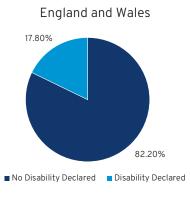


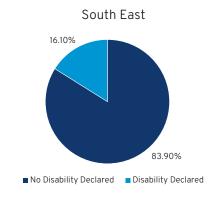


#### University staff population included in the EPA 2022

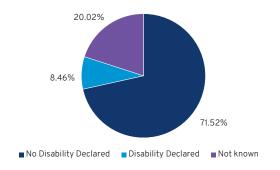


#### **Disability**

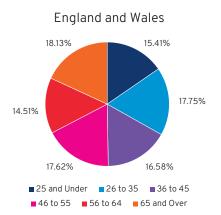


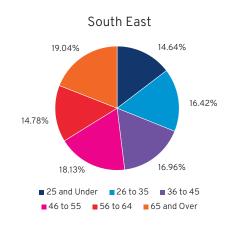


#### University staff population included in the EPA 2022



#### Age group





#### University staff population included in the EPA 2022

