



## Appendix 2

### Caerphilly County Borough Council - Integrated Impact Assessment

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Welsh Language (Wales) Measure 2011
- Well-being of Future Generations (Wales) Act 2015
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles

**PLEASE NOTE: Section 3 Socio-economic Duty only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions.**

See page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

## 1. Proposal Details

**Lead Officer:- Lisa Downey**

**Head of Service:- Lynne Donovan**

**Service Area and Department:- HR, People Services**

**Date:- 10.03.23**

**What is the proposal to be assessed?** *Provide brief details of the proposal and provide a link to any relevant report or documents.*

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**The Council's Gender Pay Gap Statement**, attached at Appendix 1.

Under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, all organisations listed at Schedule 2 to the regulations that employ over 250 employees are required to report annually on their gender pay gap from 2017. The objective of this measure is to deliver transparency, encouraging the Council to analyse the drivers that sit behind its Gender Pay Gap and explore the extent to which its own workplace policies and practices may have contributed to that gap, opposed to other factors outside of its control.

The publication of the Gender Pay Gap Statement alongside the Council's Strategic Equality Plan 2020 – 24, Workforce Development Strategy 2021 – 24, Employee Wellbeing Strategy 2021 – 24, and the Council's ambitious Transformation Strategy, the Gender Pay Gap Data that is referred to in this Statement will form part of a wider equalities review that will align to these comprehensive strategies and support the Council's wider Policy Development.



Alongside the Council's commitment to ensure equality of opportunity in all aspects of employment and service delivery, the identification of and removal of any barriers to women's progression at work may be addressed in this wider context.

In seeking to address the Council's gender pay gap differential, the measures outlined in the Gender Pay Gap Statement align to the wider equality and diversity context of the Council. The different areas covered by the Council's legal requirements, called "protected characteristics" which include gender and other, wider equalities, human rights and language strands are covered in detail in the Council's Strategic Equality Plan [Strategic Equality Plan 2020 - 2024](#)

Significant engagement and consultation were undertaken in the production of the above-mentioned strategies and the consultative and engagement processes that these were subject to are included in the Integrated Impact Assessments (IIAs) undertaken for those Strategies. The Gender Pay Gap Statement as shown in Appendix 1 refers only to a position of fact as taken from these strategies and no further wider consultative process was required in this context. As actions stem from any ongoing and annual wider data analysis however, these will be subject to further consultation processes as required and appropriate in due course.

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## 2. Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

*(The Public Sector Equality Duty requires the Council to have "due regard" to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups). Please note that an individual may have more than one [protected characteristics](#).*

### 2a Age (people of all ages)

#### (i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?

Neutral in terms of the publication of the Gender Pay Gap Statement. Positive in terms of data analysis and wider Strategy implementation that may support a reduction in the Gender Pay Gap over time.

The quartile breakdowns required under Gender Pay Gap reporting show the headline data of the proportion of women and men at different pay levels.

The in-depth analysis of the same data under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 supports the effective analysis of all equalities data aligned to Gender.

The measures in the Gender Pay Gap Statement aim to address any imbalance that may be a barrier to closing of the Gender Pay Gap and age analysis as it applies to Gender is relevant in this context.



**(ii) If there are negative impacts how will these be mitigated?**

No negative impact aligned to the publication of the Gender Pay Gap Statement. The Gender Pay Gap figures and the fact that a gap exists requires scrutiny and ongoing analysis aligned to wider equalities data on an annual cycle. The data results support Policy Review.

**(iii) What evidence has been used to support this view?**

The Council's Strategic Equalities Plan 2020-2024.

Welsh Government and Equalities Commission Reports outlining gender and equality imbalances at all ages, impacted by numerous factors at societal level.

**2b Disability** (*people with disabilities/long term conditions*)

**(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

As 2(a) (i) above.

The measures in the Gender Pay Gap Statement aim to address any imbalance that may be a barrier to closing of the Gender Pay Gap and the analysis of Disability data as it applies to gender is relevant in this context.

**(ii) If there are negative impacts how will these be mitigated?**

As 2(a) (ii) above

**(iii) What evidence has been used to support this view?**

As 2(a) (iii) above.

**2c Gender Reassignment** (*anybody who's gender identity or gender expression is different to the sex they were assigned at birth*)

**(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

As 2(a) (i) above.

The measures in the Gender Pay Gap Statement aim to address any imbalance that may be a barrier to closing of the Gender Pay Gap and the analysis of Gender Reassignment data as it applies to gender is relevant in this context.



**(ii) If there are negative impacts how will these be mitigated?**

As 2(a) (ii) above.

**(iii) What evidence has been used to support this view?**

As 2(a) (iii) above.

**2d Marriage or Civil Partnership** (*people who are married or in a civil partnership*)

**(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

As 2(a) (i) above

The measures in the Gender Pay Gap Statement aim to address any imbalance that may be a barrier to closing of the Gender Pay Gap and the analysis of Marriage or Civil Partnership data as it aligns to gender is relevant in this context.

**(ii) If there are negative impacts how will these be mitigated?**

As 2(a) (ii) above.

**(iii) What evidence has been used to support this view?**

As 2(a) (iii) above.

**2e Pregnancy and Maternity** (*women who are pregnant and/or on maternity leave*)

**(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

As 2(a) (i) above

The measures in the Gender Pay Gap Statement aim to address any imbalance that may be a barrier to closing of the Gender Pay Gap.

The Council supports the protections given to staff who are pregnant and/or on maternity leave under UK law but it is extensively reported that a woman's career progression may be impacted by her pregnancy and maternity absence. Societal level impacts can still influence the employee's interest in career progression and interest in specific roles. The analysis of pregnancy and maternity data and what this means at entry level to the Council and to promotion, etc, is relevant in this context.



**(ii) If there are negative impacts how will these be mitigated?**

As 2(a) (ii) above.

Women far outnumber men in all levels of the Council's pay structure and women also far outnumber the men who seek flexible working and/or part time opportunities following a change in family circumstances, such as the welcoming of a child. Whilst the Council supports flexibility and agile working solutions in this context, it may again seek to effectively promote the opportunities for men to take advantage of such opportunities. Appreciating of course that a higher take up of these opportunities may have a positive impact on the gender imbalance at societal level over an extended period but will only minimally impact the Gender Pay Gap of the Council if the respective partner is female and works for the Council.

The Council's move to support agile working solutions may positively impact any imbalance at entry level to the organisation but this may not be evident in any promotion data until embedded.

**(iii) What evidence has been used to support this view?**

As 2(a) (iii) above.

**2f Race** (*people from black, Asian and minority ethnic communities and different racial backgrounds*)

**(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

As 2(a) (i) above.

The measures in the Gender Pay Gap Statement aim to address any imbalance that may be a barrier to closing of the Gender Pay Gap and the analysis of Race data as it aligns to gender is relevant in this context.



**(ii) If there are negative impacts how will these be mitigated?**

As 2(a) (ii) above.

**(iii) What evidence has been used to support this view?**

As 2(a) (iii) above.

**2g Religion or Belief** *(people with different religions and beliefs including people with no beliefs)*

**(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

As 2(a) (i) above.

The measures in the Gender Pay Gap Statement aim to address any imbalance that may be a barrier to closing of the Gender Pay Gap and the analysis of Religion or Belief data as it aligns to gender is relevant in this context.

**(ii) If there are negative impacts how will these be mitigated?**

As 2(a) (ii) above.

**(iii) What evidence has been used to support this view?**

As 2(a) (iii) above.

**2h Sex** *(women and men, girls and boys and those who self-identify their gender)*

**(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

As 2(a) (i) above.

The measures in the Gender Pay Gap Statement aim to address any imbalance that may be a barrier to closing of the Gender Pay Gap and the analysis of Sex leads this data analysis with all other equalities factors as they apply to gender also relevant in this context.



**(ii) If there are negative impacts how will these be mitigated?**

As 2(a) (ii) above.

**(iii) What evidence has been used to support this view?**

As 2(a) (iii) above.

**2i Sexual Orientation** (*lesbian, gay, bisexual, heterosexual, other*)

**(i) Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?**

As 2(a) (i) above.

The measures in the Gender Pay Gap Statement aim to address any imbalance that may be a barrier to closing of the Gender Pay Gap and the analysis of Sexual Orientation data as it applies to gender is relevant in this context.

**(ii) If there are negative impacts how will these be mitigated?**

As 2(a) (ii) above.

**(iii) What evidence has been used to support this view?**

As 2(a) (iii) above.

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### 3. Socio-economic Duty (Strategic Decisions Only)

*(The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. **Socio-economic disadvantage** means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services)*

Please consider these additional vulnerable group and the impact your proposal may or may not have on them:

- Single parents and vulnerable families
- People with low literacy/numeracy
- Pensioners
- Looked after children
- Homeless people
- Carers
- Armed Forces Community
- Students
- Single adult households
- People misusing substances
- People who have experienced the asylum system
- People of all ages leaving a care setting
- People living in the most deprived areas in Wales (WIMD)
- People involved in the criminal justice system

#### 3a Low Income / Income Poverty (cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)

##### (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

Neutral in the publication of this Gender Pay Gap Statement.

Positive in relation to the payment of the Foundation Living Wage. In support of some of its lowest paid members of staff across all directorates, the Council pays its workforce the real living wage minimum hourly rate of pay, which was £9.90 per hour on 31<sup>st</sup> March 2022.

The Foundation Living Wage positively impacts gender as the data capture relevant to the Gender Pay Gap Statement shows that only 9.72% of the 1,841 male population hold posts in the lower quartile of pay, compared to 31,21% of a 4,527 female strong workforce.

This supplement to pay has a positive impact in terms of reducing the Gender Pay Gap, particularly in this time period where the Real Living Wage favourably and disproportionately increased in comparison to the NJC pay points on the Council's pay structure.





**(ii) If there are negative impacts how will these be mitigated?**

The Council has invested heavily in creating a non-discriminatory, transparent pay and grading structure and conditions of service that fully comply with the Equal Pay Act and any other anti-discriminatory legislation.

The Council is confident that its gender pay gap does not stem from paying male and female employees differently for the same or equivalent work. The gender pay gap is the result of roles in which male and females currently work and the salaries that these roles attract.

Whilst the Council's pay structure supports the Living Wage Foundation and this predominantly supports many more women than it does men in the Council's structure, it is a fact that 1,413 women hold posts in the lowest quartile of pay. These are predominantly part time posts in cleaning and catering services that continue to attract far more women than men. Only 179 men occupy posts in this lower quartile.

Whilst the Council continues to deliver diverse services with a very high concentration of part time posts in the lower earnings quartile, the opportunity to close its gender pay gap will be limited.

**(iii) What evidence has been used to support this view?**

The Council's Pay Policy Statement 2021 and data analysis aligned to the Gender Pay Gap Statement.



**3b 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 provisions for the future*)

**(i) Does the proposal have any positive, negative or neutral impacts on the following and how?**

As 3(a) (i) above.

**(ii) If there are negative impacts how will these be mitigated?**

As 3(a) (ii) above

**(iii) What evidence has been used to support this view?**

As 3(a) (iii) above.

**3c Material Deprivation** (*unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.*)

**(i) Does the proposal have any positive, negative or neutral impacts on the following and how?**

N/A

**(ii) If there are negative impacts how will these be mitigated?**

N/A

**(iii) What evidence has been used to support this view?**

N/A

**3d Area Deprivation** (*where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?*)

**(i) Does the proposal have any positive, negative or neutral impacts on the following and how?**

Neutral in terms of the publication of the Gender Pay Gap Statement.



Positive in terms of the measures stated to support a reduction in the Gender Pay Gap: As the Council implements agile working solutions to meet its ever-changing service needs. This can provide choice for many as to where they work and the opportunity for women and men alike to attain a job of choice is enhanced. The more flexible the working opportunities, the more appealing these can appear to women and men who have childcare and/or caring responsibilities or who welcome a work life balance aligned to their preference/their living arrangements.

**(ii) If there are negative impacts how will these be mitigated?**

It is recognised that some job roles will not support agile working and that front line work opportunities may remain inaccessible for some. There are however front-line working opportunities throughout the borough and the Council's family friendly policies continue to offer some flexibility.

**(iii) What evidence has been used to support this view?**

The Council's Transformation Strategy supporting agile working solutions as referred to in the Gender Pay Gap Statement.

HR Policies including flexible working, home working, career breaks, adoption leave, carers leave, a flexible working hours scheme, salary sacrifice and childcare voucher schemes, job share, leave of absence, parental, shared parental and paternity leave, part time working, shift/day swapping and term time only working opportunities.

**3e Socio-economic Background** (*social class i.e. parents education, employment and income*)

**Does the proposal have any positive, negative or neutral impacts on the following and how?**

Neutral in the publication of the Gender Pay Gap Statement.

Positive in the measure contained therein and the context of the Strategic Equality Plan 2020-2024 and Cabinet's Commitment to provide education opportunities for all.

The Council is committed to improving education opportunities for all and the primary aim of this objective is to ensure that its communities are well equipped to secure sustainable and well-paid employment as a means of preventing poverty. Through ensuring its citizens are ready to enter the working environment, the aim is to prevent long term problems associated with low skills and unemployment. The removal of societal barriers as opportunities are presented can have a positive effect on the gender pay gap and many other equalities matters.

**(iii) If there are negative impacts how will these be mitigated? how?**

'Improve Education opportunities for all' as detailed in the Council's Corporate Plan, will be delivered using outcomes identified within the Shared Ambitions 2019-2022 Strategy. This strategy outlines the Council's commitment to work with schools and the Education Achievement Services (EAS) to improve educational attainment and achievement.



Equality applies to all protected characteristics in this context including gender. The creation of opportunity at an early level represents societal change. It is extensively reported that the Gender Pay Gap figures are reflective of the causes of gender pay gap at a societal level.

**(iv) What evidence has been used to support this view?**

Council's Strategic Equality Plan 2020-2024.

Council's Corporate Plan.

Shared Ambitions 2019-2022 Strategy.

**3f Socio-economic Disadvantage** *(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)*

**(i) Does the proposal have any positive, negative or neutral impacts on the following and how?**

Neutral in terms of the Publication of the Gender Pay Gap Statement.

**(ii) If there are negative impacts how will these be mitigated?**

No negative impact aligned to the publication of the Gender Pay Gap Statement. The Gender Pay Gap figures and the fact that a gap exists requires scrutiny and ongoing analysis aligned to wider equalities data on an annual cycle. The data results will support Policy Review.

**(iii) What evidence has been used to support this view?**

The Council's Strategic Equalities Plan 2020-2024.

Welsh Government and Equalities Commission Reports outlining gender and equality imbalances at all ages, impacted by numerous factors at societal level.

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**4. Corporate Plan – Council's Well-being Objectives**

*(How does your proposal deliver against any/all of the Council's Well-being Objectives? Which in turn support the national well-being goals for Wales as outlined in the Well-being of Future Generations (Wales) Act 2015. Are there any impacts (positive, negative or neutral? If there are negative impacts how have these been mitigated?) Well-being Objectives*

**Objective 1** - Improve education opportunities for all

Neutral in terms of the publication of the Gender Pay Gap Statement.

Positive – As per 3 (e) above.



## **Objective 2 - Enabling employment**

Neutral in terms of the publication of the Gender Pay Gap Statement.

Positive in terms of the measures stated therein and alignment to Strategy – through the creation of more substantial and sustainable employment linked to a non-guaranteed hours review as outlined in the Council's Wellbeing Strategy 2021-24; the provision of the Real Living Wage, the move to support agile working solutions and the strengthening of our employment programmes to widen our provision of apprenticeships, work placements and work experience opportunities through the Council's Workforce Development Strategy. All of which have the potential to positively impact the gender pay gap and ultimately positively impact the work experience of all staff in what is an extensively predominant female workforce.

**Objective 3 - Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people's well-being**

N/A

**Objective 4 - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impact on the environment**

N/A

**Objective 5 - Creating a county borough that supports healthy lifestyle in accordance with the Sustainable Development principle with in the Well-being of Future Generations (Wales) Act 2015**

The Gender Pay Gap Statement and Data Analysis aligns to the Council's Wellbeing Strategy 2021 – 2024 in this context.

**Objective 6 - Support citizens to remain independent and improve their well-being**

Positive in an employee context for the reasons already referred to in this Integrated Impact Assessment.

## **4a. Links to any other relevant Council Policy** *(How does your proposal deliver against any other relevant Council Policy)*

The foundations of this Gender Pay Gap Statement align to the Council's Strategic Equality Plan 2020 - 2024; the Workforce Development Strategy 2021 - 2024; The Wellbeing Strategy 2021 - 2024; and the Council's Transformation Strategy.

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**5. Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working** *(Also known as the sustainable development principles. The Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the [five ways of working](#) as a baseline)*

**How have you used the Sustainable Development Principles in forming the proposal?**

**Long Term**

The publication of the Gender Pay Gap Statement is a short-term need repeated on an annual cycle. The measures referred to therein align to the longer-term aim to achieve a reduction in the Gender Pay Gap. It is hoped measures such as agile working solutions and Policy Review aligned to data analysis and the effective promotion of the Council as an employer of choice will effect change in the Long Term.

**Prevention**

The Gender Pay Gap Statement and measures referred to herein align to the Workforce Planning requirement of the Workforce Development Strategy 2021 – 2024 and Policy Review referred to therein. The data analysis referred to throughout this Integrated Impact Assessment will support the Council's ability to succession plan, considerate of the Council's equalities agenda, gender pay gap and supporting Strategies in this context.



## **Integration**

The Gender Pay Gap Statement and measures referred to herein align to the Council's Workforce Development Strategy that in fulfilling our potential aims to strengthen existing partnerships and explore new opportunities with private training providers, colleges, universities and Trade Union colleagues, to enhance learning provision. In the delivery of the Equalities Strategic Plan, one aim is to develop support for Adult Community Education to deliver digital literacy courses that will support local employability programmes. Through investing in our educational and housing stock, and providing apprenticeships, training opportunities and work placements we will increase the number of local citizens who are skilled and qualified workers and contributing to Community Benefits. As we aim to promote and facilitate inclusive and cohesive communities, work with individuals, community groups who share a protected characteristic (which includes gender alone and gender linked to other protected characteristics as relevant in this context), we will attain a greater understanding as to how we may influence the closing of the Gender Pay Gap at Societal level and specifically the gender Pay Gap of the Council.

## **Collaboration**

The measures in the Gender Pay Gap Statement require all parties to accept and own their individual responsibilities as outlined in the various Strategies that this Statement aligns to. It includes working collaboratively with WG, the Equalities Commission; external employment/placement providers, Schools, Universities and Colleges, equality champions such as stonewall and our Union colleagues. The collaboration list in the effective implementation of the measures outlined in the Gender Pay Gap Statement is fluid and extensive.

## **Involvement**

The Gender Pay Gap Statement is an inward-looking Statement that the Council is required to publish. Wider consultation with the community has not taken place in this context. The measures referred to therein however are based on the extensively consulted Strategies referred to throughout this integrated Impact Assessment.

## 6. Well-being of Future Generations (Wales) Act 2015

### Does the proposal maximise our contribution to the Well-being Goals and how?

#### **A Prosperous Wales**

*An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work*

The publication of the Gender Pay Gap Statement will have a neutral effect. An annual data analysis can positively impact the policy review aligned to the Council's Strategic Equality Plan and Workforce Development Strategy. These are the strategies that more clearly align to supporting 'A Prosperous Wales'. Data analysis on an annual cycle will however raise awareness as to the impact that all measures taken by the Council to enact a Prosperous Wales have had on the gender pay gap and all other equalities matters.

#### **A Resilient Wales**

*A nation which maintains and enhances a biodiverse natural environment healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for climate change)*

As above. Data analysis on an annual cycle will raise awareness as to the impact that all measures taken by the Council to enact a Resilient Wales have had on the gender pay gap and all other equalities matters.

#### **A Healthier Wales**

*A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood*

As above. Data analysis on an annual cycle will raise awareness as to the impact that all measures taken by the Council to enact a Healthier Wales have had on the Gender Pay Gap and all other equalities matters. The measure outlined in this Gender Pay Gap Statement align to the Council's Wellbeing Strategy in which People's physical and mental well-being is maximised and health impacts are understood.

#### **A More Equal Wales**

*A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)*

Strengthening our commitment to Inclusivity and Equality lies at the heart of the measures outlined in the Gender Pay Gap Statement.





### **A Wales of Cohesive Communities**

*Attractive, viable, safe and well-connected communities*

As above. Data analysis on an annual cycle will raise awareness as to the impact that all measures taken by the Council to enact a Wales of Cohesive Communities has had on the gender pay gap and all other equalities matters.

### **A Wales of Vibrant Culture and Thriving Welsh Language**

*A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation*

As above. Data analysis on an annual cycle will raise awareness as to the impact that all measures taken by the Council to enact a Wales of Vibrant Culture and Thriving Welsh Language have had on the gender pay gap and all other equalities matters.

### **A Globally Responsible Wales**

*A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being*

As above. Data analysis on an annual cycle will raise awareness as to the impact that all measures taken by the Council to enact a Globally Responsible Wales have had on the gender pay gap and all other equalities matters.

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## 7. Welsh Language (Wales) Measure 2011 and Welsh Language Standards

*(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language) Policy Making Standards - Good Practice Advice Document*

### 7a. Links with Welsh Government's Cymraeg 2050 Strategy and CCBC's Five Year Welsh Language Strategy 2017-2022 and the Language Profile

**(i) Does the proposal have any positive, negative or neutral impacts on the following and how?**

Neutral Impact in terms of Publication of the Gender Pay Gap Statement.

**(ii) If there are negative impacts how will these be mitigated?**

N/A

**(iii) What evidence has been used to support this view? e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census**

N/A

### 7b. **Compliance with the Welsh Language Standards.** *Specifically Standards 88–93*

**(i) Does the proposal have any positive, negative or neutral impacts on the following and how?**

Neutral Impact in terms of publication of the Gender Pay Gap Statement.

**(ii) If there are negative impacts how will these be mitigated?**

N/A

**(iii) What evidence has been used to support this view? e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census**

N/A

### 7c. **Opportunities to promote the Welsh language** *e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community*



- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

Neutral Impact in terms of publication of the Gender Pay Gap Statement.

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view? *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

N/A

#### **7d. Opportunities for persons to use the Welsh language *e.g. staff, residents and visitors***

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

Neutral Impact in terms of publication of the Gender Pay Gap Statement.

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view?  
*e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

N/A

#### **7e. Treating the Welsh language no less favourably than the English language**

- (i) Does the proposal have any positive, negative or neutral impacts on the following and how?

Neutral Impact in terms of publication of the Gender Pay Gap Statement.

- (ii) If there are negative impacts how will these be mitigated?

N/A

- (iii) What evidence has been used to support this view? *e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census*

N/A



- 7f. Having considered the impacts above, how has the proposal been developed so that there are positive effects, or increased positive effects on (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.

N/A

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## 8. Data and Information

*(What data or other evidence has been used to inform the development of the proposal? Evidence may include the outcome of previous consultations, existing databases, pilot projects, review of customer complaints and compliments and or other service user feedback, national and regional data, academic publications and consultants' reports etc.)*

**Data/evidence** *(Please provide link to report if appropriate)*

Gender Pay Gap Data Analysis of the Council's Workforce as at the 30<sup>th</sup> March 2022 in the form of a Gender Pay Gap Statement - Appendix 1. The data must be published to comply with the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.

Significant research and utilisation of best practice from professional bodies – CIPD; The Equalities Commission and Welsh Government will inform a review of the data on an annual basis.

### Key relevant findings

The key findings of the data analysis are included in the Gender Pay Gap Statement, attached Appendix 1

### How has the data/evidence informed this proposal?

The data capture for the Gender Pay Gap Statement is regulated and specific as outlined in the Gender Pay Gap Statement.

It is the wider equalities data analysis aligned to Gender that will support Strategy Development and Policy Review aimed at reducing the Gender Pay Gap.

The data also highlights the positive impact of the Council continuing to be a Real Living Wage employer.

**Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled?** *Details of further consultation can be included in Section 9.*

No significant gaps identified but the Council can and will improve its corporate data collation in matters relating to recruitment and learning and development, which will lead to and assist



assessment of the impact of measures undertaken to support the reduction of the Gender Pay Gap.

The Council is committed under its Workforce Development Strategy to implement smarter solutions to practices and technology to optimise our efficiency, quality and productivity and this will include improvement and refinement of our data management systems and processes and to be more effective in our use of data intelligence in decision making. Data capture to inform a reduction in the gender Pay gap, relevant in this context.

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## 9. Consultation

*(In some instances, there is a legal requirement to consult. In others, even where there is no legal obligation, there may be a legitimate expectation from people that a consultation will take place. Where it has been determined that consultation is required, **The Gunning Principles** must be adhered to. Consider the **Consultation and Engagement Framework**. Please note that this may need to be updated as the proposal develops and to strengthen the assessment.*

**Briefly describe any recent or planned consultations paying particular attention to evidencing the Gunning Principles.**

Corporate Management Team; Cabinet Member for Corporate Services, Head of Financial Services & S151 Officer, Head of Legal Services & Monitoring Officer, Head of People Services, HR Service Manager, Senior Policy Officer Equalities & Welsh Language in terms of agreement to seek publication of the Gender Pay Gap Statement – Appendix One.

The Strategies that align to this Gender Pay Gap Statement were subject to their own extensive consultative processes and available for reference.

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## 10. Monitoring and Review

### **How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?**

The Gender Pay Gap Data Analysis will be used to inform a wider equalities data analysis and the resulting information will be used to inform Strategy implementation and Policy Review. The data and review will be undertaken on an annual basis aligned to the requirement to publish data.

### **What are the practical arrangements for monitoring?**

Monitoring arrangements will be refined aligned to the strategies outlined in this Integrated Impact Assessment. The reporting arrangements and requirement to publish the data have been in place since 2017.

### **How will the results of the monitoring be used to develop future proposals?**

The results of the monitoring will be reflected in the Council's communication process and policy review. For example, the data may show that women are not attracted to, getting 'stuck' or staying in posts longer than men in Council roles. The data could possibly evidence a gender imbalance in promotions. On an annual cycle, this may be a movable position.

We know that there is a high concentration of women compared to a very low concentration of men that are attracted to roles at the lower end of the Council's evaluated salary range and/or to part time working and whilst we continue to provide these services, our opportunity to close the gender pay gap is limited. We also know that we have a comprehensive suite of policies that support men to share childcare and caring responsibilities.

The refinement of our data processes will support us to capture this data more comprehensively and enable the Council to be responsive to the results in all aspects of our wider Strategy implementation.

### **When is the proposal due to be reviewed?**

March 2024.

### **Who is responsible for ensuring this happens?**

Head of People Services

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**11. Recommendation and Reasoning** (delete as applicable)

Implement proposal with no amendments.

**Have you contacted relevant officers for advice and guidance?** (delete as applicable)

Yes

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**12. Reason(s) for Recommendations**

*(Provide below a summary of the Integrated Impact Assessment. This summary should be included in the "Summary of Integrated Impact Assessment" section of the Corporate Report Template. The Integrated Impact Assessment should be published alongside the Report proposal).*

The Public Sector Equality Duty requires the Council to have "due regard" to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups.

The measures as outlined in the Gender Pay Gap Statement align to the Council's Strategic Equalities Plan 2020 – 2024; Workforce Development Strategy 2021 – 2024; Wellbeing Strategy 2021-24 and the Council's ambitious Transformation Strategy.

The Gender Pay Gap Statement attached at Appendix 1, outlines the council's aspirations of being recognised as an employer of choice in terms of our approach to diversity, equalities, and personal well-being. Strengthening Inclusivity and Equality lies at the heart of this Gender Pay Gap Statement and the Strategies that underpin it.

The Council has a predominantly female workforce that represents 71.1% of the data snapshot that underpins this Gender Pay Gap Statement for 2022. The effective implementation of the measures and actions contained in the Strategies referred to throughout this Integrated Impact Assessment have the potential to positively impact the gender pay gap and support the Council's wider equalities agenda.

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### 13. Version Control

*(The IIA should be used in the early stages of the proposal development process. The IIA can be strengthened as time progresses to help shape the proposal. The Version Control section will act as an audit trail to evidence how the IIA has been developed over time) (Add or delete versions as applicable)*

#### ➤ Version 1

**Author:- Lisa Downey**

**Brief description of the amendments/update:-**

**Revision Date:-**

#### ➤ Version 2

**Author:-**

**Brief description of the amendments/update:-**

**Revision Date:-**

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### Integrated Impact Assessment Author

**Name:- Lisa Downey**

**Job Title:- HR Service Manager**

**Date:- 07.03.23**

### Head of Service Approval

**Name:- Lynne Donovan**

**Job Title:- Head of People Services**

**Signature:-**

A handwritten signature in black ink, appearing to read 'Lynne'.

**Date:- 10.03.22**