



For discussion

Title: Cairngorms National Park Authority Equal Pay Audit 2024

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Executive summary

1. Across the organisation as a whole, there are 64 female staff and 48 male staff – so female staff make up 57% of the workforce. The overall average male hourly salary is £23.28, and the overall average female salary is £20.22 (the average hourly salary across the organisation is £21.53). This makes the mean gender pay gap 13.14%. This figure is higher than the Park Authority's 2023 Gender Pay Gap of 9.55%, as well as the 2022 figure of 12.49%, but represents an improvement on the figures in 2021 of 17.44%, 2020 of 17.92%, 2019 of 19.25%, 2018 of 20.20%, 2017 of 21.47%, and 2015 of 23.64%. This figure includes the CEO's pay. If we remove the CEO hourly pay, the mean gender pay gap is 10.93%.
2. If we use the median methodology to calculate the Gender Pay Gap, the figure is 4.55%. We do not have updated data for the mean Scottish pay gap, but statistics from the Office of National Statistics Survey of Hours and Earnings 2023 (November 2023) provides data on the median pay gap in Scotland, which is of 8.7%. So, the Park Authority's median pay gap is lower than the Scottish median pay gap, and also lower than the UK figure of 14.3%.

Background

3. An equal pay audit is designed to scrutinise all aspects of pay including profiles of the different grades and directorates across the organisation, as well as recruitment and promotion in order to highlight any areas where direct or indirect discrimination may be impacting on pay equality. Cairngorms National Park Authority (CNPA) is committed to conducting an equal pay audit as part of its approach to equalities, and we assess pay for gender equality on an ongoing basis.
4. CNPA has a robust and objective job evaluation system which is designed to eliminate all elements of potential discrimination in the grading of different jobs, but



it is important that our processes are scrutinised to ensure that inequalities are not allowed to develop inadvertently. There may be socio-demographic reasons behind differences in pay or variations in numbers of male or female staff at different grades within the organisation which acts to skew some results, but it is not sufficient to assume that this is the case. Hence, we undertake a detailed review to seek to understand our equal pay position as fully as possible.

5. The gender pay gap is the difference between women's and men's average earnings. It is a complex issue and there is no definitive way in which to report a single figure which fully captures those complexities. There are typically two different methods to calculate the pay gap:
 - a) The median average gender pay gap is calculated by finding the midpoint in all employees' hourly pay and discarding the lowest and highest rates of pay – such that half of the employees' earning will be above and the other half below the mid-point. The median is therefore not skewed by very low hourly pay or very high hourly pay. However, as typically men account for the majority of those with very high rates of pay and women account for the majority of those with very low rates of pay, the median can obscure some gendered differences.
 - b) The mean average gender pay gap is calculated by adding all employees' rates of pay together and dividing by the total number of employees. It therefore includes the lowest and highest hourly rates of pay. International measure use the mean when calculating the pay gap which enables comparisons to be made with other countries. Guidance suggests that preference should be given to the mean, as it gives a deeper understanding of any pay gaps. This paper is based on the mean for the calculations across grade and directorate, but we have also provided the median figure for the overall pay gap.
6. Pay data of all staff in post on 30 March 2024 informed the gender pay gap calculation.

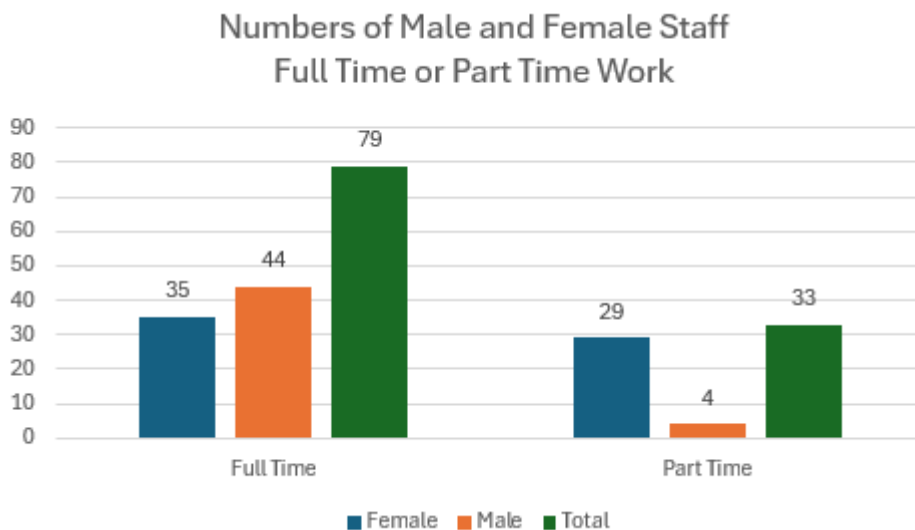
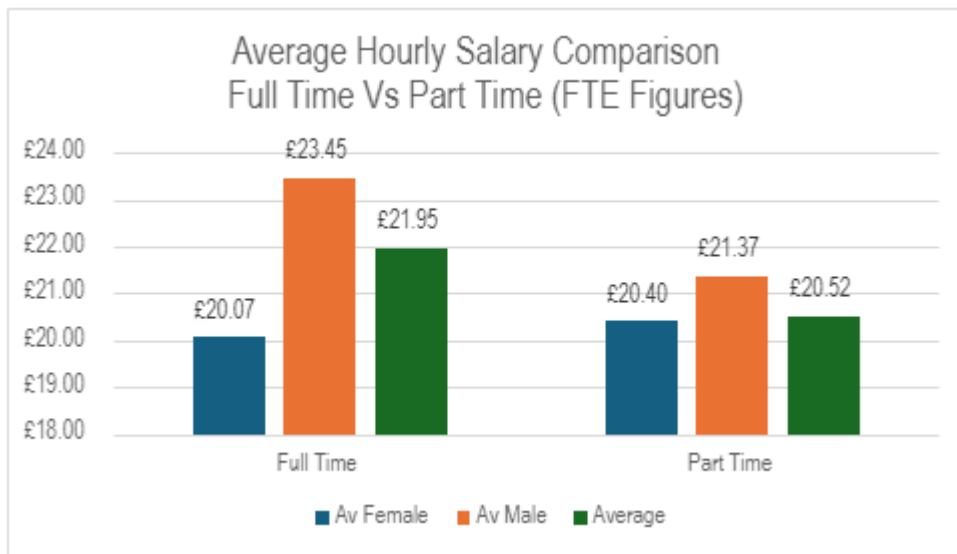
Gender pay gap results for full-time and part-time staff

7. Of our total 79 staff who work full time, 35 are women, in comparison with 44 who are men. The full-time pay gap across the entire organisation (comparing women's full-time average hourly pay with men's full-time average hourly pay) is 14.41%. This is worse than last year's figure, which was 13.78%. Of the 35 full-time female staff, 46% are in the lower graded / paid bands (A – C); 34% are in band D; and 20% are in the higher graded / paid bands (E - G). Of the 44 full-time male staff, 34% are in the lower paid bands; 27% are in band D; and 39% are in the higher bands. So, the



majority of full-time male staff are at the higher paid bands, where the majority of full-time female staff are in the lower paid bands.

8. 33 staff work part-time. 29 of the organisations' part-time staff are female, and four are male. The average part-time female salary hourly rate is £20.40, which is lower than the average male part-time salary of £21.37, making the gender pay gap for part-time staff 4.52%, which is worse than last year's figure which was -14.16 (as a negative number, the gender pay gap indicates that male staff are paid lower than female staff in that grade). Of the lower graded posts bands A – C, there is one part-time male member of staff, but 10 part-time female staff; at the middle band D range, there are 14 part-time female staff, and 2 males; and at the higher salary bands E - F, five are female and one is male. There are more female part-time staff with a spread over the salary bands.





Results by Grade

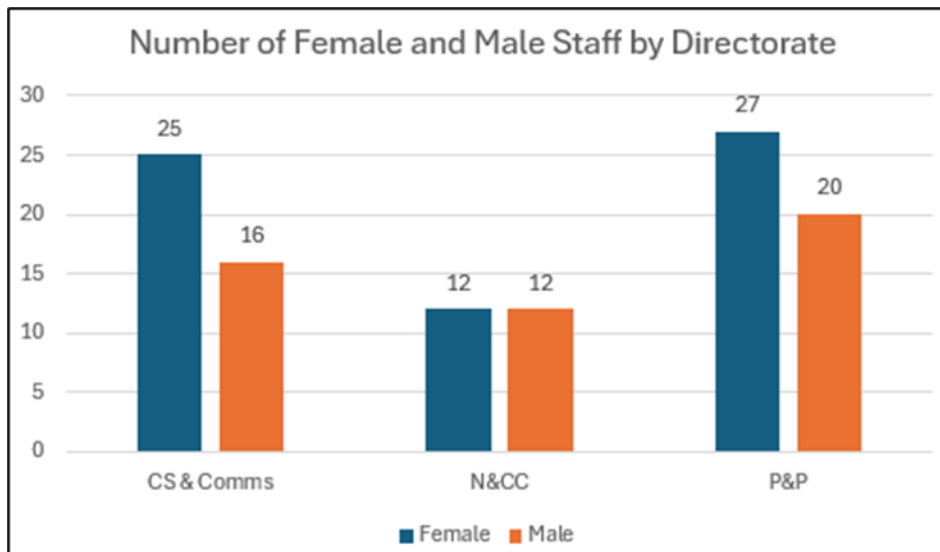
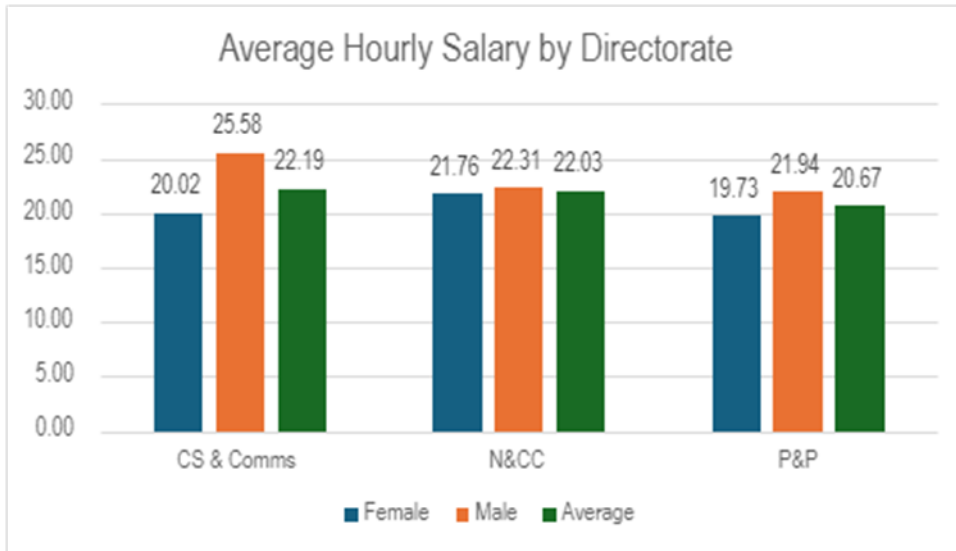
9. When someone is newly appointed to a role, they are typically appointed on the band minimum. Journey times are four years for staff at bands A and B, and 6 years for staff in bands C – G. Pay variances can therefore depend on length of service in a grade.
10. The Equal Pay Audit found that there were variances in salary average between male and female across the grades, with the female average higher than the male in some grades (bands B1, C, D); and lower than the male average in other grades (bands C1, E, F). There is no variance in salaries for male and female in Band B. There are no females at the highest paid band G.
11. Of the 36 staff in the lower graded bands A to C, 24 are female. There is a 15.99% pay gap at Band A, no pay gap at band B, -0.30% at Band B1, -4.05% at band C and 2.55% at band C1. Pay gap at band A is high, but this is due to the fact that of the four staff at this band, there is one male who due to length of service is near the band max, but there are three female staff, two newly appointed and therefore at the band minimum, and one with just over one years' service and therefore near the band min.
12. Band D is the largest band, with 40 staff, comprising 26 female staff and 14 male staff. This is a Policy Officer level of grade/pay. The gender pay gap for this grade is – 2.44%.
13. Band E has nine female and nine male staff. Three of the male staff are on the band max, with one of the female staff on the max. The pay gap is 1.29%.
14. It should be noted that of the 30 management posts (bands E to G and CEO), 12 (40%) are female (this is unchanged from last year) This represents a static position for female staff in management posts. There has been some movement in these bands, which has involved male staff. The majority (75%) of senior management roles (F, G and CEO) are held by male staff, and this figure also remains the same as in 2023.

Results by Directorate

15. An analysis of the salary levels by Directorate across the organisation showed that the average female salary was lower than the average male salary in all



Directorates. Much of this difference appears to be due to the higher levels of female staff at admin or support officer levels within the Directorates, combined with significantly more males than females at the higher paid bands F and G across the organisation.



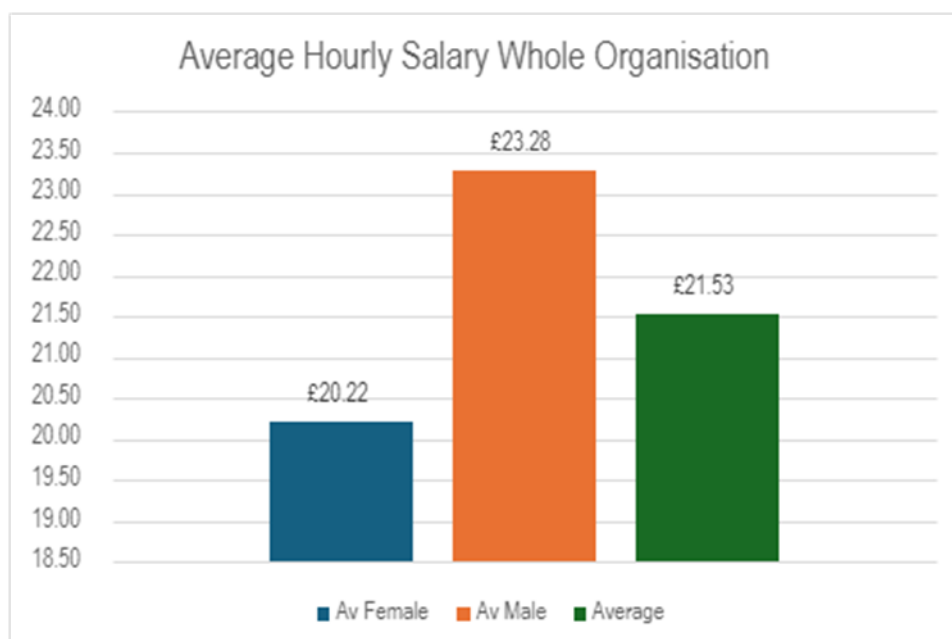
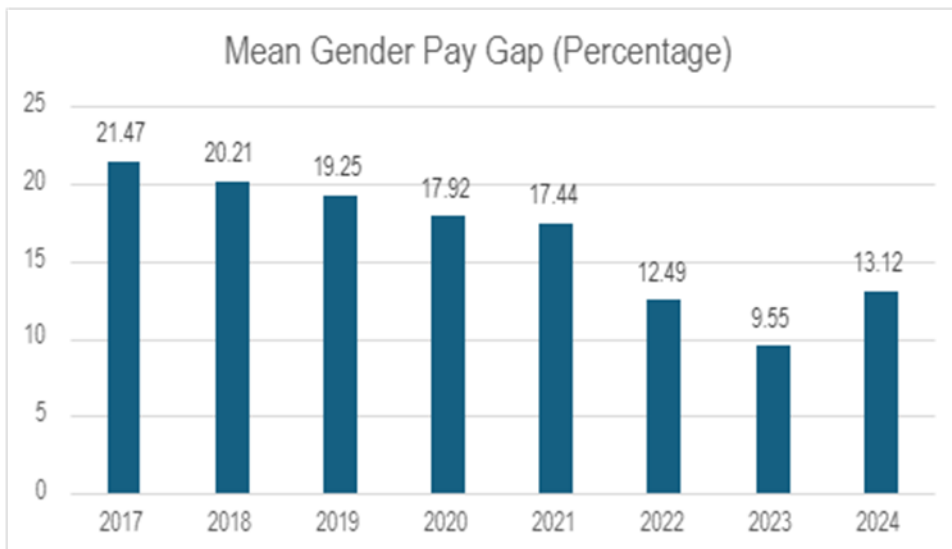
Overall Organisational Results

16. Across the organisation as a whole, there are 64 female staff and 48 male staff, so female staff make up 57% of the workforce. The overall average male hourly salary is £23.28 and the overall average female salary is £20.22 (the average hourly salary across the organisation is £21.53). This makes the mean gender pay gap 13.12% (and lower at 10.93% if you removed the CEO from the calculations). This figure is



higher than the 2023 figure of 9.55%, and the 2022 of 12.49%, but lower than the preceding 5 years (2021 of 17.44%, 2020 of 17.92%, 2019 of 19.25%, 2018 of 20.20%, 2017 of 21.47%, and 2015 of 23.64%). The gender pay gap result whilst an increase on the previous two years, does show an ongoing overall downward trend, with a 10% reduction in gender pay gap since 2015.

17. If we use the median methodology to calculate the Gender Pay Gap, the figure is 4.55%. This is an increase on the figures from 2023 of 2.92% and 2022 of -5.47%, but a reduction on the 2021 figure of 5.9%, 2020 of 10%, 2019 of 15.25%, and 2017 of 15.87%. This figure is also significantly lower than the 2023 Scottish Median Pay Gap of 8.7%, and the UK median pay gap of 14.3%.





18. The statistics suggest a significant increase in the mean pay gap generally. But the analysis of the data presented in the table below actually highlights that the gender pay gap is negative across three grades – ie, female hourly rate is higher than the male hourly rate. There is a marginal pay gap at bands C1, E and F, where the male hourly rate is slightly higher than the female rate, with an increasing pay gap at band A. However, at band G pay, representing the highest paid staff there are no female staff at this grade. As such, given there are no comparators to draw on there is no statistical pay gap at this grade, but when the grade is included in the total organisational pay gap, it has the effect of distorting the overall gender pay gap, and actually masks the fact that across all other pay bands, the organisation is doing pretty well.

| 2023/24 | |
|---------|---------|
| Grade | Pay gap |
| A | 15.99% |
| B | 0% |
| B1 | -0.30% |
| C | -4.05 |
| C1 | 2.55% |
| D | -2.55% |
| E | 1.29% |
| F | 3.48% |

Recruitment Statistics (January to December 2023)

19. In 2023, a total of 26 roles (37 posts) were advertised, with 30 posts recruited. The majority of posts were advertised internally in the first instance. Two posts were not appointed, with five of the posts being appointed in 2024.

20. There were 19 internal applicants with 12 internal appointments. Of the 19 applicants, eight were female, 11 were male and of the internal appointments four were female and eight were male.

21. In 2023, of a total of 296 external applicants there were 147 (50%) female and 146 (49%) male applicants with one preferring a term not listed and 2 not disclosing. Of the 18 posts appointed through the external round, 11 were (61%) female and seven (39%) were male.



22. So, looking at overall totals, there were about the same number of female applicants (155) to male (157). The number of female to male appointments was also the same, female 15 (50%), male 15 (50%).
23. An analysis of the recruitment data highlights the following:
- a) There were more female appointments to the lower graded band A posts than before – band A now has three female staff.
 - b) In the last year, there have been an equal number of female / male appointments at band B1 (seasonal ranger level)
 - c) Band C included three male appointments and two female appointments
 - d) There were three female appointments at band D and one male
 - e) There were two male appointments at band E
24. As part of our commitment to our Equality Outcomes regarding improving the diversity of our staff makeup and increasing the number of women at senior positions, we have continued to take the following actions:
- i. At recruitment we have reduced the number of essential criteria to ensure those that remain are indeed essential (research has indicated that women are less likely to apply for positions if they do not meet all the essential criteria). All job descriptions have to be approved by the HR team, who will robustly challenge the perception of the necessity for each essential criterion.
 - ii. Most posts are now advertised with the potential of being part time or job share.
 - iii. The recruitment page of the website provides links to all our equality policies, like the menopause policy, support for pregnancy loss policy etc.
 - iv. All recruitment panels contain male and female members.
 - v. Recruitment advertising has been revamped to highlight the benefits of flexible working.
 - vi. Recruitment advertising includes narrative to encourage applicant diversity.
 - vii. We are supportive, when possible, of secondment opportunities.
 - viii. We removed core hours, adopted a hybrid working policy and have significantly improved remote accessibility to IT facilities.
 - ix. Ongoing review of organisational structure with more policy positions being developed at lower grades, which were traditionally where only “admin” roles, more heavily slanted towards women were graded. There are now more male staff in lower graded post than there have been historically.



Conclusions from the Audit

25. CNPA jobs are evaluated to determine which band they should be placed in, and most staff start at the bottom of the band, progressing by annual progression awards to the top of the scale. The potential for all forms of inequality is thus reduced by the fact that jobs are objectively evaluated, and salaries allocated according to the job content rather than the person. There is still potential for inequality within evaluation systems, such as the weighting given to particular types of work, for example caring tasks have often attracted a lower weighting than manual labour in the past, which indirectly favours more men than women. The CNPA evaluation system has been designed and equality impact assessed to ensure this type of discrimination does not happen within CNPA.
26. The CNPA has a number of policies designed to ensure that male and female members of staff have equal access to career progression. Male and female staff are given support in managing childcare commitments and other work life balance issues to enable them to work effectively at any level of the organisation. We have a range of part time, job-share, annualised hours and hybrid working arrangements which have been accessed equally by men and women across the organisation.
27. Whilst the gender pay gap has increased in 2024, it is still broadly improving in the time since we started reporting on this data and we are starting to see the impact of the interventions implemented to support the Equality Outcomes of ensuring there is a gender balance in the senior positions. However, we cannot become complacent, and recognise that continued work and monitoring must be an organisational priority going forward. The Equality and Advisory Forum will play a key role in scrutinising, challenging and supporting this action.

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