



For discussion

Title: Equal Pay Audit 2023

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Executive Summary

1. Highlights: -

- The gender pay gap for 2023 was 9.55%, lower than the Gender Pay Gap in Scotland of 10.1%*, and lower than our pay gap in 2022, which was 12.49%. If we use the median methodology to calculate the Gender Pay Gap, the figure is 2.92%, which is also notably lower than the Scottish Median Pay Gap of 11.5%*. The Authority's Gender Pay Gap has been on the downward trajectory for the last 6 years, so this is encouraging to see that the pay gap is now lower than the national average, the work to reduce the pay gap is clearly having an impact.
- The gender pay gap for full-time staff is 13.78%, which is an improvement on the 2022 figure of 14.64%.
- For part time staff the gender pay gap is -14.16%, which again is an improvement on the 2022 figure of 1.23%.
- The female average salary is higher than the male in some grades (bands C and D);
- Band D, the largest band, with 39 staff, comprising 25 female staff and 14 male staff has a gender pay gap of -3.77%.
- Band C has a pay gap of -4.06%, this is an improvement on the 2022 figure of -2.36%.
- The middle management grade E has a gender pay gap of 0.33%, which is an improvement on 2022, when it was 2.20%.

2. Shadows: -

- Of the lower graded bands A to C, band B has a pay gap of 2.28% and B1 is 0.58%, this is a slight deterioration from 2022 when the pay gap was zero.
- Of the 30 management posts (bands E to G + CEO), 12 (40% are female) in comparison to 10 out of 26 posts (45%) in 2022. There are more women in senior



management, but the figures bely this as there are also more senior management posts than previously.

- The highest paid grade (band G) comprises only male staff.
- The senior management team (bands F, G and CEO) of 11 managers comprises only three females. However, there were only two females at this time in 2022, so this does also represent a small improvement .

Background

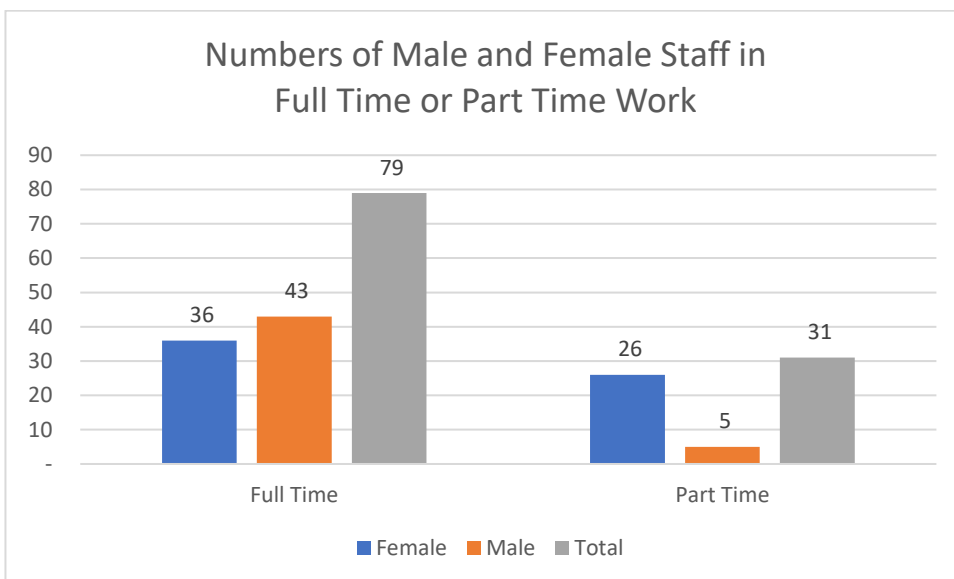
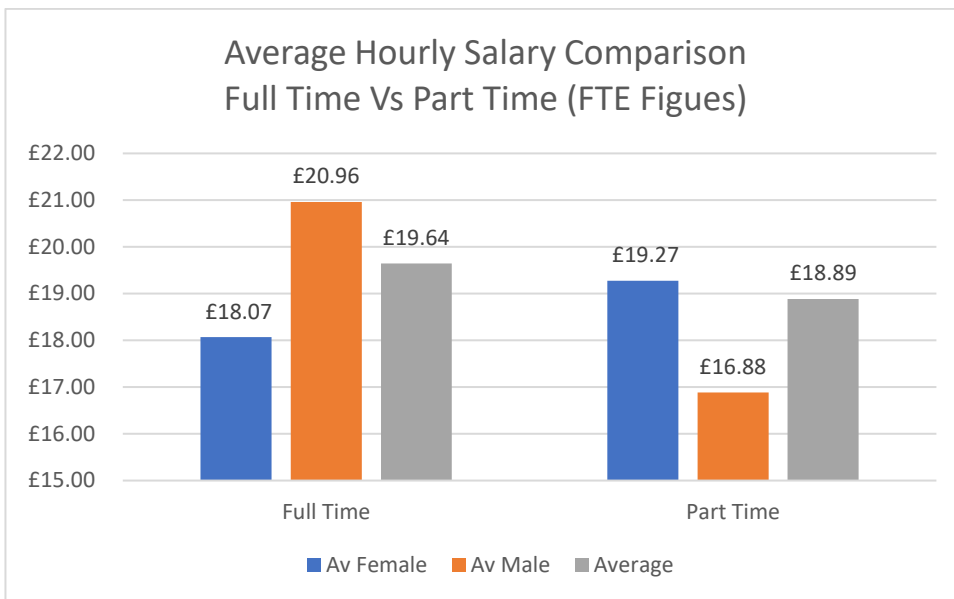
3. An equal pay audit is designed to assess pay levels across the organisation in terms of gender equality. It should scrutinise all aspects of pay including profiles of the different grades and directorates across the organisation, as well as recruitment and promotion in order to highlight any areas where direct or indirect discrimination may be impacting on pay equality. The 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. The 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. This equal pay audit was conducted using the salary levels and staff numbers as at 31 March 2023.
6. There are two measures of pay gap which we are required to report on – mean and median. The mean (sum of hourly rates of pay divided by the number of staff) includes the highest and lowest rates of pay. The median (the midpoint of the employee's hourly rates of pay) is not skewed by very low or very high hourly rates of pay, and potentially gives a more accurate representation of typical difference, but it can obscure gendered pay differences. Guidance therefore suggests that preference should be given to the mean, as it gives a deeper understanding of any pay gaps. Our calculations across the board are based on the mean average. For the overall gender pay gap figure, we have also used the median calculation.



7. We have analysed the pay gap across full and part time staff; across grades; across directorates; and then as an overall assessment, as follows:

Gender Pay Gap Results for Full-time and Part-time staff.

8. Of our total 79 staff who work full time, 46% are women, in comparison with 54% 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 13.78%. This is an improvement on last year's figure, which was 14.64% but this figure is above Scottish average for full-time staff in 2022 which is 6.6%*. Our analysis of these figures is as follows: Of the 36 full-time female staff, 47% are in the lower graded/paid bands A – C; 36% are in the middle paid range (band D); and 17% are in the higher graded/paid bands (E-G). Of the 43 full-time male staff, 33% are in the lower paid bands; 26% are in the middle range, and 41% are in the higher bands. Whilst the majority of male full time posts are in grades that are at the higher end of the salary scale, there has been a slight reduction in the female full-time posts positioned in the grades that are at the higher range of the salary scale.
9. 84% of the organisations' part-time staff are female, and 16% are male. The average part-time female salary is £19.27, which is higher than the average male part-time salary of £16.88, making the gender pay gap for part-time staff -14.16%. This is a significant improvement on the 2022 figure, which has the part-time gender pay gap at 1.23%. Of the lower graded posts bands A – C, there are 2 part-time male members of staff, but 8 part-time female staff; at the middle band D range, there are 12 part-time female staff, and 3 male; and at the higher salary bands E-F, 6 are female and none are male. There are more female part-time staff with a spread over the salary bands.

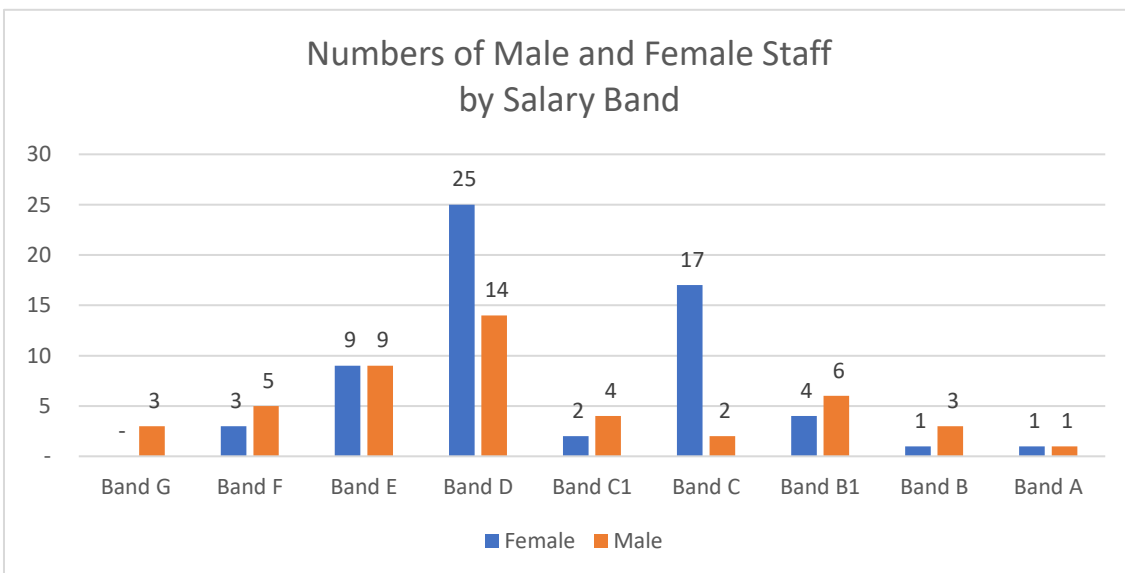
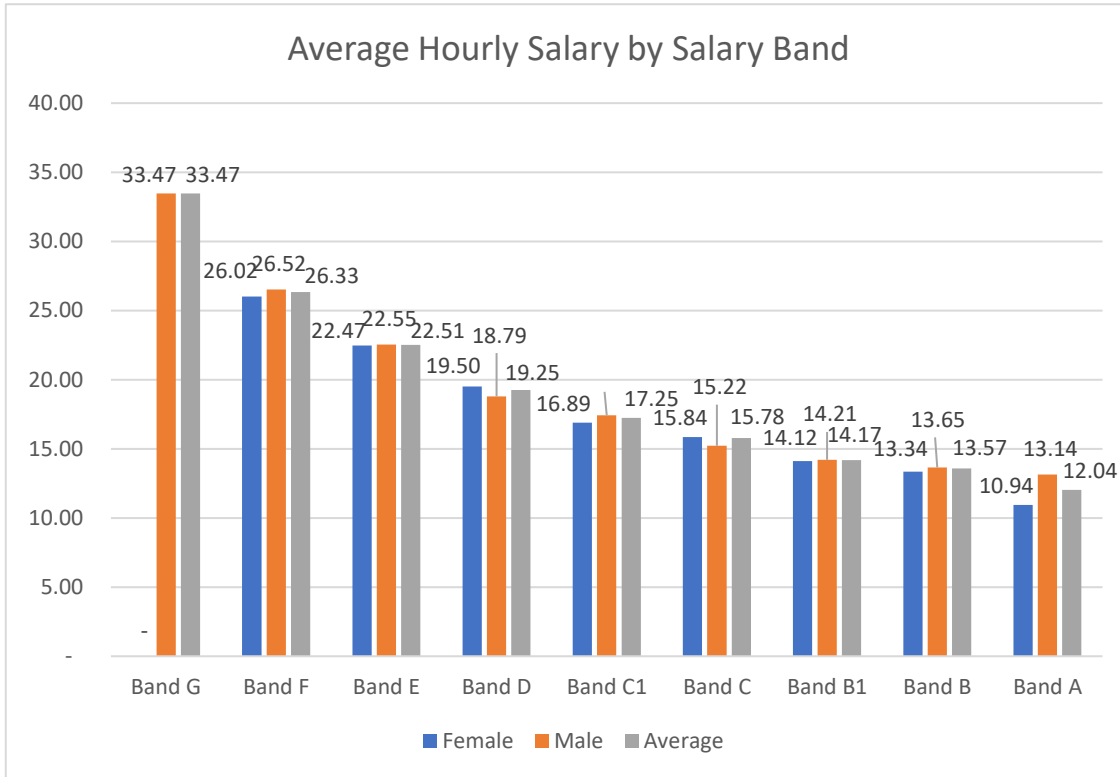


Results by Grade

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 C & D); and lower than the male average in all other grades (bands A, B, B1, C1, E & F). Band A has an equal number of male and female staff and bands B, B1, C1 & F comprise more male than females. Band E has the same number of male and female staff. 1 grade comprises only male staff (band G), which includes the highest paid staff.



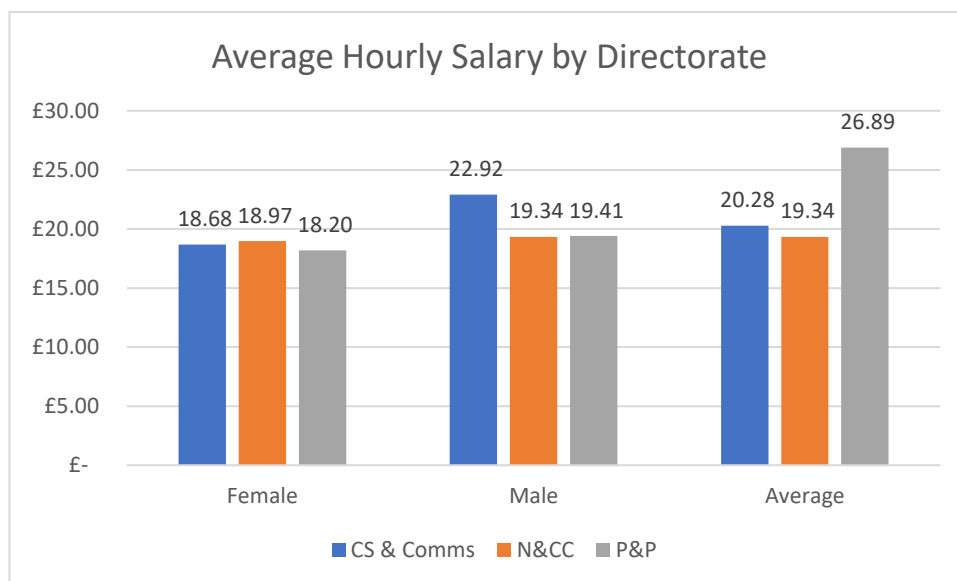
11. Of the 33 staff in the lower graded bands A to C, 23 are female. There is a 2.28% pay gap at band B, 0.58% at Band B1, 3.08% at band C1 and a -4.06% pay gap at band C.
12. Band D is the largest band, with 39 staff, comprising 25 female staff and 14 male staff. This is a Policy Officer level of grade/pay. The gender pay gap for this grade is -3.77%. 4 of the male staff are currently at the top of the salary band, all of whom having been with the organisation for at least 6 years, whilst 11 of the female staff are at the top of their bands.
13. It should be noted that of the 30 management posts (bands E to G + CEO), 12 (40%) are female in comparison to 45% in 2022, 32% in 2021, 33% in 2020, 37% in 2019 and just 25% in 2017. Although this represents a slight percentage reduction for female staff in management posts, it should be noted that there has been an overall increase in the number of posts at this level. Despite the fact that the majority (75%) of senior management roles (F, G and CEO) are held by male staff, this is an improvement on the 2022 figure which was 85%. At the middle management level band E, there are equal numbers of male and female staff, with a pay gap of 0.33%. The pay gap in this band has improved on the 2022 figure of 2.20%, 4.65% in 2021 and 6.9% in 2020.
14. Despite evidence nationally of journey times having some discrimination against female staff, the CNPA's policies have countered this to date and there is no evidence of this issue within the Authority.





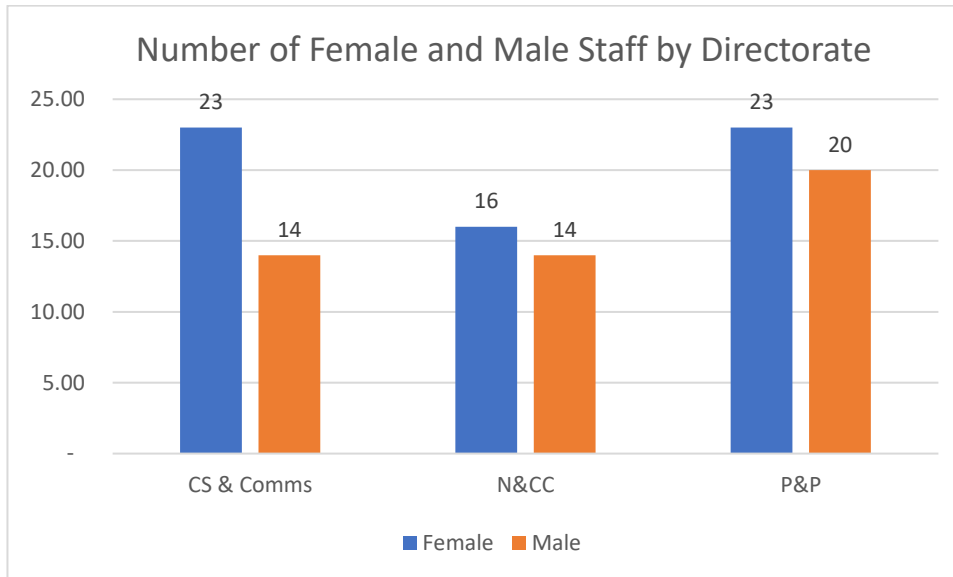
Results by Directorate

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. However, the results of the analysis of pay by grade will also play into this position. We have identified above that there are gradually increasing numbers of females in middle management grades. As these members of staff are relatively new to the grade, they are still at an early stage of their journey times through salary grade. Consequently, there is a time lag in these positive improvements in gender balance showing into the analysis of salaries by grade and by their respective directorates.



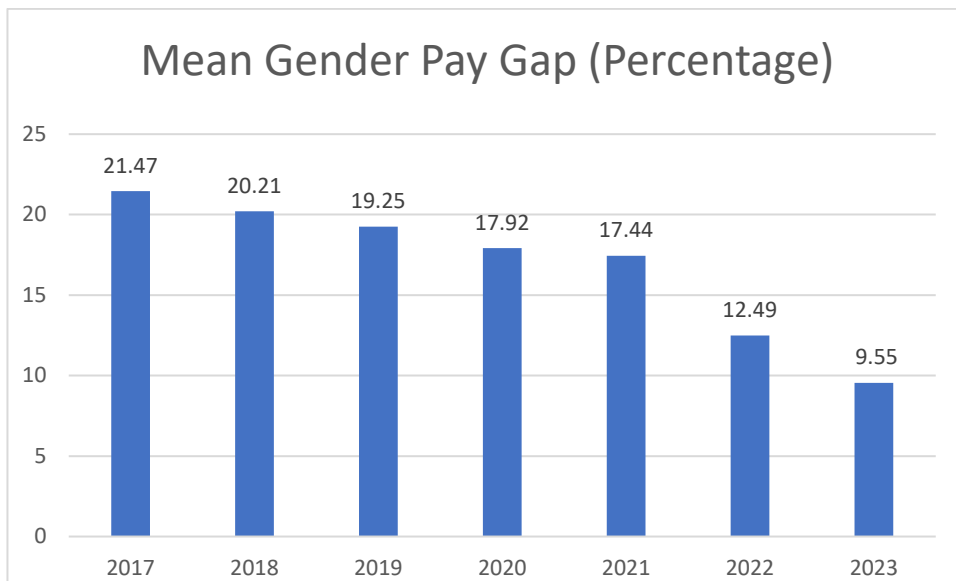


Directorate Gender:



Overall Organisational Results

16. Across the organisation as a whole, there are 62 female staff and 48 male staff – so female staff make up 56% of the workforce. This figure has stayed the same as 2022. The overall average male hourly salary is £20.54 and the overall average female salary is £18.58 (the average hourly salary across the organisation is £19.43). This makes the mean gender pay gap (i.e. the difference in average hourly earnings between men and women) **9.55%** (and lower at 6.97% if you removed the CEO from the calculations). This figure is an improvement and is now below the 2023 Scottish Gender Pay Gap (2021) of 10.1%*, it is showing a continued decreasing trajectory, once again being down on the CNPA's 2022 Gender Pay Gap of 12.49%, the 2021 figure of 17.44%, the 2020 figure of 17.92%, the 2019 figure of 19.25%, the 2018 figure of 20.20%, the 2017 figure of 21.47%, and the 2015 figure of 23.64%. The gender pay gap result therefore highlights an ongoing positive trend in the Authority's practices successfully narrowing the gender pay gap on this measure with a reduction in gender pay gap annually over the last 8 years. The foregoing analysis, highlighting an increase in female staff at policy officer and middle manager salary grades within the organisation at early stages in their journey times through salary bands also lays a good foundation for further reductions in gender pay gap in subsequent years.



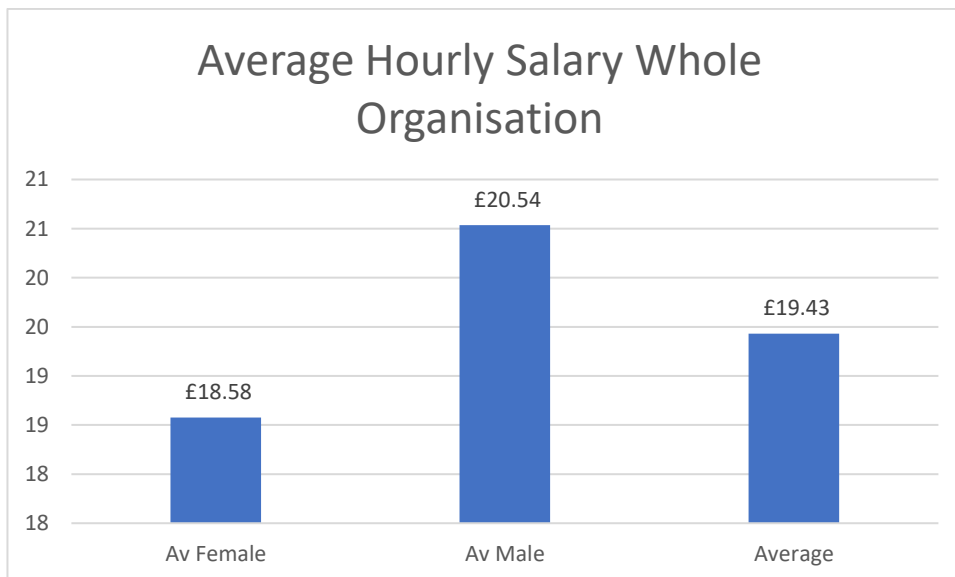
17. If we use the median methodology to calculate the Gender Pay Gap, the figure is lower at 2.92%. However, this is an increase on the 2022 figure of -5.47%, but a reduction on the 2021 figure of 5.9%, the 2020 figure of 10%, the 2019 figure of 15.25%, and on the 2017 figure of 15.87%. This figure is also significantly lower than the 2021 Scottish Median Pay Gap (2021) of 11.5%.

18. This can be explained by the following:

- a) There were more male appointments to the lower graded band B - C posts than before – band B now has 3 male staff and 1 female, band B1 has 4 male and 6 female staff and band C1 has 4 male and 2 female.
- b) In the last 12 months, a further band F Senior Manager vacancy was appointed to a female, thereby increasing the number of females in this higher paid band to three.
- c) 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. All recruitment panels contain male and female members;



- iv. Recruitment advertising has been revamped to highlight the benefits of flexible working.
- v. Recruitment advertising places looked at to encourage applicant diversity.
- vi. There is more joined up recruitment with similar public sector organisations and we are supportive when possible of secondment opportunities.
- vii. We removed core hours and improved remote accessibility to IT facilities.
- viii. 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.



Overtime

19. Overtime is paid only in exceptional circumstances and makes up a small element of the pay bill.

Recruitment Statistics (January to December 2022)

20. In 2022 a total of 34 posts were advertised, with 31 posts recruited. The majority of posts were advertised internally in the first instance. 3 posts were not appointed.

21. There were 26 internal applicants with 12 internal appointments. Of the 26 applicants, 14 were female, 11 were male and 1 preferred not to say and of the internal appointments 4 were female, 7 were male and 1 preferred not to say.



22. In 2022, of a total of 244 external applicants there were 100 (41%) male applicants and 138 (57%) female, with 6 not disclosing. Of the 19 posts appointed through the external round, 8 (42%) were male and 11 (58%) female.
23. So, looking at overall totals, there were slightly more female applicants (152) than male (107). However, the number of female to male applicants appointed was the same, female 15 (48%), male 15 (48%), with 1 person preferring not to say.

Conclusions from the Audit

24. 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 Cairngorms NPA.
25. 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 and ad-hoc working from home arrangements which have been accessed equally by men and women across the organisation. More part time or job share roles at the higher band E have been appointed, which shows that we are successfully challenging the organisational cultural perception that posts cannot be delivered at that level in part time hours.
26. The gender pay gap is improving, 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.



Cairngorms
National Park Authority

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*Close the Gap Working Paper (2022) Gender Pay Gap data for 2021

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