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Gender Pay Gap Report 2023-24

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1. Background

The Gender Pay Gap Information Regulations require all employers with 250 or more employees to report their Gender Pay Gap annually, publishing on a national Government website as well as the organisations website. The Gender Pay Gap Information Regulations apply to employers in the Public and Private sector.

In addition to these new regulations, employers in the public sector are subject to a specific public sector equality duty in respect of their functions - The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.

The regulations apply to all employers with 250 or more employees on the "snapshot" date. The "snapshot" date for the public sector is 31st March each year. Therefore, the authority is required to publish its gender pay gap for each year on the Portsmouth City Council (PCC) website and on a government website, no later than 30th March of the following year. So, for the snapshot date of March 2023, the findings must be published no later than 30 March 2024.

The purpose of Gender Pay Gap reporting is to achieve greater gender equality across the UK and increase pay transparency by narrowing and eventually eliminating the pay differential between men and women.

In 2023, the national gender pay gap for full-time employees rose marginally to 7.7% from 7.6% in 2022, meaning that average pay for full-time female employees was 7.7% lower than for full-time male employees. This remains below the national gender pay gap of 9.0%, seen before the coronavirus pandemic in 2019.

The national gender pay gap for all employees, full and part-time in 2023 is 14.3% which is a very slight decrease to that of 2022 when it was 14.4%. This latest change in the figures is in line with the longer-term trend which is showing a continual decline.

It is important to note that the Coronavirus pandemic and the furlough scheme may have had an artificial impact on the national gender pay gap figures for 2020/21 and therefore it is encouraged to focus on long-term trends rather than year-on-year changes.

What is clear from the latest data is that a challenge remains in addressing the gender pay gap. The inequality of pay between men and women is affected by short-term labour market conditions, but longer-term social norms are also central to the gulf in remuneration.

The Government considers that this rate of progress is too slow and has committed to closing the gender pay gap within a generation.

PCC is committed to the principle of equal pay for all employees by ensuring that it meets the requirements of the Equality Act. To achieve this, PCC uses a job evaluation system scheme (JESS) to assess the value of all jobs across the organisation, which provides evidence in support of the banding of each job within our grading structure. Salaries are paid according to band and incremental annual progression within the band occurs irrespective of employee's gender.

Whilst the data on the age breakdown is not a statutory requirement under the legislation, this data has been included at the request of our council Members. The ONS publishes national data on the age breakdown and the same categorisation and calculations used by the ONS have been replicated for the breakdown of the data for Portsmouth City Council.

Sources:

[Gender pay gap in the UK - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peopleinwork/employmentandearnings/articles/genderpaygapintheuk)

2. Methodology

The Regulations clearly define the methodology for the gender pay gap calculations and reporting guidelines.

The regulations require employers to publish the following information:

- The mean gender pay gap;
- The median gender pay gap;
- The mean bonus pay gap;
- The median bonus pay gap;
- And the relative proportions of male and female employees in each quartile pay band.

The Regulations detail how to conduct the calculations, and these are based on how the ONS undertakes their calculations to allow for comparisons to be made nationally against the data.

All public sector organisations are required to publish their reports by no later than 30th March of the following year.

The report will be based on hourly pay rates as of 31 March 2023 and on bonuses paid between 1 April 2022 and 31 March 2023.

3. Scope

The regulations create two categories of people who must be considered in the gender pay gap reporting: relevant employees and relevant full-pay employees.

For the purposes of gender pay gap reporting, the definition of an employee is that which is given in the Equality Act 2010. This is an extended definition which includes:

- Employees (those with a contract of employment)
- Workers with a contract to do work or provide services for your organisation.
- Some self-employed people who must personally conduct the work they do for you.

The gender pay gap calculation is based on the number of individual employees and not the full-time equivalent. This means that each part-time employee counts as one employee.

Apprentices, seasonal, temporary, or casual employees and zero hours workers are included if they fall within the reference period created by the snapshot date.

4. Definitions

Gender Pay Gap

The gender pay gap is a measure of labour market or workplace disadvantage, expressed in terms of a comparison between males and females' average hourly rates of pay. The gap can be measured in a variety of ways, and it is important to understand how the gap is being measured. The hourly rates of pay, excluding overtime are used to take account of the fact that more males than females work full-time. Overtime is excluded because it is recognised that male employees work more overtime than female employees due to female's caring responsibility and part-time nature of work.

Equal Pay

Equal pay means that there should be no difference in the contractual terms of a female and a male doing equal work, who both work for the same employer. For further details please refer to the Equality Act 2010.

The difference between Gender Pay Gap and Equal Pay

The most significant difference between equal pay and the gender pay gap is that equal pay requires one to scrutinise information at the level of the individual employee (to satisfy that there is equal pay for equal work). Gender pay gap reporting asks you to examine aggregate data.

Mean Gender Pay Gap

The difference between the mean hourly rate of pay of male full-pay relevant employees and that of female full-pay relevant employees.

To calculate the mean

The mean is an average of all the numbers in a dataset, that is, you must add up all the numbers and then divide the result by how many numbers you are dealing with. To find the mean hourly rate for PCC's full-pay relevant male employees, all the hourly rates will be added together and then divided by the total number of full-pay relevant male employees. This will give the "mean" hourly rate.

Median Gender Pay Gap

The difference between the median hourly rate of pay of male full-pay relevant employees and that for female full-pay relevant employees.

To calculate the median

The median is the numerical value which splits the top 50% and the bottom 50%. To find the median, all the hourly rates for all employees will be listed in numerical order; if there are an odd number of values, the median is the number in the middle. If there is an even number, the median is the mean of the two central numbers.

Bonus

Bonus pay means any remuneration that is in the form of money, vouchers, securities, securities options, or interests in securities and relates to profit sharing, productivity, performance, incentive, or commission. Non-consolidated bonuses are included. Long service awards with a monetary value are also included.

For PCC, this captures Long Service Awards and one-off honoraria payments. Regular honoraria payments are excluded from "bonus" calculations and included in "ordinary pay".

Mean Bonus Gap

The difference between the mean bonus pay paid to male relevant employees and that paid to female relevant employees.

Median Bonus Gap

The difference between the median bonus pay paid to male relevant employees and that paid to female relevant employees.

Bonus Proportions

The proportions of male and female relevant employees who were paid bonus pay during the relevant period.

Quartile Pay Bands

The proportions of male and female full-pay relevant employees in the lower, lower middle, upper middle and upper quartile pay bands.

Quartiles

A quartile is one of the three points that divide the population of data into four equal parts. In the context of gender pay gap reporting, the four quartile pay bands are created by dividing the total number of full-pay relevant employee into four equal parts.

Measures

A positive measure, for example 18%, indicates the extent to which females earn, on average, **less** per hour than their male counterparts.

A negative measure, for example -18%, indicates the extent to which females earn, on average, **more** per hour than their male counterparts. This may happen, for example, if PCC employ a high proportion of males in low-paid part-time work, and/or the senior and higher paid employees are female.

5. The Workforce Profile

The gender pay gap data supplied is correct for all staff, including school staff, in post with PCC on 31st March 2023 who earned their full-pay (relevant employees). At that time, there were 4802 relevant full pay employees, which is made up by 3346 females (70%) and 1456 (30%) males. Out of the 4802 relevant employees, 38 are covered by TUPE regulations (8 are male and 30 are female).

The profile of the workforce has been broken down into the proportion of full time and part time employees, whereby 1139 (45%) of males are full time¹ and 317 (14%) are part time compared to 1402 (55%) of females are full time and 1944 (86%) are part time.

The profile of the workforce has been further categorised by age range. The age ranges used are based on those as determined by the ONS data.

As our workforce is predominantly female (70%) the data is skewed as it shows that women are the higher proportion of workers across each age category compared to males, apart from the 60 and over age group in full time employment.

It is worth noting that there has been a consistent increase of **full-time** employees overall from 2388 in 2021 to 2467 in 2022 and 2541 in 2023 with a consistent decrease in part-time employees from 2484 in 2021 to 2405 in 2022 and 2261 in 2023.

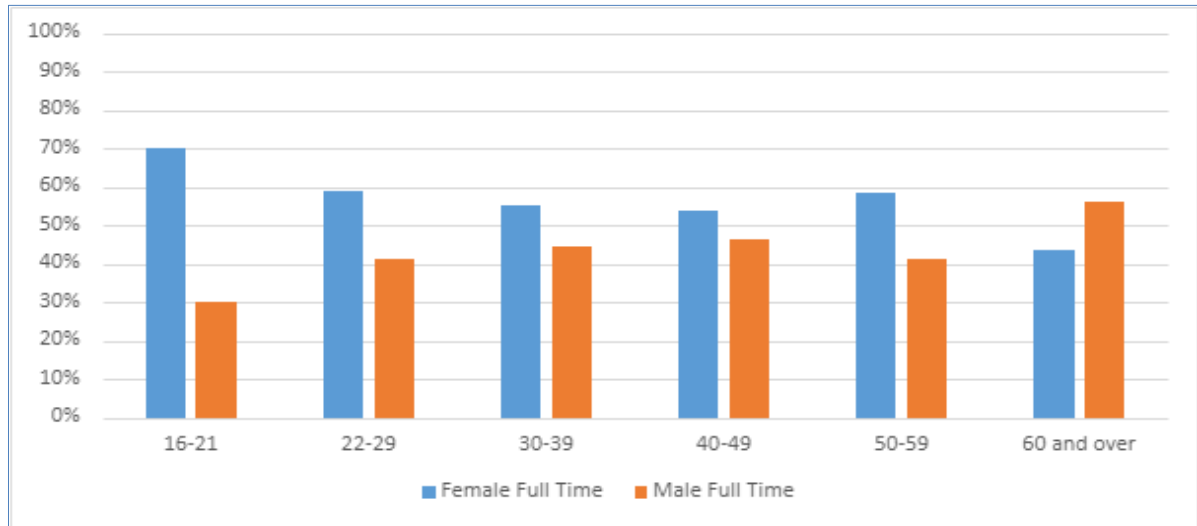
The increase in full-time workers can be seen primarily across females in all age ranges apart from the 22-29 age range where a slight decrease is shown. There have also been consistent increases for both full-time male and females in the 60 and over age range, which may be linked to the rise in retirement age as well as an impact of the cost-of-living crisis.

There have been consistent decreases in the 16-21 age range for both male full-time and part-time employees.

¹ Full time is as determined by ONS as those working 30 hours or more.

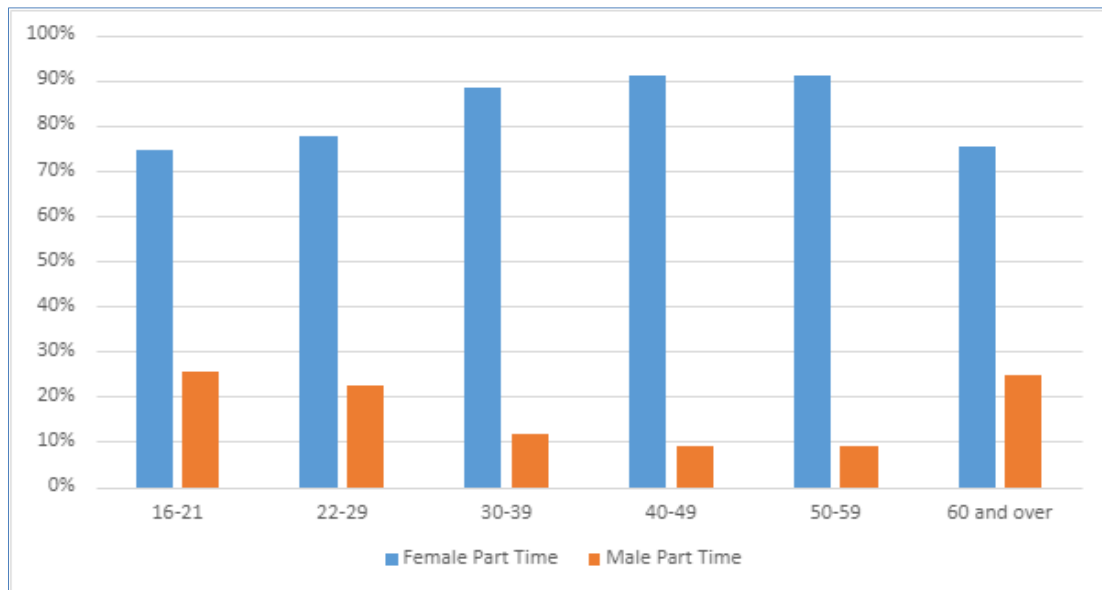
Fulltime Female vs Male

Age Range	Full-time women headcount	Full-time women %	Full-time men headcount	Full-time men %	Total headcount
16 to 21	21	70	9	30	30
22 to 29	189	59	132	41	321
30 to 39	276	55	223	45	499
40 to 49	318	54	274	46	592
50 to 59	462	59	326	41	788
60 and over	136	44	175	56	311
Total	1402	53%	1139	47%	2541



Part time Female vs Male

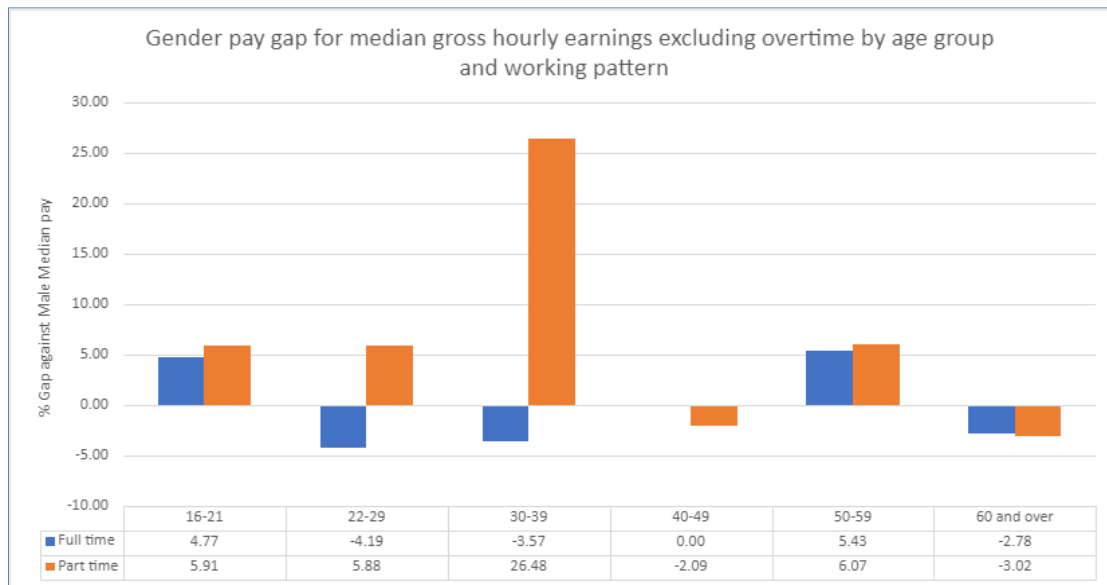
Age Range	Part-time women headcount	Part-time women %	Part-time men headcount	Part-time men %	Total headcount
16 to 21	32	74	11	26	43
22 to 29	139	78	40	22	179
30 to 39	368	88	49	12	417
40 to 49	504	91	50	9	554
50 to 59	562	91	56	9	618
60 and over	339	75	111	25	450
Total	1944	86%	317	14%	2261



In addition to the above age profile, using the same methodology as applied by the ONS, the gender pay gap has been broken down by age and full-time/part-time hours. In accordance with the ONS data, full time hours have been classed as 30 hours or more. The Gender pay gap by age full-time/part-time is based on the median salary within each data category (as per the ONS data) and uses a separate calculation for part time and full time per age range.

The data in the table below looks at the gender pay gap for people of a similar age and working pattern, unlike the statutory data which looks at the gender pay gap based on the median difference between men and women. Therefore, the gender pay gap within each age bracket does not relate to the overall median figure because that is based on **all** relevant employees across the Council, whereas the age gender gap is based on each individual age groupings and working patterns within those age brackets.

Age Bands	2023 Full Time %	2023 Part Time %
16 to 21	4.77	5.91
22 to 29	-4.19	5.88
30 to 39	-3.57	26.48
40 to 49	0.00	-2.09
50 to 59	5.43	6.07
60 and over	-2.78	-3.02



The table and graph above show that within each age bracket where there is a negative figure, for example -2.00%, this indicates the extent to which females earn, on average, more per hour than their male counterparts. A positive measure, for example 2.00%, indicates the extent to which females earn, on average, less per hour than their male counterparts.

The figures show that full-time females are earning less, on average, than their male counterparts except for within 22- 39-year-olds.

The pay gap has increased further in the 16 - 21 age bracket from 1.96 in 2022 to 4.77, a trend that also shows itself in the part-time figures with 2022 data showing no gap to a gap of 5.91 in 2023.

However, in the 60 and over age bracket the pay gap has significantly decreased for both full-time and part-time female employees from 11.05 in 2022 to -2.78 for full-time and -0.78 to -3.02 for part-time thereby closing the gap. A trend that is also seen in the 40 - 49 age brackets for full time staff, showing a gap of 0.

The gap for 30- to 39-year-old part-time females have seen the gap increase from 22.78 in 2022 to 26.48. This could be attributed to the fact that a significantly higher number of females are employed on a part-time basis within these age brackets, compared to the number of males.

The reduction in the pay gap across the age groups as listed above, could be attributed to several factors, one may be explained by the recruitment of new employees and where they are appointed to on the pay band, for example, female employees are more likely to start at the bottom of the pay band due to their levels of experience as a result of breaks in employment. If an existing employee changes their working pattern from full time to part time, their hourly rate will remain the same and if they have been employed for several years, they are likely to be at the top of their pay band through the incremental rises within the pay band compared to a new starter.

Where there are pay gaps in the age ranges (such as within the 30-39 age range) this may indicate the impact of women taking time out of the labour market and the preference for working part time when re-joining the labour market, for example for reasons such as taking time out to have children or other caring responsibilities.

6. Key Findings

6.1 Mean Gender Pay Gap

The difference between the mean hourly rate of pay for male full-pay relevant employees and that of female full-pay relevant employees is **8.63%**. In March 2022, this gap was 9.27%, 2021 it was 9.12% and in 2020 it was 10.99%. Apart from 2022, which was likely to have been impacted by the pandemic and the furlough scheme, the gender pay gap long term trend has continued to decrease.

The average hourly rate of pay for a male in the reporting period was £19.00 and £17.36 for a female, which results in the 8.63% difference in the mean figure reported above. The gap has slightly decreased since last year due to the female average mean hourly rate of pay increasing. The increase in hourly pay can be partially attributed to the application of the Real Living Wage and cost of living pay rises. There are more females on the lower pay bands and the pay increases have been more significant at the lower end of the pay scale, it has therefore brought increased pay parity on average mean hourly rate.

6.2 Median Gender Pay Gap

The difference between the median hourly rate of pay of male full-pay relevant employees and that of female full-pay relevant employees is **7.54%**. In March 2022, this gap was 13.85%, 2021 it was 13.58%.

The average median hourly rate for a male was £16.58. For a female, the average median hourly rate was £15.33. This result is a 6.31% differential in the median figure reported above from the previous year resulting in a narrowing of the gap.

6.3 Mean and Median Pay Gap summary

PCC's median and mean gender pay gap compares favourably with the national figure from the ONS where the average gap for all employees, part-time and full-time is 14.3% based on data from 2023.

In addition to a job evaluation scheme, PCC has a clear policy of paying employees equally for the same or equivalent work, regardless of their gender. As such, the council:

- provides regular job evaluation training for employees involved in undertaking job evaluation; and

- evaluates job roles and pay bands as necessary to ensure a fair structure.

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

Across the UK economy, males are more likely than females to be in senior roles (especially very senior roles at the top of organisations), while females are more likely than men to be in front-line roles at the lower end of the organisation. In addition, men are more likely to be in technical, mechanical, and IT-related roles, which attract higher rates of pay than other roles at similar levels of seniority.

Unpaid home and care work, including childcare and informal adult care, is disproportionately performed by women. This can have a significant impact on pay and progression. Females are also more likely than males to work part time, and many of the jobs that are available across the UK on a part-time basis tend to be lower paid. In addition, new females tend to take jobs that are nearer to home because of their caring responsibilities so this in turn may reduce their job opportunities and give them less access to high-paying firms. Therefore, the gap widens over time. As men move up the pay ladder, women fall behind, either staying in lower paid positions, reducing their hours, or both. Others drop out of work entirely.

The gender pay gap exists within PCC as the majority (70%) of the workforce is female and a considerable proportion of these are employed in the lower quartile pay bands, with fewer employed at the more senior levels.

PCC's gender pay gap is lower than the national average and this is down to several factors that already exist within the council:

- The commitment of PCC to continue to follow and adopt the Foundation Living Wage increases annually.
- PCC continues to promote and support flexible and hybrid working policies for all employees within the organisation, irrespective of gender.
- Robust equal opportunities and diversity policies ensure that all employees are treated fairly and equally with a clear escalation process if an individual feels they are being treated unfairly.
- The JESS Job evaluation scheme ensures that all jobs are evaluated to ensure equal pay for equal work across the entire authority.

6.4 Mean Bonus Pay Gap

The difference between the mean bonus pay paid to male relevant employees and that paid to female relevant employees is **16.41%**. Which is a further increase from last year's gap which was **12.62%** (comparatively -4.86% in 2021).

6.5 Median Bonus Pay Gap

The difference between the median bonus pay paid to male relevant employees and that paid to female relevant employees is **32.24%**. This is a decrease on last year's figure which was **54.77%**.

6.6 Bonus Proportions

The proportions of male and female relevant employees who were paid bonus pay during the relevant period in the 12 months up to 31st March was 35 males (2.35%) out of a total of 1456 males and 68 females (1.87%) out of a total of 3346 females.

6.7 Bonus pay gap summary

The mean gender bonus gap and the median gender bonus gap for the council have changed to 16.41% and 32.24% respectively, there were a total of 68 females who received a 'bonus' payment compared to 35 males, which is a slight change to 2022 with the comparative figures of 26 males (1.72%) and 74 females (2.09%) so proportionately there were fewer females who were in receipt of a bonus payment in the relevant timeframe.

The bonus value ranges for females from £23 up to £4,200 compared to the range for males from £64 up to £10,608 however, the overall average bonus payment made to males is lower to than that of females. Males were paid an average £1011 with females paid an average of £1409.

The data for the mean bonus pay gap may be distorting the figures slightly by unusually high payments compared to whole dataset which then contributes to a higher pay gap.

A proportion of honoraria (bonus) payments made within PCC are used to reward outstanding contributions and the definition of "bonus" for this report captures these types of payments. As such this can skew the data and creates inconsistencies in reporting. Continuing work is underway to ensure that recording of this data is accurate in the future.

6.8 Quartile Pay Bands

The proportions of male and female full-pay relevant employees in the lower, lower middle, upper middle and upper quartile pay bands are set out in the table below.

	Number of males	Number of females	Total	Male %	Female %	Total %
Upper Quartile	445	755	1200	37	63	100
Upper Middle Quartile	343	855	1198	29	71	100
Lower Middle Quartile	309	895	1204	26	74	100
Lower Quartile	359	841	1200	30	70	100

*The totals differ slightly to accommodate the same hourly rate distribution across the divides.

6.9 Quartile Pay Band Summary

For there to be no gender pay gap, there would need to be an equal ratio of male to female in each quartile. However, within the council, 70% of the employees in the lower quartile are female and 30% are male, which are consistent year on year. The percentage of male employees increases throughout almost all the remaining quartiles, from 26% in the lower middle quartile to 37% in the upper quartile. In direct comparison the percentage of female employees decreases throughout almost all the remaining quartiles from 74% in the lower middle quartile to 63% in the upper quartile.

7. Conclusions

While the council's gender pay gap compares favourably with that across the whole UK economy, it is committed to doing everything that it can to continue to reduce the gap. The council is confident that its gender pay gap does not stem from an equal pay issue as the pay and grading system in place ensures that all roles are evaluated equally and ensures individuals receive equal pay for equal work.

The council recognises that its scope to act is limited in areas and has for example, no direct control over the subjects that individuals choose to study, their career choices or the choices individuals make about their work/life balance. However, as the employer, the council can ensure that individuals can make these choices without experiencing discrimination with fair, consistent, and inclusive working models supported by flexible working policies such as hybrid working. In addition, our council values, and behaviours framework guide everything we do, set who we are as people, what we stand for and how we act to promote and build a diverse and inclusive culture which includes our continued commitment to maintaining our Disability Confident status, Armed Forces Covenant and a newly achieved White Ribbon accreditation.

8. Action Plan/Recommendations:

PCC is committed to continuing to close the gender pay gap. Our aim is to reduce this further as part of a wider agenda to improve equality, diversity, and inclusion across our entire workforce. This will be a staged approach over the long term and continue to work in a staged approach.

Stage 1: Analysis of the current workforce profile - ongoing

An Equalities Steering group was newly established in 2022 with representation from across all council service areas and partners. The initial task for this group was to undertake an equality, diversity and inclusion self-assessment using the Local Government Association equalities framework. In addition, an external consultation with community members was undertaken and the combined data has helped to inform the EDI Strategy and plan of action.

The draft Equality and Diversity Strategy 2024 -2028 is due to go to cabinet for adoption in March 2024.

Stage 2: Review of current policies and procedures - Ongoing

Recruitment and Retention:	Action Taken:
Work to improve data gathering from recruitment activity continues. Data looks at how posts are currently advertised, who is applying for them, who is being selected for interview and who is being appointed. This will enable us to better understand if there are barriers for women and underrepresented groups within our current policies and practices.	A new recruitment system is due to be implemented in 2024. The system will enable greater reporting of candidate data and tracking of process and policy.
Workforce and exit interview data is regularly reviewed to understand changes in the workforce profile and identify trends affecting career progression for minority groups.	A workforce profile for the Council is produced annually. Staff survey results and exit interview data is reviewed throughout the year.

Talent management:	Action Taken:
Work is underway to improve monitoring of employee's career progression, this will be used to understand if there are any barriers that are preventing women and	A new coaching faculty is being developed, with the second cohort currently being trained. A coaching for managers module and handbook has been developed as part of the new leadership and management

<p>underrepresented groups from progressing</p>	<p>course, this was launched in April 2023.</p>
<p>We will continue to promote the benefits of flexible working practices to employees and managers, as part of the Councils hybrid working model and to support those with caring responsibilities</p>	<p>A Hybrid working policy is available and services are encouraged to promote this as a benefit to assist with R&R difficulties. Job adverts now promote flexible working opportunities where job roles permit. Employees have a day one right to request flexible working.</p>
<p>Increase awareness about apprenticeship schemes to encourage more employees to improve their skills and experience giving them the opportunity to progress their career</p>	<p>A review of the apprenticeship offer was completed in November 2023. This is now being aligned too hard to recruit areas within the Council to integrate apprenticeships into new and existing career pathways. Active programmes to raise awareness within Directorates are in place, including a marketing video. There is also a full programme of events planned for Apprenticeships Week. There has been an increased uptake in apprenticeships in PCC Maintained schools due to pro-active work in this area.</p> <p>A pilot programme to recruit apprentices into care environments commenced in September 2023 funded, externally via the ICB.</p>
<p>Continue to find ways to maximise the diversity of our applicants. Encouraging closer working with schools, colleges, and universities to promote careers to women and underrepresented groups</p>	<p>Currently exploring ways to engage with external groups as well as possibility of setting up a women's network.</p>
<p>Work is currently underway to map clear career paths and competency frameworks for multiple professions across the authority-this will be to promote career development at the Council and improve retention</p>	<p>HR continue to work with services to develop career pathways to assist with staff development and as part of succession workforce planning.</p>

<p>Explore the introduction of a mentoring program linking in with the Equalities Steering group to help reduce the identified gender pay gap at senior levels, supporting women and underrepresented groups to progress in their career, build skills and encourage development</p>	<p>Informal arrangements are already in place across the council we will look to expand on this as the coaching faculty develops.</p>
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<p>Equality, Diversity, and Inclusion Actions</p>	<p>Action Taken</p>
<p>EDI strategy is due to launch in March 2024.</p>	<p>Ongoing - continued promotion of the need for employees to update their personal records. This will be primarily through corporate comms but also using other engagement tools including the Vivup portal, wellbeing champions and internal support networks.</p>
<p>Regularly analyse and present workforce equalities data to inform decision making, review progress against the current strategy and identify the underpinning activities needed to support and enable the Equality and Diversity strategy.</p>	<p>Ongoing - challenges with Fusion has limited the data available. This is currently being worked on with the HRMI team to ensure data is accessible.</p>
<p>Continue to support, engage with, and grow employee network groups to progress the work on the wider equality, diversity and inclusion agenda for the council and the city Work is underway to review our current Equality Impact Assessments to ensure that our policies, practices, decision making, and projects are fair and do not present barriers or disadvantage any protected groups.</p>	<p>Ongoing</p>
<p>Review Census data for working populations to compare and identify any gaps to determine if our workforce is reflective of the regional area. This data will also be used to inform a uniform process for data collection going forwards.</p>	<p>Ongoing - working with our EDI Officer to undertake this piece of work using ONS Census data.</p>

<p>Reintroduction of a suite of EDI online courses following the closure of LMS to be made available to the whole workforce and elected members.</p>	<p>This is currently being reviewed and re-developed with the aim of being released in early 2024.</p>
<p>Pay and Benefits:</p>	
<p>Maintain a robust job evaluation scheme to ensure equal pay and transparency around our pay structure</p>	<p>Ongoing - continue to maintain a robust job evaluation scheme to ensure equal pay and transparency around our pay structure</p>
<p>Work is underway to improve data gathering and reporting for additional payments, such as honoraria payments that are at the managers discretion to ensure that this is not contributing to the gender pay gap or unequal pay, if any anomalies are found these should be addressed.</p>	<p>Annual report presented to leadership team to review pay at PCC.</p>
<p>Include Ethnicity Pay Gap reporting as part of future Gender Pay Gap reports</p>	<p>A concerted effort is being made to improve the data held on Fusion HR system to allow us to undertake analysis of pay ethnicity. PCC ethnicity workforce data will be compared to the ONS census. It is our aim that the diversity of our workforce will be representative of the community we service.</p>
<p>Develop a process to monitor starting pay both on recruitment and promotion for men and women to assess whether there is a difference on starting pay, this can be one of the most common causes of the Gender Pay Gap</p>	<p>System is in development for this.</p>
<p>Continue to follow the Real Living Wage increases to help reduce the Gender Pay Gap where there is a high proportion of female employees</p>	<p>PCC has committed to paying the RLW in line with the Real Living Wage Foundation annual increase recommendations.</p>

Stage 3: Evaluation of progress

- Monitor current pay systems to identify and address any systematic issues and prevent any distortion of the data used for pay reporting purposes.
- Use the trend analysis to inform and address future training needs of managers and employees.

10. Timescales of achieving the action plan

The action plan will be implemented over the next 12 months and reviewed on an ongoing basis, and annually in comparison with the published results of the Gender Pay Gap report, each March.