

Committee(s)	Dated:
City of London Freeman’s School Board of Governors City of London School Board of Governors City of London School for Girls Board of Governors	6 June 2018 14 June 2018 18 June 2018
Subject: HR Update - Gender Pay Gap Data Protection Policy Employees People Security Policy	Public
Report of: Director of Human Resources	For Information
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Summary

This report outlines for the Boards of Governors the City of London Corporation’s Gender Pay Gap which includes all teaching and non-teaching staff in the three city schools.

It also advises Members of the revised Data Protection Policy for employees including teaching staff and has been adopted to ensure that the City Corporation is compliant with the General Data Protection Regulations (GDPR).

The City Corporation has also adopted an overarching Security Policy for employees, other workers, contractors and others working under contracts for services which is fundamental to embedding a security culture. Local security arrangements that exist in the schools will continue to apply but may need to be reviewed in light of the new Policy.

Recommendation

Members are asked to note the report.

Main Report

Background

Gender Pay Gap

1. With effect from 6 April 2017 all relevant employers were required to publish their gender pay gap data, the deadline for the first reports was 30 March 2018 for public sector employers and 4 April 2018 for the private / voluntary sector.
2. It is important not to confuse the gender pay gap with equal pay. The gender pay gap measures the differences between the average pay of male and female employees, irrespective of job role or seniority. Whereas equal pay concerns

pay differences between male and female employees performing the same or similar work, or work of equal value.

General Data Protection Regulations

3. Members will be aware that the EU has introduced updated and harmonised data protection regulations known as the General Data Protection Regulation, which came into force on 25 May 2018. This has had a wide sweeping impact across all of our work. The Corporate Data Protection Policy (separate from the Employee Data Protection Policy) was approved by the Establishment Committee in April 2018.

People Security Policy

4. There has been a senior officer level Security Board chaired by the Town Clerk looking at the full range of security matters that impact on the City Corporation. The People Security Board was set up this year to consider all people focussed aspects in relation to security and it has developed a full action plan of activities covering employees, other workers, Members, contractors and visitors. The aim is to create and embed a security culture.
5. The focus, particularly with the recent commonwealth events has been on the Guildhall complex but the plan is to extend its work across the entire City Corporation estate including the schools.

Current Position

Gender Pay Gap

6. The City Corporation had reported on all of its workforce which includes the teaching and non-teaching staff in the three city schools in accordance with the requirements.
7. Table 1 below reports the City Corporation's gender pay gap i.e. the pay discrepancy between men and women irrespective of their job or position. The 2016/17 workforce profile indicates that 55.21% of our workforce is male and 44.79% is female.

Table 1: The Corporation's gender pay gap ("snap shot" date of 31 March 2017)

Pay rates	Gender pay gap - the difference between women's pay and men's pay as a percentage of men's pay		
Mean hourly rate	8.1% Lower		
Median hourly rate	1.4% Lower		
Pay quartiles	Women	Men	Total
Proportion of women and men in the upper quartile (paid above the 75th percentile point)	43%	57%	100%
Proportion of women and men in the upper middle quartile (paid above the median and at or below the 75th percentile point)	51%	49%	100%
Proportion of women and men in the lower middle quartile (paid above the 25th percentile point and at or below the median)	47%	53%	100%
Proportion of women and men in the lower quartile (paid below the 25th percentile point)	46%	54%	100%
Bonus pay	Bonus Gender Pay Gap - the difference women's bonus and men's bonus as a % of men's bonus		
Mean bonus	14% Lower		
Median bonus	0%		
Bonuses paid	Women	Men	
Who received bonus pay	11%	13%	

8. For the proportion of males and females in each quartile pay band, the figures in table 1 show the proportions of male and female full-pay relevant employees in four quartile pay bands, which is calculated by dividing the workforce into four equal parts. These quartile pay bands are established when making the calculation, so they do not correlate to the Corporation's own pay banding, but as an indicator they equate to:

- Lower Quartile Range: up to £13.73 per hour
- Lower Middle Quartile Range: £13.80 to £18.71 per hour
- Upper Middle Quartile Range: £18.85 to £28.34 per hour
- Upper Quartile Range: £28.40 to £141.96 per hour

9. The data helps us to develop our HR Strategy and in particular the equality and inclusion action plan and HR policy and procedure development.

10. The gender pay gap calculations are based on the total monetary pay bill and as there are more men employed in the City Corporation particularly at the most senior grades, this impacts on the mean percentage pay and bonus calculation.

Data Protection Policy

11. We are currently reviewing HR policies and procedures to ensure compliance with the requirements of GDPR. The Employee Data Protection Policy was agreed at the Establishment Committee at its meeting in May 2018. It provides employees with a framework that outlines appropriate use of personal data in accordance with the GDPR, whilst protecting the City Corporation against liability for the actions of its employees, other workers, former employees and former other workers.
12. Appended within the revised Policy is the Employee Privacy Notice, this describes how the City Corporation as a Data Controller collects and uses personal information about employees during and after their employment. These have been sent to all members of staff. Amended contract clauses to comply with the GDPR have also been made along with a privacy notice for job applicants. In addition, all staff have been required to complete mandatory data protection eLearning.
13. The Director of HR has been granted delegated powers to approve necessary amendments to HR policies and procedures to ensure their compliance with the new legislation. Such amendments will be subject to appropriate trade union consultation.

People Security Policy

14. The People Security Board has developed and consulted on a Security Policy in relation to employees and other workers, contractors and others working under contracts for services. The Policy which was agreed at the Establishment Committee at its meeting in May 2018 clarifies the standards and expectation of all employees in relation to all matters of Security. The intention is to link to guidance and related policies and procedures as they are developed.
15. The Board considers security to be of the utmost importance. As with all conduct matters there is an incremental approach from informal standard setting, then if necessary progression through the formal stages if the required standard is not met. Any serious breaches of conduct can be considered as gross misconduct. The Establishment Committee at its meeting in May agreed to add serious breaches of security as an example of gross misconduct in the disciplinary procedures to re-enforce the importance placed on security.
16. Regular communication and messaging ensures that staff members, other workers and Members understand the types of security threat that exists and to ensure that they remain vigilant at all times.

Proposals

17. Gender Pay Gap Regulations require us to report on the total workforce. Whilst we could report on schools only it is thought that the pay gap will be more balanced than the all staff reported figure. The plan is to report on the disability and ethnicity pay gaps during the course of the year.

18. Further work is continuing to update our HR policies and procedures for GDPR compliance and as appropriate these will be reflected in the Teachers Guide. These amendments have been delegated to the Director of HR to approve and it is not proposed that these are report back to the Board for information unless there is a particular issue that the Board needs to be sighted on.
19. The establishment of a Security Policy and by making specific reference to serious breaches of security as potential gross misconduct are fundamental steps to embed a security culture.

Implications

20. There is a requirement to report our Gender Pay Gap and to be compliant with GDPR. The City Corporation recognises the range of security threats that present challenges for us and the need for these to be addressed.

Conclusion

21. We have complied with the Gender Pay Gap reporting requirements. The data capture informs the HR strategy and allows us to compare ourselves with other organisations.
22. As an employer the City Corporation must ensure it is able to demonstrate compliance with the new GDPR legislation this includes making sure our policies, procedures and contractual terms are revised accordingly.
23. Having a Security Policy that sets out the standards and expectations is an important element of embedding a security culture. Further activities will be rolled out over the coming year.

Appendices

- Appendix 1 – Employee Data Protection Policy and Employee Privacy Notice
- Appendix 2 - Security Policy - People

Background Papers

Gender Pay Gap - Report to Establishment Committee February 2018
Equalities Update - Report to Establishment Committee April 2018
Data Protection - Report to Establishment Committee May 2018
People Security Policy - Report to Establishment Committee May 2018

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