



**DEVON &  
SOMERSET**  
FIRE & RESCUE SERVICE

Equal Pay Audit

# **Equal Pay Audit**

As at 31 March 2013

HR Services Department

Devon & Somerset  
Fire & Rescue Service

May 2013

## **DSFRS Equal Pay Audit**

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## **DSFRS Equal Pay Audit**

### **Introduction**

The Equality Act 2010 (the Act) affords women (and men) a right to equal pay for equal work ('like' work or work of 'equal value'). This replaced previous legislation, including the Equal Pay Act 1970 and the Sex Discrimination Act 1975, and the equality provisions in the Pensions Act 1995.

The full-time gender pay gap has narrowed nationally since 1975 when equal pay legislation first came into force but there remains a gap of over 16%, between men's and women's pay. (The figure quoted is the mean gender pay gap between full-time employees' earnings in the UK, based on the Office for National Statistics (ONS) Annual Survey of Hours and Earnings 2009.)

The Equality Act's provisions on equal pay and sex discrimination are intended to ensure that pay and other employment terms are determined without sex discrimination or bias.

A woman carrying out equal work in the same employment as a man (and *vice versa*) is entitled to equality in pay, unless the employer can show that there is a material reason for the difference which does not discriminate because of his or her sex. The equal pay provisions in the Act also apply to all contractual terms that are directly or indirectly related to remuneration. This would include, for instance, holiday entitlement.

### **Equal Pay Audits**

The benefits to an organisation of carrying out an equal pay audit include:

- identifying, explaining and, where unjustifiable, eliminating pay inequalities;
- having rational, fair and transparent pay arrangements;
- demonstrating to employees and to potential employees a commitment to equality; and
- demonstrating the organisation's values to those with whom it does business.

## Background

Both in the Fire and Rescue Service nationally and in Devon and Somerset Fire and Rescue Service (DSFRS), various schemes of pay and conditions apply. For uniformed employees, 'Gold Book' (for the most senior officers) and 'Grey Book' conditions apply. For support employees, 'Green Book' conditions apply. These are nationally agreed schemes of conditions of service. Support roles within DSFRS are evaluated using the Greater London Provincial Council Job Evaluation Scheme 2000 which was specifically designed for local authorities. Grey book posts are classified according to national role maps in line with guidance contained in various circulars published by the Local Government Authority.

Within DSFRS, there are many more men than women in the uniformed service (other than in 'Control'), and particularly at senior levels. This can be partly explained by the long history and development of the Fire and Rescue service. As a result of the Air Raid Precautions Act 1937, all fire brigades in existence were required to recruit volunteers (men and women) to become part of the Home Office funded Auxiliary Fire Service (AFS). 1941 saw the creation of the National Fire Service (NFS): then following the war, in 1948, the NFS ceased to exist, fire brigades were handed back to Local Authority control as 'Fire Authorities', and the women in the service went back to domestic life and traditional 1940's female roles. From the 1990s onwards, efforts have been made to recruit more women into the Service through positive action, but numbers of women in the operational Service are still very low, the average being 4% nationally. Consequently women have had less time to progress in any number, and there is still much to do to dispel the stereotypes around the roles and its requirements. In the absence of national support, the DSFRS positive action strategy is to be reviewed to include recruitment, selection, retention and progression.

This equal pay report reveals that the low numbers of women in the operational service contributes to an imbalance in favour of men of 15% if full-time equivalent salaries are computed (ie if part-time salaries are "scaled up" to full time).

If actual salary received is used, the gap is currently 14% in favour of women. This is due to the high proportion of men working part time on the Retained Duty System – who receive a relatively high hourly rate but work a relatively small number of hours per week. Since, this figure depends on the number of hours individual people work and various allowances (such as the Flexi duty allowance and various on-call allowances), it is, consequently, difficult to draw meaningful comparisons.

We are confident that men and women are paid equally for the work they do under the two nationally approved (and union agreed) systems. Consequently, the emphasis in this audit is on an analysis of the number of people in various categories who are in particular salary grades.

A woman (or man) can claim equal pay and other remuneration related contract terms with a male (or female) comparator for doing work that is:



- the same or broadly similar, provided that where there are any differences in the work these are not of practical importance (known as '**like work**');
- different, but which is rated under the same job evaluation scheme as being work of equal value (known as '**work rated as equivalent**');
- different, but of equal value in terms of factors such as effort, skill and decision-making (known as '**work of equal value**').

If there are differences of practical importance in the work actually performed then roles are not considered to involve "like work" or of "equal value". Differences such as additional duties, level of responsibility, skills, the time at which work is done, qualifications, training and physical effort could all be of practical importance. A contractual obligation on a man (or a woman) to perform additional duties is not sufficient: it is what happens in practice that counts. The employer would have to provide objective justification for any discrepancy, ie it would need to prove that the difference relates to a 'proportionate means to achieve a legitimate end' which is not related to sex.

The nationally recognised job evaluation scheme for Green Book employees and national role-maps for Grey Book employees can be said to provide assurance within the pay scales, ie men and women are paid equally for the work they do within the scales and within national conditions of service. However, the two schemes are completely different in nature and it is not possible to make meaningful comparisons between them.

The key issues identified in this audit are essentially the same as in the previous audit in 2011. These are:

- women are under-represented in senior operational roles;
- women are under-represented in uniformed roles other than in 'Control';
- the majority of support posts in grades 1-3 are women;
- there is a low level of LGB employees' self-identification in the Service;
- a substantial number of employees have preferred not to state their ethnicity and/or sexuality.

DSFRS has developed an action plan to address a number of issues including the lack of numbers of women in uniformed roles and, particularly in senior roles in the service. This is attached as an appendix.

Guidance on the Equal Rights Act may be found [here](#) and [here](#).

## Summary of findings (see tables 1 and 2)

Please note that all percentages in this analysis are rounded to the nearest 1%.

On average within the Service, men are paid 14% more than women when Full Time Equivalent (FTE) salaries are taken into account.

This is a reflection of the historically overwhelmingly male workforce and larger number of senior posts on the operational side. Also, because of the operational commitment, 'uniformed' employees are generally paid more than Support ('non-uniformed') employees in otherwise similar posts.

There are very few employees categorising themselves as being in ethnic minorities, but the number of people preferring not to state their nationalities is substantial. Given the small numbers, there is no evidence of bias against ethnic minorities.

Similarly, the number of people in sexuality categories other than heterosexual is so small as to make any statistical analysis meaningless – particularly since there are large numbers preferring not to state their sexualities.



**Table 1 - Total Salaries by category**

These figures are based on actual earnings (other than overtime) so part time salaries, including those on the Retained Duty System ('Retained') will, by definition, be lower than full-time. This also includes allowances (such as the 20% allowance paid to officers on the Flexible Duty System).

Table 1		All		Part-time		Disability		Non-White-British		Ethnicity Not Stated	
Total salaries		Number	Average Salary	Number	Average Salary	Number	Average Salary	Number	Average Salary	Number	Average Salary
Wholetime	Male	693	33230	42	16636	14	37800	11	37980	53	31960
Control	Male	9	31501	0		2	32030	0		0	
Support	Male	149	26407	14	12308	6	27407	1	29236	16	25240
Retained	Male	1165	6786	338	5170	17	7717	7	5418	46	6661
Wholetime	Female	23	30826	2	23272	1	53037	0		2	21749
Control	Female	37	28211	4	13658	1	29997	1	27575	0	
Support	Female	154	20269	54	12618	5	29805	5	20803	19	17363
Retained	Female	35	6076	12	4660	0		0		0	
		2265									
Wholetime	All	716	33153	44	16938	15	38816	11	37980	55	31589
Control	All	46	28855	4	13658	3	31352	1	27575	0	
Support	All	303	23288	68	12554	11	28497	6	22208	35	20964
Retained	All	1200	6766	350	5153	17	7717	7	5418	46	6661
All	Male	2016	17437	394	6646	39	22792	19	25524	115	20905
All	Female	249	20429	72	11645	7	33151	6	21931	21	17780

Note: "Retained" refers to 'on-call' employees on the Retained Duty System

**Table 2 - FTE salaries by category**

These figures are based on full time equivalent salaries so part time salaries will, by definition, be comparable to full-time and allowances are not included.

Table 2		All		Part-time		Disability		Non-White-British		Ethnicity Not Stated	
FTE salaries		Number	Average Salary	Number	Average Salary	Number	Average Salary	Number	Average Salary	Number	Average Salary
Wholetime	Male	693	32858	42	31804	14	35831	11	34699	53	31496
Control	Male	9	30530	0		2	31771	0		0	
Support	Male	149	27560	14	21125	6	27407	1	29236	16	28478
Retained	Male	1165	28402	338	28091	17	29410	7	25687	46	27076
Wholetime	Female	23	31040	2	33156	1	46892	0		2	28481
Control	Female	37	29305	4	27057	1	29997	1	27057	0	
Support	Female	154	23735	54	21256	5	35505	5	24036	19	19942
Retained	Female	35	27502	12	26146	0		0		0	
		2265									
Wholetime	All	716	32800	44	31866	15	36569	11	34699	55	31386
Control	All	46	29545	4	27057	3	31180	1	27057	0	
Support	All	303	25616	68	21229	11	31087	6	24903	35	23844
Retained	All	1200	28376	350	28024	17	29410	7	25687	46	27076
All	Male	2016	29881	394	28239	39	31528	19	31091	115	29308
All	Female	249	25767	72	22724	7	36345	6	24540	21	20755

Note: "Retained" refers to 'on-call' employees on the Retained Duty System



### Wholetime (see table 3)

There are fewer women than men at every level above Firefighter, compared to the overall ratio of women to men in this category (i.e. 14 of the 23 Wholetime women are at Firefighter level). In addition, there are only 23 women, compared to 693 men across all the levels.

The last wholetime recruitment campaign in 2009 was underpinned by a positive action message aimed at women, and resulted in 2 women recruits in a cohort of 24, or 12%. There has been little opportunity to increase the number of women in the Wholetime workforce since then, other than from the existing retained workforce into Fixed Term contract posts.

**Table 3 - Wholetime grades by gender**

Table 3										
Wholetime Grades		Number	% of total	% of grade	% of gender		Number	% of total	% of grade * <sup>2</sup>	% of gender
CFO	Male	1	0%	100%	0%	Female	0	0%	0%	0%
DCFO	Male	1	0%	100%	0%	Female	0	0%	0%	0%
ACFO	Male	2	0%	100%	0%	Female	0	0%	0%	0%
AM	Male	9	0%	100%	1%	Female	0	0%	0%	0%
GM	Male	38	2%	97%	5%	Female	1	0%	3%	4%
SM	Male	65	3%	98%	9%	Female	1	0%	2%	4%
WM	Male	124	5%	98%	18%	Female	3	0%	2%	13%
CM	Male	103	5%	96%	15%	Female	4	0%	4%	17%
FF	Male	350	15%	96%	51%	Female	14	1%	4%	61%
Total	Male	693	31%	97%	100%	Female	23	1%	3%	100%

\*<sup>1</sup> uniformed members of the Senior Management Board

\*<sup>2</sup> percentage of gender within grade





## Retained Duty System (Retained or 'on-call' firefighters) (see table 4)

In some ways, the situation here is similar to that of the wholetime category. The most senior category open to employees on the Retained Duty System is that of Station Manager. Of the 1165 male members of the Retained Duty System, 9% (107) are Watch Managers, 16% (183) are Crew Managers and 75% (875) are Firefighters. There are no female Watch Managers and only three female Crew Managers (equivalent to 9% of the women on the Retained Duty System) – though this has increased from 1 person (2%) in 2011. This leaves 32 (91%) as Firefighters. The Retained Duty System provides the clearest opportunity to recruit more women into the operational service and a positive action toolkit has been embedded into the retained recruitment process.

**Table 4 - Retained Duty System (RDS) grades by gender**

Table 4										
Retained Grades		Number	% of total	% of grade	% of gender		Number	% of total	% of grade <sup>*2</sup>	% of gender
CFO	Male	0	0%	0%	0%	Female	0	0%	0%	0%
DCFO	Male	0	0%	0%	0%	Female	0	0%	0%	0%
ACFO	Male	0	0%	0%	0%	Female	0	0%	0%	0%
AM	Male	0	0%	0%	0%	Female	0	0%	0%	0%
GM	Male	0	0%	0%	0%	Female	0	0%	0%	0%
SM	Male	0	0%	0%	0%	Female	0	0%	0%	0%
WM	Male	107	5%	100%	9%	Female	0	0%	0%	0%
CM	Male	183	8%	98%	16%	Female	3	0%	2%	9%
FF	Male	875	39%	96%	75%	Female	32	1%	4%	91%
Total	Male	1165	51%	97%	100%	Female	35	2%	3%	100%

<sup>\*2</sup> percentage of gender within grade



## Control (see table 5)

The ratio of women to men in control is approximately four to one (decreasing from 5:1 in 2011). There is one Group Manager in Control who is a woman. However, there are fewer women than men at the other three 'officer' grades ie at Station Manager, Watch Manager and Crew Manager, compared to the overall ratio of women to men in Control.

**Table 5 - Control grades by gender**

Table 5										
Control Grades		Number	% of total	% of grade	% of gender		Number	% of total	% of grade <sup>*2</sup>	% of gender
CFO	Male	0	0%	0%	0%	Female	0	0%	0%	0%
DCFO	Male	0	0%	0%	0%	Female	0	0%	0%	0%
ACFO	Male	0	0%	0%	0%	Female	0	0%	0%	0%
AM	Male	0	0%	0%	0%	Female	0	0%	0%	0%
GM	Male	0	0%	0%	0%	Female	1	0%	0%	3%
SM	Male	1	0%	33%	11%	Female	2	0%	67%	5%
WM	Male	3	0%	33%	33%	Female	6	0%	67%	16%
CM	Male	3	0%	27%	33%	Female	8	0%	73%	22%
FF	Male	2	0%	9%	22%	Female	20	1%	91%	54%
Total	Male	9	0%	20%	100%	Female	37	2%	80%	100%

<sup>\*2</sup> percentage of gender within grade



## Support (“non-uniformed”) (see table 6)

Overall the numbers of men and women in this category are very similar. Most grade 1 employees are women. These women are all cleaners and although there are a total of 15 cleaners (including 3 men) they all work a very small number of hours together making the equivalent of less than 2 full time posts. There are very many more women than men in grade 2 and 3 posts – most of the women being in clerical or administrative posts and the men in caretaking or technician roles. There are significantly more men than women at grades 4, 5, 7 and 8 – though the total numbers at the more senior grades (9, 10 and 11) are similar.

There are rather more women than men at grade 6 which includes both senior administration and junior management. There is no obvious explanation for this.

**Table 6 - Support grades by gender**

Table 6										
Support Grades		Number	% of total	% of grade	% of gender		Number	% of total	% of grade <sup>*2</sup>	% of gender
SMT	Male	2	0%	67%	1%	Female	1	0%	33%	1%
Grade 11	Male	3	0%	75%	2%	Female	1	0%	25%	1%
Grade 10	Male	4	0%	57%	3%	Female	3	0%	43%	2%
Grade 9	Male	5	0%	42%	3%	Female	7	0%	58%	5%
Grade 8/9	Male	1	0%	100%	1%	Female	0	0%	0%	0%
Grade 8	Male	6	0%	75%	4%	Female	2	0%	25%	1%
Grade 7	Male	22	1%	61%	15%	Female	14	1%	39%	9%
Grade 5/7	Male	0	0%	0%	0%	Female	1	0%	100%	1%
Grade 3/7	Male	10	0%	83%	7%	Female	2	0%	17%	1%
Grade 6	Male	7	0%	30%	5%	Female	16	1%	70%	10%
Grade 5	Male	28	1%	62%	19%	Female	17	1%	38%	11%
Grade 4/5	Male	1	0%	100%	1%	Female	0	0%	0%	0%
Grade 4	Male	38	2%	69%	26%	Female	17	1%	31%	11%
Grade 2/4	Male	1	0%	100%	1%	Female	0	0%	0%	0%
Grade 3	Male	12	1%	31%	8%	Female	27	1%	69%	18%
Grade 2	Male	6	0%	15%	4%	Female	34	2%	85%	22%
Grade 1	Male	3	0%	20%	2%	Female	12	1%	80%	8%
Total	Male	149	7%	49%	100%	Female	154	7%	51%	100%

<sup>\*1</sup> non-uniformed members of the Senior Management Board

<sup>\*2</sup> percentage of gender within grade

### **Ethnicity (see table 8), disability and part-time employees (see tables 1 and 2), and sexuality (see table 7)**

The number of those declaring themselves as of black and minority ethnic origin (18 including 11 'white-other') is low and not reflective of the working age population average across Devon and Somerset. However, a substantial number of employees (136) have not stated their ethnicity and, consequently, it is difficult to draw any conclusion from this. Equality monitoring is currently undertaken on recruitment and periodically thereafter. An update exercise is due in 2013.

Similarly, the number of people in sexuality categories other than heterosexual is so small as to make any statistical analysis meaningless – particularly since there are large numbers preferring not to state their sexualities.

The number of employees with disabilities is also relatively small. As the majority of the workforce consists of operational firefighters, the level of disability is likely to be lower than the population as a whole and whilst having a disability is not necessarily a barrier to operational fire-fighting, some types of disability would lead to unsuitability for this type of work. However, the service has attained the "Two Ticks", positive about disabled people accreditation and an objective in the Equality Plan 2012-16 is to promote key messages about disability and operational fire-fighting in recruitment.

The average salary for people with disabilities is consistently higher than those without a declared disability, in all areas of the Service, with the exception of the Retained Duty System. This could be taken to indicate that the Service has been successful in retaining disabled people in roles by making 'reasonable' adjustments – though there are other ways of explaining these figures.



**Table 7 Sexuality**

Table 7						
Sexuality		Heterosexual	Gay/Lesbian	Bisexual	Not Stated	Total
Wholetime	Male	453	0	1	239	693
Control	Male	6	1	0	2	9
Support	Male	95	1	0	53	149
Retained	Male	850	3	2	310	1165
Wholetime	Female	17	1	0	5	23
Control	Female	29	0	0	8	37
Support	Female	102	1	0	51	154
Retained	Female	22	3	0	10	35
Total		1574	10	3	678	2265

**Table 8 Ethnicity**

Table 8										
Ethnicity		Chinese	Mixed - White/Asian	Mixed - White/ Black Caribbean	Mixed - Other	White - British	White - Irish	White - Other	Not Stated	Total
Wholetime	Male	1	1	2	0	629	3	4	53	693
Control	Male	0	0	0	0	9	0	0	0	9
Support	Male	0	0	0	0	132	1	0	16	149
Retained	Male	1	1	0	0	1112	1	4	46	1165
Wholetime	Female	0	0	0	0	21	0	0	2	23
Control	Female	0	0	0	1	36	0	0	0	37
Support	Female	0	0	0	0	130	2	3	19	154
Retained	Female	0	0	0	0	35	0	0	0	35
Total		2	2	2	1	2104	7	11	136	2265

Note: "Retained" refers to 'on-call' employees on the Retained Duty System



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## Appendix

### Action plan

To address the key issues identified in this audit, namely:

The key issues identified in this audit are essentially the same as in the previous audit in 2011. These are:

- women are under-represented in senior operational roles;
- women are under-represented in uniformed roles other than in 'Control';
- the majority of support posts in grades 1-3 are women;
- there is a low level of LGB employees' self-identification in the Service;

DSFRS has developed an action plan to address a number of issues including the lack of numbers of women in uniformed roles and, particularly in senior roles in the service.

Desired outcome	Action	How it will be measured	Who is responsible	When it will be completed
Increased number of women in Senior uniformed roles	Develop positive action progression strategy for women in uniformed roles	More women applying for ADC More women recruited into senior uniformed posts	HR/Training and Development	2014
More women in uniformed roles	<ul style="list-style-type: none"> <li>Review the Positive action strategy</li> <li>Evaluate the positive action toolkit in the retained recruitment process</li> </ul>	Revised strategy in place and toolkit embedded and evaluated. More women attracted and recruited into retained roles	HR/CWE	Equality Plan action 2014
Ensure women are not disadvantaged in any Wholetime permanent or FTC recruitment	Carry out Equality Risks and Benefits Analysis on appointment criteria for Wholetime posts	Thorough consideration of criteria against ERBA principles	HR	Ongoing
To examine and eliminate any barriers to progression women in grades 1-3	Examine development opportunities offered and feedback at grades 1-3 PPD	No barriers to progression identified Satisfactory development opportunities offered to men and women in grades 1-3	Training and Development	2014



Increase the percentage of Ethnic minorities to reflect the working age population in the community	<ul style="list-style-type: none"> <li>Review the Positive action strategy</li> <li>Embed the positive action toolkit in the retained recruitment process</li> </ul>	<p>Revised strategy in place and toolkit embedded and used.</p> <p>More ethnic minorities attracted and recruited into retained roles</p>	HR/CWE	2012/13 Equality Plan Action
Exit interviews /feedback forms reveal detailed reasons for leaving	Analyse the exit interview feedback	Improved information about reasons for leaving captured and analysed	HR	April 2014
Family leave and flexible working policies are robust and assist in the attraction and progression of women	Review family leave and flexible working provision	<p>Attraction/ recruitment/ progression rates</p> <p>How many women return to work</p> <p>How many women progress after maternity /adoption leave</p> <p>Feedback on flexible working policy</p>	HR	April 2014
Women staff, as a minority are informed and encouraged to fulfil their own potential	Continue to support the WANDS network, NWFS membership and development days	WANDS network supported and evaluated development days held	CWE	Equality Plan action 2013 and ongoing

Increased identification of LGB staff identified	Complete the Stonewall Diversity champions action plan	Remain in the Top 100 Stonewall employer's list and improve ranking in Top 100 by 2014	CWE	Equality Plan action 2013 and ongoing

