

**The Pensions Regulator's
commitment to diversity and
the Single Equality Scheme
Annual report 2008-2009**

June 2009

www.thepensionsregulator.gov.uk 

**TPR's commitment to diversity and the Single Equality Scheme
Annual Report 2008-2009**

1. Purpose

This report provides an update on the delivery of the second year of the Single Equality Scheme for 2008-2009, and sets out the relevant impact assessments. It is published both internally and externally on our website.

2. Action plan progress

Action	Situation as at 31 March 2009
Carry out a full equal pay audit	<p>Completed.</p> <p>The audit showed there are no significant pay differentials in terms of gender, race, disability, age, part-time working or length of service. There is however one exception in job group 3 as the audit showed a disproportionate number of women with longer service on lower pay and a higher number of males with shorter service on higher pay. On further examination the roles with the higher salary are those relating to IT roles, which attract a higher market rate of pay for these specific roles, whereas the roles with a lower salary are customer support roles that attract lower rates of pay in market. We hold independently provided market data to justify the decisions on salaries. As a precautionary measure a formal job re-evaluation and re-benchmarking exercise will be carried out in respect of the customer service and IT roles in job group 3.</p>
Impact assessment of the job evaluation scheme	<p>Completed.</p> <p>Impact assessment attached at appendix 1.</p> <p>Findings and action plan summarised below:</p> <p>Findings:</p> <ul style="list-style-type: none"> • TPR's job evaluation scheme is very robust and there is very little scope for inconsistency of treatment in how it is applied or delivered • The job evaluation system is based on the role not with assessing the performance of the individual • A tailored proprietary system is used • Fully documented and published internally • HR trained and accountable for ensuring process is applied consistently • Evaluations carried out by a trained panel including a PCS representative • Standard question sheet is used by the panel to collect job information.

	<p>Action for 2009-2010:</p> <ul style="list-style-type: none"> • During Q1 of 2009-2010 we will include reference to TPR's diversity aims on our internal job evaluation material.
Action	Situation as at 31 March 2009
Impact assessment of the procurement policy	<p>Completed. Impact assessment attached at appendix 2. Findings and action plan summarised below:</p> <p>Findings:</p> <ul style="list-style-type: none"> • Areas identified for improvement are inherent within the procurement teams operational plans for 2009-2010. <p>Action plan for 2009-2010:</p> <ul style="list-style-type: none"> • Inclusion of an equality clause in TPR's procurement standard terms and conditions templates and appropriate evaluation criteria for pre-qualification questionnaires • Amendment of TPR's equal opportunities policy to outline TPR's commitment to achieving equality in procurement and include this in tender materials and contracts (joint HR/Procurement) • Review TPR's procurement process guidelines to ensure they follow best practice guidelines, including CIPS, OGC and DWP • Review existing contracts, as part of a wider objective, to ensure compliance with our diversity aims (prioritisation and risk based approach to be taken) • Development of joint HR/Procurement wider communication and education plan which includes: <ul style="list-style-type: none"> ➤ training for the business ➤ making our potential supply base aware of our equality terms and conditions.

PART 1: Initial questions
Job evaluation

Question	Comment	More information needed?
1. What is the aim or purpose of the policy, service or practice?	Job evaluation forms the basis of TPR's job grouping structure. The results of a job evaluation exercise determine which group a job is allocated to. As new roles are created and/or jobs change and develop to meet the organisation's business requirements, jobs will be re-evaluated to ensure they are placed in the correct group.	
2. Who is it aimed at – eg everyone; particular categories or groups of people?	All permanent employees.	
3. Could the aims be in conflict with equal opportunities or good relations between groups - eg who is it intended to benefit?	No conflict identified.	
4. Are there any criteria, requirements or processes that could contribute to inequality? Eg who is eligible, access to information; location.	None.	
5. Is there scope for inconsistency/different treatment in how it is applied or delivered?	<p>No – TPR's job evaluation system is based on the role not with assessing the performance of the individual.</p> <ul style="list-style-type: none"> • TPR's uses a simplified and adapted version of the PWC Monks Job Evaluation system. This is a competency based analytical scheme. • The job evaluation approach is fully documented and set out on TPR's internal website. • The HR team are accountable for ensuring that the policy and process are effectively and consistently followed by the organisation and the HR team are trained and experienced in this field. • Evaluations are carried out by a panel made up of a member of HR, a trade union representative and a senior manager from a different executive function to that of the role being evaluated. 	

	<p>The line manager is interviewed by the panel to describe the job for which they are responsible and answer specific questions so the panel can make an accurate assessment of the job.</p> <ul style="list-style-type: none"> • All panel members are fully trained in the principles of job evaluation and the use of the job evaluation system. • The job evaluation panel have a standard question sheet (Data Collection Document) to complete the data collection consistently and the line manager has guidance to assist them with their preparation. • The guidance includes when jobs are to be evaluated and re-evaluated. 	
<p>6. Does the policy/service/practice include any measures designed to meet special needs, or to promote equal opportunities or good relations between groups?</p>	<p>Yes – the job evaluation is based on the role not with assessing the performance of the individual.</p>	

General impressions

Question	From consultation	Surveys/Research	Regular monitoring	Complaints	Other feedback	National/wider data
7. What information do we have on its impact in general terms? Eg popularity; high rates of complaints; changes requested	In regular consultation with the trade union - no issues raised in 2008-2009	No survey/research information	Equal pay audit – every three years.	No complaints.	No feedback	None

Question	Different ethnic groups	Gender	Disability	Other issues – eg age, religion
8. Do we have any information, currently, on the impact of the policy, service or practice for different groups? Eg from community feedback or staff perceptions (Indicate whether the impact is positive, negative or neutral)	Process based on roles not on individuals.	Process based on roles not on individuals.	Process based on roles not on individuals.	Process based on roles not on individuals.

PART 2: Assessing feedback and practical outcomes

Question	Gender	Ethnic origin	Disability	Other – including age, religion
<p>1. What does available data/results of consultation indicate on take up/usage by different groups? No difference/possible adverse impact/possible positive impact/not known</p>	<p>No difference</p>	<p>No difference</p>	<p>No difference</p>	<p>No difference</p>

PART 3: Initial recommendations

**What changes or practical measures would achieve the policy’s aim – without causing adverse impact?
eg changes in communication methods, eligibility criteria, outreach, measures to build awareness**

During Q1 of 2009-2010 we will:

- Include reference to TPR’s diversity aims on our internal job evaluation material.

PART 1: Initial questions

Procurement

Question	Comment	More information needed?
1. What is the aim or purpose of the policy, service or practice?	TPR's procurement service is designed to deliver best practice commercial services and solutions that support business outcomes, provide best value for money and demonstrate continuous improvement in customer service and performance.	
2. Who is it aimed at – eg everyone; particular categories or groups of people?	The procurement approach is aimed at: <ul style="list-style-type: none"> • potential and actual suppliers • TPR staff • other key external stakeholders 	
3. Could the aims be in conflict with equal opportunities or good relations between groups - eg who is it intended to benefit?	No conflict identified	
4. Are there any criteria, requirements or processes that could contribute to inequality? Eg who is eligible, access to information; location.	No. As a Non-Departmental Public Body (NDPB), the regulator must comply with European Union (EU) procurement directives and UK procurement regulations which include equality and diversity requirements.	
5. Is there scope for inconsistency/different treatment in how it is applied or delivered?	Yes –in terms of a lack of understanding in some areas of the business leading to non compliance with procurement regulation. However the procurement team provide a safeguard as they are accountable for ensuring that the policy and processes are effectively and consistently followed by the organisation. This area could be strengthened through education and communication.	
6. Does the policy/service/practice include any measures designed to meet special needs, or to promote equal opportunities or good relations between groups?	TPR's procurement team apply due diligence via both the evaluation criteria and contractual terms, however these could be strengthened by spelling out the equalities aspects that must be met by contractors.	

General impressions

Question	From consultation	Surveys/Research	Regular monitoring	Complaints	Other feedback	National/wider data
8. What information do we have on its impact in general terms? Eg popularity; high rates of complaints; changes requested	FOI requests		None		Formal debriefing process from external suppliers.	

Question	Different ethnic groups	Gender	Disability	Other issues – eg age, religion
9. Do we have any information, currently, on the impact of the policy, service or practice for different groups? Eg from community feedback or staff perceptions (Indicate whether the impact is positive, negative or neutral)	None	None	None	None

PART 2: Assessing feedback and practical outcomes

Question	Gender	Ethnic origin	Disability	Other – including age, religion
1. What does available data/results of consultation indicate on take up/usage by different groups? No difference/possible adverse impact/possible positive impact/not known	Not known	Not known	Not known	Not known
2. Is there insufficient data from which to judge comparative impact?	Yes	Yes	Yes	Yes
3. Is there any detailed information on comparative impact – eg. regarding individual ethnic groups, specific disabilities etc Please mark* and expand below	No	No	No	No
4. How can we find out more?	Introduce an evaluation criteria for procurement tenders.	Introduce an evaluation criteria for procurement tenders.	Introduce an evaluation criteria for procurement tenders.	Introduce an evaluation criteria for procurement tenders.

<p>5. If there is adverse impact what are the possible or likely reasons?</p>	<p>Possible positive impact</p>	<p>Possible positive impact</p>	<p>Possible positive impact</p>	<p>Possible positive impact</p>
<p>6. Is the adverse impact directly or indirectly discriminatory?</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>

PART 3: Initial recommendations

**What changes or practical measures would achieve the policy's aim – without causing adverse impact?
eg changes in communication methods, eligibility criteria, outreach, measures to build awareness**

As part of operational plans for 2009-2010 diversity requirements will be addressed as follows:

Inclusion of an **equality clause in TPR's procurement standard terms and conditions templates** and appropriate **evaluation criteria for pre-qualification questionnaires**.

Amendment of TPR's equal opportunities policy to **outline TPR's commitment to achieving equality in procurement** and include this in tender materials and contracts. (Joint HR & Procurement action)

Review of TPR's procurement process guidelines to ensure they follow best practice guidelines, including CIPS, OGC and DWP.

Review of existing contracts, as part of a wider objective, to ensure compliance with our diversity aims (prioritisation and risk based approach to be taken).

Development of a joint HR and procurement **communication and education** plan which includes

- training for the business.
- making our potential supply base aware of our equality terms and conditions.

Part 4: Further steps

1. What are the main data gaps?	We have no database of existing tenders.
2. How can we obtain a fuller assessment of impact? Eg consultation, surveys, group discussions, pilot projects, complaints and customer feedback	Introduce an equalities monitoring system for procurement tenders. This is dependent on the introduction of e-tendering process which is planned for 2009-2010.
3. Who should be consulted and how?	Relevant key stakeholders CIPS, OGC, DWP
4. What do we need to do next?	Flag up to follow introduction of e-tendering process.
5. Who will be responsible?	Procurement lead