

People Committee – for assurance

Meeting agenda title: Career banding outcomes and pay data

Meeting date: 4 May 2023

Time required: 15 minutes

Presenter: Sarah Lal

1. Summary

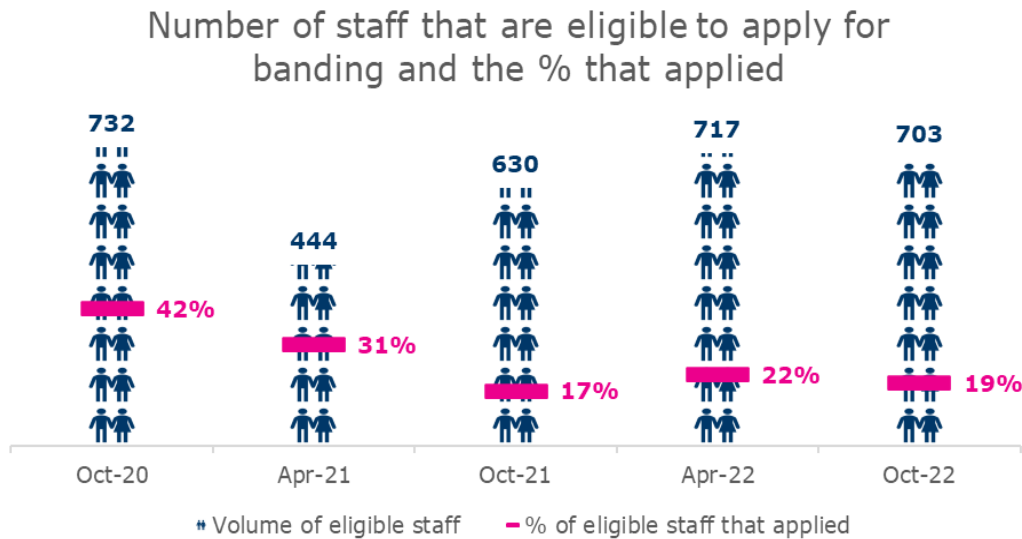
- 1.1. This report provides data and analysis on the career band outcomes for grades B – G from 1 April to 31 October. The report includes ICO staff profiles by grade, career band distribution across the organisation, and equality information of those who applied and were successful. The information provided within this report has been reviewed and ratified by the Pay Consistency Panel resulting in payments being made to those who applied for career band progression.
- 1.2. Career band progression is an in-band pay mechanism, and is separate to promotion progression. Within the same career band progression window, the ICO has promoted 115 staff, 88 permanent and 27 temporary. This is an average of 12% of our workforce.
- 1.3. Grade G2 career band outcomes are not included in this report as they are discussed at the executive team pay consistency panel meeting; Grade H outcomes are discussed at the remuneration advisory sub-committee (RASC).
- 1.4. To be eligible to apply for career banding assessment at the ICO, staff need to have passed their probationary review, not have any live conduct warnings, not be on a performance improvement plan and not have applied for career banding within the last 12 months.

Author: David McKeever

Outcome reached:

2.0 High level data

136 assessments were conducted for staff in grades B-G. There were 703 eligible staff.



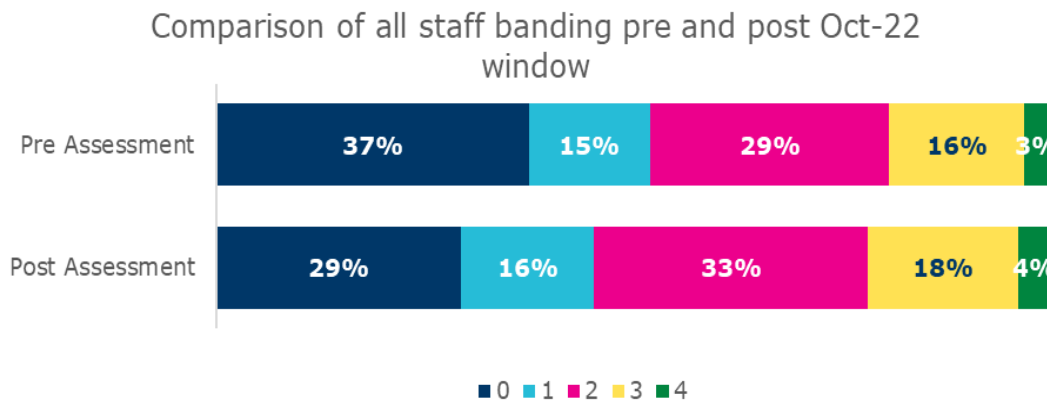
In this window 19% of eligible staff applied for assessment. This is higher than the 17% that applied in October 2021 but lower than the 22% that were assessed in April 2022. Over the last 12 months (2 assessment windows), 41% of all colleagues, eligible to be assessed in this window, have been assessed.

59% of those eligible to apply for assessment, but did not, were already at CB2 or above. Staff at CB2 and above have already been assessed as fully competent or demonstrating mastery in their role. There is less scope for movement in their Career Banding, and so they are less likely to apply for an assessment. 29% of those eligible to apply for assessment, but did not, have been in grade for less than one year and so are less likely to apply for assessment.

The highest number of assessment outcomes resulted in full competence (CB2) with fewest in the mastery band (CB4). This is as expected. 5 assessments in this window resulted in a jump of 3 career bands, 4 of these individuals were in one executive directorate.

The average number of career bands that staff have progressed in this assessment window is 1.32. This is the same as the last progression window where the average progression was 1.32 bands.

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The above chart show a large number of colleagues in band 0. Based on previous windows, colleagues do not tend to apply for assessment until they have been in post more than a year. Due to headcount growth and an increase in our turnover rate, majority of those at band 0 have less than 1 year in service.

It should be noted that there are some staff who are on salaries which are between bands (e.g. as a result of a 10% increase in their pay following a promotion). Where this is the case the lower career banding is counted, even where the salary is close to the higher banding figure.

3.0 Equality data and analysis

3.1 Disability

7% of staff have declared they have a disability at the ICO. Out of this, 10% applied for career banding assessment (5 out of 51). 3.7% of those who did apply for an assessment have a disability. This is lower than the current ICO profile which shows 6.9% of staff have informed us they have a disability.

The average number of progression points for staff with a disability was 1.2 with an average career banding position of 2.0. The average time in grade for those assessed was 2.1 years. The average number of progression points for staff who have not informed us they have a disability was 1.33 with an average career banding position of 1.96. The average time in grade for those assessed was 1.64 years. Of the 30 staff with a disability who were eligible to apply for a career banding but did not do so, 24 (52%) were already at CB2 or above and 15 (33%) had less than a year in their current grade.

3.2 Ethnicity

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Understanding the distribution of Career Bandings by ethnicity is essential to understand if there are any indicators of underlying bias or disproportionality in the implementation of the system.

The sample size of staff from some ethnicities is too small to provide a break down by each background without potentially providing personal data. Therefore, information is presented by combining data for those who have an ethnic/race minoritised background in the UK, and those from various white categories according to European and American race standards, together for comparison purposes.

The ICO has a declaration rate of 96% for ethnicity disclosure from staff. 3% of staff at the ICO have not declared their ethnicity, and 1% prefer not to disclose their ethnicity.

12 of 63 eligible staff who have an ethnic minoritised background applied for assessment. This is 19.0% of those eligible, and is the same as the proportion of eligible staff from a white background who applied (18.9%). The proportion of staff in each group who came forward for assessment are therefore in line with one another.

The table below looks at the proportion of people who might have expected to have applied for a career banding.

Cohort	Ethnic Minoritised	White
% of group eligible and applied	19.0%	18.9%
At CB2 – less likely to apply	29.4%	38.8%
At CB3/4 – less likely to apply	17.6%	28.0%
Less than 12 month in grade and didn't apply	25.5%	11.9%
% of whole group in CB0/1 with more than 1 year in grade and did not apply	31.3%	33.2%

The average progression points and banding outcome of colleagues from an ethnic minoritised background was 1.30, this is similar to white colleagues at 1.26. 9.4% of colleagues assessed are from an ethnic minoritised background which is similar with the ICO profile of 10.1%.

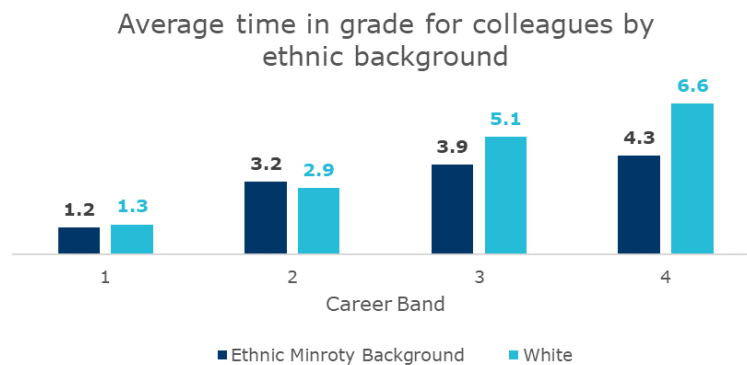
In this window a similar proportion of people from ethnic minoritised and white backgrounds applied for an assessment. A significantly higher

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proportion of eligible ethnic minoritised staff (25.5%) with less than one year's service applied for an assessment than for white staff (11.9%). This is to be expected as the ICO attraction and offer rates for ethnic minoritised staff has increased incrementally over the past 4 years, year on year, due to talent attraction efforts.

In this window the average number of progression steps for staff from an ethnic minority background is 1.30. The average number of progression steps for staff from a white background is 1.27. The difference is not considered to be material, and shows that there has been consistency in this assessment window.

The table below shows the average progression steps made by staff based on their ethnicity in each of the Career Banding windows.



The data shows that white staff progressed more in the first 2 windows. In Oct 2020 and Apr 2021 the rates of progression were essentially the same for staff from ethnic minoritised backgrounds and white staff. In Oct 2021, on average, ethnic minoritised staff progressed more than white staff. In April 2022 the window showed a higher progression rate for white staff and with a longer average time in grade.

The most recent window (Oct 2022) shows a similar progression rate for ethnic minoritised staff and white staff. The average time in grade is also very similar.

	Average time in grade for colleagues achieving each band in this window	
	Ethnic Minoritised	White
CB1	1.26	0.66
CB2	1.16	1.39
CB3	1.98	3.49
CB4	-	3.52

The table above suggests that, in this window, it took white colleagues longer to get to bands 2 and 3 than colleagues from an Ethnic Minority

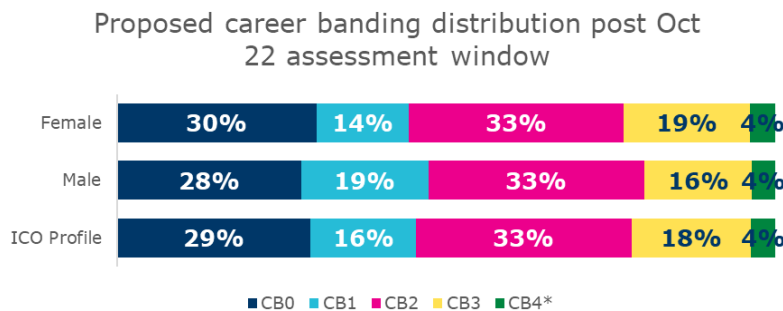
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Background. However, there have been no ethnic minoritised colleagues achieving a CB4 in this or the last window.

Gender

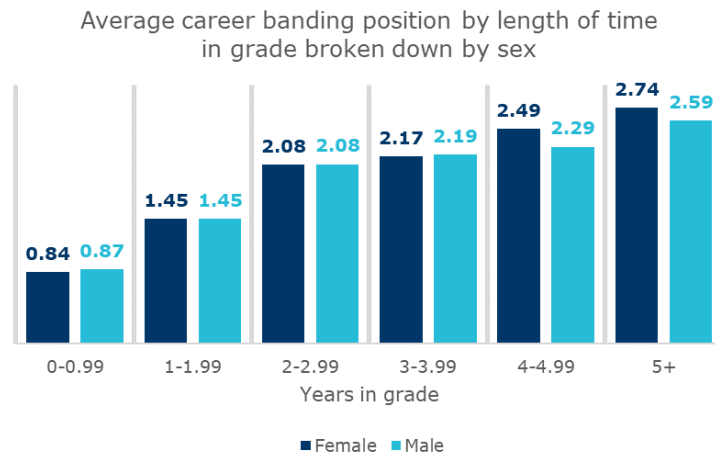
63% of those assessed were female and 37% were male. This is similar to the profile of the ICO. Further analysis shows that 61% of female staff who did not apply for Career Banding were already at CB2 or higher, compared to 56% of male staff.

The average number of progression points for female staff was 1.34 and for male staff was 1.29. This shows a consistent rate of progression, with the difference not considered to be material. The average Career Banding outcome of female staff assessed was 2.1 with an average time in grade of 1.6 years. For male staff the average Career Banding outcome was assessed at 1.8 with an average time in grade of 1.7 years. This indicates that for those assessed, there is a higher final Career Banding position for female staff, though this is coupled with a lower average time in grade. However, this should be put in context of the last window where male staff had a higher average final Career Banding position.



The above data shows that there is a similar proportion of females and males in CB0, which is largely a reflection of people being new to the ICO or their grade. There is a higher proportion of males in CB1 (around 5% more), and higher proportion of female staff in CB2, though the difference is around 3%.

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Current patterns shows a similarity of the average position of female and male staff by tenure. There is not a consistent pattern of one gender having an average higher position than the other in each of the service brackets. The largest difference between female and male average banding is in the 4 – 4.99 years cohort where there is a 9% difference. Of the colleagues who have been at the ICO longer than 4 years, two thirds are female.

Four staff who have taken maternity/ secondary carer/ adoption/Shared Parental leave in the last two years were assessed in this window. The average progression for staff in this group was 1.25 progression points, which is the same as the average progression rate for all assessed. However, the average Career Banding outcome was 2.25 which is above the average outcome for the ICO of 2. This is due to 25% (1 person) of this cohort moving from band 2 to band 3.

3.4 Part-time

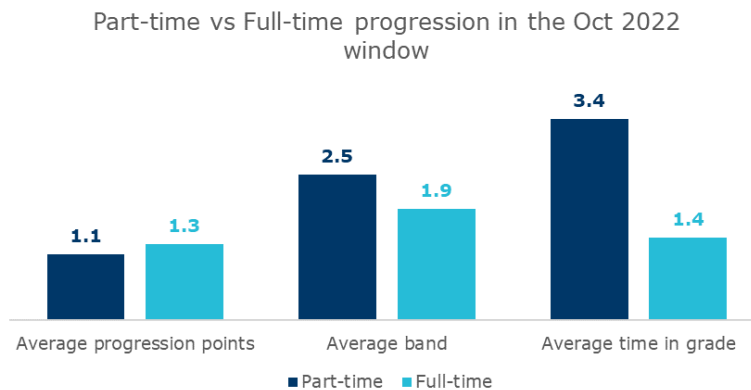
Monitoring whether working part time has a negative impact on a person's ability to progress on the career band framework is essential to ensure the system is fair.

16 of the staff who applied for an assessment in this window are part time. This represents 11.8% of those assessed. 77.6% of the eligible part time staff who did not apply for an assessment are already CB2 or higher. A further 12.8% had less than a year in their current grade. The average number of progression steps for part-time staff was 1.2, with an average time in grade of 3.4 years and average career band position of 2.5.

Full-time staff assessed in this window averaged 1.3 steps, with an average time in post of 1.4 years and an average career band position of 1.9. This indicates that part-time staff have progressed fewer steps and

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have a higher average time in grade. However, their average career band is higher than full-time colleagues.



3.5 Age

The extent to which age impacts on progression, linked with the accumulation and demonstration of experience and impact. The analysis considered the extent to which age might be a factor in progression.

The analysis below sought to discover if age was a material factor in the rate of progression of staff. The ICO has not staff under the age of 20.

Age group	% of staff assessed	Average career band position before assessment	Average progression points	Average career band position after assessment	Average time in grade
20-29	21%	0.60	1.31	0.82	0.89
30-39	33%	1.28	1.38	1.49	1.76
40-49	26%	1.43	1.33	1.61	2.72
50-59	17%	1.66	1.04	1.79	3.75
60+	3%	2.01	1.25	2.08	5.27

The figures above indicate progression rates which are largely in line across age categories.

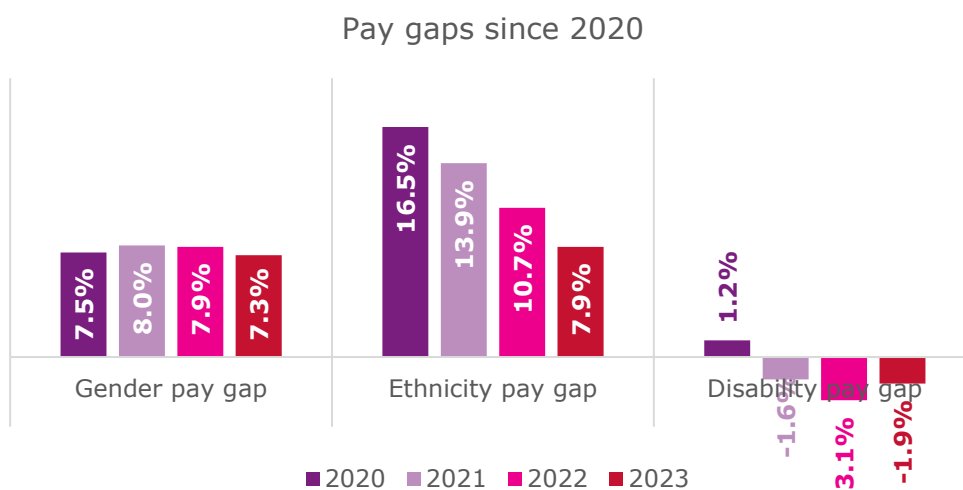
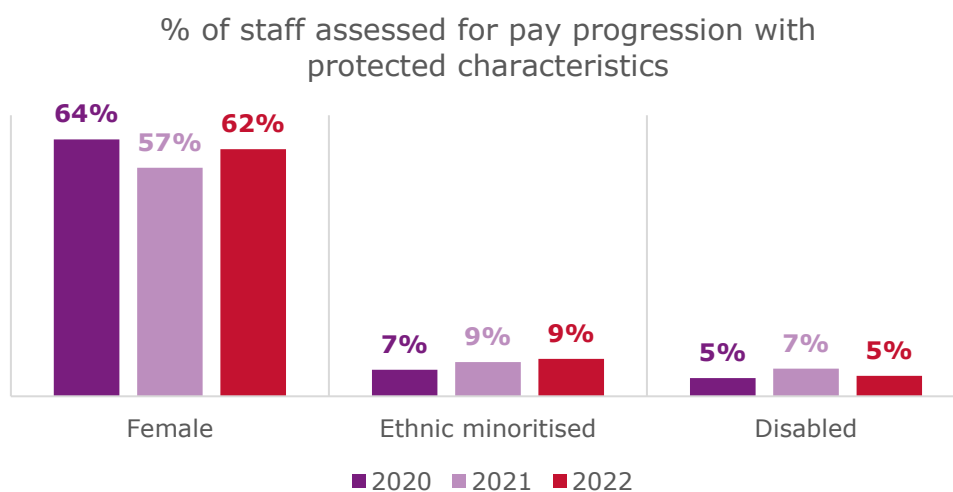
There is a higher progression rate for 20-49 than 50+, this could be due to the lower average career band position.

Appendix – EDI objective appendix

1.0 Pay gap

Through recruitment, pay progression and promotion we have been able to more than halve our ethnicity pay gap since 2020. Our gender pay gap has shown a decrease and the disability pay gap is very close to the target of 0%. Our data shows that, on average, staff with disabilities get paid 1.9% higher than staff without disabilities.

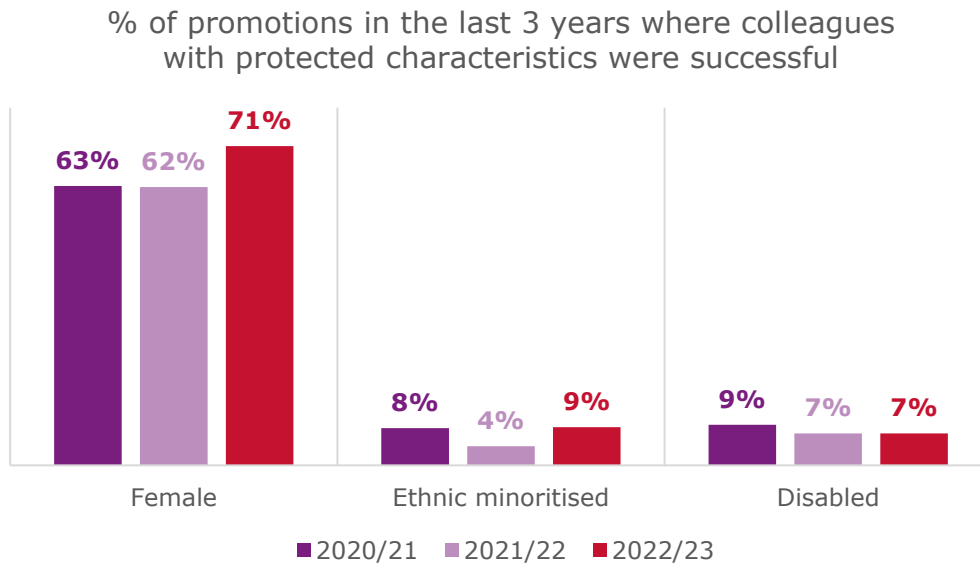
The profile of staff who have been successful their career band assessment is in line with the profile of the ICO.



Our data shows that promotions for colleagues with protected characteristics are in line with the profile of the ICO. In some circumstances the percentage of staff promoted had a higher level of

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protected characteristics than the ICO profile such as Female colleagues in 2022/23.



We made progress over the past three years to increase disability, ethnic minoritised and female representation at senior leadership level. A factor to this increase is our active commitment to widening our pool to attract people to the ICO, and progressing our staff internally.

We want to reach equal pay by 2028, to do this we must continue to progress and evaluate our disability, ethnicity and gender pay gaps and measure the impact our initiatives and objectives have on improving these figures.