

## GROUP COMMON BOARD

### GOVERNANCE AND REMUNERATION COMMITTEE

#### Disability Pay Gap 2023

#### 1.1 Recommendations

- 1.2 To note Ongo's Disability Pay gap and to confirm they are satisfied with Ongo's approach to addressing issues around the Disability Pay Gap.

#### 2.0 IMPACT ASSESSMENT ON CROSS CUTTING THEMES

THEME	IMPACT – Positive and / or Negative	Relevant to report?
Risk	It is not a legal requirement that we report on disability pay figures at this moment in time therefore we're not at risk of being unlawful if we do not publish this data at the present time.	Yes
Governance		No
RSH economic regulatory standards		No
RSH consumer regulatory standards		No
Other statutory/regulatory compliance, e.g. legal, charity commission, FCA		No
Financial	There may be a financial implication to close the gap in some areas if the disability pay gap is significant.	Yes
Value for money		No
Equality, diversity & inclusion	We are committed to achieving equality of opportunity in employment. All our employees are recruited on their ability to do the work required, regardless of age, gender, gender identity, race, colour, national or ethnic origin, disability, sexual orientation, religion or belief, marital or family status, socio economic status, disability, or any	Yes

<b>THEME</b>	<b>IMPACT – Positive and / or Negative</b>	<b>Relevant to report?</b>
	other reason which might cause a person to be treated unfairly.	
People and Culture	Retention and recruitment could be negatively impacted if the disability pay gap highlights difference in pay between disabled and non-disabled individuals.	Yes
Customer voice/impact		No

### **3.0 BACKGROUND**

- 3.1 Unlike gender pay gap reporting, disability pay gap reporting is completed on a voluntary basis. The disability pay gap shows the difference in the average pay between colleagues from those that are disabled in a workforce, compared to non-disabled colleagues. If there is a particular high disability pay gap this can indicate issues which the data can help identify.
- 3.2 The government have no plan to introduce disability pay gap reporting unlike gender pay gap reporting that is mandatory for organisations that have 250 or more employees.
- 3.3 There is no guidance on the pay measures that need to be reported as part of Disability Pay Gap reporting nor any guidance on the methodology for calculation. We have taken the approach to mirror the legislated pay measures used for gender pay gap reporting.
- 3.4 When calculating the difference in average earnings, the disability pay gap takes into account all jobs, at all levels and all salaries within the company.
- 3.5 The calculations include all employees employed on the snapshot date as of 2023 and who were paid their usual full basic pay. If employees were paid less than their usual basic pay as result of being on leave then they are not a full pay relevant employee. (Leave is defined as maternity, paternity, adoption, parental leave, sickness, unpaid special leave).
- 3.6 The data used for this report is based only on those that opt to disclose if they have a disability so it is important to note that 48 employees who have chosen not to disclose could positively or negatively impact the pay gap position.

### **4.0 ISSUES FOR CONSIDERATION**

#### **4.1 What is Ongo's current position?**

- 4.1.1 When looking at the mean, the percentage difference in the hourly rate of pay is 13.86% with mean average of £16.52 per hour and those who are disabled mean average being £14.23 per hour.

The median shows a pay gap of 2.61% with the middle point for individuals who are disabled being £14.16 and the middle point overall being £14.54.

4.1.2 The figure below shows us the proportion of disabled individuals and non-disabled individuals in each quartile:

Quartiles	Disabled %	Not Disabled %	Not Disclosed%
Upper	2.56%	94.02%	3.42%
Upper Middle	5.98%	88.03%	5.98%
Lower Middle	10.34%	75.86%	13.79%
Lower	12.07%	69.83%	18.10%

4.1.3 Please see Appendix A for further breakdown of findings.

#### 4.2 **Ongo's approach to closing the Disability pay gap.**

4.2.1 Ongo is committed to recruiting the best people with the right skills, ambition and motivation for the job and the business to deliver quality services to all our customers, including a balanced workforce.

4.2.2 Agile working allows colleagues much better flexibility to achieve a work/life balance. This is beneficial for those who tend to be more likely to require a reduced working pattern to accommodate disabilities or where the commute presents a challenge.

4.2.3 Ongo have recently undertaken a review of the companies' pay and benefits again, to ensure that roles are paid fairly, which highlighted the need to bring up some of the lower pay levels up to or above the national minimum wage rates and market value, which was actioned.

4.2.4 Ongo has just completed pay deal negotiations with our three recognized unions and agreed to make a cost of living pay award to all colleagues of 5.1% which was processed in April 2024.

4.2.5 Our Reward and Recognition Policy and Guidance sets out our approach to how we determine pay and other elements of the total package. Ongo will continue to ensure a fair and transparent policy and processes that enables all individuals to reach their potential career goals.

4.2.6 Ongo is committed to being a Level 2 Disability Confident Employer, it helps us reflect our customer base in our workforce and reduces staff turnover by supporting staff that might acquire an impairment during their working life. It enables us to be inclusive, making sure we are recruiting from the widest pool of talent at the market rate.

4.2.7 A regular reminder is sent to employees to update their profile information on our People Portal in order for us to capture maximum data for reporting.

4.2.8 An accessibility audit was conducted, and the recommendations are being reviewed as part of the office changes to accommodate Cole Street colleagues moving to Ongo House.

4.2.9 Ongo will continue to ensure a fair and transparent recruitment process is undertaken by:

- Having a good balance on interview panels in order to counteract any unconscious bias.
- Continuing to have open and encouraging worded recruitment advertisements for all of our roles at Ongo.
- Working with social media platforms that encourages all individuals, whether disabled or not, to look at and apply for our vacancies.
- Working closely with colleges and schools to encourage all individuals to gain work experience with us and apply for our vacancies and apprenticeships.

4.2.8 Ongo will also:

- Continue to have two dedicated roles within the organisation for people with disabilities.
- Continue to have a dedicated and active leadership team who fosters diversity and does not tolerate bias towards people with a disability.
- Continue to ensure our managers are equipped with confidence and competence to manage people with a disability with training, support and Ongo's policies.
- Continue to ensure we're implementing reasonable adjustments in the workplace where possible.
- Continue with agile approach and flexibility in our working practices and culture.
- Continue to drive the inclusive workplace culture at Ongo.

**Associated background papers:**

*Appendix A – Disability pay gap publication.*

**Name of report author:** Lauren Robinson

**Job title:** People, Culture & Organisational Development Business Partner

**Email:** [lauren.robinson@ongo.co.uk](mailto:lauren.robinson@ongo.co.uk)

**Telephone:** (01724) 298896

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