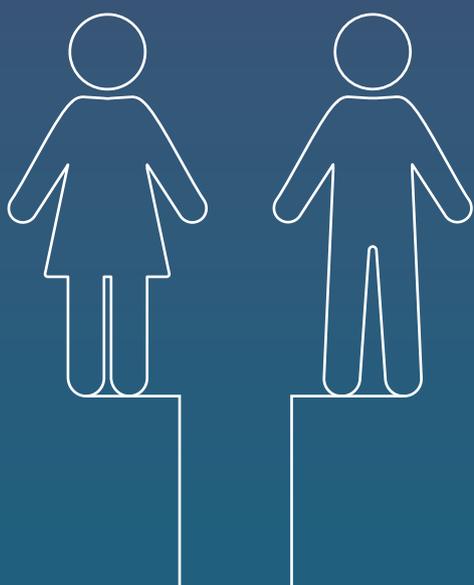


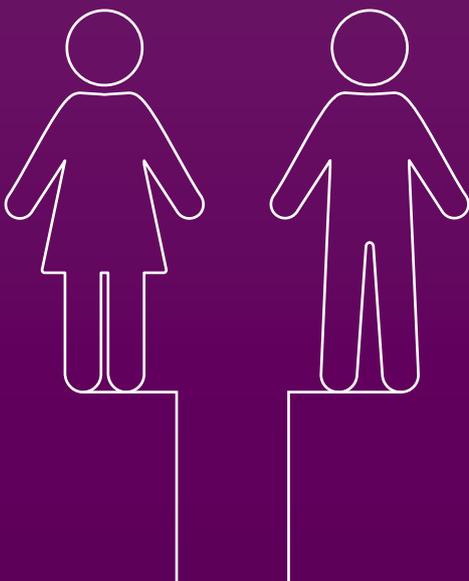
THE UNIVERSITY OF LAW GENDER PAY GAP REPORT 2021



OVERVIEW

Mandatory gender pay gap reporting.

Since April 2017, any organisation that has 250 or more employees has been required to publish and report specific figures about their gender pay gap. The gender pay gap is the difference between the average earnings of men and women, expressed relative to men's earnings. We are required to publish our gender pay gap data and a written statement on our public-facing website at law.ac.uk



INTRODUCTION



UNDERPINNING EVERYTHING WE DO IS OUR COMMITMENT TO ACHIEVE EQUALITY AND DIVERSITY AMONGST OUR PEOPLE

The University of Law Ltd is one of the UK's longest established specialist providers of legal and business education. We are committed to addressing workplace barriers to equality in the form of career equity for men and women by developing and maintaining a working environment that encourages and rewards career progression equally, regardless of gender.

We believe that the policies and procedures we have in place represent good practice and encompass what we believe to be major influencers on gender pay e.g., opportunities for career progression and development; diversity; recruitment; reward and working practices. However, like any responsible organisation, we will continue to review and monitor the effectiveness of these, so that they continue to develop and evolve to meet existing and future employee, our client and business needs.

There is a strong commitment from the organisation's senior leadership team to reduce our gender pay gap, as they recognise the importance from both a moral, ethical, and business perspective of not only career equity between men and women, but fairness on how they are rewarded.

We operate in a competitive business environment and to deliver services successfully to our diverse client and partner group, we need to ensure that we mirror their high expectations and those of our staff in achieving equality. While we will not compromise on appointing the best person for a role, we will continue to look for opportunities to encourage, develop and grow our staff, with the aspiration of achieving and maintaining equality in pay and career progression opportunities.

Some examples of the actions that we have taken, include:

- Appointed a Director of Equality, Diversity and Inclusion to the Executive Board reporting directly to the Vice-Chancellor. This is one of several steps the University is taking to progress and prioritise our diversity and inclusion activity.
- Created and appointed a Head of Recruitment within the HR function. This role will be instrumental in developing and embedding our EDI strategy in every aspect of the recruitment journey.
- Recruited 16 Volunteer Inclusion Champions to help deliver unconscious bias training to staff and offer local level support on campus.
- Continuing to monitor diversity data to ensure representation at all levels in the organisation. Currently 70% of our staff are women and 62.5% of the Executive are women.
- Developed a Diversity Matters series of events to raise awareness and promote inclusion. This has included the celebration on International Women's Day and an event to highlight the importance of gender diversity and inclusivity in the workplace.



GENDER PAY GAP

- THE HEADLINE DATA ON PAY AND BONUS DIFFERENTIALS

The University of Law on 5 April 2021	The gender pay gap. Women's earnings relative to men's earnings* (see note)	Page
Our mean gender pay gap	5.47% lower (6.08% lower)	7
Our median gender pay gap	9.63% lower (5.41% lower)	9
Our mean gender bonus gap	7.43% lower (24.75% lower)	11
Our median gender bonus gap	15.00% lower (0%)	11
The proportion of male employees receiving a bonus	8.68% (10.20%)	
The proportion of female employees receiving a bonus	8.72% (7.6%)	

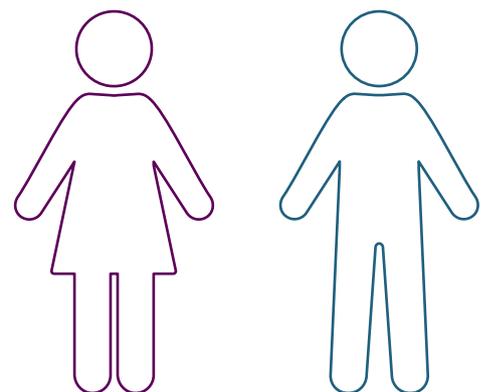
*NB – For comparative purposes our 2020 Gender Pay Gap figures are provided in brackets

Footnote - Where the term 'lower' is used in the table, it signifies that women's' earnings relative to men's' are xx % lower
i.e. the Gender Pay Gap is xx%

THE PROPORTION OF MALES/FEMALES IN EACH QUARTILE PAY BAND

	Female	Male
Top Quartile	61.30% (66.49%)	38.70% (33.51%)
Upper Middle Quartile	70.87% (71.13%)	29.13% (28.87%)
Lower Middle Quartile	70.87% (73.85%)	29.13% (26.15%)
Lower Quartile	71.62% (72.31%)	28.38% (27.69%)

*NB - The percentage figures for females and males in each quartile in 2020 are shown in brackets



OUR DATA: THE 'MEAN' GAP

We have a mean pay gap of 5.47% for all employees (see note below on how this compares to the wider economy), indicating that on average men are paid 5.47% more than women within the organisation. This represents a reduction in the 'mean' gap from our last report in 2020, when the gap stood at 6.08%.

Whilst the ONS and sector averages are generally significantly higher than this, we are constantly looking to address any influences on gender pay differentials, specifically to identify any internal structural, cultural or policy decisions that we can adjust with the aim of removing barriers or enhancing opportunities for advancement. Although analysis and comparison to benchmarks are important, ultimately the purpose of measuring the gap is to allow an organisation to work to irradicate the gap. An update on some of the initiatives that we have put in place to help support this is given towards the end of this report.

In analysing the four quartiles individually, the biggest 'mean' gap in 2021 is in the lower quartile at 6.12% in favour of women, which represents a significant increase from 2020 when the gap stood at 1.34% in favour of women in this quartile. This can be attributed to a significant increase in the 'mean' hourly rate for women for 2021, when compared to the same period in 2020.

From time to time and to meet specific business requirements, we need to access specialist knowledge or experience from outside the organisation. This tends to be from a very small pool of applicants and, therefore, subject to market forces, including remuneration.

In April 2021, our Executive Board comprised of 11 employees, 6 female and 5 males, with a mean gender pay gap of 3.97% in favour of women (a change from 2020, when the gap was 0.93% in favour of men). In each of the analysis that have been undertaken since Gender Pay Gap was introduced, what it has shown, is that where small groups are involved, a single change in gender for that group (either a joiner or a leaver) can have a disproportionate impact, meaning that the gap will always be subject to variation and fluctuation.

In our:

- Lower quartile, our 'mean' pay gap is 6.12%, in favour of women, up from 1.34% in favour of women in 2020.
- Lower middle quartile, the 'mean' gap is 2.26%, in favour of women, down from 2.84% in favour of women in 2020.
- Upper middle quartile, the 'mean' gap is 0.52%, in favour of men, down from 1.81% in favour of men in 2020.
- Top quartile, the 'mean' gap has decreased significantly to 1.92%, in favour of men, down from 5.97% in favour of men in 2020.

To help put this into context and to help visualise what the trends looks like for the quartiles over the past 5 years, the 'mean' pay gap values have been illustrated in the Table 3 below:

Table 3 – 'Mean' Pay Gap based on female's earnings relative to men's earnings per quartile

Quartile	2021	2020	2019	2018	2017
Lower quartile	6.12% higher	1.34% higher	3.85% higher	0.11% higher	4.00% higher
Lower middle quartile	2.26% higher	2.84% higher	3.55% higher	0.78% lower	1.36% higher
Upper middle quartile	0.52% lower	1.81% lower	1.01% lower	32.40% lower	1.88% lower
Top quartile	1.92% lower	5.97% lower	5.81% lower	10.19% lower	11.6% lower

Where there are variations in the 'mean' pay gaps of more than +/- 3% (i.e., outside of our aspirational targets), we will investigate further the reasons for this.

We will also look at the factors that have enabled the organisation to reduce the 'mean' gap in the upper quartile since 2017, in order to maintain progress with reducing that gap further in the future.

*NB – National Statistics (ASHE 2021) had the 'mean' gap at 14.9% for all employees, up from 14.6% in 2020.

OUR DATA: THE 'MEDIAN' GAP

The median indicator, does we believe provides a far more accurate reflection and measure of the gender pay gap in the organisation, as the 'median' is less susceptible to the extreme variations that the 'mean' is, where a small number of highly paid individuals or specialists can significantly skew the overall gender pay gap.

Our overall 'median' gap for April 2021 is 9.63%* for all employees (see note below) in favour of men. In 2020, the 'median' gap was 5.41% in favour of men, so the gap has increased significantly since last year. There are several factors which appear to be behind this:

- The number of employees who fall within the scope of the 2021 report has increased significantly. In 2020 there were 777 employees, but in 2021 this has increased to 919 (representing an 18.3% increase in the population size of the University).
- On closer examination, the number of men covered by the 2021 report has increased by 28% since the 2020 report (i.e., from 225 to 288) and the number of women covered by the report by 14% (i.e., 552 to 631), so exactly double.
- The impact of this can be seen in the proportion of females and males in each of the four quartiles, which is illustrated in the table above on Page 6. In each of the four quartiles, the proportion of females has decreased, whilst at the same time the proportion of men each of the four quartiles has increased. The most marked changes are in the top quartile, where the proportion of women has decreased in 2021 to 61.30%, down from 66.49% in 2020, whilst the proportion of men has increased to 38.70% in 2021, up from 33.51% in 2020 and in the lower middle quartile where the proportion of women has decreased from 73.85% in 2020 to 70.87% in 2021, whilst at the same time the proportion of men has increased from 26.15% in 2020 to 29.13% in 2021. The decreases in the lower and upper middle quartiles are much smaller.

*NB – National Statistics (ASHE 2021) had the 'median' gap for all employees at 15.4%, down from 15.5% in 2020.

The median gaps across the four quartiles, provide for a mixed picture, with the upper middle and top quartiles falling within our zero 3% +/-, but with the Lower and lower middle quartiles falling outside of this. However, overall, except for the lower quartile the data for the other three quartiles shows an encouraging downward trend on the 'median' gap across the quartiles, suggesting that the University is generally in a good position and it is good to see a

further reduction in the gap in the top quartile. Nonetheless, we are not complacent and know that there is still work to be done to reduce existing gaps further e.g. by ensuring that we continue to provide opportunities for career development and enhancement for all of our staff. As with the quartiles analysis for the 'mean' figures, the 'median' varies through the quartiles. Further analysis will enable us to target and develop future interventions that may be required.

	Female	Male	mean % gap* (see note)	median % gap* (see note)
Top Quartile			1.92% (5.97%)	2.97% (4.37%)
Upper Middle Quartile			0.52% (1.81%)	0.86% (2.31%)
Lower Middle Quartile			-2.26% (-2.84%)	-4.00% (4.80%)
Lower Quartile			-6.12% (-1.34%)	-8.68% (-3.31%)

*NB - Figures in brackets taken from 2020 Gender Pay Gap and used for comparative purpose

Table 4 below, illustrates the movements in the median for the four quartiles over the past five years.

Table 4 - 'Median' Pay Gap based on female's earnings relative to men's earnings per quartile

Quartile	2021	2020	2019	2018	2017
Lower quartile	8.68% higher	3.31% higher	3.08% higher	0.15% higher	2.91% higher
Lower middle quartile	4.00% higher	4.80% higher	5.42% higher	2.84% lower	3.94% higher
Upper middle quartile	0.86% lower	2.31% lower	0.77% lower	3.33% lower	4.74% lower
Top quartile	2.97% lower	4.37% lower	4.78% lower	2.41% lower	2.28% lower

Where there are variations in the 'median' pay gaps of more than zero +/- 3% (i.e., outside of our aspirational targets), we will investigate further the reasons for this, particularly for the lower and lower middle quartiles.

OUR DATA: THE 'BONUS' GAP

Although a small number of discretionary bonus awards are made each year, except for the schemes operating for the Executive Board and Sales Recruitment Teams, historically the University has not tended to make widespread use of such arrangements to reward and recognise performance and achievement.

However, as the University operates in a competitive business environment, it will continue to evaluate the merits of adopting such types of arrangements in the future; in the context of the development of our future reward strategy and its role in supporting/underpinning organisational strategy and objectives

The proportion of men and women receiving a discretionary bonus award has increased since our last Gender Pay Gap report in 2020. The number of men receiving a discretionary bonus has decreased from 10.2% in 2020, to 8.68% in 2021. The number of women receiving a discretionary bonus has increased from 7.6% in 2020 to 8.72% in 2021, meaning that the differential that existed up until 2020, between the proportion of men and women receiving a discretionary bonus award, has almost completely disappeared and indeed is now slightly in favour of women.

The 'mean' annual discretionary bonus amount is higher for men than women. At 7.43% the 'mean' gender bonus gap, is still in favour of men, but has decreased significantly since 2020, when the gap stood at 24.75%.

The 'median' annual discretionary bonus amount is higher for men than women. At 15%, the 'median' gender bonus gap in the 12 months to April 2021, has increased from a position in 2020 when the 'median' bonus gap had been equalised.

The significant reduction in the 'mean' gender bonus gap from 2020 can be put down to the fact that a higher proportion of women received discretionary bonus awards in the 12 months to April 2021, than men e.g., 55 women are identified as having received discretionary bonus awards, compared with 25 men.

OUR GENDER PAY GAP – CONCLUSIONS AND HOW WE PLAN TO ADDRESS IT

Benchmarking of roles, both internally and externally, is undertaken throughout the course of the year to ensure that salary levels are set fairly and equitably. Where any potential issues are identified and are supported by evidence, the University's remuneration committee will consider any requests for adjustments in salary to address these.

With a large proportion of our roles, based on either 'spot-rates' or narrow salary bands, which allow for only small pay variations, the opportunity for variations caused by 'time-served' is reduced. Nonetheless, we do know that we still have some work to do with several roles, where relatively wide pay ranges exist and some legacy pay differentials persist. Action has been taken through the annual pay review process over recent years to address some of these issues and progress has been made. However, where outstanding legacy pay issues remain, we will continue to address these.

The University continues to strive to ensure that the full range of career and development opportunities are available to both men and women, on the same basis, identifying and removing any actual or perceived barriers to progression at all levels, but particularly for senior roles through appropriate interventions.

In our first Gender Pay Gap Report in 2017, as part of our commitment to achieving change, to measure our progress, we committed to monitoring four key metrics. Specifically,

1. Equalisation of the ratios of men to women in all four quartiles, with a particular focus on maintaining the ratio at the top of our business to demonstrate fair and open career paths.
2. Achieve zero pay gaps (+/-3%), within each individual pay quartile.
3. Continue to develop Apprenticeship opportunities for career development.
4. Monitor the effectiveness of our recruitment methods, including advertising, to ensure that we are reaching as broad an audience as possible in terms of both women and men.

PROGRESS WITH FOUR KEY METRICS

So how are we doing in relation to each of the four key metrics?

1

Women continue to be the dominant gender in all four quartiles. In the context of the equalisation of the ratios, compared with 2020, the ratio of men and women in the lower, middle lower and upper middle quartiles have even more closely aligned with 2.52 women for every man in the lower quartile, 2.43 women for every man in the middle lower quartile and 2.43 women for every man in the upper middle quartile. However, in the top quartile the ratio has reduced from 2020, with 1.58 women for every man in the top quartile, which does not align with our stated objective of trying to maintain the ratio in that quartile. The reductions in the ratios across all four quartiles for 2021, can be directly attributed to an increase in the number of men employed, as a proportion of the total workforce, increasing from 28.85% in 2020 to 31.34% in 2021. In respect of the top quartile and the impact of the change in workforce composition on the ratio, this has had a significant influence with the proportion of females in the top quartile having reduced from 66.49% in 2020 to 61.30% in 2021, whilst at the same time the proportion of men in the top quartile has increased from 33.51% in 2020 to 38.70% in 2021. For 2020, the position was 2.64 in the lower quartile, 2.76 in the lower middle quartile, 2.46 in the upper middle quartile and 1.98 in the top quartile.

2

An examination of the 'mean' gender pay gaps on page 8 indicate that except for the 'mean' lower quartile, the remaining three quartiles' indicators show that they fall inside our target range of zero (+/-3%). In terms of the 'median' gender pay gaps, the both the upper middle quartile and top quartiles fall within the zero (+/-3%) tolerance, with the lower and lower middle quartiles falling outside of the target range of zero (+/-3%). In 2020, 4 of the quartiles fell outside the target range of zero (+/- 3%), so with only 3 now sitting outside in 2021, this represents an improvement on the previous reporting period. The lower quartile 'mean' sat inside the +/- 3% tolerance level last year at 1.34% and the lower quartile 'median' just outside at 3.31%. However, for 2021 both quartiles have now significantly deviated from +/- 3%, with the 'mean' at 6.12% and the 'median' at 8.68% in favour of women. . For the lower middle quartile, whilst it is still sitting outside of the +/- 3% tolerance at 4.0% for 2021, this represents an improvement on 2020 when it was sitting at 4.80%. We continue to make strides through our interventions in the top quartile to reduce the 'mean' and 'median' pay gaps.

3

Since our first Gender Pay Gap Report in 2017, the University has pro-actively been promoting the Apprenticeship Scheme and providing apprenticeship opportunities not only for new entrants, but also for existing staff; thus, providing numerous career development opportunities. The table illustrates the number of apprenticeships completed over the past three years, broken down by gender:

Year	No of Completed Apprenticeships	
	Men	Women
2019	5	2
2020	3	2
2021	2	1

We will continue to look at ways in which we can improve the take up amongst women. At the time of preparing this report, we currently have five apprenticeships in progress, with four of the five participating in the scheme being women.

4

The University uses a web recruitment tool, which with its reporting functionality helps us to review and assess more effectively, how successful we are at attracting both male and female candidates through our recruitment campaigns e.g. by looking at the number of applications by gender, gender of those shortlisted for interview, gender breakdown of those offered a role and the gender of successful candidates who commence employment. The information that we gather from this will be used to help inform how we can potentially improve our recruitment processes and candidate-attraction methods, going forward.

FURTHER ACTIONS PLANNED

As part of our 2020 Gender Pay Gap report, we highlighted several areas in the report where we planned to act and put in place initiatives. These are illustrated below:

1. Developing a Diversity and Inclusion strategy which will include gender related objectives and actions.
2. Monitoring of recruitment data at application, shortlisting and appointment to assure ourselves of fairness in recruitment and career progression.
3. To ensure that we have an inclusive university and that staff feel they have a safe and supportive environment, we will develop a new suite of Dignity at Work and Study policies and an online reporting platform with training. We will also launch a campaign on acceptable behaviour.

An update on our progress against each of these is given below:

1. An Equality, Diversity and Inclusion strategy has been developed, which includes the ambition to apply for the Athena Swan Charter. The Charter is a framework which is used across the globe to support and transform gender equality within higher education. It recognises the commitment to advancing the careers of women.
2. Monitoring of recruitment data takes place with a particular focus on gender, ethnicity, and disability. The data is analysed, reported, and discussed at the Executive Board.
3. We have developed and published our Dignity at Work and Study policy and procedures. We also launched our online 'Report and Support' platform that staff can use to report bullying, harassment, or discrimination. A 'Safe Inclusive Campus' campaign was launched, and events, training and communication will continue throughout the year.

FURTHER ACTIONS PLANNED

Following the completion of the 2021 Gender Pay Gap analysis, further new commitments that we are planning to take forward linked to Intersectional Pay Gaps include:

1. As part of our analysis, to also produce a breakdown of the Gender Pay Gap by function / Dept, to give greater ownership at Exec Board / Snr level and greater insight into where challenges maybe and action plans created if any issues identified, which represents best practice as recommended by the Universities and Colleges Employers Association (UCEA).
2. To commit to removing all questions about salary history from application forms and interview discussions. This has been identified as a key reason for Gender Pay Gaps being perpetuated according to UCEA.
3. In line with best practice, to look at the gender pay gap in relation to ethnicity, ensuring that there are not large differentials between BAME and White women across the organisation.



