



Office for
Nuclear Regulation

Office for Nuclear Regulation Gender Pay Report 2021



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Foreword

To achieve our strategic objectives and live by our organisational values, we need an engaged, capable and diverse workforce that feels valued and is committed to our goals. We understand that key to this is establishing a culture where our people feel proud to work for us and that they are all valued for their personal contribution, regardless of role.

We are aware that we continue to have a gender pay gap and that there remains more to be done to improve this. As we take steps to establish a truly inclusive culture, we are heading in the right direction with continued focus on improving our diversity and inclusivity, and we must ensure that how we recognise and reward the contribution of all is an important element of that. We remain fully committed, at all our levels, to building a workforce that is reflective of the society we operate in and to continue to act and report on our progress.

At ONR, we recognise the value of a diverse workforce, particularly when it comes to creative problem solving and informed decision making. We understand that being acknowledged as an inclusive employer will help us attract talented people from a wider range of communities and backgrounds and that increased diversity of thought and perspective will enhance our decision making and capability as a regulator.

To emphasise our commitment, we have a strategic theme to create a culture of inclusion and excellence, and this is underpinned by a commitment to address the concerns that this report highlights.

The report highlights the degree of challenge that we face, but we are unwavering in our determination to improve and to be able to meet those challenges.



Dave Caton
ONR HR Director

Introduction

This is the Office for Nuclear Regulation's (ONR) fifth Gender Pay Report.

It is based on a 'snapshot' of the pay of all our employees as of 31 March 2021, as well as annual payments and bonuses which were paid between 1 April 2020 and 31 March 2021.

The report has been produced in line with the guidance in the Equalities Act 2010 and associated Advisory Conciliation and Arbitration Service (ACAS) guidance 'Managing gender pay reporting', February 2019.

Why do we have to report on our gender pay gap?

The Equalities Act 2010 (Specific Duties and Public Authorities) came into force on 6 April 2017 and requires public sector organisations to publish their results against six prescribed indicators of gender pay equality.

As an organisation we are interested in this information as we strive to build greater equality across a more diverse and inclusive workforce. This is in line with our 'People Strategy', and we are committed to our aim of making ONR a great place to work as is to be expected of us as a world class regulator.

This report helps us to better understand and focus on the issues, holding ourselves to account as we plan actions to improve on our current position.

What do we have to report about our gender pay gap?

We need to report against six prescribed organisation-wide indicators to show the difference between the average earnings of men and women in the organisation. We have included additional information in this report to provide a broader context in understanding the organisation in relation to the gender pay gap.

When and how do we have to publish the information?

We are publishing our gender pay gap results through this report. This report contains background context to the results as well as plans to address issues relating to the gender pay gap.

The prescribed gender pay gap indicators have also been uploaded to the government website: gender-pay-gap.service.gov.uk/

What do we have to report?

The legislation requires us to report against the following six prescribed organisation-wide gender pay gap indicators for 2020/21:

Mean gap	The difference between the mean* hourly rate of pay of men and women	25.3% (27.6%)
	*average pay for all men and average for all female employees	Difference in hourly rate of men £40.59 (£38.01) and women £30.31 (£27.52)
Median gap	The difference between the median* hourly rate of pay of men and women	36.59% (37.9%)
	* middle value of pay for all men and middle value for all female employees	Difference in hourly rate of men £41.92 (£40.90) and women £26.58 (£25.40)
Mean bonus gap	The difference between the mean* bonus paid to men and women	-6.0% (-7.9%)
	*average bonus for all men and average for all female employees	Difference in bonus pay of men £1,233.33 (£1,390.33) and women £1,306.85 (£1,500.19)
Median bonus gap	The difference between the median bonus pay paid to men and women	7.7% (15.4%)
	*middle values of bonuses paid to all men compared to all female employees	Difference in bonus payment of men £1,300.00 (£1,300.00) and women £1,200.00 (£1,100.00)
Bonus proportions	The proportions of men and women paid a bonus	29.7% (32.6%) of men and 33.5% (36.4%) of women received a bonus payment

2019-20 figures are provided in brackets to illustrate any change

Overall results

We are pleased to see a small yet positive shift in our gender pay gap decreasing from 27.6% to 25.3%. This is an overall decrease of 7.64% since we first reported in 2017. Although the gap remains significant it is not unexpected given our workforce profile and that of the industry from which we draw where a pay premium is required for these roles to attract and retain niche skilled staff in a competitive global market. We believe that while there remains much still to do the gap is heading in the right direction.

We must go right to the heart of the issue to ensure we create an environment that empowers and supports women over the long-term. This calls for cultural change, across our organisation and the nuclear industry more widely, which is why we have introduced mandatory Diversity and Inclusion training for all staff this year. We want everyone in ONR to feel they belong and to develop a truly inclusive culture by making our staff feel valued, respected, and supported. We have made a significant change this year by integrating our core values into our performance management process, reflecting a cultural change where everyone feels able to openly be themselves and feel that they have a voice.

We have traditionally struggled to recruit as many women as men into our technical roles, which attract a higher premium rate of pay. Many of our female employees are employed in largely administrative and support roles within the corporate and operational functions. This gender split is largely historical as for many years we have recruited our technical specialists from a nuclear industry where men predominated in the science, technology, engineering and mathematics (STEM) subjects. While we have made improvements in our diversity of recruitment, with positive results, we also acknowledge that we need to support work to promote diversity across STEM subjects. As part of our strategic approach, we have extended our outreach and targeted our activity to ensure we promote adequate opportunities for female students to explore maths and science throughout primary and secondary school and encourage them to pursue career paths in STEM.

Further breakdown of the results

ONR's workforce profile by grading level is shown below:

Table 1: ONR number of men and women employed at each grading level as of 31 March 2021

ONR Employees by gender and grade 2021	Band 1	Band 2	Band 3	Band 4	Band 5	Band 6	SCS 1	SCS 2	Board Member	Total
Female	9	37	68	32	42	29	3	1	4	225
Male	25	159	168	30	16	20	5	1	2	426
Total	34	196	236	62	58	49	8	2	6	651
% Female	26.5%	18.9%	28.8%	51.6%	72.4%	59.2%	37.5%	50.0%	66.7%	34.6%

A further breakdown of our data for 2020-21 shows that across specific peer groups (grading level and specialism) the gender pay gap is far less pronounced.

Overall, we employ a higher percentage of men (65%) than women (35%). The proportion of men employed in higher grades is significantly greater at 75% within the senior bands 1-3.

While women strongly predominate in the lower grades (bands 4-6), we are pleased to highlight that there are equal or greater numbers of women in the most senior grades/roles Senior Civil Service 2 and Non-Executives).

Table 2: ONR 2021 mean gender pay gap at each grading level

ONR 2021 Mean gender pay gap calculation	Band 1	Band 2	Band 3	Band 4	Band 5	Band 6	SCS 1	ONR
A - Hourly pay rates of Males divided by number of Males	£53.44	£48.68	£38.90	£22.36	£16.93	£13.49	£59.84	£40.59
B - Hourly pay rates of Females divided by number of Females	£45.62	£43.59	£34.96	£22.51	£19.66	£12.14	£55.42	£30.31
Formula (A-B)/A x 100	14.6%	10.5%	10.1%	-0.6%	-16.2%	10.0%	7.4%	25.3%

Note: Columns showing results for Senior Civil Service (SCS) 2 and Audit and Risk Assurance Committee Non-Executive have been excluded due to identifiable data. The data is included in our total results.

The gender pay gap is different to equal pay, which is the legal requirement that men and women are paid equally for doing the same job under the Equality Act 2010. We have seen a small positive shift, with our mean gender pay gap decreasing by 2.3% to 25.3%; while the pay gap overall remains significant, we are confident that our gender pay gap does not reflect an equal pay issue nor that it is related to paying men and women differently. It continues because of historic structural factors that can only be fully addressed in the longer term and we remain committed to improving our diversity at all levels and, as an inclusive employer, to address the issues highlighted through our gender pay analysis.

We have identified an overall positive trend for those at bands 1-3 in both nuclear technical and corporate support functional specialist roles. Although there is an overall gender pay gap of 35.2%, this reflects a positive shift of 7.9% in the pay gap on 2020 from 43.1% at this level. This is due, in part, to 'Competency Pay Progression' (CPP), which was first introduced in autumn 2017 and which has contributed to our improving gender pay gap. It provides a clear and transparent path for individuals to progress their pay in their existing grade while developing their skills and competencies and being rewarded financially for their enhanced contribution. This has helped to create a greater equality of opportunity for all genders to progress and has moved away from the 'time served' previous approaches that were more limiting for many female staff.

Women are predominantly employed in our lower paid bands (bands 5 and 6), where there is a mix of corporate and operational support roles.

Table 3: ONR 2021 median gender pay gap at each grading level

ONR 2021 Median hourly rate	Band 1	Band 2	Band 3	Band 4	Band 5	Band 6	SCS 1	ONR
A Median hourly rate of Males	£53.01	£48.97	£40.99	£19.26	£15.88	£11.83	£59.27	£41.92
B Median hourly rate of Females	£46.41	£47.73	£35.54	£19.77	£19.14	£11.78	£58.20	£26.58
Formula (A - B) / (A) x 100	12.45%	2.52%	13.31%	-2.65%	-20.56%	0.43%	1.82%	36.59%

Note: columns showing results for SCS 2 have been excluded due to identifiable data. The data is included in our total results.

The overall median gender pay gap is still significant at 36.59%, The gap at the higher grades reflects the greater prominence of men towards the top of the pay scales in technical roles, which attract a premium rate. This is continuing to be eroded through our fairer CPP approach.

Specialism: technical specialists / support (corporate and operational) roles

The workforce profile across all our roles and bands is shown below:

Table 4: ONR number of men and women by specialism and grading level as of 31 March 2021

	Corporate & Support Males	Corporate & Support Females	Technical Specialists Males	Technical Specialists Females	Total
Band 1	2	6	23	3	34
Band2	17	15	142	22	196
Band 3	17	26	151	42	236
Band 4	15	24	15	8	62
Band 5	16	42	0	0	58
Band 6	20	29	0	0	49
SCS1	1	2	4	1	8
SCS2	0	1	1	0	2
Total	88	145	336	76	645
Percentage	38%	62%	81.50%	18.50%	

We acknowledge that for technical specialist roles, the number of women remains low (20% or less) in all areas and addressing this gender imbalance is the key to making a substantial change to the gender pay gap.

Research into barriers to women's progression in the workplace, led by the Government Equalities Office, indicate that many unpaid caring responsibilities still fall onto women, and often conflict with expectations of constant availability and excess workloads. The Covid-19 pandemic, along with significant investment in improved technology, has provided us with the opportunity to consider how we can reduce these barriers through 'New Ways of Working' (NWoW) and promote greater flexibility in terms of where and when people work, while considering their health and wellbeing. This is increasing opportunities to attract a wider talent pool of staff with different backgrounds and lifestyles, while helping us become more inclusive by opening new and diverse recruitment channels, and marketing us as an employer of choice.

In the corporate support roles, the proportion of female staff is greater by more than 20%, as expected.

Table 5: ONR new starters over last 3 years by specialism

New starters	2017/18		2018/19		2019/20		2020/21	
	Men	Women	Men	Women	Men	Women	Men	Women
Technical specialists	23	9	30	6	15	10	10	3
% Technical specialists		28.1%		16.6%		40%		23%
Support roles (corporate and operational)	25	34	10	17	6	15	4	2
% Support roles		69.3		29.8%		71.4%		33%

Since we first reported in 2017, we sought to open new recruitment pipelines with mixed success. While we recognise the need to recruit a higher proportion of women into our workforce and particularly into our technical specialist roles and while our NWoW initiatives are not specifically about supporting females, they are about providing a more flexible approach for all our staff and helping them to achieve a better work-life balance and improve their wellbeing. We believe that opening access to more flexible working arrangements is key to us attracting and retaining females and improving gender equality.

Table 6: ONR 2021 Mean gender pay gap by specialism

ONR 2021 Mean gender pay gap by specialism	Band 1	Band 2	Band 3	Band 4	Band 5	Band 6	SCS 1	ONR
TECHNICAL SPECIALISTS								
A - Hourly pay rates of Men divided by number of Men	£54.94	£50.23	£40.27	£21.60	-	-	£62.35	£45.05
B - Hourly pay rates of Women divided by number of Women	£56.12	£51.08	£39.29	£23.05	-	-	£67.11	£42.02
Formula (A-B)/A x 100	-2.1%	-1.7%	2.4%	-6.7%	-	-	-7.6%	6.7%
CORPORATE/SUPPORT								
A - Hourly pay rates of Men divided by number of Men	£36.23	£35.72	£26.72	£23.12	£16.93	£13.49	£49.83	£23.54
B - Hourly pay rates of Women divided by number of Women	£40.37	£32.59	£27.97	£22.33	£19.66	£12.14	£49.57	£23.13
Formula (A-B)/A x 100	-11.4%	8.8%	-4.7%	3.5%	-16.2%	10.0%	0.5%	1.7%

Table 6 note 1: columns showing results for SCS 2 have been excluded due to identifiable data. The data is included in our total results. In considering whether there are any equal pay issues within ONR, we have compiled the data by band to compare specialists by gender and corporate support function staff by gender. This confirms there is a negligible difference and provides reassurance that there is no equality pay issue.

Table 6 note 2: No technical specialist staff in Bands 5 and 6

Table 7: ONR 2021 average mean gender pay by specialism

	Males	Females	total	Average hourly rate	Males	Female
Corporate	55	86	141	£27.21	£28.04	£26.68
Divisional Support	33	59	92	£17.28	£16.04	£17.97
Technical Specialists	336	76	412	£44.50	£45.05	£42.02
Totals	2	4	6	£59.08	£40.99	£68.12

What else do we need to do?

In responding to the ongoing Covid-19 pandemic, our priority was to significantly support staff through challenging and uncertain times whilst continuing to seek opportunities to promote and create a more inclusive culture. We are publicly committed to Diversity and Inclusion (D&I) and we must continue to be accountable for measuring and reporting progress. This gender pay analysis indicates that many of the factors are historical and our strategy (running alongside that of the nuclear industry from which we draw most of our resource) is to seek a longer-term improvement, over the next five to ten years. There remains much to do and the business case for diversity has never been stronger.

While we have made good progress on gender equality over the past few years, we have sought to drive forward further change. To provide everyone with equal access to opportunities and support everyone to fulfil their potential, we have supported the launch of a new staff-led network to promote gender equality in our organisation. The gender equality network is a member-led, independent network, which informs, supports, challenges, and works alongside the Diversity and Inclusion Group (DIG) and trade unions. It has been established to support staff as a place where everyone can come together to be a champion and ally for gender equality.

To build a deeper understanding of D&I and to increase awareness of the barriers under-represented groups face, we launched a 'Reverse Mentoring for Inclusivity' programme. The aim of the programme is to build understanding about the barriers faced by, and experiences of, people from different backgrounds. It has provided opportunities for staff from under-represented groups, from across the protected characteristics, to mentor our Senior Leadership Team, working as equal 'partners' to enhance knowledge and understanding of 'lived' experiences. Colleagues shared perspectives and insights to help inform and influence decision-making and longer term contribute towards establishing a more equitable and inclusive organisation.

During the past year we have started to see a positive impact across a range of Diversity and Inclusion (D&I) areas including gender. With our current demographics showing that 54% of our female staff are over the age of 45, the introduction of a menopause policy has been welcomed and viewed as a practical demonstration of our commitment to change attitudes and behaviour across often-taboo or ignored subjects. The success of creating the dialogue within teams and a 'safe environment' to share openly is demonstrated through staff willing to disclose their own 'lived' experiences and to talk about menopause, demonstrating their importance and effectiveness in helping us create a more inclusive culture.

What are we doing to close the gender pay gap?

Recent trends in increasing the gender balance of the workforce and within the leadership positions have stalled, but we have at least maintained the previous gains. We are confident that steps are in place that will see the longer-term positive trajectory continue as

our outreach, recruitment, training and development programmes and wider D&I initiatives impact.

The aim going forward is to draw more women into technical specialist and more senior roles. This will largely be done by continuing to support the recruitment pipelines which reach a more diverse field of candidates and continuing with our gender-neutral attraction and selection processes, aimed at both attracting and retaining the best person for the job.

We recognise that the significantly higher proportion of men in our more highly paid technical specialist roles will continue to result in a gender pay gap. We have already acknowledged that a diverse workforce, that is more representative of society on behalf of which we hold the industry to account, is key to achieving our strategic aims and being a world class regulator.

We are committed in our strategies and plans to improve our diversity at all levels. Being successful in addressing these diversity issues will impact directly on addressing the issues that the gender pay analysis has highlighted. Some of the work we have been doing recently to support this is outlined below:

Improving representation of women in our workforce

To reduce the current gender pay gap (and improve our diversity more generally) we must continue to improve our ability to attract females into higher paid nuclear specialist and higher band roles. Our recruitment strategy aims to achieve this by the following activities:

- **Promoting ONR to others** - over the last year we have focused our recruitment campaigns and websites on demonstrating diversity of opportunities at all levels and specialisms for diverse candidates. For example, we have developed YouTube-style video clips on our website which feature female role models including those in senior leadership roles.
- **Changing the perception** of the nuclear industry from being male-dominated and providing a platform for inspiring women within the industry. We have continued to promote greater gender equality in conjunction with the BBC's 50:50 campaign, by aiming to have 50% female representation across all our corporate media content and publications. The 50:50 Project encourages partner organisations to measure and report gender balance on key communications channels, establishing a baseline and a target for achieving gender balance.
- **We are engaging externally** with wider sector organisations including the Nuclear Skills Strategy Group, Women in Nuclear, Environment Agency and Nuclear Decommissioning Authority to raise our profile externally as an employer of choice for women and to bring about positive change across the sector. We are committed to supporting the Nuclear Sector Deal, which commits to meeting the government's target for 40% of nuclear industry employees to be female by 2030.

- **Selection arrangements** – we have ‘name/gender-anonymous’ selection and use gender neutral wording throughout our recruitment process to remove unconscious bias at an early stage. All selection panels (for external or internal recruitment) have at least one female panel member as far as practically possible. All selection panels have a HR professional involved as a panel member or advisor. We review our recruitment and selection processes annually to ensure any equality issues are identified.
- **Senior leadership roles** - we are proud of the fact our Board is now equally split by gender and we have 21% of women in senior leadership roles at SCS to band 2.
- **Nuclear graduates’ scheme** - since 2014, we have sponsored an annual cohort participating in the industry-wide ‘nuclear graduates’ graduate training programme, and a further cohort will start in autumn 2019. To date, more than 36% of our sponsored participants have been women. We are also pleased that so far 12 women have subsequently joined us as technical specialists on permanent appointments through this route.
- **Degree level apprenticeships** – in support of our STEM strategy, we launched our first-degree level apprenticeships in nuclear engineering and science. This is a change to our traditional practice of recruiting nuclear specialists with a minimum of a first degree. We are looking to develop a new talent pipeline that allows people to combine both the academic study from a traditional university degree and the practical experience and wider employment skills from working in a nuclear environment.

Starting young – our support for STEM (science, technology, engineering and mathematics) activity

We also recognise there is a shortage of skilled and trained people and in particular women in STEM related subjects. Therefore, it is in our interest to ensure we are attracting as many people as possible from a diverse background given the competitive market environment for talent and that we are representative of our wider community.

- We have developed a STEM strategy supporting the Nuclear Energy Agency on ‘Mentoring a Future Generation of Female Leaders in Science and Engineering’. We can directly impact directly young people and girls by inspiring and supporting the next generation of nuclear specialists and positively improve the gender balance. Our staff can play a vital role in inspiring future generations of women engineers and scientists, both through our work or by supporting other bodies with which we’re proud to be connected.
- We continue to work with our external community stakeholders to promote STEM career opportunities for women through our participation in activities in local schools and the STEM Ambassadors programme. We actively support our staff as STEM Ambassadors, getting involved in a range of activities, which can have an impact on young people’s learning and enjoyment of STEM subjects. We have hosted several

school-aged children undertaking a period of work experience in the organisation. We will continue to engage with schools, colleges, and universities to encourage the take up of STEM subjects by all genders and seek to attract more female applications into the industry, and potentially ONR.

Developing our women

- We have reviewed and revised our leadership and management development programmes to be more inclusive. These now provide all leaders with emotional intelligence and unconscious bias training, setting out our expectations around diversity and inclusion, while creating better self-awareness and the ability to understand others.
- In achieving the 'National Equality Standard and Disability Confident Leader' accreditation, we have recognised the strategic value of being a diverse and inclusive organisation as we look to transform the way we attract, recruit, and develop talented people from different backgrounds, and identify more ways we can create a 'great place to work for everyone.'
- We recognise and celebrate key days such as International Women's Day, using these opportunities to promote inspirational female role models in our organisation.

Flexible working

- With the Covid-19 pandemic proving a catalyst for change across the world, our New Ways of Working project gave us a unique opportunity to help us shape the future ONR, both as an employer and as a regulator.
- We have implemented in the short-term a voluntary, self-selected approach to working location that provides more flexibility, empowering staff to choose when they work in a way that enables our staff to deliver its mission effectively and efficiently, with a longer-term objective of a hybrid/blended approach working model.
- We want to ensure a culture aligned to our values and effective processes, which sustain new ways of working and enable us to be an agile and inclusive organisation, where engaged and empowered staff are trusted to work flexibly and securely remotely through best practice and effective technology.
- We advertise flexible working on our website and in our job vacancies in recognition that many highly skilled individuals are looking for flexibility in working hours.

Performance Management

- We have improved our performance management process by simplifying it and basing it on values-based conversations linked to performance, with a greater focus on well-being and career development while providing the opportunity for more

regular coaching discussions. We undertake analysis at key stages of our performance management process focusing on diversity specific issues and to ensure there is no evidence of conscious or unconscious bias. We have strengthened our guidance to line managers making assessments and shared best practice and experiences to ensure a fair and transparent performance management process.

Pay

- The introduction of competence-based pay progression has had a positive impact in helping to address the gender pay gap across grading levels given the higher ratio of men already at the top of their respective pay scales (a legacy based on length of service that has now been removed).

Why should we do this?

We are committed to creating an environment where all our staff can be themselves at work and perform at their best. As an employer of choice, we want to attract diverse talent, to ensure we reflect the society in which we work. We want to remove barriers to minority groups across the nuclear industry and create a more motivated, engaged and therefore more productive workforce. A more diverse and balanced team has a more positive impact on improved decision making and strategic focus for an organisation.

We recognise the benefits of a more gender balanced workforce to help us meet our strategic aims by enhancing our professional knowledge, bringing challenge and new perspectives, and providing a working environment in which everyone achieves their full potential. To do this we are positive we must have a culture which supports women and their progression to greater levels of representation at more senior levels.

We are committed to our vision of being an exemplary regulator that inspires respect, trust, and confidence. We recognise the important obligation we have, on behalf of the public, in holding the nuclear industry to account. We do this through our people, and it is incumbent on us to provide a great workplace and positive culture that enables us to get the best out of all our staff. Identifying and addressing diversity issues, including those highlighted in this report are integral to improving our delivery and influence on issues of nuclear safety, security and safeguarding.

Any enquiries related to this document should be sent to contact@onr.gov.uk

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