Negotiating pay structures

UNISON Bargaining Support Group





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How levels of pay are set out and how pay is distributed among the workforce, can clearly have a massive impact on the relationship between employers and workers. These issues will inevitably affect efficiency and productivity rates, as well as the morale and motivation of the workforce.

This guide gives a basic overview of the different types of pay structures being used across UNISON's bargaining groups, and provides advice to branches on how to make them work best for you.

If negotiators have any comments on this guidance or any experience of negotiations that could be usefully incorporated in the guidance, please contact Bargaining Support at <u>bsg@unison.co.uk</u>

Further guidance is available from bargaining support for branches and workplace reps <u>www.unison.org.uk/bargaining</u>

Contact your regional education teams and / or LAOS to find out what training and resources are available to assist you with negotiating with your employer or promoting the issues in this guide with your members https://learning.unison.org.uk

Organising to Win

The outcome of any negotiation is in large part determined by the relative bargaining power of the parties involved. The most skilled, experienced, and informed UNISON officer, representative or organiser will only get so far without the backing of an organised and engaged membership and a readiness to deploy tactics designed to influence and persuade the employer.

Ultimately bargaining power is the ability to get an employer to do something they would not otherwise do – in this case, reach collective agreement with terms more favourable to UNISON members than would otherwise have been the case.

Bargaining on its own is not organising, until there is active engagement with members as a collective. Every bargaining aim must be seen as an organising opportunity, to build the union and achieve better bargaining outcomes.

The UNISON 5 Phase Plan to Win sets out the 5 phases of successful strategic organising campaigns to support a bargaining aim:

- 1. Research and development
- 2. Union base building
- 3. Launch issue-based campaign
- 4. Resolve the issue (and go to 5) or escalate and create a crisis (for the employer or ultimate decision maker).
- 5. Win, celebrate, review and sustain

A resourced and credible plan to win shifts the balance of power in negotiations in favour of UNISON. It enables the bargaining team to negotiate with confidence and win for members.

Where the plan requires member participation and supports the identification and development of activists, significant organising outcomes can be achieved to build the long-term strength of the Branch.

Ideally, bargaining goals can be achieved without the need to escalate campaigns to dispute. Where there is member support for escalation to deal with employer intransigence, further advice must be sought from the regional centre.

Further detail is outlined in the **5 Phase Plan to Win guide and template**, which is available as one of the resources of the Organising to Win series.

UNISON activists can access the resources via the Organising Space – UNISON's online space for activists. Visit the Organising to Win tile at <u>OrganisingSpace.unison.co.uk</u> or contact your Regional Organiser for guidance and support.

UNISON staff can access the resources via the Organising to Win page on Pearl and can contact the National Strategic Organising Unit for guidance and support.

Had an organising win? Let's learn the lessons and celebrate! Send a summary to <u>WIN@unison.org.uk</u> and we'll be in touch.

What are pay systems and pay structures?

All employers make decisions on the **pay systems** they want to use to reward each worker for their contribution to the organisation.

There are generally two types of pay systems that the pay structure will be based on:

- 1. A **basic rate system** where the pay does not vary in relation to performance or length of employment.
- 2. An **incentivised system** where pay can vary depending on results and performance (whether individuals or groups), and this includes the acquisition of skills or competencies. This includes performance-related pay systems.

Employers will use different types of pay systems to support the organisation's strategic objectives such as by rewarding high levels of performance.

The Equality and Human Rights Commission (EHRC) highlight in their *Equal Pay: Code of Practice* how "pay systems that are transparent and value the entire workforce send positive messages about an organisation's values and ways of working. Fair and non-discriminatory systems represent good management practice and contribute to the efficient achievement of business objectives by encouraging maximum productivity from all employees."

Once the pay system is decided, the pay structure is then developed based on the system. The **pay structure** allows an employer to assign a basic pay level or rate and a pay range or scales to a job role.

As the Chartered Institute of Personnel and Development (CIPD) explain in their factsheet "pay structures provide a framework for valuing jobs and understanding how they relate to one another both within the organisation and to the external labour market.

Pay structures may also need to allow for certain additional elements other than basic pay rates, for example location allowances."

They explain that they are designed to:

- Align the reward strategy with an employer's mission, vision, purpose, culture, and its business strategy, by encouraging required behaviours and performance.
- Bring order and clarity in managing pay rises and career development.
- Help ensure fairness and lawfulness, for example by avoiding pay discrimination."

All pay structures will list a number of **bands**, **rates**, **grades or pay levels** for the different roles within a workplace.

How many there are and how narrow or wide the differences are between the bands or grades, (the 'differentials') or how wide the difference between the minimum and maximum pay level within the band or grade (the 'span') will depend on how similar or varied the roles are, how the workplace operates, and on negotiations with the trade union.

Employers may set pay levels based on market rates, but job evaluation may provide a fairer approach. The aim of using an agreed job evaluation scheme is to ensure that individuals are not evaluated for more or less pay through whim, favouritism or prejudice, or indeed a misunderstanding or misrepresentation of what a job entails.

More information on job evaluation schemes from UNISON at www.unison.org.uk/content/uploads/2019/12/Job-evaluation-schemes.pdf

Employers may offer pay progression through a pay range to reward long service or new skills, competency or performance levels that an employee has attained in the year. They may also adapt pay rates to job roles to mirror the local job market.

As part of simplifying pay structures, more employers are now moving away from the more traditional hierarchical shape structures. Instead they are moving towards those that incorporate fewer bands or grades, and where job roles are more 'harmonised' within their pay system.

Ideally, pay systems and structures should be clear, simple and easy to follow so that workers know and understand how much pay they are entitled to.

Pay structures should be used to ensure that staff are paid fairly and equitably in a way which does not discriminate.

All pay structures have to comply with legal requirements such as paying at least the national minimum wage, reporting on the gender pay gap or providing equal pay. Women have the right to equal pay with men if they are doing 'like' work or work that is of 'equal value'.

The employer may also have a voluntary commitment to the real Living Wage that should be taken account of within their pay structure.

All pay structure will have a number of bands

Role of the trade union

It certainly would be good practice for employers to involve the recognised trade unions in any process of selecting, installing and reviewing a pay system and structure. Ideally employers will form a joint working party with representatives of the trade unions.

Branch and workplace reps should consider issues such as:

- The potential pay levels within a role
- The relationship between the role's pay level and qualifications, training or skills
- The relationship between pay levels within the workplace and within the wider labour market

- Whether there is a regional variation to pay (such as paying a London weighting or recruitment and retention allowance)
- How workers can progress or be promoted and move up through the pay structure
- How performance is measured and whether pay is directly linked to this
- The job evaluation process to be used
- compensation in the form of back pay for any past disadvantage
- pay protection protecting the pay of people whose jobs are assessed as being overpaid in the past.

Types of pay structures

The CIPD in their 2022 Reward Management Survey found that 81% of employers asked regularly review pay structures and levels to ensure fairness. Of these public sector organisations are most likely to regularly review their pay structures, while the voluntary sector is least likely to do so. However, just 31% of employers then go on to let their employees see the findings of their reviews into pay and benefit fairness.

This is borne out in the CIPD's survey of employees, which found that only a third of employees know why they get paid what they do and only one in five know what they need to do to secure a pay rise.

Spot rates / individual pay rates

Under this basic type of pay structure, employees are paid a single hourly or weekly or annual rate of pay which is linked to a specific job.

This type of pay structure is mainly found in smaller workplaces where there are fewer roles, and therefore a limited number of pay levels.

The biggest drawback of using spot rates to employ staff is that it leaves no scope for progression or incentive, which can lead to problems with morale and productivity in the workplace.

Sometimes the employer may include some incremental scales that allow for progression, perhaps as additional experience and skills are obtained.

However, use of this type of pay structure may lead to equal pay claims, especially if 'wage drift' is allowed to happen, where the actual salary paid to an individual has increased faster than the standard rate for the job. This may be because pay increases have been linked to their length of service, overtime or bonuses, which could result in a group of workers performing the same job role on different salaries.

UNISON's 'Bridge the Gender Pay Gap' bargaining guide

(www.unison.org.uk/content/uploads/2021/10/26580.pdf) warns that: "Pay gaps can be caused by the effect of men staying in the full-time workforce for longer than women and so progressing up the pay scale further...

A strong contributing factor to this pattern is women stepping out of the labour force to have children and the tendency for women to take on the caring roles for family members, which extends their absence. On return to work, women frequently have to take on part time work to balance with caring responsibilities, which are often lowskill, low-paid jobs with little opportunity for progression."

Spot salaries are often based on a market-based pay system that links salary levels to those rates available in the market. Regardless of the performance of the worker, it is difficult for employees to progress if they are deemed to be earning the 'market

rate' for their job. Pay increases for the individual worker would only ever depend on a general uprating of pay levels (usually at the annual pay review).

'Bridge the Gender Pay Gap' bargaining guide

(www.unison.org.uk/content/uploads/2021/10/26580.pdf) warns that "Private and community/voluntary organisations engaged in delivering public services are much more likely than the public sector to have pay systems that are not based on job evaluation systems. For that reason, they are much more vulnerable to violating equal pay legislation.

Pay structures in these organisations can take a wide variety of forms but are often based on 'spot rates' or pay ranges that vary for each individual and are influenced by estimates of changes in 'market rates'. Equal pay audits are even more vital for these pay systems to address suspected Equal Pay Act violations...

In the longer term, branches should make the case to such employers that **a pay scale structured around job evaluation is the fairest system** that offers the greatest protection for the employer against equal pay claims."

More information about job evaluation schemes from UNISON at www.unison.org.uk/content/uploads/2019/12/Job-evaluation-schemes.pdf

UNISON's bargaining support has access to benchmarking data showing market rate salaries for different job roles across the economy. If your branch would like further information, email bargaining support at <u>bsg@unison.co.uk</u>

Individual pay ranges

This is a similar pay arrangement to spot rates, but instead of having a single rate for the job, employees are employed on individual pay ranges. This allows for some form of pay progression.

If branches are negotiating pay systems linked to spot rate salaries, clearly guiding an employer towards implementing an individual pay range is more advantageous than keeping staff on spot rates. The potential for improved staff morale and productivity could be highlighted to employers if they adopt a pay range, as it would give workers the ability to progress through the range.

Pay spines

Pay spines are the most commonly used pay structure. In the public sector, they are generally used in local government and often also in the voluntary and community sector where pay mirrors the National Joint Committee Green Book pay spines.

Pay spines allow for length-of-service-related pay progression. However, in the community sector, there has been reported an increase in employers using pay increments as a substitute for a cost-of-living increase.

Narrow-graded pay structures

This pay structure is also very common in the public sector and other large employers and consists of a large amount (sometimes 10 or more) of grades (or bands or levels).

For example, the NHS has about 500 different non-medical job 'profiles' and these have been allocated to nine nationally agreed pay bands, within a pay spine of 54 pay levels.

Most major public sector organisations have adopted job evaluation procedures that rate jobs according to their demands and difficulty as a measure of 'value' so that they can then be allocated against national or local pay scales.

Incremental rises are mainly due to length of service but the range of 'scales' within the grade is usually limited. Therefore pay increases for the individual worker would depend on moving up a scale, being promoted to another grade, or a general uprating of pay levels.

A downside of this pay structure is that many employees reach top of their grade within a few years. Some employees may request and be given a higher grade to incentivise them. But again this leaves the employer open to equal pay claims if there is some 'grade drift' within jobs whereby, gradually over time, the relationship between the pay for a group of jobs and the characteristics of the jobs is no longer considered relevant.

Although job evaluation procedures have been designed to reduce the occurrence of unjustifiable inequalities, they do not make pay scales immune to **equal pay issues**.

In these cases, **equal pay audits** offer a valuable tool to review job evaluation procedures and ensure that inequality has not crept into pay systems.

For more information, see UNISON's 'Bridge the Gender Pay Gap' bargaining guide <u>https://www.unison.org.uk/content/uploads/2019/03/25466-1.pdf</u>

Broad-graded pay structures or broad-banding

This pay structure is made up of a small number of wider pay bands (usually just four or five for broad-banding, six to nine for broad-graded) and is designed to give some flexibility in pay grades and also possibly with role definitions. Base rates for job roles are usually determined through job evaluation schemes but often the emphasis in a broad-banding structure is shifted on evaluating the individual, their competency, skills and career development.

A classic broad-banding structure allows for continual pay progression within each band getting rid of the need for frequent re-grading or promotion exercises. However again employers need to be careful over equal pay and other discrimination issues, should one protected group find it harder to reach maximum pay levels than others.

UNISON's 'Bridge the Gender Pay Gap' bargaining guide

(https://www.unison.org.uk/content/uploads/2019/03/25466-1.pdf) recommends:

- "Factors based on experience should generally avoid being defined in terms of continuous service..
- The number of pay points through which an employee must progress to reach the top of their pay band must be based on an accurate assessment of the time necessary to develop the skills and expertise to fully discharge the requirements of a job. Unreasonably long pay scales can leave women short of the top when they take time out because of pregnancy or caring responsibilities. Bands should not usually exceed four or five points and the same number of points should apply consistently across each band...
- Elements of pay based on reaching a competence standard should seek equality in access to opportunities for developing the required level of competence. For example, the timing and location of any training should accommodate part-time employees who may have caring responsibilities or those on maternity leave;
- Elements of pay based on performance should utilise criteria that are clearly defined and achievable, with targets consistently applied across all departments. Measurable, and objective criteria can help avoid bias...
- A single respected job evaluation scheme should be applied across all roles. [In local government, the NJC and SJC job evaluation schemes are recommended by the joint committees. In the NHS, Agenda for Change roles are covered by the NHS Job Evaluation Scheme] "

Appraisal or performance-related pay is often used to link progression through a pay band with an assessment of an individual's work performance during a particular reference period (often this is a yearly review).

In the Acas guidance (now archived) on pay systems

(https://webarchive.nationalarchives.gov.uk/ukgwa/20160701134425/http://webextde v.acas.org.uk/index.aspx?articleid=716) it is suggested that "organisations often use a combination of systems to provide greater flexibility in the pay package to address particular needs. For instance they may have a basic rate for the job, with a top-up increase that is self-financing, and an element for individual performance. This has been particularly common in the public sector and the privatised ex-public sector/agencies."

However, as the Equality and Human Rights Commission warns: "A pay system with more than one grading structures can become confusing and create opportunities for inequality to creep in unnoticed."

In particular, there can be lots of disadvantages to performance-related pay including inconsistency in some appraisal schemes and how they are managed by the employer. Some appraisal schemes are viewed by employees as a tick box exercise with an expected or 'automatic' pay increase every year. But the increases in pay tend to be small amounts and therefore do not act as a good motivator for

staff, especially those members of staff who have already reached the top of their grade.

As the Equality and Human Rights Commission states: "The risk of pay discrimination will increase if performance is not linked to quantifiable and easily explained criteria."

For further information about performance-related pay, see the bargaining support guide <u>www.unison.org.uk/content/uploads/2019/05/Performance-related-pay.pdf</u>

Job families

A job family pay structure is a group of jobs with similar characteristics and involved in similar work, although with varying levels of competency and skill. This pay structure usually has six to eight levels. There are separate pay grades and pay spines for different families (for example one for HR staff, one for IT staff and one for sales staff).

Job family pay structures may be used by organisations that employ specialist groups of staff as they can assign higher rates for highly sought-after workers. However, UNISON has advised in 'Keeping pay equal: Trade union side guide to local government pay and grading reviews 2017 Edition' "in local government organisations, the 'market model' of job families (with separate pay structures for different families) would invite equal pay problems. We would strongly advise against having separate 'market rate groups' in a job family structure. In roles or occupations where it is difficult to recruit or retain staff, there are other solutions available (such as the payment of labour market supplements)."

Job Family	A group of jobs in the same occupation		
Job Function	A more specific area within a family		
Job Category	Operational and Technical	Professional	Supervisors and Managers
	Level 1	Entry	Supervisor 1
	Level 2	Intermediate	Supervisor 2
	Level 3	Experienced	Manager 1
		Advanced	Manager 2
		Expert	Manager 3

An example of a job family pay structure is below:

Career families

Some organisations may also have a career family or career-grade structure, where a number of job families share the grades and pay structure, so potentially widening the opportunities for career development and making the path clearer for skill development and progression.

Case studies

Liverpool Women's Hospital and the national pay structure

In April 2019, UNISON members at Liverpool Women's Hospital won their struggle to secure NHS rates of pay. The domestics, porters, catering and security staff are all employed by a private contractor, OCS, which had refused to pay them the same rate for the job as staff employed directly by the NHS, who had seen their pay rise under last year's nationally agreed deal.

Now, the OCS staff will no longer be paid just the legal minimum wage, but will receive the higher NHS rate.

This is worth more than £1 an hour – over £2,000 a year for full-time staff. As part of a three-year deal, staff will now also get the same payments as their colleagues for working anti-social hours, overtime and weekends.

This case again highlights that where branches are negotiating pay structures and rates outside of national collective bargaining with private companies, there is a strong argument that it is important for staff morale and productivity that pay rates have parity with the national pay structure.

Staff should receive the same conditions in terms of pay uplifts, annual leave, sickness pay and career progression opportunities as staff on national terms and conditions, in order to halt pay drift within certain job groups.

Pay Fair for Patient Care campaign

Pay Fair For Patient Care calls for all band two staff of the national Agenda for Change pay scale with increased responsibilities, to be paid at the correct rate for the job they are doing and for workers to be compensated for the work they've already done at band three level.

For example, many of the healthcare assistants working in A&E at Calderdale and Huddersfield NHS Foundation Trust had been on band two but have undertaken clinical duties falling under band three for several years.

Thanks to UNISON, more than 50 A&E staff were re-banded to band three in a deal made with the trust at the end of 2023 and are set to receive around £3,000 in back pay.

In November 2023, NHS Employers published new advice for employers dealing with re-banding requests from band 2 and band 3 clinical support staff. This will

support UNISON's organising and negotiating efforts to win backpay that fairly reflects when band 3 duties were taken on.

More information at <u>www.nhsemployers.org/articles/band-2-and-band-3-healthcare-support-worker-roles</u>

Education workers in Northern Ireland

More than 6,000 UNISON schools support staff members in Northern Ireland took to picket lines for a day's strike action for fair pay in December 2023 with a further day's strike planned for January 2024.

From Belfast to Omagh, Downpatrick to Ballycastle, members demanded long overdue reform to the education authority's pay and grading structure.

They want a fair grading structure that:

- standardises all grades with more than 4 points to a max of 4 points in length
- removes overlaps between grades consolidates admin and former ancillary and general grades into a single structure
- restores the supervisor differential to an agree level and addresses recruitment challenges
- assimilates to the new scales on the principle of next equal to or higher point.

The action comes as education services in Northern Ireland experience significant cuts as a result of budgets set by the secretary of state for Northern Ireland, in the ongoing absence of an executive at Stormont.

More details at <u>www.unison-ni.org.uk/news</u>

Checklist for branches not covered by national pay and grading systems

For those branches not covered by national pay and grading systems such as Agenda for Change (NHS) or the NJC Green Book pay spines, it may be time to take stock of your current pay system and structure. As pay arrangements can often be very complex it is always good practice to evaluate the current pay system in order to help avoid any sex discrimination.

1. Review the existing pay system

If branches are aware that a pay system isn't working as well as it could and that employers are leaving themselves open to equal pay claims, it may be advantageous to set up a joint working party to discuss reviewing the existing pay system and structure to see if it is still fit for purpose.

UNISON branches should have an important part to play on a working party and be part of any reassessment strategy as well as being part of the negotiations on any revisions made to an existing pay system.

2. Who is covered by the current system?

It's important to establish what pay systems and structures are used by your employer, and who is covered under each.

It is not uncommon for employers to use two forms of payment system, so it may be worth considering whether it would be fairer and more transparent if the employer was encouraged to harmonise two systems into one.

Also are part-time and fixed-term employees, as well as any eligible agency workers receiving their full entitlement and not treated less favourably?

3. Advice on spot salaries - pay progression issues v. cost uplifts

Clearly pay progression is an issue for those members on spot salaries as their pay remains, for the most part, static unless they are able to negotiate a pay rise locally.

Pay rates may benefit from comparing them to the wider market (external benchmarking) but this could also lead an employer to use the comparison as an excuse to cut wages, regardless of whether staff are successful or productive. Any statistics used by employers of earning levels elsewhere should be analysed closely to see if they are truly comparing like with like, such as whether or not they include bonuses and other extras paid as standard elsewhere, and if there are actually out-of-date figures being use.

When branches are negotiating a new pay structure with an employer they should be encouraged to consider adopting a pay range structure rather than sticking to spot salaries. This will allow for progression through the range and can help incentivise staff in terms of reward for career development.

Limited pay ranges can be problematic as staff are more likely to reach the top of the range very quickly. At that point, the only uplift they are likely to receive in their pay is a cost-of-living pay increase (if these haven't been frozen). Employers are increasingly using the annual cost-of-living increase as a substitute for a pay rise. Therefore it is important that it is made clear to the employer early in the negotiations that cost-of-living increases should be considered separately from pay uplifts.

4. Job evaluation

UNISON supports the use of equality-proofed job evaluation schemes as a way of establishing fair pay and grading structures. A working party with employer and trade union representatives should ensure that the job evaluation scheme and any pay and grading outcomes used are impartial, gender neutral and reliable.

The job evaluation process should be a joint management and union exercise, with ground rules agreed prior to the introduction of the scheme, and with a fully representative and trained steering group to oversee it. The process should include an appeals procedure, monitoring arrangements and full disclosure of data for all posts to the unions.

A job evaluation exercise should set up a fair grading structure. However it can take some months to complete and do not determine the actual pay levels.

If your branch is considering going through a job evaluation process with the employer, contact your **regional officer** <u>www.unison.org.uk/regions</u>.

Also contact your **regional education teams and / or LAOS** to find out what training and resources are available to assist you with negotiating with your employer or promoting the issues in this guide with your members <u>https://learning.unison.org.uk/</u>

Further guidance on pay and other workplace issues is available from the bargaining support unit <u>www.unison.org.uk/ bargaining</u>

Further Information

From UNISON

Job evaluation schemes www.unison.org.uk/content/uploads/2019/12/Job-evaluation-schemes.pdf

Bridge the Gap, bargaining guide www.unison.org.uk/content/uploads/2021/10/26580.pdf

Performance-related pay www.unison.org.uk/content/uploads/2019/05/Performance-related-pay.pdf

Negotiating advice for college staff: Job evaluation, grading structures and equal pay <u>www.unison.org.uk/catalogue/21160</u>

Keeping Pay Equal: Trade union side guide to local government pay and grading reviews, 2017 Edition

www.unison.org.uk/content/uploads/2018/06/Keeping-Pay-Equal-%E2%80%93-NJC-Trade-Union-Side-Guide-to-Local-Government-Pay-and-Grading-Reviews-2017-edition.pdf

Step by Step. NHS pay progression – guidance for members in England and Wales <u>www.unison.org.uk/content/uploads/2021/02/26044.pdf</u>

'Pay progression in the public sector' - research report for UNISON from Incomes Data Services (IDS), August 2013

www.unison.org.uk/pay-progression-in-the-public-sector-report/

Delivering equal pay in local government www.unison.org.uk/at-work/local-government/key-issues/delivering-equal-pay/

Competence related pay progression in the local government sector <u>www.unison.org.uk/content/uploads/2018/06/Competence-Related-Pay-Progression-</u> <u>in-the-Local-Government-Sector.pdf</u>

Pay in education

https://www.unison.org.uk/at-work/education-services/key-issues/pay-in-education/

Pay in the NHS

https://www.unison.org.uk/at-work/health-care/big-issues/more-campaigns/pay-inthe-nhs/

Local government pay – the National Joint Council (NJC) <u>www.unison.org.uk/at-work/local-government/key-issues/pay-national-joint-council-njc/</u>

Police staff pay

www.unison.org.uk/content/uploads/2023/10/Web-Pages-Police-Staff-Pay-and-Conditions.docx Probation staff pay www.unison.org.uk/content/uploads/2023/10/Web-Pages-Probation-Pay-and-Conditions-Guide-1.docx

Two-tiered workforce www.unison.org.uk/get-help/knowledge/contracts/two-tier-workforce/

From CIPD

Pay structures and pay progression www.cipd.org/uk/knowledge/factsheets/pay-structures-factsheet/

Reward: an introduction <u>www.cipd.org/uk/knowledge/factsheets/reward-factsheet/</u> Job evaluation and market pricing <u>www.cipd.org/uk/knowledge/factsheets/market-pricing-factsheet</u>

From Acas

Job Evaluations: Considerations and Risks www.acas.org.uk/job-evaluation-considerations-and-risks-advice-booklet

From the Equality and Human Rights Commission

Advice and guidance on equal pay, including sections on job evaluation and job grading

www.equalityhumanrights.com/guidance/equal-pay/how-achieve-equal-pay/howimplement-equal-pay

Check for equal pay risky practices <u>www.equalityhumanrights.com/guidance/equal-pay/how-achieve-equal-pay/check-</u> equal-pay-risky-practices