

Mole Valley District Council Pay Policy Statement 2021/22 and Gender Pay Gap as at 31st March 2020

1.0 Purpose

This report combines the Pay Policy Statement and details under legislation brought in in 2018 that is referred to as 'Gender Pay Gap' reporting.

The Pay Policy Statement was first introduced in 2012 under the Localism Act and is required to be approved for the year ahead.

The Gender Pay Gap is calculated based on a prescribed snapshot date of 31st March. This is the fourth time figures under the Gender Pay Gap reporting legislation are being provided.

Both reports must be published and reported annually by no later than the end of March.

2.0 Legal background

2.1 General provisions relating to pay

In determining the pay and remuneration of its employees, the council will comply with all relevant employment legislation. This includes the Equality Act 2010, Part Time Employment (Prevention of Less Favourable Treatment) Regulations 2000, The Agency Workers Regulations 2010 and where relevant, the Transfer of Undertakings (Protection of Earnings) Regulations. With regard to the Equal Pay requirements contained within the Equality Act, the council ensures that all pay arrangements can be objectively justified through the use of Job Evaluation methods.

2.2 Pay Policy Statement.

The Pay Policy Statement is provided annually in accordance with Section 38 of the Localism Act 2011.

The Pay Policy Statement is required to set out Mole Valley District Council's policies relating to the remuneration of its workforce, and in particular the relationship between the remuneration of the highest and lowest paid members of staff and between Chief Officers and non Chief Officers.

2.3 Gender pay gap reporting:

Under the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 (SI 2017/172) and Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 (SI 2017/353) relevant employers are required to report on

- the difference in the mean pay of full-pay men and women, expressed as a percentage;
- the difference in the median pay of full-pay men and women, expressed as a percentage;
- the difference in mean bonus¹ pay of men and women, expressed as a

¹ See Section 4.4.1 and 5.1 for the applicability of reporting on bonus payments under our Pay Policy Statement.

- percentage;
- the difference in median bonus pay of men and women, expressed as a percentage;
- the proportion of men and women who received bonus pay; and
- the proportion of full-pay men and women in each of four quartile pay bands.

The mechanisms for the necessary calculations are set out in the Regulations.

3.0 Context and differences between the two reporting requirements:

It is important to note there are key differences between the figures reported under each of the differing legislative requirements. This links to the broader purpose of the legislation which is explained below.

The Pay Policy Statement applies purely to employees. The definitions separately prescribe 'pay' and 'remuneration' with the latter including employer pension contributions.

Interpretation of pay under the Gender Pay Gap is prescribed by the legislation and as such is required to include salary and allowances paid to everybody that MVDC pays. This therefore includes not only established staff but agency and casual workers. The payments do not however include employer pension contributions (or payments to Members). Other elements of remuneration that are one off payments must also be included regardless of when during the year they are paid. These are therefore included pro rata.

Legislation on the Gender Pay Gap mandates the applicable date at which the data must be drawn from (a 'snapshot date'). This date for the public sector is 31st March. There is no mandated date for the Pay Policy statement.

The main purpose of the Pay Policy statement is to review the pay ratio between the top of the organisation (Chief Executive and all Chief Officers) and (a) the remainder of the organisation (all employees minus Chief Executive/Chief Officers); and (b) those who are the lowest paid within the organisation. The data can therefore be taken at any point within the calendar year. This year the data has been taken from the month of November 2020.

The purpose of reporting on the Gender Pay Gap is to provide transparency on the difference between the hourly rate of pay between men and women. Typically organisations will have a Gender Pay Gap in favour of men. The government is committed to reducing the gap between men and women.

It is important to note the national picture for Gender Pay Gap reporting and to distinguish between having a Gender Pay Gap and equal pay.

The Gender Pay Gap is the pay discrepancy between men and women irrespective of their job or position. There are many reasons why an organisation will have a Gender Pay Gap which will be influenced by society as a whole.

That is distinct from equal pay - when companies are required to ensure that men and women carrying out the same or similar roles are paid the same for the amount of work they do.

See Section 5.2 for further details.

The figures given for the ratios under the Pay Policy Statement are provided in Sections 4.5 to 4.7.

The figures given for Gender Pay Gap ratio are provided in Section 5.1

4.0 Pay Policy Statement

4.1 Definitions

4.1.1 Chief Officers

For the purposes of Mole Valley District Council's Pay Policy Statement the following posts are defined as Chief Officers.

- The Head of the Paid Service (Chief Executive)
- Section 151 Officer (Deputy Chief Executive)
- The Monitoring Officer
- Executive Heads of Service and the Strategic Lead for HR and OD (Organisational Development) reporting to the Head of Paid Service
- Executive Heads of Service reporting to the Deputy Chief Executive/Section 151 Officer

"Employee who is not a Chief Officer" refers to all staff not covered under the "Chief Officer" group above. This includes the "lowest paid employees" and excludes staff governed by National consultation groups (e.g. Apprentices).

4.1.2 Definition of "Lowest paid Employees"

The bottom pay scale in use on the Council's pay framework² is used as a reference point for pay calculations for the 'lowest paid employees'. Whilst there is no national or local government definition of 'lower paid' it is generally used to refer to those paid below the 'Real Living Wage'. The lowest point on the Council's pay framework (scale point 9) is however above the 'Real Living Wage for the year referenced by this report.'³ This excludes staff governed by National consultation groups (e.g. Apprentices) or any staff who are TUPE transferred into the Council on pre-existing terms and conditions.

4.2 Pay framework principles and cost of living

4.2.1 General approach

Under section 112 of the Local Government Act 1972, the council has the "power to appoint officers on such reasonable terms and conditions as authority thinks fit". Remuneration at all levels needs to be adequate to secure and retain high-quality employees dedicated to fulfilling the Council's business objectives and delivering services to the public. This has to be balanced by ensuring remuneration is not (and is not seen to be), unnecessarily excessive. Each Council has responsibility for balancing these factors and each council faces its own unique challenges and opportunities in doing so. Flexibility to cope with various circumstances that may arise is retained by the use of market supplements or other such mechanisms for individual categories of posts where appropriate.

The Council has historically committed to a pay framework starting at or above the Real Living Wage (for the year referenced by this report – 2020/21 - this is £9.41 per

² Also referred to in this report as a 'grading' or 'evaluation' framework

³ The 'Real Living wage' set by the Living Wage Foundation is a voluntary minimum which employers can choose to adhere to. This is distinguished from the 'National Living Wage' which is a legal minimum employers must pay to all workers aged 23 or over. For workers under 23 the National Minimum Wage is the legal minimum. All figures generally increase annually.

hour, rising to 9.50 per hour for 2021/22). There are separate legal minimum wages dependent on age.

4.2.2 Responsibility for decisions on remuneration

With the exception of any groups where pay is governed by national consultation groups, pay for all employees bar the Chief Executive and Deputy Chief Executive is determined by the Chief Executive exercising the delegated powers as set out in the Constitution. Decisions on pay are determined according to the grading framework, details for which are set out below.

4.2.3 Salary, grades and grading framework

All Mole Valley District Council staff are employed subject to locally agreed policies and other conditions of service.

Mole Valley District Council has a job grading system which is used to evaluate the grade of posts. This followed a national requirement for all Local Authorities and other public sector employers to review their pay and grading frameworks to ensure fair and consistent practice for different groups of workers with the same employer, in accordance with the legal principles relating to equal pay. The grade allocated to a post is determined by the duties, level of responsibility and competencies required as outlined in the job description and person specification.

Each employee is paid according to a pay scale based on the job evaluation of their role. The pay scale contains numbered incremental points. Employees can progress to the salary range maximum of their grade (the highest incremental point) subject to performance management, based on management assessment. The evaluation framework does not apply to Chief Officers as a precise assessment of tasks and responsibilities is not possible or desirable at senior management team level.

Any employees transferred to Mole Valley through TUPE (e.g. shared services) have their pay (and other terms) protected on transfer in accordance with the legislation⁴.

4.2.4 Cost of living elements

The Council has a contractual commitment with staff to award a cost of living rise equivalent to at least the Local Government national pay award each year.

For the year 2020/21 the staff pay award was 2.75%. (Council had initially agreed 2.5% however national pay settlements finalised at the higher figure).
For the year 2021/22 the staff pay award will be up to 1%⁵

Incremental and cost of living increases are normally paid with effect from 1st April.

4.3 Mechanisms for approval of pay and appointments

4.3.1 The Chief Executive and Deputy Chief Executive:

⁴ Although many employers desire harmonisation of pay as it can create anomalies in pay between original employees and those transferred in, this is contrary to employment law and therefore, where attempted, gives rise to legal rights to challenge.

⁵ At the time of writing the final pay award has not been confirmed but will be included in this report before publication as required under the Localism Act

The Chief Executive is appointed by the Council. The Deputy Chief Executive is also appointed by Members and this can be via a committee. The salaries of the Chief Executive and Deputy Chief Executive are determined by Members through the recruitment process.

The Chief Executive has delegated authority in the Constitution to make appointments and determine salaries for all officers other than those falling within the remit of Members.

4.3.2 New starters joining the Council

Employees new to the Council will normally be appointed to the first point of the salary range for their grade.

Where the candidate's current employment package would make the first point of the salary range unattractive (and this can be demonstrated by the applicant in relation to current earnings) or where the employee already operates at a level commensurate with a higher salary, a higher salary may be considered by the recruiting manager providing it remains within the salary range for the grade.

These arrangements apply to all posts up to and including the Chief Executive and Deputy Chief Executive.

4.4 Elements of Pay and Remuneration

4.4.1 Salary and other similar payments

The Council operates a performance related pay scheme whereby all staff can be awarded a single increment on the salary scale which will determine their salary.

This is dependent on satisfactory performance throughout the year assessed through a performance review process by the appropriate line manager. Once an employee reaches the top of their salary scale there is no opportunity to earn more in that role. There are no additional performance related pay opportunities for Chief Officers.

In exceptional circumstances increments may be accelerated within the grade subject to the maximum of the grade not being exceeded. Any such accelerations are considered carefully in terms of the added value perceived as likely to lead to enhanced performance as well as assessment of prior strong performance through the performance review process. In the case of the Deputy Chief Executive such approval must be given by the Chief Executive. Any additional payments to the Chief Executive must be considered by the Council.

In addition there is scope subject to stringent criteria set out in Mole Valley District Council's Pay and Expenses Policy to pay a market supplement. This is an additional payment made to employees where the market value of their job is higher than the value placed on them by an internal pay structure. It is therefore intended to recognise the need to reflect external pressures whilst ensuring internal equity. Market supplements are rarely awarded, and only when there is evidence that targeted recruitment is not producing the desired results. Any requests require a business case to be approved by the Chief Executive in conjunction with advice from the Strategic Lead for HR and OD, s151 Officer and the line managers and are removed when circumstances change.

The Pay and Expenses Policy also provides in exceptional circumstances for

payment of recognition awards (a small one off lump sum) for exceptional and outstanding work over and above duties required in the job description. (These figures are referred to under the gender pay gap reporting requirements given in section 5.1 as 'bonus payments' although the term bonus is not one that we would normally use given the very prescribed and limited circumstances in which it applies). These payments are subject to approval by the Chief Executive. There is no scope for such a payment to be paid to the Chief Executive or the Deputy Chief Executive.

In exceptional circumstances loyalty payments may be paid to retain employees where their function will cease at a future date and there is a need to maintain current service levels and staffing until that date. These payments are only granted where there is a business need and subject to the employees being in post at the future specified date, and must be approved by the Chief Executive with advice from the Strategic Lead for HR and OD and s151 Officer.

There is additionally provision to award an Acting Up supplement where an employee has taken on additional duties and responsibilities for a defined period of time, for example covering a vacancy or taking on a special project. The level of the supplement is determined through the job evaluation framework.

"Chief Officers" are subject to the same performance management process as the "lowest paid employees" and "employees who are not Chief Officers".

Chief Officers receive incremental progression until the top of their grade is reached.

The control measures in place ensure that the requirement for any additional allowance or supplement is objectively justified by reference to clear and transparent evidence and where market supplements are considered that this is with reference to data available from within and outside the local government sector.

4.4.2 Charges, expenses, additional fees or allowances

Pay for all employees (including Chief Officers) comprises payments by way of salary, pensions, expenses legitimately incurred in connection with undertaking essential duties, and other standard required elements of contractual remuneration.

Fees for parish, borough and county elections vary according to the size of the electorate and number of postal voters and are calculated in line with the Surrey wide scheme. Payments for national and European elections are set by central government and are not paid by the Council as the money is reclaimed.

Prior to April 2012 Chief Officers and officers who required a car for the performance of their duties or who joined the authority where a car was part of their salary package were entitled to a lease car or car allowance. The lease car scheme is now closed but operating as a protected discontinued entitlement.

Employees subsequently joining the authority who travel by virtue of their post in excess of 3,500 miles per year are entitled to a car allowance paid in monthly instalments. The amount paid is dependant on the engine size of the employee's vehicle. Employees have to pay tax and national insurance on this allowance. Business mileage necessarily incurred is paid dependent on the engine size subject to a prescribed maximum. These amounts are paid in accordance with HMRC guidance.

4.4.3 Buying and Selling Annual Leave

Employees may apply to buy additional annual leave and in the event their application is approved deductions are made from their monthly salary equivalent to their rate of pay. The Council does not generally allow employees to sell untaken annual leave other than in the event of genuinely unforeseen and exceptional circumstances and subject to a limit of 5 days (pro rata). Any applications are made to individual Executive Heads to agree the provision is applicable before seeking overall approval from the Strategic Leadership Team.

4.4.4 Benefits schemes

The council believes that it has a responsibility to help support the health, wellbeing and welfare of its employees in order to ensure that they are able to perform at their best. As part of this approach, and in common with other large employers it provides or makes arrangements for any health, fitness and wellbeing benefits; and discounts schemes which support the local economy.

Any benefits need to meet the tests of being affordable and assisting retention and/or supporting or enhancing ability of staff to achieve optimum performance levels.

Those considered to meet these tests currently include the following:

- Childcare voucher scheme to help working parents pay for registered childcare. (NB this is gradually being replaced by a government scheme).
- Preferential rates for local leisure centre membership
- Access to an Employee Assistance Programme (EAP)
- Referral to an occupational health scheme where recommended by the line manager (i.e. if health issues are affecting job performance)
- Annual flu, blood pressure and wellbeing clinics (subject to availability)
- Training (external or internal) to meet job/professional qualification requirements or anticipated business requirements. This is subject to the establishment of a business case justifying any expenditure or authorised absence.
- Local discount schemes with participating local businesses

4.4.5 Pension

All employees as a result of their employment are eligible to join the Local Government Pension Scheme. If the Officer is a member of the Local Government Pension Scheme (LGPS) the employer's contribution is paid. Following auto enrolment legislation, employees are automatically opted in to the scheme and need to actively elect to opt out. In addition, casual workers are also either opted in (depending on earnings thresholds), or eligible to join.

The employee contribution rates, which are defined by statute, currently range between 5.5 per cent and 12.5 per cent of pensionable pay depending on full time equivalent salary levels. The Employer contribution rates are set by Actuaries advising each of the 89 local LGPS funds and reviewed on a triennial basis in order to ensure the scheme is appropriately funded. The current average rate is 17.1 per cent set following the 2020 valuation.

In accordance with our Early Retirement Policy Mole Valley District Council considers requests from staff or new employees who wish to draw their pension but continue working in a reduced capacity where it is in the Council's interests to do so and

taking account of the employer costs of early payment of flexible retirement pension benefits. All costs falling on the Council must be affordable, therefore a request should typically involve a substantial reduction in salary, through reduced hours and/or reduced level of responsibility (grade). Authority to approve such requests rests with the Council (for the Chief Executive); the Cabinet (for Executive Heads of Service and the Deputy Chief Executive) and the Management team for all other staff.

4.4.6 Severance Payments

Chief and other Officers who leave the Council's employment, where appropriate, will receive compensation in accordance with the Council's Policy to Manage Staff Changes or through a negotiated settlement the terms of which will be according to assessment of legal risk and consequent financial impact on the Council. In order to be eligible for redundancy payments, continuous service in line with legal eligibility is required (currently 2 years).

The Policy to Manage Staff Changes applies to all staff below the Chief Executive and the Deputy Chief Executive. In the event of the redundancy of the Chief Executive or Deputy Chief Executive any redundancy payment would need to be approved by Council.

The policy sets out a consistent method of calculating redundancy pay allowing a discretionary enhancement to the statutory system by using a multiplier of 2 with no statutory cap on weekly earnings. It is subject to a legal obligation to cap at £95,000 (total cost) under the Restriction of Public Sector Exit Payments Regulations 2020.

The payment is intended to recompense employees for the loss of their livelihood and provide financial support whilst they seek alternative employment.

The Policy sets out how we will calculate any payments made to support early retirements in the efficiency of the service and will be interpreted in compliance with legal advice and prevailing legislation pertaining to local government and the public sector as a whole. Payments are subject to the rules of the Surrey Pension scheme, and will generally only be made where they facilitate an employee leaving which will result in the Council being enabled to make savings, for example by restructuring. Payments made to the Chief Executive or Deputy Chief Executive as a result of their employment being terminated also have to be approved by Council.

With regards to re-employing former local government staff who have been made redundant, if there is less than a 4 week gap between someone being made redundant from another council and joining Mole Valley District Council they will be required to repay their redundancy payment to their previous employer. As legislative changes take effect the Policy to Manage Staff Changes will be brought in line with requirements.

4.5 Relationship between pay and remuneration of "Chief Officers" and "employees who are not Chief Officers"

The calculations below were taken from data as of 30th November 2020.

The mean salary for Chief Officers (as defined in section 2 above) is £83,671 and for employees who are not Chief Officers it is £33,015.

Therefore the ratio of mean Chief Officer Pay to the mean pay of other employees is 2.5:1 (rounded).

The above figures are based on full time equivalent salaries.

All Chief Officers are employed on full time permanent employment contracts.

The mean remuneration for Chief Officers is £98,314 and for employees who are not Chief Officers it is £33,390

The above figures are based on actual payments made to the calculation date.

Therefore the ratio of mean Chief Officer remuneration to the remuneration of other employees is 2.9:1

4.6 Relationship between pay and remuneration of Chief Executive post and the lowest paid worker

The total annual salary for the Chief Executive post (according to the relevant pay scales currently in place) is £120,977. Total remuneration is £139,096.

The current postholder is a full time employee on a permanent employment contract.

Using information as at 30th November 2020 the lowest paid employee on the MVDC pay framework is paid £18,152 as a full time equivalent employee (with total remuneration of £20,096).

This gives a ratio between the highest paid and lowest paid employees of 6.7:1 (rounded). This figure is the same as last year. Taking total remuneration into account the ratio is 6.9:1.

4.7 Relationship between pay and remuneration of Chief Executive post and all other employees

The mean salary of all employees excluding the Chief Executive is £34,091. Mean remuneration is £34,793. Therefore the pay ratio between the Chief Executive post and all other employees within the Council is 3.5:1 (rounded) for pay and 4:1 for total remuneration. These ratios are identical to last year.

All the above ratios are therefore comfortably within the maximum ratio of 20:1 identified as a maximum pay multiple within the Hutton review of Fair Pay in the Public Sector.

5.0 Gender Pay Gap

5.1 Statutory figures

The figures set out below have been calculated using the standard methodologies used in the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 with the specified snapshot date of 31st March 2020.

- The mean gender pay gap for MVDC is 5.5% The median gender pay gap for MVDC is 2.3%

- The mean gender bonus⁶ gap for MVDC is 0%
- The median gender bonus gap for MVDC is 0%. For the definition of bonus see section 4.4.1.
- The proportion of male employees in MVDC receiving a bonus³ was 0% and the proportion of female employees receiving a bonus was 0.9%.

Please note that the reporting requires calculations of the differences in mean/median hourly pay between women and men in proportion to the mean/median male hourly rate. This therefore means a positive figure illustrates a gender pay gap in favour of men (a negative figure thereby means women are more highly paid as a mean/median relative to men).

Pay quartiles by gender

Band	Males	Females	Description
A	40%	60%	Includes all employees whose standard hourly rate places them at or below the lower quartile
B	37.4%	62.6%	Includes all employees whose standard hourly rate places them above the lower quartile but at or below the median
C	37.1%	62.9%	Includes all employees whose standard hourly rate places them above the median but at or below the upper quartile
D	47.1%	52.9%	Includes all employees whose standard hourly rate places them above the upper quartile

In the table above depicting pay quartiles by gender, MVDC's workforce is divided into four equal-sized groups based on hourly pay rates, with Band A including the lowest-paid 25% of employees (the lower quartile) and Band D covering the highest-paid 25% (the upper quartile). In order for there to be no gender pay gap, there would need to be an equal ratio of men to women in each Band.

Within MVDC there are more women than men in Band A and this trend is marginally increasing compared to last year. In Band B the trend continues with women clearly the largest proportion (little change this year), and this trend continues further into Band C (very similar proportions especially as the trend is increasing with more women and less men being in this band now compared to last year).

In Band D the percentage of male employees is now 5.8% lower than the percentage of women. In the past year therefore more women have joined or progressed to senior higher paid roles in MVDC.

⁶ See section 4.4.1 for applicability of 'bonus' payments under our Pay Policy Statement. It is not a term that we would normally use given the very prescribed and limited circumstances in which it applies. This figure relates to 2 females receiving small recognition awards ('honorariums') paid to recognise when an individual has significantly exceeded their job requirements for a particular project/defined period (often reflecting situations where an employee has absorbed significant additional pressures - for example dealing with unexpected projects or covering more senior staff absence for a period. When compared to alternative options available payment of a small honorarium represents good value for money).

5.2 Equal Pay

Gender Pay Gap reporting is entirely separate from Equal Pay.

Under the law, men and women must receive equal pay for:

- the same or broadly similar work;
- work rated as equivalent under a job evaluation scheme; or
- work of equal value.

MVDC is committed to the principle of equal opportunities and equal treatment for all employees, regardless of sex, race, religion or belief, age, marriage or civil partnership, pregnancy/maternity, sexual orientation, gender reassignment or disability. It has a clear policy of paying employees equally for the same or equivalent work, regardless of their sex (or any other characteristic set out above). As such, it:

- provides equalities training for all staff, requiring new staff to complete within the first month of joining
- evaluates all new and revised posts according to our grading framework to ensure fair pay on the basis of job requirements, benchmarked across other similar posts
- provides a mechanism for an employee to request a pay review in the event that they believe they have evidence of disparity
- requires all managers to assess job roles on at least an annual basis through the Performance and Development Review (PDR)

5.3 How does MVDC's gender pay gap compare with that of other organisations?

The vast majority of organisations have a gender pay gap.

According to the latest available data from the Office of National Statistics⁷ the headline median gender pay gap across the whole economy in April 2020 was 7.4% and 11.2% in the public sector. This data excludes overtime.

Due to Covid the requirement to submit and report gender pay gap data was suspended in 2020. Some organisations, including MVDC, continued to report however there are gaps in the available data to benchmark against.

According to the latest available figures reported by the Local Government Association in April 2019 (therefore relating 2018/19)

- The mean gender pay gap in local government was 6.1% ranging from -18% (women paid 18% more than men) to 23.9% (women paid 23.9% less than men)
- The median gap in local government was 4% (ranging from -50% to 32.7%)

Currently available data pertaining to neighbouring local government organisations at the time of writing demonstrates a wide range of Gender Pay Gaps – including those significantly higher than the gap for Mole Valley to negative statistics (demonstrating the hourly rate of pay for women, on average, is higher than for men).

⁷ This data is derived from the Annual Survey of Hours and Earnings 2020 and is therefore provisional – relating to November 2020

The figures being reported by MVDC this year demonstrate a smaller gap than the whole economy gap and public sector figures reported through the ONS as well as the most recently available local government averages in relation to both the mean and the median.

The root cause of gender pay gaps is very complex as there are many reasons why there are often more senior men than women in the workplace.

Where authorities have large numbers of males within the lower pay quartiles it is more likely that the result will be a Gender Pay Gap in favour of men. Authorities with a large direct labour force for manual workers (e.g. refuse collectors) therefore have a greater chance of being in this position. (Upper tier authorities providing care services may find a large female gender pay gap). As Mole Valley District Council has outsourced its waste collection service it does not have a large manual labour workforce.

There is an increasing expectation on employers to offer flexibility so far as possible in order to accommodate different working patterns. This benefits all staff with caring responsibilities including men and therefore has the capacity to positively influence staff retention and size and quality of applicant pools when seeking to recruit.

To enhance recruitment and retention the Council has developed an Organisational Development Strategy. Enhancing our flexible work offering is one of five priority areas within the Strategy which will have been thoroughly road tested during the pandemic, however it will continue to be explored in order to ensure all demographics have sufficient and fair access to employment.