EQUALITY IMPACT ASSESSMENT (EIA) ON PROPOSED REFORMS TO THE USS INTRODUCTION

a) What is the workforce profile in relation to employees' declarations on being covered by one or more of the nine protected characteristics; race, disability, age, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion and belief, sexual orientation and gender according to scheme membership? (Report as individuals irrespective of hours worked, including fixed term contract staff employed at the time of the Assessment).

		Final Salary/CRB	Disabled	BME	Male	Female	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Religion and belief	Sexual orientation	Average Age (all staff average 44 yrs)
1. USS Members		Final Salary section	88	131	1238	1106	-	1533	30	219	54	46 yrs
		CRB section	27	153	567	616	-	533	13	200	33	36 yrs
2. USS eligible members (those not currently in the scheme but who are eligible to join or rejoin)		Final Salary section	8	12	121	117	-	84	<5	16	<5	43 yrs (average for all USS
	. ,	CRB section	5	50	137	167	-	116	<5	39	11	eligible members)
3. Other	LGPS		<5	<5	6	11	-	13	<5	<5	<5	51 yrs
scheme	TPS											
members	SAT											
	SAUL											
	NHSPS		<5	10	49	62	-	43	9	19	<5	42 yrs
	Other e.g.	UGPS	64	51	614	996	-	891	17	180	24	47 yrs
	NEST,	NEST	13	35	149	365	-	157	<5	111	16	38 yrs
	GPP(please	MRC Pens	6	6	27	65	-	54	<5	9	<5	46 yrs
	specify)	STSS	<5	<5	<5	7	-	7	<5	<5	<5	57 yrs
4. Non sch members	eme		12	28	171	376	-	187	<5	60	7	42 yrs

b) Gaps in data

Institutions to identify any gaps in the data and the possible reasons for the gaps.

For example: The above data excludes hourly paid staff due to high turnover. There is also insufficient disclosure on staff records to provide meaningful data on x and x (insert relevant protected characteristics).

The University of Glasgow received no clarification on the categories, and therefore the following interpretations have been made:

- 1. BME = Black Minority Ethnic in the instance the University has group all non-White ethnicities into this category, including those who identified as 'Mixed' or 'Other'. All staff who have not disclosed either stating information refused or prefer not to say have been excluded.
- 2. Gender reassignment the University does not currently collect data on staff who have gone through gender reassignment, and therefore cannot respond in this category.
- 3. Religion and belief the University has grouped together all staff who identified as having any faith (Christian [any denomination], Muslim, Jewish, Spiritual etc.), in comparison to staff who have identified as having no religion, or not responded to the question.
- 4. Sexual orientation the University has grouped together staff who identify as Lesbian/Gay Woman, Gay Man, Bisexual and Other. This is in comparison to staff who have identified as heterosexual, or not responded to the question.
- 5. Age we have considered the average age of the relevant populations.

In the document, the University makes reference to the 'University average' – this is the proportion of that protected characteristic recorded on the HR Core System. The University annually reports these figures inline with legislative requirements. This information is available here - http://www.gla.ac.uk/services/humanresources/equalitydiversity/monitoring/latest/

The University has presumed the sections entitled 'anticipated impact of proposed reform on existing non-USS members' relates only to those who are eligible, but not members of USS.

Form for full Equality Impact Assessment of changes to the USS

Name of person completing this form:	Mhairi Taylor
Job title:	Equality and Diversity Manager
Department:	Equality and Diversity Unit, Human Resources
Telephone number:	0141 330 4714
Email address:	Mhairi.taylor@glasgow.ac.uk

STEP 1 The proposed revisions to the USS are as follows:

Blended employer contribution payable on total salary	18%
1. DB section on salaries up to £55,000	
Salary link for past service	Increased annually by CPI (capped* in relation to post October 2011 service)
Future benefit design	CRB
Pension accrual rate	1/75ths
Lump sum accrual rate	3/75ths

£55,000
Annually by CPI (capped*)
Annually by CPI (capped*)
8% on salary up to £55,000 salary threshold
8% on salary above the salary threshold of £55,000
12% of salary above the salary threshold of £55,000
nparable with current provision in the CRB section of USS.
threshold

Additional information required

For example:

Comparability data for the proposed changes to the USS from the other pension schemes to which employees of the institution belong. The data should cover all 10 areas of proposed change and the elements set out below are by way of example.

Propos	sed Reform	STSS	LGPS	SAT - UGPS	NHSSS	NEST
1.	Final salary accrual would cease at 31/03/2016	Final salary accrual ceased 31/03/2015	Final salary accrual ceased 31/03/2015	Final salary accrual continues	Final salary accrual ceased 31/03/2015	N/A - DC scheme
2.	Members would build up future defined benefits in CRB section on an accrual rate of 1/75 th with tax free cash sum of 3/75ths	CRB accrual rate of 1/57th	CRB accrual rate of 1/49th	Final salary accrual of 1/80 th with tax free cash sum of 3/80ths	CRB accrual rate of 1/49th	N/A - DC scheme
3.	Benefits in CRB section would be increased annually in line with CPI on a capped basis	CPI plus 1.6%	CPI	N/A - Final salary accrual	CPI plus 1.5%	N/A - DC scheme
4.	Benefits in CRB section would be based on first £55K of pensionable salary (actual pay)	CRB accrual on all pensionable salary	CRB accrual on all pensionable salary	Final salary accrual on all pensionable salary	CRB accrual on all pensionable salary	All pensionable salary is pensioned on DC basis
5.	Salary threshold would increase each year in line with CPI (capped)	N/A - No salary threshold	N/A - No salary threshold	N/A - No salary threshold	N/A - No salary threshold	N/A - No salary threshold
	threshold would be pensioned through new DC section - employer contribution would be 12%	N/A - No salary threshold	N/A - No salary threshold	N/A - No salary threshold	N/A - No salary threshold	N/A - No salary threshold
	Employee contributions would increase to 8%	7.2% - 11.9% depending on earnings level	5.5% - 11.2% for different earnings levels	7.5%	5.2% - 14.7% depending on earnings levels	4%
8.	All members would be able to pay additional 1% of salary to DC pot	Members can pay additional	Members can pay additional	Members can pay additional	Members can pay additional	Members can pay additional

This institution has employees in the following schemes:

which would be matched by employer	contributions but no employer matching	contributions but no employer matching	contributions but no employer matching	contributions but no employer matching	contributions but no employer matching
9. Benefits in DIS and IHER would remain comparable with current provision in CRB section	Comparable DIS and IHER benefits	Comparable DIS and IHER benefits	Comparable DIS and IHER benefits but on final salary basis	Comparable DIS and IHER benefits	N/A - DC scheme
10. Employers would pay 18% of payroll	14.9%	24.5%	19.5%	14.9%	10%

STEP 2 Analysis of the proposed reforms to the USS

Having regard to the duty to promote equality and eliminate discrimination, do the proposed reforms to the USS minimise unfairness? Do they have a disproportionate negative effect on people with one or more of the nine protected characteristics?

In completing the impact assessment using this form, if it is anticipated that the proposed reform will have a negative impact on one or more of the protected groups, note the likely impact including whether there is direct or indirect discrimination and whether such discrimination can be justified, identify the range of options to address it in order to meet the general equality duties, identify the effect of each option, the preferred option and the reasons for preferring it. Possible options include feeding back to the USS on the basis of the impact that the reforms have at this institution that:

- (i) there should be no change to the proposed reform;
- (ii) the proposed reform should be adjusted in a particular way;
- (iii) that it should continue with the proposed reform; or
- (iv) that it should abandon the proposed reform.

Any options chosen must be informed by the evidence available. Evidence may need to be supplemented by consultation, where appropriate, with affected groups. Sufficient evidence will be required to allow conclusions to be drawn. If the evidence is insufficient, consultation with affected groups is likely to be necessary. Institutions must retain a record of evidence relied upon.

Final salary accruals would cease as at 31 March 2016. Benefits built up before this date would be protected. Their value would be calculated using the existing definition of pensionable salary and service as at 31 March 2016 and from that date accrued benefits would be increased annually in line with CPI, rather than increases in final salary, (capped in relation to post October 2011 service).

	Ar	ticipated impact of proposed reform on existing USS members	
	Positive	Negative	Neutral
Race		X – over 8% of staff identify as BME – this is higher than the University average of	
		6.4%. It is marginal – but should be noted.	
Disability			X
Gender			X
Age			X
Gender reassignment			
Marriage and civil			X
partnership			
Pregnancy and			X
maternity			
Religion and belief			X
Sexual orientation		X – 2.5% of staff have identified as LGB, this compares to a University average of	
		1.7%. The numbers are too small to be significant, but it should be noted.	
If it is anticipated that the p	roposed refo	orm will have a negative impact on one or more of the protected groups:	
 Likely impact: Nega 	ative for BMI	E and LGB – see details above.	
 Range of options for 	or addressin	g anticipated negative impact:	
 Preferred option for 	r addressing	likely negative effect:	
Reason for preferri			
•	0 1		
	Antie	cipated impact of proposed reform on existing non-USS members	
	Positive	Negative	Neutral
Race		11% of BME staff are eligible to be part of USS, but are not members. This	
		is higher than the University average.	
Disability			Х
Gender			Х

Age		Х
Gender reassignment		
Marriage and civil partnership		X
Pregnancy and maternity		X
Religion and belief		X
Sexual orientation	X – 2.2% of LGB staff are eligible to be part of USS, but are not member	ers.
	The numbers are very small however, so this is insignificant.	
If it is anticipated that the propos	sed reform will have a negative impact on one or more of the protected groups:	
Likely impact: Negative	for BME and LGB – see details above.	
Range of options for ad	dressing anticipated negative impact:	
o 1	ressing likely pagative offect	

- Preferred option for addressing likely negative effect: Reason for preferring this option

All members would build up future defined benefits in the Career Revalued Benefits (CRB) section based on an accrual rate of 1/75th of actual pensionable salary. The right to a tax free cash sum of 3 times pension (3/75^{ths}) will also be increased in line with the higher accrual rate. This is higher than the current CRB accrual rate of 1/80th.

Anticipated impact of proposed reform on USS members						
	Positive	Negative	Neutral			
Race	Х					
Disability	Х					
Gender	Х					
Age	Х					
Gender reassignment						
Marriage and civil partnership	Х					
Pregnancy and maternity	Х					
Religion and belief	Х					
Sexual orientation	Х					

Likely impact: Positive on all groups as this section will move from 1/80" to 1/75".

Range of options for addressing anticipated negative impact: ٠

- Preferred option for addressing likely negative effect: ٠
- Reason for preferring this option •

Anticipated impact of proposed reform on non-USS members						
	Positive	Negative	Neutral			
Race			X			
Disability			X			
Age			X			
Gender reassignment						
Marriage and civil partnership			X			
Pregnancy and maternity			X			
Religion and belief			X			

Sexual orientation	X
Sender	X
 it is anticipated that the proposed reform will have a negative impact on one Likely impact: Neutral 	e or more of the protected groups:
Range of options for addressing anticipated negative impact:	
 Preferred option for addressing likely negative effect: 	
 Reason for preferring this option 	

Benefits in the CRB section would be increased annually in line with CPI on a capped basis.

	Anticipated impa	ict of proposed reform on USS	members
	Positive	Negative	Neutral
Race			X
Disability			X
Age			X
Gender reassignment			
Pregnancy and maternity			X
Religion and belief			X
Sexual orientation			X
Marriage and civil			X
partnership			
Gender			X
• .	-	ot:	
		of proposed reform on non-US	
	Positive	Negative	Neutral
Race			X
Disability			Χ
Age			Χ
Gender reassignment			
Marriage and civil partnershi	p		Χ
Pregnancy and maternity			X
Religion and belief			Χ
Sexual orientation			X

Gender			X
If it is anticipated that the propos	sed reform will have a	negative impact on one or m	nore of the protected groups:
 Likely impact: Neutral 			
 Range of options for add 	dressing anticipated ne	egative impact:	
 Preferred option for add 	ressing likely negative	effect:	
 Reason for preferring th 	is option		

Benefits in the CRB section would be based on the first £55,000 of the member's pensionable salary, based on their actual pay, not the full time equivalent. Therefore for members earning up to £55,000 their total salary would be pensioned through the CRB scheme. However, all members would receive this core benefit up to and including the salary threshold of £55,000.

	Anticipated in	npact of proposed reform on USS members	
	Positive	Negative	Neutral
Race			X
Disability			X
Age		X – older workers are disproportionately impacted (average age those earning >£55K = 50yrs)	
Gender reassignment			
Pregnancy and maternity			X
Religion and belief			X
Sexual orientation			X
Marriage and civil			X
partnership			
Gender		X – Men are disproportionately impacted by this change to USS, as 70% of those who ear over £55K are male.	
Likely impact: NegativeRange of options for ac	for older workers and me Idressing anticipated neg dressing likely negative e	ative impact:	
	Anticipated imp	act of proposed reform on non-USS members	
	Positive	Negative	Neutral
Race			X
Disability			X

X
X
X
X
X
X
ative impact on one or more of the protected groups:
Ũ

- Preferred option for addressing likely negative effect:
- Reason for preferring this option

The salary threshold would increase each year in line with CPI (capped) (subject to the outcome of a review to be completed by the USS Joint Negotiating Committee by 31 March 2020).

	Anticipated in	npact of proposed reform on USS members	
	Positive	Negative	Neutral
Race			X
Disability			X
Age		X – older workers are disproportionately impacted (average age those earning >£55K = 50yrs)	X
Gender reassignment			
Pregnancy and maternity			X
Religion and belief			X
Sexual orientation			X
Marriage and civil partnership			X
Gender		X – Men are disproportionately impacted by this change to USS, as 70% of those who ear over £55K are male.	
Likely impact: NegatRange of options for	addressing likely negative e	•	
	Anticipated impa	act of proposed reform on non-USS members	
	Positive	Negative	Neutral
Race			X
Disability			X
Age			X

Gender reassignment	
Pregnancy and maternity	Х
Religion and belief	Х
Sexual orientation	Х
Marriage and civil partnership	X
Gender	Х
If it is anticipated that the proposed reform will have a n	egative impact on one or more of the protected groups:

- Likely impact: Neutral ٠
- Range of options for addressing anticipated negative impact:
 Preferred option for addressing likely negative effect:
 Reason for preferring this option

If the member earns more than £55,000 they would still build up CRB benefits on their salary up to the salary threshold of £55,000, but any pensionable salary over this threshold would instead be pensioned through a new Defined Contribution (DC) section of the scheme. Employers would pay a contribution of 12% of pensionable salary over the threshold into the DC section.

	Antici	pated impact of propo	osed reform on USS men	nbers	
	Positive	Negative		Neutral	
Race				X	
Disability				X	
Age			X – older workers are disproportionately impacted (average age those earning >£55K = 50yrs)		
Gender reassignment					
Pregnancy and maternity				X	
Religion and belief				X	
Sexual orientation				X	
Marriage and civil partnership				X	
Gender			X – Men are disproportionately impacted by this change to USS, as 70% of those who earn over £55K are male.		
If it is anticipated that the propo	sed reform will h	ave a negative impact	on one or more of the prot	ected groups:	
 Likely impact: Negative Range of options for ad Preferred option for ado Reason for preferring the 	dressing anticipa Iressing likely ne	ated negative impact:	ore likely to earn over £55ł	<	
	Anticipa	ted impact of propose	ed reform on non-USS m	embers	
	Positive		Negative	Neutral	
Race				X	
Disability				Х	
Age				X	
Gender reassignment					
Pregnancy and maternity				Х	

Religion and belief		Х
Sexual orientation		Х
Marriage and civil		X
partnership		
Gender		Х
Likely impact: NeutralRange of options for ad	sed reform will have a negative impact on or dressing anticipated negative impact: ressing likely negative effect: is option	e or more of the protected groups:

Employee contributions would increase to 8% of pensionable salary. If the member earns over the £55,000 salary threshold then their contribution of 8% of their pensionable salary over the threshold will be paid into their DC pot, in addition to the employer's 12% contribution.

	Anticipated impa	ct of proposed reform on USS mem	Ibers
	Positive	Negative	Neutral
Race			X
Disability			X
Age			X
Gender reassignment			
Pregnancy and maternity			X
Religion and belief			X
Sexual orientation			X
Marriage and civil			X
partnership			
Gender			X
	ddressing anticipated negative ddressing likely negative effec this option		
		of proposed reform on non-USS me	
	Positive	Negative	Neutral
Race			
			X
Disability			X X
Age			X
Age Gender reassignment			X X X X
Age Gender reassignment Pregnancy and maternity			X X X X X
Age Gender reassignment			X X X X

Marriage and civil partnership			X
Gender			X
e .	dressing anticipated negati	ive impact:	re of the protected groups:

All members would have the opportunity to choose to pay in an additional 1% of pensionable salary into their personal DC pot, which would be matched by their employer to build up an additional flexible DC fund. This option would be available to those members earning below the £55,000 salary threshold as well as those earning over this amount.

	Anticipated im	pact of proposed reform on USS mem	bers
	Positive	Negative	Neutral
Race			Х
Disability			Х
Age			Х
Gender reassignment			
Pregnancy and maternity			X
Religion and belief			X
Sexual orientation			X
Marriage and civil partnership			X
Gender			X
 Preferred option for a Reason for preferring 	•		
		ct of proposed reform on non-USS me	
	Positive	Negative	Neutral
Race			X
Disability			X
Age			X
Gender reassignment			
Pregnancy and maternity			X
Religion and belief			X
Sexual orientation			X

Marriage and civil partnership		X
Gender		X
Likely impact: NeutralRange of options for ad	sed reform will have a negative imp dressing anticipated negative impa ressing likely negative effect: is option	protected groups:

Marriage and civil

Benefits on death in service and on ill health would remain comparable with current provision in the CRB section of USS.

	Anticipated in	npact of proposed reform on USS mem	bers
	Positive	Negative	Neutral
Race			X
Disability			X
Age			X
Gender reassignment			
Pregnancy and maternity			X
Religion and belief			X
Sexual orientation			X
Marriage and civil partnership			X
Gender			X
•	-	ffect:	
		act of proposed reform on non-USS me	
Page	Positive	Negative	Neutral
Race			X
Disability			X
Age			X
Gender reassignment			
Pregnancy and maternity			X
Religion and belief			X
Sexual orientation			X

Х

partnership			
Gender			X
If it is anticipated that the Likely impact: N		a negative impact on one or more of	the protected groups:
· ·	s for addressing anticipated i	negative impact:	
•	n for addressing likely negativ	e effect:	
 Reason for pref 	erring this option		

Employers would commit to pay contributions of no less than 18% of payroll for the next two valuations. This extends the increased employer contribution rate until the 2020 valuation (i.e. until 31 March 2020). 18% is a blended rate payable by all employers and includes the contributions to the DB and DC sections of the scheme. If the USS funding position as assessed at triennial valuations were to improve, over and above the improvements in funding assumed in the deficit recovery plan, employers would commit to using this to improve member benefits.

	Anticipated in	pact of proposed reform on USS mem	bers
	Positive	Negative	Neutral
Race			X
Disability			X
Age			X
Gender reassignment			
Pregnancy and maternity			X
Religion and belief			X
Sexual orientation			X
Marriage and civil			X
partnership			
Gender			X
If it is anticipated that the propo • Likely impact: Neutral	sed reform will have a ne	gative impact on one or more of the prote	ected groups:
	dressing anticipated neg fressing likely negative ef		
Reason for preferring tr			
	Anticipated impa	act of proposed reform on non-USS me	embers
	Positive	Negative	Neutral
Race			X
Disability			X
Age			X
Gender reassignment			

Pregnancy and maternity	X
Religion and belief	X
Sexual orientation	X
Marriage and civil	X
partnership	
Gender	X
If it is anticipated that the proposed reform will have a negative impa	ct on one or more of the protected groups:

- Likely impact: Neutral •
- Range of options for addressing anticipated negative impact:
 Preferred option for addressing likely negative effect:
 Reason for preferring this option

STEP 3

Could the impact identified in Step 2 above be minimised or removed or equality be promoted in some other way?

Group	Action required
Age	The average age for workers who earn over £55K is 50 years of age as compared with the overall staff average age of 44 years of age. On average older workers may be disproportionately impacted by the changes. The University will aid understanding of the impact of this and other tax changes on this group by offering workshop sessions to this cohort of staff on the implications of these changes to the pension.
BME	This process has identified that a higher percentage of BME staff do not participate in USS, than are eligible. The reason for this are unknown, however the University should consider how to promote this benefit to this group of staff.
Disabled	
Male	Male staff who earn over £55K are disproportionately impacted by the changes. The University will aid understanding of the impact of this and other tax changes on this group by offering workshop sessions to this cohort of staff (male and female) on the implications of these changes to the pension.
Female	
Gender	
reassignment	
Marriage and	
civil partnership	
Pregnancy and maternity	
Religion and belief	
Sexual orientation	A higher percentage of LGB staff are both within the USS scheme, and eligible to join the scheme than the University average. However as the numbers are very small, no action is suggested.

STEP 4

How will the reforms to the USS be monitored in the future and by whom? (consider a five-yearly review of membership demographics and a repeat of the EIA?)

The demographics for the USS scheme can be reviewed in a cyclical manner – this will be agreed internally. This would be managed between Pay and Pensions and HR.

March 2015