

# Gender Pay Report 2022



# Office for Nuclear Regulation Gender Pay Report 2022

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### **Foreword**

At ONR, we recognise the value of a diverse workforce, particularly when it comes to creative problem solving and informed decision-making. We are actively continuing to develop policies and practices that will enable an equitable and inclusive working culture. 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 capability as a regulator.

Creating an inclusive workplace is the focus of our People Strategy 2020–25 and we have a strong governance structure in place to help support the delivery and outcomes of our diversity and inclusion work. Gender balance is a key area of the strategy, continuing our commitment to achieving gender balance and addressing the under-representation of women in ONR in both technical and senior roles.

We recognise that women have historically been under-represented in the UK nuclear sector. Progress is being made: currently 35% of our employees are women, and we are pleased to see an increase in women in ONR senior management positions. We have also seen initial success with our Nuclear Engineering Degree Apprentice routes into ONR. However, we continue to face challenges as a sector, as many of our higher paid technical roles require a background in STEM (science, technology, engineering

and maths) and so are affected by the low proportion of women studying these subjects. It will take time for our current initiatives to translate into career progression into higher paying positions, meaning that their impact on the gender pay gap will only be seen in the longer term.

We are passionate about enabling a culture that is rewarding and engaging for all our employees and we are committed to creating a diverse and inclusive place to work, where our employees can fully be themselves, feel respected and included, and perform at their best. We recognise that we continue to have a gender pay gap and there remains more to be done to improve this. We are delivering several initiatives to support women in the workplace and increase our gender diversity. We believe that over time these initiatives will contribute to the continuing erosion of the gender pay gap.

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 inclusion. We remain fully committed, at all levels of ONR, to building a workforce reflective of the society we operate in and reporting on our progress. To emphasise this, we have a strategic theme to create a culture of inclusion and excellence. Recognising and rewarding all our employees' contributions is an important element of this work.

This report highlights the degree of challenge we face, but we are unwavering in our determination to meet those challenges.

Dave Caton, HR Director

### Introduction

This is ONR's sixth Gender Pay Report. It is based on a snapshot of the pay of all ONR employees as of 31 March 2022, as well as annual payments and bonuses paid between 1 April 2021 and 31 March 2022.

This 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 2020–25 and ONR's organisational values (fair, open-minded, supportive, accountable). We are committed to our aim of making ONR a great place to work as is 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 continue 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 on our progress and the sector-specific influences to put our current gender pay gap into context.

## When and how do we have to publish the information?

We are publishing ONR's 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 gov.uk Gender pay gap service.

### What do we have to report?

The legislation requires ONR to report against the following six prescribed organisation-wide gender pay gap indicators for 2021/22.

Moan aan	The difference between the mean* hourly rate of pay of men and women	27.1% (25.3%)
Mean gap	* Average pay for all men and average pay for all women	Difference in hourly rate of men £40.12 (£40.59) and women £29.25 (£30.31)
Modieus geus	The difference between the median* hourly rate of pay of men and women	40.26% (36.59%)
Median gap	* Middle value of pay for all men and middle value of pay for all women	Difference in hourly rate of men £43.89 (£41.92) and women £26.22 (£26.58)
Manus banasa nam	The difference between the mean* bonus paid to men and women	-1.9% (-6.0%)
Mean bonus gap	* Average bonus for all men and average bonus for all women	Difference in bonus pay of men £281.66 (£1,233.33) and women £287.10 (£1,306.85)
	The difference between the median* bonus pay paid to men and women	0% (7.7%)
Median bonus gap	* Middle values of bonuses paid to all men compared to all women	Difference in bonus payment of men £250.00 (£1,300.00) and women £250.00 (£1,200.00)
Bonus proportions	The proportions of men paid a bonus and women paid a bonus	93.8% (29.7%) of men and 91.9% (33.5%) of women received a bonus payment

2020/21 figures provided in brackets for comparison.

### Overall results

Our overall mean gender pay gap increased slightly (by 1.8%) this year to 27.1%. We are determined to redouble our efforts and to focus on the right activities to deliver change. As an organisation we are committed to implementing actions that will improve gender diversity at all levels, and with that reduce our gender pay gap. We have made progress since we first reported in 2017 and we will see the benefit as our talent pipeline increases in future years, but we clearly have more to do.

We know that, although our gender pay gap remains significant, it is largely due to the gender and demographic mix of our workforce and the historical legacy of the industry from which we draw. A lower proportion of women work in STEM fields, and this is especially pronounced in the nuclear sector, where 23% of the UK-based workforce is female. While we continue to attract, retain and develop our female employees, with a focus on our graduate and apprenticeship schemes, we understand that in the short term this disparity will continue to contribute to our gender pay gap. However, progress is being made: currently 35% of our employees are women, moving us closer to the target set jointly by industry and government in the Nuclear Sector Deal (2018) of 40% women in the industry by 2030. We are also pleased to see an increase in women in senior management positions. Through our strategy and action plan we will continue to drive progress.

Encouraging and increasing gender diversity through our recruitment and talent acquisition processes is a priority for ONR, with the goal of reducing and ultimately closing the gender pay gap. One of our main aims is to inspire and attract a diverse range of individuals and increase the number of people recruited into ONR from under-represented groups, specifically women, people from ethnic minority backgrounds, members of the LGBTQ+ community and people with disabilities. We have embedded fairness and inclusion principles into the advertising, selection and progression processes for all roles.

While we have made improvements in the diversity of our recruitment that have led to 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 initiatives and targeted our activities to ensure we promote opportunities for female students to explore maths and science throughout primary and secondary school and encourage them to pursue career paths in STEM.

We want everyone in ONR to feel they belong and aim to do this by developing a truly inclusive culture, making our colleagues feel valued, respected and supported through shared knowledge and understanding. To drive ongoing cultural change across our organisation and the nuclear industry more widely, we have introduced a Reverse Mentoring for Inclusivity programme. It has provided

the opportunity for senior leaders to hear first-hand about lived experiences, particularly where individuals have been impacted by discrimination or exclusion, bringing a new perspective to decision-making on key issues. Participants in the pilot programme felt it brought tangible benefits by allowing different perspectives to be taken into consideration. We are pleased to see this success translate into a second cohort of mentors taking part this year.

### 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 2022.

ONR 2021/22 employees by gender and grade	Band 6	Band 5	Band 4	Band 3	Band 2	Band 1	SCS 1	SCS 2	Non-Executives	Total
Female	36	40	34	66	43	11	2	1	3	236
Male	23	20	23	169	162	28	7	1	3	436
Total	59	60	57	235	205	39	9	2	6	672
% female	61.0%	66.7%	59.6%	28.1%	21.0%	28.2%	22.2%	50.0%	50.0%	35.1%

Further breakdown of the ONR data for 2021/22 shows that the gender pay gap is far less pronounced across specific peer groups (grading level and specialism).

Overall, ONR employs 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 grades (Bands 1–3).

While women strongly predominate in the lower grades (Bands 4–6), we are pleased to highlight that there are equal numbers of women and men in the most senior grades (SCS 2 and Non-Executives).

**Table 2:** ONR 2021/22 mean gender pay gap at each grading level.

ONR 2021/22 mean gender pay gap calculation	Band 6	Band 5	Band 4	Band 3	Band 2	Band 1	SCS 1	ONR
Hourly pay rates of men divided by number of men (A)	£12.95	£17.19	£21.59	£38.03	£48.05	£53.52	£57.10	£40.12
Hourly pay rates of women divided by number of women (B)	£14.07	£17.80	£21.19	£34.59	£42.32	£44.09	£51.64	£29.25
Formula (A-B)/A x 100	-8.7%	-3.6%	+1.9%	+9.0%	+11.9%	+17.6%	+9.6%	+27.1%

Note: columns showing results for SCS 2 and Non-Executives have been excluded due to identifiable data. The data is included in the ONR total results.

We have seen a small widening of our mean gender pay gap, which has increased by 1.8% to 27.1%. 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 are confident that our current gender pay gap does not reflect an equal pay issue. The legacy of historic structural factors continues to be a contributory factor that can only be fully addressed in the longer term. ONR remains committed to improving our diversity at all levels and, as an inclusive employer, to address the issues highlighted through our gender pay analysis.

We are pleased that we are starting to see positive results in terms of female recruitment and career progression within ONR. We have seen an increase of 22% in the number of women securing roles at the more senior Band 1 level. Similarly, we have seen an increase of 16% in female employees at the Band 2 level and a resulting decrease of 3% at Band 3 level. The consequence of this is more female representation at a more senior level. However, as all employees start at the lower end of the pay scale for their respective bands, this has initially broadened the pay gap for Bands 1-3 by 3.4% from 35.2% (2021) to 38.6% (2022), as longer serving male colleagues are currently further along the same pay scale. This should be resolved in the long term as more women progress up the pay scale.

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

**Table 3:** ONR 2021/22 median gender pay gap at each grading level.

ONR 2021/2022 median hourly rate	Band 6	Band 5	Band 4	Band 3	Band 2	Band 1	SCS 1	ONR
Median hourly rate of men (A)	£13.54	£17.59	£20.87	£41.08	£51.01	£55.09	£59.27	£43.89
Median hourly rate of women (B)	£13.98	£18.21	£20.37	£33.54	£48.13	£41.36	£51.64	£26.22
Formula (A - B) / (A) x 100	-3.3%	-3.5%	+2.4%	+18.4%	+5.7%	+24.9%	+12.9%	+40.3%

Note: columns showing results for SCS 2 and Non-Executives have been excluded due to identifiable data. The data is included in the ONR total results.

The overall median gender pay gap remains significant at 40.26%. The gap at the higher grades reflects the greater distribution of men in technical roles towards the top of the pay scales, which attract a premium rate of pay, as is the case across this sector. Progress towards narrowing the gap has been made through competency-based pay progression, which enables colleagues at the lower end of the pay scale to be recognised for their attainment.

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 2022.

% of organisation	15%	23%	50%	12%	100%
Total	100	152	336	78	666
SCS2	0	1	1	0	2
SCS1	3	1	4	1	9
Band 1	3	7	28	2	40
Band 2	17	19	144	24	204
Band 3	23	23	147	43	236
Band 4	10	26	12	8	56
Band 5	20	40	0	0	60
Band 6	24	35	0	0	59
ONR 2021/22 employees by gender, specialism and grade	Support roles (men)	Support roles (women)	Technical specialists (men)	Technical specialists (women)	Total

Addressing this gender imbalance for technical specialist roles is the key to making a substantial change to the gender pay gap. Currently, the number of women remains at 20% or less across all technical specialisms. As part of a longer-term strategy, we will continue our outreach activities to ensure we promote opportunities for female students to explore maths and science throughout primary and secondary school and encourage them to pursue career paths in STEM. We are also working to broaden the career routes into our sector with initiatives such as our Nuclear Degree Apprenticeship programme, which is already having an impact.

Conversely, the representation of female colleagues within support roles is higher than 20% across all individual levels, with an overall average of 60%. This is indicative of having a more gender-balanced talent pool to recruit from.

In 2019, the Global Institute for Women's Leadership <u>led research into barriers to women's progression in the workplace</u>, which indicated that many unpaid caring responsibilities still fall on women and often conflict with the expectations of senior roles, such as constant availability and excess workloads. The COVID-19 pandemic, along with significant investment in improved technology, has provided ONR with the opportunity to consider how we can reduce these barriers through New Ways of Working and better promote greater flexibility in terms of where and when people work, while considering their health and wellbeing. This enables ONR to become a more attractive employer to a broader talent pool of potential applicants who would benefit from the range of flexible options available, thereby helping us become more inclusive by opening new and diverse recruitment channels.

**Table 5:** ONR new starters over last three years by specialism.

New starters	2019/20		2020/21		2021/22	
New Statters	Men	Women	Men	Women	Men	Women
Technical specialists	15	10	10	3	16	4
% female technical specialists		40%		23%		20%
Support roles	6	15	4	2	16	13
% female support roles		71%		33%		45%

Since we first reported on our gender pay gap in 2017, we have continued to explore and enhance new recruitment pipelines to attract a broader range of candidates, including more women, into our technical specialist roles. The results to date have been mixed. The **Department of Education's research (2019)** has shown a 26% increase in the number of girls taking STEM A-Levels since 2010, but 15-year-old boys are still more likely than girls to see STEM subjects as useful for getting a job and girls are less likely to consider a STEM subject as their favourite.

The sector's strategy to unlock the female talent pipeline in the longer term, encouraging female students to explore maths and science throughout primary and secondary school and ultimately pursue career paths in STEM, will take time to translate into tangible results. However, broadening the routes into our technical roles with the introduction of Nuclear Degree Apprenticeships has proved to be a positive step. Similarly, the introduction of our New Ways of Working initiatives offers increased flexibility to support a better work-life balance and improved wellbeing for all colleagues, regardless of gender. We believe that opening access to more flexible working arrangements is another key step to ONR attracting and retaining female employees and improving gender equality.

In terms of ONR's support roles, female representation within our workforce is considerably higher at 44.8% (2021/22). The talent pool for these roles is wider and less impacted by requirements for STEM qualifications and experience, and therefore is more reflective of the female population.

**Table 6:** ONR 2021/22 mean gender pay gap by specialism.

ONR 2021/22 mean gender pay gap by specialism	Band 6	Band 5	Band 4	Band 3	Band 2	Band 1	SCS 1	ONR
Technical specialist roles								
Hourly pay rates of men divided by number of men (A)	-	-	£23.78	£40.10	£56.46	£52.76	£60.60	£326.92
Hourly pay rates of women divided by number of women (B)	-	-	£22.70	£39.37	£47.81	£55.71	£60.18	£225.77
Formula (A-B)/A x 100	-	-	+4.5%	+1.8%	+15.3%	-5.6%	+0.7%	+30.9%
Support roles								
Support roles  Hourly pay rates of men divided by number of men (A)	£12.97	£17.19	£21.13	£23.88	£34.15	£36.99	£52.43	£198.75
Hourly pay rates of men divided	£12.97	£17.19 £17.80	£21.13	£23.88 £24.93	£34.15 £31.68	£36.99	£52.43 £43.10	£198.75

Note: columns showing results for SCS 2 and Non-Executives have been excluded due to identifiable data. The data is included in the ONR total results.

When we compare ONR's gender-related pay data by band, technical specialism or corporate function, the differential between these is minimal, which indicates equality of pay between gender.

### What else do we need to do?

Our priority in responding to the ongoing COVID-19 pandemic was to significantly support colleagues 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 ONR necessarily draws most of its 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 colleague-led network to promote gender equality in ONR. The gender equality network is a member-led, independent network that informs, supports, challenges and works alongside the Diversity and Inclusion Group (DIG) and Trade Unions. It has been established to support colleagues 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 lived experiences of, and the barriers faced by, people from different backgrounds. It has provided opportunities for colleagues from under-represented groups associated with 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 decision-making and contribute towards establishing a more equitable and inclusive ONR in the longer term.

# What are we doing to close the gender pay gap?

A diverse workforce that is more representative of society, on behalf of which we hold the nuclear industry to account, is key to achieving our strategic aims and being a world class regulator. We are confident that we have put steps in place to continue the longer-term positive trajectory showing the impact of our outreach, recruitment, training and development programmes and wider D&I initiatives.

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. Our aim going forward is to draw more women into technical specialist and more senior roles. This will largely be done

by continuing to support recruitment pipelines that 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 are committed in our strategies and plans to improve our diversity at all levels. Addressing these diversity issues will impact directly on addressing the issues highlighted in our gender pay analysis. Some of the work we have done 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 women into higher paid roles. Our recruitment strategy aims to achieve this through the following activities:

- **Promoting ONR to others** 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 video clips for our website which feature female role models, including those in senior leadership roles.
- Changing perceptions of the nuclear industry the sector has been historically male-dominated, so we are working to provide a platform for inspiring women to choose nuclear-related careers. We have continued to promote greater gender equality in conjunction with the BBC's 50:50 campaign, aiming for 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 communication channels, establishing a baseline and a target for achieving gender balance.
- External engagement we are working with wider sector organisations including the Nuclear Skills Strategy Group, Women in Nuclear, the Environment Agency and the Nuclear Decommissioning Authority, both 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 unconscious bias can be a feature of recruitment activity in any sector and at ONR we have introduced several initiatives to ensure it does not affect opportunities for our applicants. We have name- and 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 include an HR professional 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 24% of our senior leadership roles at SCS to Band 2 are held by women.
- **Nuclear graduates' scheme** since 2014, ONR has sponsored an annual cohort participating in the industry-wide Nuclear Graduates training programme. To date, over 37% of the ONR-sponsored participants have been women. We are also pleased that 12 women have subsequently joined ONR as technical specialists on permanent appointments through this route, including one in 2022.
- Degree level apprenticeships apprenticeships offer an alternative and appealing entry point into a career in the sector and ONR has an active programme that is supporting women to enter STEM-based careers. 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 of a traditional university degree and the practical experience and wider employment skills of working in a nuclear environment. Three of our five current degree apprentices are female.

#### Starting young – our support for STEM activities

ONR also sees the challenge in the longer term and as such is actively engaging with schools to promote STEM careers for girls and women. We recognise there is a shortage of skilled and trained people, in particular women, in STEM-related subjects. Therefore, it is in our interest to ensure that we are attracting as many people as possible from a diverse background, given the competitive market environment for talent, and that ONR is 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 young people, particularly girls, by inspiring and supporting the next generation of nuclear specialists and therefore improving the gender balance. ONR colleagues can play a vital role in inspiring future generations of female engineers and scientists, both through our work in ONR or by supporting other bodies with which we are proud to be connected.
- We continue to develop our outreach strategy with local schools and colleges to improve diversity across all socio-economic groups.
   We promote STEM career opportunities for women through our participation in activities in local schools and the STEM Ambassadors programme. ONR actively supports our colleagues as STEM Ambassadors, getting involved in a range of activities that 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 young people of all genders to take up STEM subjects and attract more female applicants into ONR and the wider nuclear industry.

#### **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 D&I 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. We are transforming the way we attract, recruit and develop talented people from different backgrounds, and identifying more ways we can make ONR 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 ONR.

### Flexible working

- The COVID-19 pandemic has presented ONR with the unique opportunity to review how we can benefit from a more flexible way of working. This can support a better work-life balance for all, whilst ensuring we deliver our mission and continue to build a more inclusive culture. Key to enabling this is the adoption of a hybrid approach to where we work, as a step on our journey to realising New Ways of Working in the longer term. This means that, subject to operational and business requirements, we can enable greater choice to blend the level of working in the office, on site and remotely/at home.
- Flexible working covers a wide range of working patterns, including hybrid working. It allows individuals to be more flexible about when they work their contracted hours to achieve a better work-life balance without adversely affecting the overall efficiency and effectiveness of ONR, including the service we provide to the public. We are committed to supporting all colleagues to take up hybrid working, harmonising the wider needs of the organisation with individuals' personal preferences and circumstances.
- We want to ensure a culture aligned to our values and effective processes that sustain new ways of working. These will enable ONR to be an agile and inclusive organisation, where engaged and empowered colleagues are trusted to work remotely with flexibility and security through best practice and effective technology.
- We advertise flexible working on our website and in our job vacancies, recognising that many highly skilled individuals are seeking
  flexibility in working hours.

#### Policies and procedures

#### Recruitment

- We use name- and gender-anonymous selection and gender-neutral wording throughout our recruitment process, to remove unconscious bias at an early stage. We also ensure gender-balanced interview panels where possible.
- We aim to encourage more women to stay and progress through employment policies that make it easier to combine a career with a
  family life. Results from our 2022 People Survey show that 95% of people agreed that flexible working options were available to them,
  and 88% believed that ONR supports a balance between their work and personal commitments. We have also sought to introduce
  policies and toolkits around menopause, disability and race to help us become a more inclusive employer.
- Ensuring men are more aware and equipped to play their part is key to creating an inclusive workplace that is welcoming to women. While the policies we have in place aim to eliminate any form of discrimination or inappropriate behaviour, we recognise that there is more to do. We continue to ensure that our leadership teams are reinforcing appropriate standards throughout their business areas, and that they are supportive of our D&I work, such as promoting our Carers Policy and Passport, our Reverse mentoring scheme, and our new approach to performance management, which has a greater focus on wellbeing.

#### **Performance management**

We have improved our performance management process by simplifying it and basing it on values-based conversations linked
to performance, increasing the focus on wellbeing 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 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 guidance 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. This was a legacy based on length of service that has now been removed.

### Why should we do this?

ONR is committed to creating an environment where all our colleagues can be themselves at work and perform at their best. As an employer of choice, we want to attract diverse talent that reflects 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, benefiting from the positive impact a more diverse and balanced team will have on decision-making and strategic focus for our organisation.

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

Our vision is to be 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 colleagues. Identifying and addressing diversity issues, including those highlighted in this report, is integral to improving our delivery and influence on issues of nuclear safety, security and safeguarding.