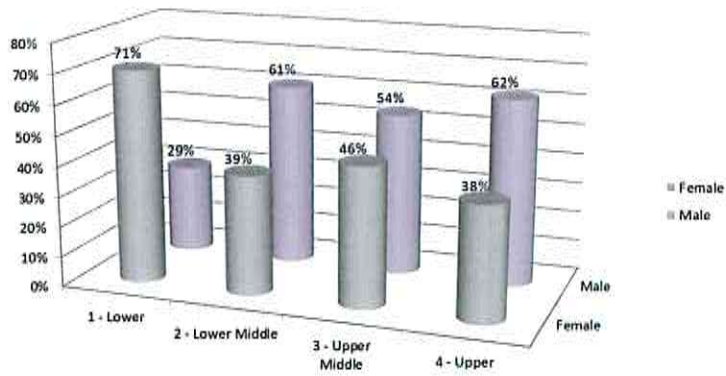


Gender Pay Gap Report



Quartiles



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Definitions:

Averages

Mean: A calculation of adding up all of the numbers in a set field and dividing the result by how many numbers were on the list.

Mean Average Hourly Rate: A result comparing the mean average hourly rate paid to males verses the mean average hourly rate paid to females.

Mean Average Bonus Pay: A result comparing the mean average of bonus pay paid to males verses the mean average bonus pay paid to females (for the period of 12 months prior to the snapshot date).

Median: A calculation of listing all the numbers in a set field in ascending order to identify the central number of that list. In the case that there is an even number of results, the median will be the mean of the two central numbers.

Median Average Hourly Rate: A result comparing the median average hourly rate paid to males verses the median average hourly rate paid to females.

Median Average Bonus Pay: A result comparing the median average of bonus pay paid to males verses the median average bonus pay paid to females (for the period of 12 months prior to the snapshot date).

Bonus Payment Proportions: A result showing the proportions of both males and females that have received a bonus payment (within the period of 12 months prior to the snapshot date) as a percentage of the total number within their gender type.

Quartiles: A result showing the proportions of males and females in each of four quartile bands. The four quartile bands are in ascending order from the lowest hourly rate of pay to the highest hourly rate of pay.

Gender Pay Gap vs Equal Pay

Equal pay relates to men and women receiving equal pay for equal work, whereas, the gender pay gap is a measure of the disparity in pay between the average earnings of male and females. It does not relate to equal work and, instead, relates to other factors such as part-time working, taking time out of work for family and caring responsibilities and returning to work in lower roles.

Results - Explained

Sands Heritage Ltd. is required by law to publish an annual gender pay gap report.

This is its report for the snapshot date of 5 April 2018:

- The mean gender pay gap for Sands Heritage Ltd. is 4.7%.
- The median gender pay gap for Sands Heritage Ltd. is 0%.
- The mean gender bonus gap for Sands Heritage Ltd. is 67.6%.
- The median gender bonus gap for Sands Heritage Ltd. is 0%.
- The proportion of male employees in Sands Heritage Ltd. receiving a bonus is 16% and the proportion of female employees receiving a bonus is 13.5%.

Pay quartiles by gender

Band	Males	Females	Description
A	29%	71%	Includes all employees whose standard hourly rate places them at or below the lower quartile
B	61%	39%	Includes all employees whose standard hourly rate places them above the lower quartile but at or below the median
C	54%	46%	Includes all employees whose standard hourly rate places them above the median but at or below the upper quartile
D	62%	38%	Includes all employees whose standard hourly rate places them above the upper quartile

The figures set out above have been calculated using the standard methodologies used in the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

What are the underlying causes of Sands Heritage Ltd.'s gender pay gap?

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.

Sands Heritage Ltd. 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:

- carries out pay and benefits audits at regular intervals;
- provides regular equal pay coaching for all managers and other staff members who are involved in pay reviews; and
- evaluates job roles and pay grades as necessary to ensure a fair structure.

Sands Heritage Ltd. is therefore confident that its gender pay gap does not stem from paying men and women differently for the same or equivalent work. Rather its gender pay gap, especially regarding the payment of bonuses, is the result of the roles in which men and women work within the organisation and the pay that these roles attract.

Across the UK economy as a whole, men are more likely than women to be in senior roles (especially very senior roles at the top of organisations), while women are more likely than men to be in front-line roles at the lower end of the organisation. In addition, men are more likely to be in technical and engineering roles, which attract higher potential for bonus payments than other roles at similar levels of seniority. Women are also more likely than men to have had breaks from work that have affected their career progression, for example to bring up children. They are also more likely to work part time, and many of the jobs that are available across the UK on a part-time basis are relatively low paid. As a business, Sands Heritage Ltd. would look to address these areas in the coming years to encourage a reversal in these trends.

This pattern from the UK economy as a whole is reflected in the make-up of Sands Heritage Ltd.'s workforce, where the majority of front-line employees/workers are women, while the majority of supervisors, line manager and senior manager roles are held by men.

This can be seen above in the table depicting pay quartiles by gender. This shows Sands Heritage Ltd.'s workforce divided into four equal-sized groups based on hourly pay rates, with Band A including the lowest-paid of employees (the lower quartile) and Band D covering the highest-paid (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. However, within Sands Heritage Ltd., 71% of the employees in Band A are women and 39% men. The percentage of male employees increases throughout the remaining Bands up to 62% in Band D.

How does Sands Heritage Ltd.'s gender pay gap compare with that of other organisations?

All organisations will have a gender pay gap, and we are pleased to be able to say that Sands Heritage Ltd.'s gap compares favourably with that of other organisations, including those within our industry.

The mean gender pay gap for the whole economy (according to the October 2018 Office for National Statistics (ONS) Gender pay gap in the UK: 2018 report) is 17.9%, while in the leisure industry it is 5.2%. At 4.7%, Sands Heritage Ltd.'s mean gender pay gap is therefore significantly lower than both that for the whole economy and that for our sector.

The median gender pay gap for the whole economy (according to the November 2018 ONS ASHE figures) is 17.1%, while in the leisure sector it is 5.2%. At 0%, Sands Heritage Ltd.'s median gender pay gap is therefore significantly lower than both that for the whole economy and that for our sector.

Comparison with other organisations

	Sands Heritage Ltd.	2018 ONS ASHE Leisure sector	2018 ONS ASHE Leisure & Theme park Attendants sub-sector
Mean gender pay gap	4.7%	8.6%	-2.4%
Median gender pay gap	0%	5.2%	5.2%

The mean gender bonus gap for Sands Heritage Ltd. is relatively large at 67.63%. However, when the difference is analysed in terms of cash amounts rather than percentage terms, the figure is comparatively small, at £159.79. This together with a median gender bonus gap of 0%, we believe is reflecting our existing policy of not paying large bonuses to individual members of staff.

The proportion of men at Sands Heritage Ltd. who received a bonus in the 12 months up to 5 April 2018 was 16%, while for women this was 13.5%. This reflects the higher proportion of men in the management and technical engineering roles that, under our current policy, attract a performance bonus.

What is Sands Heritage Ltd. doing to address its gender pay gap?

While Sands Heritage Ltd.'s gender pay gap compares favourably with that of organisations both across the whole UK economy and within the leisure sector, this is not a subject about which Sands Heritage Ltd. is complacent, and it is committed to doing everything that it can to reduce the gap. However, Sands Heritage Ltd. also recognises that its scope to act is limited in some areas - it has, for example, no direct control over the subjects that individuals choose to study or the career choices that they make.

To date, the steps that Sands Heritage Ltd. has taken to promote gender diversity in all areas of its' workforce include the following:

- **Creating an evidence base:** To identify any barriers to gender equality and inform priorities for action, in 2018 Sands Heritage Ltd. introduced equal opportunities monitoring (includes gender) to understand:
 - the proportions of men and women applying for and obtaining promotions;
 - the proportions of men and women leaving the organisation and their reasons for leaving;
 - the numbers of men and women in each role and pay band;
 - take-up of flexible working arrangements by gender and level within the organisation;
 - the proportion of men and women who return to their original job after a period of maternity or other parental leave; and
 - the proportion of men and women still in post a year on from a return to work after a period of maternity or other parental leave.
- **Revising the flexible working policy:** Sands Heritage Ltd.'s flexible working policy has been substantially revised to make it clear that employees in all areas and levels of the organisation will be considered for flexible working regardless of their role and level of seniority, and that flexible working need not be limited to part-time working.

None of these initiatives will, of itself, remove the gender pay gap - and it may be several years before some have any impact at all. In the meantime, Sands Heritage Ltd. is committed to reporting on an annual basis on what it is doing to reduce the gender pay gap and the progress that it is making.

Right now, Sands Heritage Ltd. has plans to extend its evidence-gathering to include qualitative data. It will do this through a consultation exercise across all areas and levels of the organisation to identify the barriers (and the drivers) for women employees.

In the coming year, Sands Heritage Ltd. is also committed to:

- reviewing its recruitment processes to ensure we are not unintentionally excluding female applicants from all our roles;
- expansion of the equal opportunities monitoring to include gender, to understand the proportions of men and women applying for jobs and being recruited;
- reviewing its policy on reward and recognition; and
- promoting flexible working for all our employees.

I, Eddie Kemsley, CEO], confirm that the information in this statement is accurate.

Signed



Date

04/04/2019