

21<sup>st</sup> December 2018  
Ethnicity Pay Reporting Consultation



Department for Business, Energy and Industrial Strategy  
Spur 1, 1st Floor  
1 Victoria Street  
London  
SW1H 0ET

Dear Ethnicity Pay Reporting team,

**ACS Submission: Ethnicity Pay Reporting**

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Department for Business, Energy and Industrial Strategy consultation on Ethnicity Pay Reporting. ACS represents 33,500 local shops across the UK including Co-op, McColls, BP and thousands of independent retailers trading under brands such as Spar, Nisa and Budgens.

We recognise the intention for ethnicity pay reporting to enhance workforce transparency and support employees from all backgrounds to progress in their careers. The convenience sector is diverse, with 41% of store owners in England identifying as Asian or Asian British and 33% being born outside the UK<sup>1</sup>. ACS conducts an annual Colleague Survey to collect data directly from shop floor staff, confidentially from employers. We intend to collect data on ethnicity in the 2019 edition of the survey and are open to sharing these results with you.

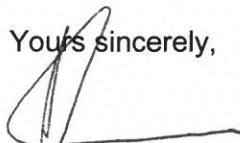
The methodology behind ethnicity pay reporting should mirror gender pay gap reporting where possible to provide consistency for business. We would therefore support data in ethnicity pay reports being published by pay quartile. This method would better reflect pay distribution across the workforce regardless of real terms pay and how flat or hierarchical a business' structure is.

We agree with the Government's recommendation that employers of fewer than 250 people should not be expected to publish ethnicity pay data. This threshold would be consistent with gender pay reporting and would not place undue burden on small businesses.

Setting a centrally determined, standardised approach to the classification of ethnicity would provide guidance for business and improve the transparency of ethnicity pay reporting. For example, the 5 ONS ethnic classifications used in the 2011 Census could be used to deliver simplicity for employers. The Government should provide full guidance for employers detailing how to calculate and publish pay for reporting purposes.

For more information on this submission, please contact Eleanor O'Connell, ACS Public Affairs Assistant, via [Eleanor.O'Connell@acs.org.uk](mailto:Eleanor.O'Connell@acs.org.uk) / 01252 533018.

Yours sincerely,



James Lowman

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<sup>1</sup>ACS Local Shop Report 2018