

# OPDC Gender Pay Gap Report: March 2022 Data

## Key information

Publication type: General

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## Executive summary

At OPDC we are committed to creating a diverse and inclusive workforce that reflects the diversity profile of London. We are committed to creating a workplace where everyone can feel comfortable with being their true authentic selves. Publishing our Pay Gap report supports this aim. This report informs the current position as at 31 March 2022 of our Gender, Ethnicity and Disability pay gap reporting.

We are a small organisation (headcount less than 250), and there is no legal requirement for the OPDC to report on gender, ethnicity, disability and pay. However, we welcome the Mayor's commitment that all functional bodies regardless of size will report on gender, ethnicity, disability and pay. It is important to note that due to the size of the organisation, very small changes in staffing numbers can have a significant impact upon the percentages and overall findings of the audit.

This report covers overall mean and median gender, ethnicity and disability pay gaps.

Salaries at the OPDC are determined through a job evaluation scheme (Hay) that evaluates the job and not the post holder, and the organisation pays the same salary to jobs that are of an equal weight. The scheme does not make reference to gender or any other personal characteristics of existing or potential job holders.

# Methodology

For the purposes of this report all calculations are in accordance with the Government Guidance.

The following formula is used to calculate the pay gap:

$$\frac{A - B}{A}$$

$$\times 100$$

where A is the mean/median hourly rate of pay for relevant male staff;

and, where B is the mean/median hourly rate of pay for relevant female staff.

As a public sector body, the snapshot date for the data collection was 31 March 2022. The data does not include OPDC Board Member and Committee Member appointment.

## Gender Pay Gap Audit

The Old Oak and Park Royal Development Corporation (OPDC) is committed to building a workforce that is truly reflective of London's diverse population. We are serious about celebrating diversity and challenging all forms of inequality, and the publishing of the Gender Pay Gap report supports this ambition.

The purpose of the gender pay gap audit is to explore the extent of disparities of gender and pay, and to look at ways to mitigate these.

The data contained in this report represents the gender pay gap data for the OPDC as at 31 March 2022. During this reporting period there were 38 employees on a permanent or fixed term contract in the OPDC all of whom are counted for gender pay gap reporting purposes. Of the 38 members of staff included in the data below, 25 (66%) are women and 13 (34%) are men. We are pleased to report that a number of women hold senior roles within the organisation which is reflected by 75% of women that are members of the Senior Management Team.

## Overall Gender Pay Gap Summary

At 31 March 2022, the OPDC had a mean pay gap of **3.7 per cent** (2021: 14.42 per cent) and a median pay gap of **-11.1 per cent** (2021: 4.06 per cent). This is a decrease of 10.72 per cent of the mean pay gap, and a decrease of 15.16 per cent of the median pay gap. The OPDC figures continue to compare favourably to both the London and National figures\*. We will continue to do all that we can to ensure that we address any gender pay gap in our business through targeted initiatives and our recruitment processes.

\*The national median gender pay gap for all workers is reported as 15.4 per cent in 2021. The national and London data are derived from the 2021 Annual Survey of Hours and Earnings (ASHE) report.

**Table 1: Overall gender pay gap (for all staff), March 2022**

Overall Median Pay Gap		Overall Mean Pay Gap	
Median Hourly Pay (all staff)		Mean Hourly Pay (all staff)	Staff numbers
<b>Female</b>	£29.02	<b>Female</b>	£32.14
			25
<b>Male</b>	£26.12	<b>Male</b>	£33.38
			13
<b>Pay Gap</b>	-11.1 per cent	<b>Pay Gap</b>	3.7 per cent
			38

**Table 2: Overall gender pay gap (for all staff), March 2021**

Overall Median Pay Gap		Overall Mean Pay Gap	
Median Hourly Pay (all staff)		Mean Hourly Pay (all staff)	Staff numbers
<b>Female</b>	£28.40	<b>Female</b>	£29.58
			31
<b>Male</b>	£29.60	<b>Male</b>	£34.56
			15
<b>Pay Gap</b>	4.06 per cent	<b>Pay Gap</b>	14.42 per cent
			46

## Quartile Summary

The quartile data has been calculated in accordance with the methodology as set out in the regulations by “dividing the workforce into four equal sized groups and separating them according to the hourly pay rate, starting from lowest paid to the highest paid”.

There is a pay advantage for men across the upper quartile mean and lower quartile and upper quartile median quartile figures. The biggest pay gap is at the upper quartile figures. The pay advantage for women are at the lower quartile, lower middle quartile and upper middle quartile for mean hourly pay, and at the lower middle quartile and upper middle quartile for the median hourly pay. The figures suggest that women are earning more across the quartiles with the exception of the upper quartile level. The figures have changed from the previous reporting period due to staff turnover. Overall, there are still more women represented across the organisation.

**Table 3: Quartile Mean Hourly Pay, March 2022****Mean Hourly Pay**

	<b>Female</b>		<b>Male</b>		<b>Pay Gap</b>
	<b>Hourly rate</b>	<b>No</b>	<b>Hourly rate</b>	<b>No</b>	
<b>lower quartile</b>	£20.46	6	£19.46	4	-5.1 per cent
<b>lower middle quartile</b>	£25.55	6	£25.23	3	-1.3 per cent
<b>upper middle quartile</b>	£34.82	7	£30.60	3	-13.8 per cent
<b>upper quartile</b>	£47.30	6	£62.86	3	24.8 per cent

**Table 4: Quartile Mean Hourly Pay, March 2021****Mean Hourly Pay**

	<b>Female</b>		<b>Male</b>		<b>Pay Gap</b>
	<b>Hourly rate</b>	<b>No</b>	<b>Hourly rate</b>	<b>No</b>	
<b>lower quartile</b>	£19.06	9	£20.56	3	7 per cent
<b>lower middle quartile</b>	£24.85	7	£25.67	4	3 per cent
<b>upper middle quartile</b>	£29.62	7	£31.49	5	6 per cent
<b>upper quartile</b>	£45.52	8	£65.53	3	31 per cent

**Table 5: Quartile Median Hourly Pay, March 2022**

## Median Hourly Pay

	Female		Male		Pay Gap
	Hourly rate	No	Hourly rate	No	
lower quartile	£19.82	6	£21.70	4	8.7 per cent
lower middle quartile	£25.54	6	£25.40	3	-0.6 per cent
upper middle quartile	£36.41	7	£30.80	3	-18.2 per cent
upper quartile	£44.00	6	£58.95	3	25.4 per cent

**Table 6: Quartile Median Hourly Pay, March 2021**

## Median Hourly Pay

	Female		Male		Pay Gap
	Hourly rate	No	Hourly rate	No	
lower quartile	£19.33	9	£19.82	3	2 per cent
lower middle quartile	£24.17	7	£25.72	1	6 per cent
upper middle quartile	£29.60	7	£30.80	6	4 per cent
upper quartile	£42.15	8	£58.18	2	28 per cent

## Grade Summary

The OPDC has chosen not to analyse and include pay in relation to its grading structure for the 2022 audit. This is because it is not possible to draw any meaningful conclusions from the statistical analysis of such small data sets.

### **£10,000 Salary bands Summary**

In addition, the OPDC is also publishing the distribution of salaries across female and male staff in £10k increments up to £100k with those earning more than £100k in one group. This broadly mirrors information published in the Mayor's Annual Report.

These tables contain information as at 31 March 2022 and **do not** include any of the OPDC Board and Committee Member appointments.

**Table 7: Distribution by gender in £10k increments, March 2022**

#### **No of staff by salary**

<b>Pay Band</b>	<b>Female</b>	<b>Male</b>	<b>Total</b>
<£20,000	0	0	0
£20,000 to £29,999	0	1	1
£30,000 to £39,999	4	1	5
£40,000 to £49,999	7	4	11
£50,000 to £59,999	4	4	8
£60,000 to £69,999	0	0	0
£70,000 to £79,999	7	1	8
£80,000 to £89,999	0	0	0
£90,000 to £99,999	1	0	1

>£100,000	2	2	4
<b>Total</b>	<b>25</b>	<b>13</b>	<b>38</b>

**Table 8: Distribution by gender in £10k increments, March 2021**

**No of staff by salary**

<b>Pay Band</b>	<b>Female</b>	<b>Male</b>	<b>Total</b>
<£20,000	0	0	0
£20,000 to £29,999	1	0	1
£30,000 to £39,999	7	2	9
£40,000 to £49,999	7	5	12
£50,000 to £59,999	8	3	11
£60,000 to £69,999	0	2	2
£70,000 to £79,999	4	0	4
£80,000 to £89,999	1	0	1
£90,000 to £99,999	1	1	2
>£100,000	2	2	4
<b>Total</b>	<b>31</b>	<b>15</b>	<b>46</b>

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<b>Pay Band</b>	<b>Female</b>	<b>Male</b>	<b>Total</b>
<£20,000	0	0	0
£20,000 to £29,999	0	1	1
£30,000 to £39,999	4	1	5
£40,000 to £49,999	7	4	11
£50,000 to £59,999	4	4	8
£60,000 to £69,999	0	0	0
£70,000 to £79,999	7	1	8
£80,000 to £89,999	0	0	0
£90,000 to £99,999	1	0	1



>£100,000	2	2	4
<b>Total</b>	<b>25</b>	<b>13</b>	<b>38</b>

**Table 8: Distribution by gender in £10k increments, March 2021**

**No of staff by salary**

<b>Pay Band</b>	<b>Female</b>	<b>Male</b>	<b>Total</b>
<£20,000	0	0	0
£20,000 to £29,999	1	0	1
£30,000 to £39,999	7	2	9
£40,000 to £49,999	7	5	12
£50,000 to £59,999	8	3	11
£60,000 to £69,999	0	2	2
£70,000 to £79,999	4	0	4
£80,000 to £89,999	1	0	1
£90,000 to £99,999	1	1	2
>£100,000	2	2	4
<b>Total</b>	<b>31</b>	<b>15</b>	<b>46</b>

## Salary Breakdowns

The data is broken down into equally sized salary groupings. Whilst not necessary for gender pay gap reporting it provides an illustration of the gender distribution of the staffing population across the salary groupings.

**Table 9: Salary distribution by gender, March 2022**

	<b>Group 1</b>	<b>Group 2</b>	<b>Group 3</b>	<b>Group 4</b>	<b>Totals</b>
	£20,933 - £59,218 £59,219 - £97,504 £97,505 - £135,789 £135,790 - £174,074				
<b>Male</b>	8	3	1	1	13
<b>Female</b>	13	10	2	0	25
<b>Totals</b>	21	13	3	1	38

**Table 10: Salary distribution by gender, March 2021**

	<b>Group 1</b>	<b>Group 2</b>	<b>Group 3</b>	<b>Group 4</b>	<b>Totals</b>
	£29,467 - £65,619 £65,618 - £101,769 £101,769 - £137,920 £137,920 - £171,074				
<b>Male</b>	11	2	1	1	15
<b>Female</b>	23	6	2	0	31
<b>Totals</b>	34	8	3	1	46

## Ethnicity Pay Gap Audit

The Old Oak and Park Royal Development Corporation (OPDC) is committed to being an anti-racist organisation and we will take the necessary steps to tackle any form of structural and persistent inequality. We are serious about addressing all forms of inequality, and the publishing of the report supports this commitment. We are clear that to address areas of inequality, we will need to closely monitor and review our action plans. We will continue to focus on Race Equity, and to address disproportionate and racial disparities.

The Mayor has led by example in publishing this data and is committed, not only to recognise pay inequality and seek to address it at the GLA and its functional bodies, but to encourage businesses in the capital to follow this lead.

We are pleased to report that 50 per cent of our Senior Management Team are from a Black, Asian and Ethnic Minority background. This is particularly encouraging as we are working in an industry that is not well represented in terms of ethnicity and women.

The Equality and Human Rights Commission express the ethnicity pay gap as follows: *"the pay gap is defined as the difference between the average hourly pay of ethnic minorities and White British people. When ethnic minorities are paid less, overall, than White British people they experience a pay gap. When they are paid more they experience a pay advantage. The pay gap is often expressed as a percentage difference between the pay of people from ethnic minorities and the pay of White British people, with the latter representing 100 per cent"*.

## Headline Ethnicity Pay Gap Summary

The headline ethnicity pay gap data for OPDC in table 1 is broken down into ethnicity groups;

- Black, Asian, Ethnic Minority (Black, Asian, Dual, Other)
- White

As at 31 March 2022, the total number of permanent members of staff including staff on a Fixed Term Contracts is 38, 29 per cent are from a Black, Asian, Ethnic Minority background, and 71 per cent from a White Background.

We are reliant on accurate reporting to be able to provide a credible narrative and make the correct assumptions. The figures take into account that we have 100 per cent reporting on ethnicity.

Overall the calculations show there is a mean pay gap of **-0.99 per cent** (2021: 2.44 per cent) and a median pay gap of **11.47 per cent** (2021: 13.42 per cent). This shows an improvement from the March 2021 figures. It is worth noting that small changes can have a significant impact on figures and percentages.

The figures still demonstrate the improvement that has been made since our first ethnicity pay gap report on 31 March 2017 where the mean pay gap figure was 31.51 per cent and the median figure was 37.52 per cent. However, we recognise that we will need to need to maintain our focus and efforts on closing the pay gap.

**Table 1: Headline Ethnicity Pay Gap – White/Black, Asian, and Ethnic Minority, March 2022**

### Headline Ethnicity Pay Gap - White/Black, Asian, and Ethnic Minority

Ethnicity	No of staff	Mean	Median	Mean Pay Gap	Median Pay Gap
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Black, Asian, and Ethnic Minority (Black, Asian, Dual, Other)	11	£32.79	£25.69	-0.99 per cent	11.47 per cent
White	27	£32.47	£29.02		

**Table 2: Headline Ethnicity Pay Gap – White/Black, Asian, and Ethnic Minority March 2021**

#### Headline Ethnicity Pay Gap - White/Black, Asian, and Ethnic Minority

Ethnicity	No of staff	Mean	Median	Mean Pay Gap	Median Pay Gap
Black, Asian, and Ethnic Minority (Black, Asian, Dual, Other)	16	£29.84	£25.63	2.44 per cent	13.42 per cent
White	27	£30.58	£29.60		

## Quartile Summary

The next section looks at the ethnicity pay gap by quartile. This quartile data has been calculated by *dividing the workforce into four equal sized groups and separating them according to the hourly pay rate, starting from lowest paid to the highest paid*. This mirrors the approach taken for gender pay gap reporting. The analysis by quartile shows that there is a pay advantage for staff from a white background across all of the mean and median quartiles, with the exception of the median lower quartile where there is a pay advantage for staff from a Black, Asian and Ethnic Minority background.

**Table 3: Quartile Mean hourly pay March 2022**

#### Mean Hourly Pay

White	Black, Asian, and Ethnic Minority	Pay Gap	% Black, Asian, and Ethnic Minority
Hourly rate	Hourly rate		

lower quartile	£19.75	£20.79	-5.3 per cent	30 per cent
lower middle quartile	£25.41	£25.50	-0.4 per cent	33 per cent
upper middle quartile	£32.46	£37.91	-16.8 per cent	20 per cent
upper quartile	£54.39	£48.67	10.5 per cent	33 per cent

**Table 4: Quartile Mean hourly pay March 2021**

**Mean Hourly Pay**

	White	Black, Asian, and Ethnic Minority	Pay Gap	% Black, Asian, and Ethnic Minority
	Hourly rate	Hourly rate		
lower quartile	£19.91	£18.97	4.69 per cent	45 per cent
lower middle quartile	£25.77	£25.53	0.92 per cent	55 per cent
upper middle quartile				
upper quartile	£48.23	£45.87	4.89 per cent	45 per cent

**Table 5: Quartile Median Hourly pay March 2022**

**Median Hourly Pay**

	White	Black, Asian, and Ethnic Minority	Pay Gap	% Black, Asian, and Ethnic Minority
	Hourly rate	Hourly rate		
lower quartile	£19.82	£19.82	0.0 per cent	30 per cent
lower middle quartile	£24.93	£25.40	-1.9 per cent	33 per cent
upper middle quartile	£30.80	£37.91	-23.1 per cent	20 per cent
upper quartile	£49.18	£48.59	1.2 per cent	33 per cent

**Table 6: Quartile Median Hourly pay March 2021**

**Median Hourly Pay**

	White	Black, Asian, and Ethnic Minority	Pay Gap	% Black, Asian, and Ethnic Minority
	Hourly rate	Hourly rate		
lower quartile	£20.14	£19.33	4.01 per cent	45 per cent
lower middle quartile	£25.61	£25.63	-0.09 per cent	55 per cent
upper middle quartile				

upper quartile	£48.19	£44.89	6.86 per cent	45 per cent
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## Grade Summary

The OPDC has chosen not to analyse and include pay in relation to its grading structure for the 2022 audit. This is because it is not possible to draw any meaningful conclusions from the statistical analysis of such small data sets.

### £10,000 Salary bands Summary

In addition, the OPDC is also publishing the distribution of salaries across female and male staff in £10k increments up to £100k with those earning more than £100k in one group. This broadly mirrors information published in the Mayor's Annual Report.

These tables contain information as at 31 March 2022 and **do not** include any of the OPDC Board and Committee Member appointments.

**Table 7: Distribution by ethnicity in £10k increments, March 2022**

#### No of staff by salary

Pay Band	Black, Asian, and Ethnic Minority White Not Known Total			
<£20,000	0	0	0	0
£20,000 to £29,999	0	1	0	1
£30,000 to £39,999	2	3	0	5
£40,000 to £49,999	4	7	0	11
£50,000 to £59,999	0	8	0	8
£60,000 to £69,999	0	0	0	0

£70,000 to £79,999	3	5	0	8
£80,000 to £89,999	0	0	0	0
£90,000 to £99,999	1	0	0	1
>£100,000	1	3	0	4
<b>Total</b>	<b>11</b>	<b>27</b>	<b>0</b>	<b>38</b>

**Table 8: Distribution by ethnicity in £10k increments, March 2021**

**No of staff by salary**

<b>Pay Band</b>		<b>Black, Asian, and Ethnic Minority</b>	<b>White</b>	<b>Not Known</b>	<b>Total</b>
<£20,000	0	0	0	0	0
£20,000 to £29,999	0	1	0	1	1
£30,000 to £39,999	5	3	1	9	9
£40,000 to £49,999	5	6	1	12	12
£50,000 to £59,999	1	10	0	11	11
£60,000 to £69,999	0	2	0	2	2
£70,000 to £79,999	2	2	0	4	4
£80,000 to £89,999	1	0	0	1	1
£90,000 to £99,999	1	1	0	2	2



>£100,000	1	2	1	4
<b>Total</b>	<b>16</b>	<b>27</b>	<b>3</b>	<b>46</b>

## Disability Pay Gap Audit

The Mayor's manifesto contained a commitment to publish a disability pay audit for the GLA Group with a mandate to narrow any pay gaps. This analysis has been conducted based on salaries as at 31 March 2022. We welcome this commitment, and this is OPDC's second Disability Pay Gap audit. At that point OPDC employed 38 members of staff including staff on Fixed Term contracts. This audit takes into account that all employees have declared whether or not they have a disability.

The disability pay gap describes the difference between the average hourly pay for non-disabled staff and the average hourly pay for disabled staff expressed as a percentage of non-disabled staff earnings. Gender, ethnicity and disability pay gap analyses tend to highlight the gender, ethnic and disability diversity at senior levels. Of the 38 members of staff 8% declared themselves as being disabled.

The median disability pay gap is **-70.73 per cent** (2021: -26.41 per cent) and the mean disability pay gap is **-37.27 per cent** (2021: -33.78 per cent). Due to small numbers of staff, and in the interests of maintaining anonymity we have been unable to do any further analysis.

Although, all employees have reported on disability, we suspect that there are some members of staff who may be reluctant to disclose a disability. Equally education is key in this area for staff to have a better understanding about why it is important for us to have an accurate picture of this information.

Overall, our figures show that we do not have a disability pay gap and we will work to continue to maintain that position.

### Overall Disability Pay Gap Headline Figures – March 2022

Overall Median Pay Gap		Overall Mean Pay Gap	
Median Hourly Pay (all staff)		Mean Hourly Pay (all staff) %	
<b>Disabled</b>	£48.59	<b>Disabled</b>	£43.42
			8 per cent
<b>Not Disabled</b>	£28.46	<b>Not Disabled</b>	£31.63
			92 per cent
<b>Pay Gap</b>	-70.73 per cent	<b>Pay Gap</b>	-37.27 per cent

## Overall Disability Pay Gap Headline Figures – March 2021

Overall Median Pay Gap		Overall Mean Pay Gap	
Median Hourly Pay (all staff)		Mean Hourly Pay (all staff) %	
Disabled	£38.07	Disabled	£38.07 5 per cent
Not Disabled	£30.04	Not Disabled	£28.46 95 per cent
Pay Gap	-26.41 per cent	Pay Gap	-33.78 per cent

## OPDC Pay Gap – Action Plan

Our action plan has been developed to signal both internally and externally that we are committed to taking serious steps to address pay gaps at OPDC.

The OPDC are aligned to the GLA's terms and conditions of employment and where appropriate the OPDC will adopt the GLA's action plan to address gender, ethnicity, and disability pay gaps.

We have developed and launched our [Equity, Diversity & Inclusion Strategy](#). This was approved by the OPDC Board in May 2022. For OPDC, EDI is an integral part of how we work. We will continue to build and embed diverse and inclusive experiences, opinions and voices into everything we do through our Board, our staff and our communities. Only by doing this, will we deliver the world class regeneration we aspire to. The strategy will support us with addressing and closing pay gaps.

In addition, to address the Gender, Ethnicity, and Disability Pay Gaps, the OPDC will take the following course of action outlined below:

### Recruitment

#### Name Blind application:

- As part of the HR Shared Services with Transport for London (TfL), they will be undertaking recruitment for OPDC and they will be using the name blind recruitment process for all internal and external recruitment campaigns.
- However, OPDC will continue to do recruitment for senior roles, as well as Board and Committees. We will also undertake name blind recruitment process for senior roles.

- The name blind application process is a positive effort to reduce any potential impact of unconscious bias at the shortlisting stage.
- (Owner - TfL HR/OPDC HR & OD)

### **Unconscious Bias Script:**

- Continue to include an unconscious bias script/reminder in the interview pack for recruiting managers, to ensure unconscious bias (and how to minimise it) is front of mind.
- (Owner - TfL HR, OPDC HR & OD/EDI Action Group/Staff Networks)

### **Diverse interview panels:**

- We will continue to ensure that that all interview panels are gender and ethnically diverse, trained in best practice recruitment, including countering discrimination and unconscious bias.
- (Owner - SMT/Line Managers)

### **Specialist recruitment agencies:**

- We will engage with specialist Black, Asian and Ethnic Minority recruitment agencies where appropriate to achieve diverse shortlists of high calibre candidates from.
- We will also use specialist inclusive recruitment advertising agencies to place our adverts.
- (Owner - OPDC HR&OD)

### **Guaranteed interview scheme:**

- We are committed to the employment and career development of disabled people. As part of this commitment, we operate a guaranteed interview scheme for disabled applicants who meet the minimum criteria for the role they have applied for.
- (Owner - TfL HR/OPDC HR & OD)

### **Building an inclusive workplace**

#### **Lived Experience Sessions:**

- At the OPDC we are creating an inclusive culture where all staff feel comfortable, and able to talk about diversity and inclusion in a safe space.
- We are continuing to run Lived Experience sessions at OPDC. Some of our Board Members have run sessions with staff, and the invitation to these sessions have been extended to colleagues within the GLA Group. These sessions will continue with external speakers that will come in and talk to our staff about their experiences.
- (Owner - SMT/OPDC HR & OD/EDI Action Group)

### **Future of London Leaders – Emerging Talent Programme:**

- OPDC are members of Future London Leaders. Future London Leaders are doing excellent work on race and diversity which includes their Emerging Talent programme, mentoring opportunities, and other diversity and inclusion specific training and development. We will be hosting a Emerging Talent placement in the Spring 2023.
- (Owner - OPDC HR & OD)

**EDI Moment:**

- At our All Staff meetings, we have introduced a slot for an EDI moment. The purpose of this is to provide staff with an opportunity to raise awareness about different topics throughout the year linked to the Inclusive Employers calendar.
- (Owner - All Staff)

**Disability Confident Employer:**

- We have signed up as a Disability Confident Employer, level 1. We will assess ourselves to progress to level 2, as a Disability Confident Employer.
- (Owner - OPDC HR & OD)

**Data Transparency**

- OPDC will continue to analyse and publish transparent, clear and detailed workforce information including information on the gender pay gap, ethnicity pay gap and disability pay gap.
- We will continue to support a culture of disclosure where staff will feel comfortable about disclosing protected characteristics. This will support us with being able to collect the necessary data to accurately report on pay gaps.
- We will run annual campaigns to encourage staff to update their diversity data on our HR systems. We will outline why we need this information, how it will be protected and what it will be used for.
- (Owner - OPDC HR & OD)

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