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Equal pay reviews survey 2008

Lorna Adams, Peter Hall and Stefan Schäfer IFF Research

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IFF Research



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EXECUTIVE SUMMARY

This report presents the findings of the 2008 equal pay reviews (EPRs) survey conducted by IFF Research on behalf of the Equality and Human Rights Commission (EHRC). It follows a series of similar surveys conducted on behalf of the Equal Opportunities Commission (EOC), which looked at the use of equal pay reviews to assess the pay gap between men and women. The study involved 866 interviews with businesses across the private and public sectors conducted by telephone in February/March 2008.

Compared with 2005, participation in all types of EPR activity was higher in 2008. The proportion of organisations with completed EPRs had risen 5 percentage points to 17%; those with EPRs in progress had risen by 2 percentage points to 5%; and those with plans to conduct an EPR had risen by 8 percentage points.

Moreover, of those carrying out EPRs, only 16% were checking for both equal pay and equal value, which means that there will have been an under-reporting of the extent of pay discrimination.

The overall increase in EPR participation suggests that plans to conduct EPRs are being realised and that with a number of first EPRs planned, this trend should continue.

The public sector (where establishments tend to have a workforce with a substantial female majority) has the highest levels of EPR activity, with 43% having either completed an EPR, having one in progress or planning to conduct one compared with 23% in the private sector (where women tend to be in the minority).

Manufacturing is the only sector where EPR activity has decreased since 2005. In part, this may be a result of a more developed understanding of what constitutes an EPR (meaning that reviews previously considered to be EPRs are no longer classified as such).

The 2008 survey shows, in similar vein to previous surveys, that incidence of EPR activity increases as the size of organisations increases.

A third of organisations have an objective related to closing the pay gap (37%). This rises to 63% in the public sector. The incidence of organisations with an objective increases with the size of organisation. The most commonly cited objective is that

'pay is equal/related to position, status or value' (51%). An EPR is the objective itself for 4% of organisations overall, rising to 16% in the public sector.

The 2008 survey shows that only 2% of organisations have previously been or are currently presented with an equal pay claim. For more than half of the organisations in question here, less than 20 cases have been filed. 2% of employers have been presented with an equal pay questionnaire. Larger employers and organisations in the public sector are more likely to have had a questionnaire presented to them.

The survey also showed that while only 2% of organisations report that their employees have been canvassed by contingency (no win/no fee) lawyers, high numbers (14%) state that they do not know whether or not this is the case. This implies that such activity may be going on without the awareness of employers.

Businesses most commonly cited two reasons for conducting an EPR: it is seen as good business sense (87% overall and the main reason for 25%) and there is a desire to be seen as a 'good practice employer' (82% overall and the main reason for 51%).

The most common reason given for not conducting an EPR, by 93% of all those with no EPR participation, was that they consider that their organisation already provides equal pay.

Just under half of the organisations that had conducted, or were conducting, an EPR (47%) expressed their intention to conduct an EPR every year. 19% plan to conduct an EPR every two years and a further 19% intend to do so every three years.

The majority of organisations that had conducted or were conducting an EPR cited their own review process as the most important approach they took (55%) and just under a quarter stated that the advice of consultants was the most important approach (23%). The EOC Small Employers Kit and the EOC Kit for larger employers were the most important approaches for 7% and 5% respectively.

In terms of the scope of EPR activity, a general increase on previous years was found. 96% of organisations which had completed an EPR or had one in progress stated that their EPR covered all their employees in Britain. 37% examined differences in pay by ethnic origin and 41% by disability – an increase from 2005. 84% checked that their job evaluation system is free from discrimination – up from 72% in 2005.

1. INTRODUCTION

1.1 Background

This report presents the findings of the 2008 equal pay reviews (EPRs) survey conducted by IFF Research on behalf of the Equality and Human Rights Commission (EHRC). It follows a series of similar surveys conducted on behalf of the Equal Opportunities Commission (EOC), which looked at the use of equal pay reviews to assess the pay gap between men and women. The EHRC takes over the roles previously carried out by the EOC, the Commission for Racial Equality and the Disability Rights Commission and therefore the 2008 survey looks not just at EPRs investigating gender pay gaps, but also those focused on the pay of employees from ethnic minorities and employees with disabilities.

The legislation covering gender pay gaps is the Equal Pay Act 1970 (amended 1984) which grants individuals the right to have the same contractual pay and benefits as a person of the opposite sex in the same employment, in cases where men and women are doing:

- Like work.
- Work considered to be equivalent under an analytical job evaluation study.
- Work that is proved to be of equal value.

The Equal Pay Act applies solely to pay gaps between men and women doing equal work. The pieces of legislation covering ethnic minority and disabled workers are the Race Relations Act 1976 and the Disabled Discrimination Act 1995. Neither makes explicit reference to equal pay though they require that employers offer the same terms of employment to workers from ethnic minorities and with disabilities as they offer to all other workers. Therefore the more detailed coverage of equal pay found in the Equal Pay Act is used as the basis of the questions regarding ethnicity and disability found in this survey.

While the intentions of the Equal Pay Act are clear, there remains considerable evidence to suggest that the gender pay gap persists. In part, this persistence may result from the fact that establishing whether or not any unfair treatment is taking place within an individual organisation involves a thorough review of job roles and remuneration. This is what an EPR aims to achieve. This process enables employers to identify if there are any situations within their workforce where men and women receive different levels of pay and/or benefits for reasons that cannot be explained except by sex.

An EPR is a tool to enable employers to ensure that their pay system delivers equal pay, as defined in the Equal Pay Act. An EPR is concerned with an important, but narrow, aspect of discrimination in employment – unequal pay for equal work. It does not directly address other aspects of inequality, such as occupational segregation, or the lack of flexible working in higher paid jobs. However, such aspects – which may well contribute to pay gaps – may be highlighted by the review, especially if the employer is experienced in dealing with equality issues.

At present, employers are **not** required by statute to carry out an EPR. The EHRC, the EOC and various trade unions have campaigned to close the gender pay gap and the Government has been encouraging organisations voluntarily to carry out EPRs. The EOC produced a range of advice and support for interested employers (including a comprehensive 'Equal Pay Review Kit'). Since 2001, the EOC had conducted work to monitor the proportion of businesses that had undertaken an EPR, their experiences of doing so and the extent to which they have identified pay gaps as a result (Morrell, Boyland, Munns and Astbury, 2001; Neathey, Dench and Thomson, 2003; Brett and Milsome, 2004; Schäfer, Winterbotham and McAndrew, 2005; Neathey, Willison, Akroyd, Regan and Hill, 2005; Adams, Carter and Schäfer, 2006). This report outlines the findings of the most recent survey in this series.

1.2 Reporting conventions

Unless explicitly noted, all findings presented in this report are based on weighted data. Unweighted bases (the number of responses from which the findings are derived) are displayed where appropriate as an indication of the robustness of results.

The following conventions are observed throughout this report:

- All references to 'all employers' refer only to the employer population sampled for the survey (i.e. organisations based in England, Scotland or Wales with 25 or more employees, across all sectors).
- All references to 'country', unless otherwise stated, refer to the country in which the organisation's head office is based.
- All references to 'size' refer to the number of employees an organisation has across all of its sites in Great Britain, rather than any other measure of organisation size (annual turnover, number of sites, etc.).

All references to statistical significance within this report are at the 95% confidence level. That is to say, there is a 95% probability that the difference reported is real and not the result of sampling error.

Within data tables shown in the report, the symbol "*" indicates a finding of under 0.5 and the symbol "-" indicates a finding of exactly 0. Unless otherwise stated, percentages in data tables are *column* percentages, indicating the proportion of the column total, rather than the proportion of the total in the row.

2. METHODOLOGY

2.1 The telephone survey

As in all previous pay review surveys in this series, interviewing was conducted by telephone using CATI (Computer Aided Telephone Interviewing) technology. Interviewing took place between 11th February and 12th March 2008.

Interviewers initially asked to speak with the most senior person within the organisation responsible for human resources (HR) issues. Typically this would be the HR manager or director in a large organisation or the owner or managing director in smaller ones. In some cases - especially when speaking to larger organisations - we would then be passed on to a colleague with more specific responsibility for equal opportunities issues.

2.2 Sampling

Sampling was undertaken at the enterprise level, meaning that in the case of organisations with more than one site, we spoke to the head office and its representative answered for the whole organisation. This follows the methodology used in previous surveys in this series and is chosen because EPRs may often by organised or administered by head offices.

The sample was drawn from the Dun & Bradstreet business database, as used in 2005. In 2004, the sample for the survey was drawn from the Experian business database. While at an overall level, the Dun & Bradstreet database is not quite as comprehensive as the Experian database, it was primarily compiled on an organisation basis meaning that Dun & Bradstreet is better able to identify head offices than is Experian. As a result, fieldwork can be targeted more effectively at those eligible to take part. It is also the case that Experian's superior coverage is largely at the smaller end of the scale, i.e. businesses that are outside the scope of this survey.

A total of 866 interviews were conducted in Great Britain. For results at an overall level, this gives a maximum standard error of +/-3.3% with a 95% degree of confidence (for findings of around 50%).

Quotas were set within this total by country (location of head office) and, within country, by sector and size interlocked.

The size quota was split into three bands: 25 to 99 employees; 100 to 499 employees; and 500 or more employees. As in previous years, those with fewer than 25 employees were excluded from the survey.

The sector quota was based on four groups, which together covered all industries. Standard Industrial Classification (SIC) definitions of these sectors are shown in Table 2.1.

Table 2.1 Sector definitions

Sector	Sector definition (2 digit 2003 SIC codes)
Manufacturing	01-41
Construction	45
Private services	50-74 and 90-93
Public sector	75, 80, 85

EPR surveys conducted before 2005 did not cover all sectors of the economy. These earlier surveys covered only three sectors, defined as:

Manufacturing: SIC 15-36.

Public sector: SIC 75, 80 and 85.

Private services: SIC 50-74 and 90.

Therefore these surveys excluded organisations whose primary business activity was:

- Agriculture, forestry and mining (SIC codes 01-14).
- Utilities (40 and 41).
- Construction (45).
- Membership organisations (91).
- Leisure activities (92).

Analysis conducted at the time of the 2005 survey showed that the impact of the inclusion of these 'missing' industries is small enough to be negligible at the overall level.

Within each quota cell, sample was drawn on a '1 in n' basis - i.e. a stratified random sample approach was employed. In Scotland and Wales, quotas were set such that the smallest employers (those with between 25 and 99 employees) made up the largest proportion of the overall target. This was done to reflect the actual

employment population within the two countries more closely and to make an analysis of the differences by country easier. In England, a target of 50 was set in each size-by-sector cell, thus under-representing the smallest organisations relative to their incidence in the population, but ensuring that analysis by size is possible across the sample.

The actual sample achieved is summarised below in Tables 2.2, 2.3 and 2.4, while Table 2.5 compares this with the sample achieved in previous surveys.

Table 2.2 Sample achieved in England, 2008

		Size:			
Sector	Total	25-99	100-499	500+	
Manufacturing	143	55	50	38	
Construction	142	53	51	38	
Private services	154	52	53	49	
Public sector	161	54	51	56	
Total	600	214	205	181	

Notes:

Interviews achieved are given as unweighted figures, indicating the actual numbers of interviews conducted in each cell.

Table 2.3 Sample achieved in Scotland, 2008

		Size:			
Sector	Total	25-99	100-499	500+	
Manufacturing	35	23	8	4	
Construction	33	23	7	3	
Private services	30	20	6	4	
Public sector	35	22	8	5	
Total	133	88	29	16	

Notes:

Interviews achieved are given as unweighted figures, indicating the actual numbers of interviews conducted in each cell.

Table 2.4 Sample achieved in Wales, 2008

		Size:			
Sector	Total	25-99	100-499	500+	
Manufacturing	35	23	8	4	
Construction	31	25	5	1	
Private services	33	21	7	5	
Public sector	34	22	8	4	
Total	133	91	28	14	

Notes:

Interviews achieved are given as unweighted figures, indicating the actual numbers of interviews conducted in each cell.

Table 2.5 Sample achieved in EPR surveys, 2001-08

	2001	2002	2003	2004	2005	2008
Total number of organisations	301	251	385	650	872	866
Small organisations (25-99 employees)	-	-	98	282	382	393
Medium-sized organisations (100-499 employees)	116 ¹	113	131	193	260	262
Large organisations (500+ employees	185	138	156	175	230	211
Manufacturing	100	90	146	217	217 ²	213
Construction	-	-	-	-	209	206
Private services	101	80	143	218	220 ²	217
Public sector	100	81	96	215	226	230
England	264	218	-	450	602	600
Scotland	31	23	-	99	135	133
Wales	6	10	-	101	135	133
Organisations with locations in England	-	-	309	501	658	656
Organisations with locations in Scotland	-	-	115	195	245	228
Organisations with locations in Wales	-	-	92	174	220	193

Notes:

Source: Equal pay reviews survey 2008; Adams et al (2006), Table 2.5.

2.3 More detail on the sample achieved

Beyond these key quota variables, other important measures of the sorts of organisations that were interviewed were collected. These were, in particular, the proportion of female employees in the workforce and the countries of Great Britain within which the organisation has sites.

¹ Organisations with 200 to 499 employees only.

² Sector definitions enlarged in 2005.

Table 2.6 Proportion of workforce that is female overall, 2008

	Per cent:
None	2
Less than 5%	8
Between 6 and 10%	9
Between 11 and 20%	13
Between 21 and 30%	9
Between 31 and 40%	10
Between 41 and 50%	13
Between 51 and 60%	11
Between 61 and 70%	10
Between 71 and 80%	6
Between 81 and 90%	3
More than 90%	4
100%	*
Don't know	2
Mean proportion	39
Base: All businesses	866

Source: Equal pay reviews survey 2008.

The mean female proportion of the workforce among sampled employers was 39% (similarly, it was 39% in 2005). There was limited variation across the three constituent countries. Variation by sector, however, was marked.

Table 2.7 shows that establishments in the public sector tend to have a workforce with a substantial female majority. On average, three-quarters of a public sector organisation's workforce is female. Women tend to be in the minority in the three private sectors – they form under a half of the average workforce in the private services sector, less than a third in the manufacturing sector and around an eighth amongst construction organisations. These findings are similar to the previous survey in 2005.

Table 2.7 Proportion of workforce that is female by sector, 2008

		Per cent:				
	GB	Manuf.	Constr.	Private services	Public sector	
Between 0 and 20%	32	46	82	22	1	
Between 21 and 50%	32	33	13	36	13	
Between 51 and 100%	34	19	3	40	84	
Mean proportion	39	31	15	46	75	
Base: All businesses	866	213	206	217	230	

Source: Equal pay reviews survey 2008.

Employees from ethnic minorities form a smaller proportion of employers' workforces – 14% on average. One in five organisations reported that they have no staff from ethnic minorities and for a further quarter the proportion was less than 5%.

Table 2.8 Proportion of workforce that is from ethnic minorities overall, 2008

	Per cent:
None	21
Less than 5%	26
Between 6 and 10%	11
Between 11 and 20%	13
Between 21 and 30%	8
Between 31 and 40%	3
Between 41 and 50%	3
Between 51 and 60%	2
Between 61 and 70%	2
Between 71 and 80%	1
Between 81 and 90%	1
More than 90%	0
100%	0
Don't know	9
Mean proportion	14
Base: All businesses	866

Source: Equal pay reviews survey 2008.

Almost three-fifths of organisations reported that they employed no staff they considered to be disabled (57%); for a further 30%, disabled staff formed less than

5% of the total workforce. On average, just 2% of the staff of organisations was reported to be disabled.

Table 2.9 Proportion of workforce that is disabled overall, 2008

	Per cent:
None	57
Between 1 and 5%	30
Between 6 and 10%	4
Between 11 and 20%	2
Between 21 and 30%	-
Between 31 and 40%	*
More than 40%	-
Don't know	7
Mean proportion	2
Base: All businesses	866

Source: Equal pay reviews survey 2008.

2.4 The questionnaire

The questionnaire used in 2008 is based on that used in previous years to maximise the potential for comparison over time. A copy of the questionnaire is included in the appendix. The principal changes were that new questions were added to:

- Ascertain whether the organisation had an objective or 'mission statement' related to closing the gender pay gap, and in turn discover what that objective is.
- Further gauge the extent to which employers have had equal pay claims filed against them, whether they were canvassed by contingency fee lawyers and by what means they were canvassed.
- Extend the scope of equal pay monitoring to take into account both ethnicity and disability in addition to gender.

As in 2005, the incidence of the separate categories of EPR activity - 'Has conducted', 'Plans to conduct', 'In process of conducting' and 'No plans' - were recorded separately, allowing for a full record of respondents' EPR activity. Once the separate EPR activities had been recorded, a filter was applied to those reporting more than one stage of EPR activity. This determined which EPR the

respondent should discuss for the remainder of the interview and helped respondents to focus on a particular EPR, rather than giving misleading or inconsistent information about several different processes. Routing within the questionnaire was then used to direct respondents to discuss only this EPR. The EPR they were asked about was determined by looking at the one which was the most recently started. This was done so that responses would be about the most up-to-date policies and outcomes.

The four possible categories of EPR activity, in order of priority, and the criteria for falling into these categories are shown in Table 2.10.

Table 2.10 Categories of EPR activity

EPR category	Criteria
EPR in progress	Organisation has an EPR in progress
Completed EPR	Organisation has completed an EPR, but does not have an EPR in progress
Planned EPR	Organisation has an EPR planned, but has neither completed an EPR nor has one in progress
No EPR	Organisation has not completed an EPR, does not have one in progress and has no plans to conduct one
Source: Equal pa	ay reviews survey 2008 questionnaire.

3. EXTENT OF EQUAL PAY REVIEW ACTIVITY

This chapter discusses the incidence of EPRs. Where appropriate, comparisons are drawn with the levels of activity discovered in previous surveys and results are analysed principally by sector, size and country.

3.1 Incidence of EPR activity

Table 3.1 gives the headline incidence of EPR activity in all 866 businesses surveyed. Employers can fall into more than one category (if they plan an EPR and have already completed an EPR, for example).

As in 2005, each respondent was given a short working definition, agreed with the EHRC, of what an EPR is, on which to base their responses. The full text of the question is in the appendix (question 7). This information was intended to help organisations answer accurately and minimise the number mistakenly describing other less rigorous review processes, or processes focused on aspects of equal pay other than gender, ethnicity and disability, as being EPRs. Where respondents were still unsure of the status of pay reviews their organisation had carried out, further detail was given to clarify matters for respondents (see appendix, question 7).

The information given was substantially unchanged from that used in 2005 with the addition of specific reference to EPRs that looked at disability and ethnicity, as well as gender. This means that there will be some increase in the proportion of employers reporting EPR activity due to this broader scope, though the impact is likely to be small.

Table 3.1 Incidence of EPR activity overall, 2008

	Per cent	:
Yes	No	Don't know
17	78	6
5	92	3
17	77	6
76		
	17 5 17	Yes No 17 78 5 92 17 77

Base: All businesses: 866

Notes: Row percentages used.

Source: Equal pay reviews survey 2008.

Over three-quarters (76%) of those interviewed had had no involvement with EPRs whatsoever. That is, they had not completed an EPR, did not have an EPR in progress and did not have plans to conduct an EPR at the time of the interview. Just over one in six had completed an EPR (17%). Only 5% were in the process of conducting an EPR, and a further 17% had plans to conduct an EPR, but did not currently have one in progress. The proportions of respondents who were either unsure whether their organisation had completed an EPR, or were planning an EPR but did not have one in progress, were 6% and 3% respectively.

Since employers could be in more than one category within Table 3.1 (e.g. planning a future EPR, as well as having conducted one in the past), follow-up questions on the implementation of EPRs could potentially be answered by respondents on the basis of more than one process. This would have generated a conflicting or unclear picture. To avoid this, the questionnaire was designed so that respondents were asked about their *most recent* EPR activity only. Hence all those in the process of conducting an EPR were asked about this activity (5%). Those with an EPR completed, but none in progress, were asked about their completed EPR (13%) and those with just an EPR planned and none either completed or in progress were asked about that (6%). In the report, this variable is referred to as 'EPR discussed'.

3.2 Incidence of EPR activity in previous years

The most straightforward and relevant comparison of the incidence of EPR activity is with that reported in 2005 and 2004. Table 3.2 below shows the incidence in 2004 and 2005 compared with 2008's figures for the total sample, based on all interviews conducted in all sectors.

Table 3.2 Incidence of EPR activity overall, 2004-08

	Per cent:				
	2004	2005 (comparable sectors)	2005 (total sample)	2008 (total sample)	
Completed an EPR	21	12	12	17	
In the process of conducting an EPR	5	3	3	5	
Plans to conduct an EPR, but do not currently have a review in progress	20	8	9	17	
No EPR activity	68	82	82	76	
Base: All businesses	650	644	872	866	

Source: Equal pay reviews survey 2008; Adams et al (2006), Table 3.3.

This comparison tells an encouraging story. Between 2004 and 2005, there was a decline in EPR activity, including a decline in the proportion of employers describing themselves as having completed an EPR. A full discussion of the reasons behind this is included in the report on the 2005 survey (Adams et al, 2006: 17-19).

However, the proportion of employers now reporting that they had completed an EPR has increased by 5 percentage points since 2005 to 17%. Similarly, those in the process of conducting an EPR rose 2 percentage points in 2008 and those with plans to conduct an EPR increased by 8 percentage points. The proportion of organisations reporting no involvement with an EPR decreased by 6 percentage points between 2005 and 2008. This further supported the finding of increased EPR activity.

Table 3.3 below shows time series comparison back to 2003. In order to do this the data from 2004-08 are reclassified to match the data collected in 2003. For the 2003 survey, respondents were only able to provide one answer out of the four; in the later surveys respondents could combine answers (and report that they had both completed an EPR in the past and were currently conducting and EPR, for example).

On this measure, the proportion of organisations having completed an EPR has increased to 17% suggesting that those reporting that they were in the process of *conducting* or *planning to conduct* an EPR in previous surveys are translating these plans into completed EPRs. Encouragingly, the proportion of organisations with plans to conduct their first EPR has risen from 4% in 2005 to 6% in 2006. Should these plans continue to convert into completed EPRs, this indicates a sustained upward trend in EPR activity.

Table 3.3 EPR incidence (single-code), 2003-08

	Per cent:			
	2003	2004	2005	2008
Completed	15	21	12	17
First EPR in progress, but none completed	2	2	2	1
Plans to conduct first EPR, but none in progress or completed	15	9	4	6
No EPR activity	68	68	82	76
Base: All businesses	385	650	872	866

Notes: Data in this table are re-categorised so that each respondent falls into one

category only. This reflects the set-up of the questionnaire in 2003 and is

necessary to allow for comparison with results from this survey.

Source: Equal pay reviews survey 2008; Adams et al (2006), Table 3.4.

It seems to be the case that EPRs are receiving more attention from organisations. Interest in those which have been conducted in the past is being sustained and plans to conduct further ones are indicated, suggesting that the issue is back on the agenda of HR departments.

3.3 Proportion of employees covered by EPRs

The analysis so far has looked at the number of organisations conducting EPRs. Table 3.4 below looks at EPRs in terms of what proportion of the total GB workforce (in organisations with 25 staff or more) works in organisations that have conducted, are conducting and are planning to conduct an EPR.

Table 3.4 Incidence of EPR activity overall, 2008 – employee base

		Per cent	•
	Yes	No	Don't know
Completed an EPR	31	55	15
In the process of conducting an EPR	16	79	5
Plans to conduct an EPR, but do not currently have a review in progress	22	61	17
No EPR activity	53	44	3

Base: All businesses: 866

Notes:

Row percentages used. These figures are generated using an employee weight rather than the unit weight used for all other tables in the report. This weights results to reflect the proportion of employees in GB that work in organisations falling into each cell of the weighting grid used for the standard organisation-based weight.

Source: Equal pay reviews survey 2008.

Looking at EPR activity in terms of the number of employees, rather than the number of organisations, gives higher figures for all three kinds of involvement. This is due to the fact that larger organisations, which have the largest share of the GB workforce in organisations with 25 or more staff, report the highest levels of EPR activity.

This analysis shows that nearly a third of this workforce is working for an employer that has conducted an EPR (31%), an increase of 4 percentage points since 2005. The proportion employed by organisations that are in the process of conducting an EPR has remained steady at 16%. The proportion of workers employed by organisations that are currently planning an EPR, however, has fallen to 22% from 31% in 2005. This is despite the fact that in terms of the number of organisations, there has been an overall increase. The reason for this is that, as we will see in the

analysis of EPR activity by size later in this chapter, the proportion of the largest employers (accounting for 70% of the workforce) planning an EPR has fallen since 2005, pulling down the overall figure. However 500+ organisations are relatively uncommon, forming only 5% of all organisations so they do not have a similar effect on the organisation-based measure.

In total, 44% of the GB workforce in organisations with 25 staff or more are employed by an organisation with some EPR activity.

3.4 Incidence of EPR activity by sector

Table 3.5 shows the extent of EPR activity by sector in 2008. We can compare these latest findings with the situation in 2005.

Table 3.5 Incidence of EPR activity by sector, 2008

		Per cent:				
	GB	Manuf.	Constr.	Private services	Public sector	All Private sector
Completed an EPR	17	9	11	20	24	17
In the process of conducting an EPR	5	4	6	4	15	4
Plans to conduct an EPR but do not currently have a review in progress	17	11	17	19	19	16
No EPR activity	76	83	75	75	57	77
Base: All businesses	866	213	206	217	230	636

Source: Equal pay reviews survey 2008.

The incidence of EPR activity amongst public sector organisations is higher than amongst organisations in the three other sectors – almost one in four reported having completed an EPR and 43% reported at least some activity. Across the private sector as a whole, 23% of businesses reported EPR activity.

Public sector employers were also the most likely to be engaged in each of the three stages of EPR activity. As many as 15% of public sector employers had an EPR in progress, three times the national average and almost four times the average in the three other sectors This rises to 18% in local government organisations and 22% in central government organisations.¹

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Note that in this survey, the 'public sector' also includes charity and not-for-profit organisations, as well as private education and healthcare establishments and as local and central government.

The construction sector, reporting workforces with the lowest mean proportion of female employees, show levels of overall EPR activity comparable with the private services and manufacturing sectors – 11% had completed an EPR and 25% in total reported some form of EPR activity.

Compared with 2005, there has been an increase in the proportion of employers reporting some involvement with EPR activity across all industry sectors except manufacturing. Where 22% of manufacturing organisations reported some EPR activity in 2005, that proportion has fallen to 17% in 2008. It is now the sector reporting the least EPR activity. This fall is due, in particular, to a decrease in the proportion of manufacturing employers reporting that they had previously completed an EPR. In real terms, however, business closures notwithstanding, this proportion cannot have dropped. The apparent decline may reflect either that previous EPRs have fallen into disuse, or that the perception of what constitutes an EPR has changed so that reviews previously considered an EPR are no longer considered to be one. Nevertheless, the figures may suggest that within this sector, awareness and engagement with equal pay has decreased.

The largest increase in EPR activity was seen in private services, where 25% of employers now report EPR activity as compared with 15% in 2005. This is driven by an increase from 9% to 20% in the proportion reporting a completed EPR and from 6% to 19% in the proportion reporting plans to conduct an EPR.

As charity and voluntary sector organisations operate across different sectors of industry, they can cross-cut the usual sector analysis. Table 3.6 below shows how charity and voluntary sector organisations specifically compare with the national average.

Table 3.6 Incidence of EPR activity in the charity/voluntary sector, 2008

	Per cent:			
	GB	Charity/voluntary sector		
Completed an EPR	17	28		
In the process of conducting an EPR	5	5		
Plans to conduct an EPR but do not currently have a review in progress	17	19		
No EPR activity	76	66		
Base: All businesses	866	75		

Source: Equal pay reviews survey 2008.

3.5 Incidence of EPR activity by size

Table 3.7 shows that the incidence of EPR activity increased with the number of staff organisations employed. Just under a third (32%) of the largest organisations (those with 500+ employees) had completed an EPR, 15% were in the process of conducting one and 27% did not have an EPR in progress, but were in the process of planning. At the other extreme, only 15% of the smallest organisations sampled (25-99 employees) had completed an EPR, 4% were in the process of conducting an EPR and 15% had no EPR in progress, but were planning one.

Table 3.7 Incidence of EPR activity by size, 2008

		Per cent:		
	GB	25-99	100-499	500+
Completed an EPR	17	15	21	32
In the process of conducting an EPR	5	4	6	15
Plans to conduct an EPR but do not currently have a review in progress	17	15	21	27
No EPR activity	76	80	68	50
Base: All businesses	866	393	262	211

Source: Equal pay reviews survey 2008.

The pattern for 2008 was little changed from that for 2004 and 2005, when an increase in activity by size was also seen. Indeed, the figures for the largest organisations were very close to those reported in 2008, with the largest changes being found in the smaller size bands. In 2005, just one in ten organisations with 25-99 employees had completed an EPR and one in twenty planned to conduct one, but did not have one currently in progress. In 2008, both these figures improved to one in six. Likewise, the proportion of organisations with 100-499 employees, which had completed an EPR, or was planning to conduct one, had both increased to one in five.

3.6 Incidence of EPR activity by country

In this section, an analysis is made of the incidence of EPR activity amongst GB employers by the location of their headquarters.

A comparison of previous survey findings shows a change from 2005. Organisations with their head office in England were the most likely to report EPR activity in 2008. The proportion of these organisations that reported some form of activity increased from 18% to 26%, in line with the national picture. In contrast, employers based in Scotland and Wales showed a decline in reported EPR activity. Those reporting completed EPRs comprised only 5% of employers in Scotland and 11% of those in

Wales in 2008. In 2005, these figures were 12% and 17% respectively. As with the fall in manufacturing organisations' reported EPR activity, this again suggests that engagement with EPRs (and therefore knowledge that they have been performed in the past) has fallen since 2005 amongst Scottish and Welsh employers. It also suggests that the EPRs reported to be *taking place* or *planned* in 2005 may have failed to translate into completed EPRs. Moreover, the proportions of employers in Scotland and Wales currently conducting, or with plans to conduct EPRs, have fallen, signalling that this downwards trend could continue.

Table 3.8 Incidence of EPR activity by country, 2008

			Per cent:	
	GB	England	Scotland	Wales
Completed an EPR	17	18	5	11
In the process of conducting an EPR	5	5	3	2
Plans to conduct an EPR but do not currently have a review in progress	17	18	6	7
No EPR activity	76	74	90	83
Base: All businesses	866	600	135	135

Source: Equal pay reviews survey 2008.

3.7 Incidence of EPR activity by female proportion of the workforce

As may be expected, Table 3.9 shows there is variation in the proportion of organisations involved in EPR activity according to the proportion of the workforce that is female. It reveals that the lower the proportion of women comprising the workforce, the lower the level of EPR activity.

Table 3.9 Incidence of EPR activity by female proportion of the workforce, 2008

		Per cent:				
	GB	0-20%	21-50%	51-100%		
Completed an EPR	17	7	25	18		
In the process of conducting an EPR	5	6	6	3		
Plans to conduct an EPR but do not currently have a review in progress	17	6	29	15		
No EPR activity	76	87	64	77		
Base: All businesses+	866	296	214	331		

Notes:

+ Respondents who were unsure of the proportion of the proportion of female workers in their organisation are not included in this analysis, hence unweighted bases do not sum to 866.

Source: Equal pay reviews survey 2008.

Table 3.9 shows that employers with the lowest proportion of female employees (less than 20%), in their workforce were the least likely to be involved in any kind of EPR activity (87% reported no EPR activity whatsoever). At the opposite extreme, employers with a workforce that is between 21-50% female, show a considerable increase in EPR activity. Within this category, organisations completing EPRs have increased 11 percentage points to 25% and those with plans to conduct an EPR have increased from just over one in ten to nearly one in three. To a lesser extent, organisations comprised of 51-100% women also reported increased activity. Employers from this category involved in any type of EPR activity increased from 20% to 23%. In 2005, there was far less variation according to the proportion of the workforce that is female.

Table 3.10 below shows EPR activity for employers with different proportions of staff from ethnic minorities.

Table 3.10 Incidence of EPR activity by proportion of the workforce from ethnic minorities, 2008

		Per cent:		
	GB	0-20%	21-50%	51-100%
Completed an EPR	17	18	9	10
In the process of conducting an EPR	5	5	6	-
Plans to conduct an EPR but do not currently have a review in progress	17	17	15	9
No EPR activity	76	75	79	89
Base: All businesses+	866	644	102	24

Notes:

+ Respondents who were unsure of the proportion of the proportion of ethnic minority workers in their organisation are not included in this analysis, hence unweighted bases do not sum to 866.

Source: Equal pay reviews survey 2008.

Table 3.10 shows that in fact those organisations with between 0 and 20% of staff from ethnic minorities report the highest incidence of EPR activity – a quarter report EPR activity of some sort (25%). This may partly be the effect of relatively small base sizes (the difference between those with between 0% and 20% and those with 51-100% is not statistically significant) but nevertheless suggests that at best having a higher proportion of staff from ethnic minorities does not increase the likelihood of conducting an EPR, and may even make it less likely.

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To some extent, the variation in EPR activity by proportion of the workforce that is female reflects the fact that public sector organisations (that exhibit greater levels of activity) tend to have workforces containing a higher proportion of women.

Base sizes for organisations with a substantial proportion of disabled staff are insufficient for proper analysis of EPR activity by the proportion of the total workforce who are disabled.

3.8 Comparison with CIPD research

The Chartered Institute of Personnel and Development (CIPD) produce a yearly survey of their members' approaches to reward management. The most recent of these was published in February 2008 and provides findings based on 603 self-completion questionnaires returned in late 2007 (Cotton, 2008). The CIPD's survey includes a question on EPRs. This found that over half of the CIPD members taking part in the survey had either completed an EPR or were planning to do so in 2008 (54%). This compares with 24% found by the research published in this report, markedly lower than the findings of the CIPD survey.

That the CIPD's estimate for EPR activity is considerably higher than that found in this research is in keeping with the findings in 2004. As in 2008, the 2004 CIPD survey gave a higher degree of activity. The difference in the estimates is likely to be due to the fact that the population surveyed by the CIPD – reward specialists and people managers who are members of the CIPD – are likely to represent a considerably more engaged audience than the randomly selected sample used for the present survey.

By sector, a similar pattern emerges from the CIPD's data as from the findings of the present research – that public sector employers are the most likely to have conducted an EPR (82%) as compared with 44% of manufacturing and production organisations and 48% of private services organisations.

By size, however, the CIPD survey reported the opposite pattern to that found by this research. It found that smaller organisations are more likely to have conducted an EPR than larger ones (63% of those with between 0 and 49 staff have done so, falling to 21% of those with 5,000 staff or more). It should be noted that this reduction in activity with size is very surprising not only when compared with this research, but also in comparison to previous CIPD research which has found consistently in all previous years that EPR activity *increases* with organisational size. This finding may reflect the fact that the number of small businesses responding to the CIPD study was relatively small (31).

3.9 Gender pay gap objectives

Overall, nearly two-fifths of organisations (37%) stated that they have an objective relating to closing the gender pay gap. The proportion of firms with such an objective

was fairly consistent within the private sector, ranging between 31% of manufacturing firms and 36% of construction firms. However, in the public sector, the proportion rose to almost two-thirds (63%) as shown in Table 3.11.

Table 3.11 Whether organisation has an objective relating to the pay gap by sector, 2008

		Per cent:				
	GB	Manuf.	Constr.	Private services	Public sector	All Private sector
Yes	37	31	36	35	63	35
No	62	69	64	64	34	65
Don't know	1	1	1	0	4	0
Base: All businesses	866	213	206	217	230	636

Source: Equal pay reviews survey 2008.

A breakdown by size of organisation shows that the larger an organisation is, the more likely it is to have an objective relating to the gender pay gap. As shown by the table below, less than a third of organisations in the smallest size band (30%) have such an objective, which increases to just under half (46%) of those with between 100 and 499 staff, and over half (56%) in the largest size band.

Table 3.12 Whether organisation has an objective relating to the pay gap by size, 2008

		Per cent:			
	GB	25-99	100-499	500+	
Yes	37	30	46	56	
No	62	70	53	40	
Don't know	1	0	1	3	
Base: All businesses	866	393	262	211	

Source: Equal pay reviews survey 2008.

Organisations based in Scotland are more likely to have an objective relating to the pay gap (62%, compared with 37% overall). A substantial part (though not all) of this difference may be on account of the fact that organisations with their head offices in Scotland tend to be larger and Table 3.12 illustrates, larger firms are more likely to have an objective relating to the pay gap.

In terms of the specific nature of the objectives related to closing the gender pay gap that were reported by respondents, Table 3.13 shows that the most commonly cited objective was to have an 'equal pay policy' where pay is relative to position, status or value. This was reported by over half the respondents (51%). In the construction sector however, only 11% mentioned this as their objective; this is largely balanced out by a higher than average proportion of organisations in the sector which described their objective as having or ensuring that 'treatment or conditions are equal' (30%, compared with 6% overall). Organisations in the public sector were more likely to have an EPR as the basis for their objective or policy on closing the pay gap (16%, compared with 4% overall), in keeping with the greater incidence of EPR activity amongst these organisations.

Table 3.13 Objective related to closing the pay gap by sector, 2008

		Per cent:				
	GB	Manuf.	Constr.	Private services	Public sector	All Private sector
Pay is equal/pay related to position, status or value	51	30	11	64	38	54
Equality policy/statement	13	11	6	14	12	13
Treatment or conditions are equal	6	11	30	1	7	6
Equal pay review	4	3	1	2	16	2
Comply with law/government guidelines	3	0	15	4	0	4
Job/role review	2	0	0	1	6	1
Other review process (including grading, single status)	1	7	0	0	1	1
Diversity statement	0	0	1	0	0	0
Other	7	4	0	6	16	5
Don't know	13	35	36	8	3	15
Base: All businesses with an objective related to closing the gender pay gap	137	18	21	28	70	67

Source: Equal pay reviews survey 2008.

An analysis of the nature of an organisation's objectives relating to closing the gender pay gap by size re-enforces the idea that the larger an organisation is, the more likely it is to have a tangible objective. Just as companies in the smallest size band are less likely to have such an objective, those that do so mainly (76%) describe an 'equal pay policy' where pay is relative to position, status and value. No smaller organisations

mentioned having a more rigid 'equality policy/statement', but larger firms of 100-499 and 500+ employees did so in significant numbers (29% and 21% respectively). Similarly, organisations in the largest size band were far more likely than average to cite an EPR as forming the basis for their objective on closing the gender gap.

Table 3.14 Objective related to closing the pay gap by size, 2008

		Per cent:		
	GB	25-99	100-499	500+
Pay is equal/pay related to position, status or value	51	76	22	30
Treatment or conditions are equal	6	6	6	5
Equality policy/statement	13	0	29	21
Equal pay review	4	1	3	16
Job/role review	2	0	2	6
Other review process (including grading, single status)	1	0	3	1
Diversity statement	0	0	0	0
Comply with law/government guidelines	3	2	7	0
Other	7	1	9	18
Don't know	13	13	19	3
Base: All businesses with an objective related to closing the gender pay gap	137	28	44	65

Source: Equal pay reviews survey 2008.

3.10 Equal pay claims

Staff who believe that they are not receiving equal pay in contravention of the Equal Pay Act, may bring an equal pay claim against their employer. As Table 3.15 shows, only 1% of organisations had had an equal pay claim filed against it in the past and a further 1% were in the process of currently dealing with an equal pay claim. The majority of these organisations are in the public sector.

Table 3.15 Whether organisation has had equal pay claims filed against it, 2008

	Per cent:					
	GB	Manuf.	Constr.	Private services	Public sector	All Private sector
Yes – in the past	1	0	*	*	4	*
Yes - Currently	1	0	0	*	6	*
No	98	97	100	99	85	99
Don't know	1	3	0	0	6	1
Base: All businesses	866	213	206	217	230	636

Source: Equal pay reviews survey 2008.

As Table 3.16 illustrates, for the majority of organisations (55%) who have had an equal pay claim filed against them, the number of cases filed in their organisation is less than 20. In the private sector, no organisations have had more than 100 cases filed against them. In the public sector, the majority of organisations (57%) have had less than 20 cases filed against them; but there are instances of organisations having had considerably more claims filed.

Table 3.16 Number of cases filed against organisation

	Per cent:
Less than 20	55
20 – 100	22
100 – 500	11
Over 500	6
Don't know	6
Base: Businesses who have had an equal pay claim filed against them	15

Source: Equal pay reviews survey 2008.

In terms of the assistance used by employees in making an equal pay claim, the majority of claimants did use legal representation in one form or another (89%).

3.11 Canvassing by contingency fee lawyers

Overall, only 2% of organisations reported that their employees had been canvassed by contingency fee (no win/no fee) lawyers, varying little between organisations of different sizes and sectors and with their head offices in different countries (Table 3.17). There were significantly high rates of 'Don't know' answers to this question,

rising as high as 16% in private services, illustrating that a great many employers recognise that such activity may go on without their knowing about it.

Table 3.17 Whether employees were canvassed by contingency fee lawyers, 2008

	Per cent:
	GB
Yes	2
No	84
Don't know	14
Base: All businesses	866

Source: Equal pay reviews survey 2008.

3.12 Conclusions

The overall proportion of organisations reporting a completed EPR increased from 12% in 2005 to 17% in 2008. The level of activity generally has also risen. In 2005, 82% of employers reported no involvement whatsoever with EPRs, a proportion which fell to 76% in 2008.

By size, the larger employers showed the highest level of engagement with EPR activity, with just under a third (32%) having completed an EPR. That said, it should be noted that a further 15% of large organisations were in the process of conducting an EPR in 2008, while an additional 27% planned to conduct such a review. Overall, then, 50% reported *some* EPR activity. By 2004, 33% of large organisations had completed an EPR. But between 2004 and 2008, activity stagnated.

Employers based in England were the most likely to have completed an EPR, in 2008. In total, 18% of these organisations had completed an EPR as compared with only 5% and 11% in Scotland and Wales respectively. Employers in Wales showed a particular decline in EPR activity, which is surprising given the predominance of the public sector amongst Welsh employers.

By sector, public sector organisations were the most likely to report EPR activity (43% did so). However, almost as many private services (20%), as public sector organisations (24%), had actually completed EPRs. The manufacturing sector, showed a decline from 2005, with 9% reporting a completed EPR in 2008, as compared with 18% in the 2005 survey. The construction sector showed comparable levels with the other sectors of the economy, with 11% having completed an EPR and 25% reporting some EPR activity.

4. CONDUCTING AN EPR

This chapter addresses the reasons employers gave for their level of EPR activity both the reasons they provided for having conducted, currently conducting or planning an EPR, and the reasons they gave for having not done so.

4.1 Reasons for conducting an EPR

Table 4.1 shows the reasons given by GB employers for deciding to conduct an EPR. This includes completed and planned EPRs, as well as those currently in progress. Respondents were also asked to nominate the single 'main reason' behind their decision to conduct an EPR. Where just one reason was mentioned initially, this was taken to be the 'main reason' automatically.

Table 4.1 Reasons for conducting an EPR overall, 2008

	Per cent:		
	All reasons mentioned	Main reason	
Saw it as good business sense	87	25	
Wanted to be seen as a good practice employer	82	51	
As a result of government policy or publicity	22	7	
As a result of leadership from employer bodies	22	1	
As a result of EHRC policy or publicity	8	1	
Were under pressure from trade unions	5	2	
To investigate or close gaps in pay	5	5	
Standard practice	4	3	
As a result of equal pay cases being raised in your organisation	4	1	
Change of ownership/management/policy	2	1	
Were introducing new pay scales/structures	1	1	
Other	1	*	
Don't know	*	1	
Base: All businesses that have conducted, are conducting or plan to conduct an EPR	270	270	

Source: Equal pay reviews survey 2008.

The most commonly cited reason for conducting an EPR amongst GB employers was that it was seen as 'good business sense'. Almost nine-tenths (87%) mentioned it, and a quarter (25%) nominated it as the single most important reason behind their decision. Over eight-tenths (82%) of organisations mentioned that they conducted an

EPR 'to be seen as a good practice employer', and over half cited this as their main reason for doing so (51%). Government policy or publicity was mentioned by a just under a quarter of employers (22%) as a reason for conducting an EPR, but only one in fourteen perceived it to be the key reason behind their decision. Leadership from employer bodies was also mentioned by just under a quarter of organisations (22%) as a reason for conducting an EPR, but only 1% considered this to be their main reason for doing so.

EOC policy or publicity and pressure from trade unions were mentioned by around one in fifteen to twenty employers, but were very rarely the main reasons for involvement with EPRs. Hence these factors are influences rather than key drivers.

By contrast, while only 5% of organisations mention 'to investigate or close gaps in pay' as a reason for conducting an EPR, the same proportion cite this as the main reason for doing so. This implies that, for certain firms, the key driver for EPR activity is either the existence of pay gaps or the desire to locate pay gaps within their organisation. This shows an encouraging willingness amongst these employers to engage with the issue of equal pay.

Table 4.2 shows the most important reason that employers gave for conducting or planning EPRs in 2005 and 2008.

Table 4.2 Main reason given for conducting an EPR, 2005 and 2008

	Per cent:	
	2005	2008
Wanted to be seen as a good practice employer	58	51
Saw it as good business sense	17	25
As a result of government policy or publicity	13	7
All other reasons/don't know	12	16
Base: All businesses that have conducted, are conducting or plan to conduct an EPR	267	270

Source: Equal pay reviews survey 2008; Adams et al (2006), Table 4.2.

Table 4.2 reveals that the hierarchy of importance to organisations, in terms of their main reason for conducting an EPR, remains unchanged since 2005. However, the two categories being 'seen as a good practice employer' and 'as a result of government policy or publicity' have fallen proportionately in comparison with 2005, whereas seeing an EPR as 'good business sense' has increased proportionally.

4.2 Reasons for conducting an EPR by sector

Table 4.3 shows the variation in the reasons for conducting an EPR by sector.

Table 4.3 Reasons for conducting an EPR by sector, 2008

				Per cent	t:	
	GB	Manuf.	Constr.	Private services	Public sector	All Private sector
Wanted to be seen as a good practice employer	82	78	81	82	88	81
Saw it as good business sense	87	79	70	93	76	88
As a result of government policy or publicity	22	8	14	22	50	19
As a result of leadership from employer bodies	22	19	26	19	44	19
As a result of EOC policy or publicity	8	7	13	4	30	6
Base: All businesses that have conducted, are conducting or plan to conduct an EPR	270	52	50	63	105	165

Source: Equal pay reviews survey 2008.

It is important to note that the questionnaire asked about EOC policy or publicity, rather than EHRC policy or publicity, because it was thought, at the time of research, that organisations would have been more influenced by the former organisation than the latter (given the EHRC had only been in operation for a few months at the time).

As might be expected, public sector employers were significantly more likely than average to be influenced by policy or publicity from either the EOC or the Government. They were also significantly more likely than average to conduct an EPR as a result of leadership from employer bodies; almost half (44%) cited this as a reason, compared with less than two-fifths (19%) of private sector employers.

The desire to be seen as a good practice employer and the belief that conducting an EPR is good business sense are consistently the most common motivators across all sectors.

4.3 Reasons for conducting an EPR by size

There were few significant variations by size in the reasons given for conducting EPRs, as can be seen from Table 4.4. The influence of EOC policy or publicity rises steeply with size of employer, with only 3% of the 25-99 size band citing this as a reason, compared with over a quarter (26%) of the largest employers (with 500+

staff). In a similar vein, the influence of leadership from employer bodies is most cited by the largest employers and government policy and publicity is most prevalent amongst the two larger sizebands (100-499 and 500+).

Table 4.4 Reasons for conducting an EPR by size, 2008

			Per cent:	
	GB	25-99	100-499	500+
Wanted to be seen as a good practice employer	82	77	92	88
Saw it as good business sense	87	92	77	81
As a result of government policy or publicity	22	14	38	31
As a result of leadership from employer bodies	22	25	11	29
As a result of EOC policy or publicity	8	3	13	26
Base: All businesses that have conducted, are conducting or plan to conduct an EPR	270	72	86	112

Source: Equal pay reviews survey 2008.

4.4 Reasons for not conducting an EPR

Employers that had no involvement with an EPR (none conducted, planned or in progress) were asked the reasons for this. The responses are displayed in Table 4.5. The belief by employers that they already provide equal pay was by far the most common reason given for having no involvement with an EPR (93%). Two-fifths (42%) said that the organisation already had an analytic job evaluation system.

Three of the four most cited responses have a commonality in that they imply that the organisation does not *need* to conduct to an EPR. However, other frequently cited responses do not necessarily imply a lack of need; around one in ten employers stated that they did not have either the financial resources (12%) or time (11%) to carry out such a review. No other reason was mentioned by more than one in twenty of these employers.

Table 4.5 Reasons for having no involvement with an EPR overall, 2008

	Per cent:
Consider they already provide equal pay	93
Organisation has an analytic job evaluation system	42
Do not have the financial resources to carry out a review	12
Are implementing or planning to implement a new pay or grading system	12
Do not have time to carry out a review	11
Feel current processes are sufficient	6
Wages are performance, merit or experience-based	2
Conducted by Head Office	2
Men and women employed in different roles	1
Workforce largely male	1
Haven't thought about it/wasn't aware of the problem	1
Workforce largely female	1
Small company	1
Pay rates fixed by industry/unions/government	1
Recent change of ownership/management	*
Have concerns about what such a review would find	*
Other	1
Don't know	1
Base: All businesses that have not conducted, are not currently conducting and do not plan to conduct an EPR	596

Source: Equal pay reviews survey 2008.

The reason most commonly given by organisations for not having any involvement with an EPR was that they considered that they already provided equal pay.

4.5 Reasons for not conducting an EPR by sector

Overall, there was very little variation in the reasons for having no involvement in an EPR by business sector. However, some differences were observed and are highlighted in bold in Table 4.6.

Private sector employers were more likely to report lack of time (11%) and financial resources (12%) than public sector counterparts as reasons for their lack of involvement in EPR (6% and 7% respectively). Private sector organisations were also twice as likely as public sector organisations to state that their current processes are sufficient.

Table 4.6 Reasons for having no involvement with an EPR by sector, 2008

	Per cent:					
	GB	Manuf.	Constr.	Private services	Public sector	All Private sector
Consider they already provide equal pay	93	88	85	96	93	93
Organisation has an analytic job evaluation system	42	42	38	42	47	42
Do not have the financial resources to carry out a review	12	11	7	13	7	12
Are implementing or planning to implement a new pay or grading system	12	9	13	13	10	12
Do not have time to carry out a review	11	13	13	10	6	11
Feel current processes are sufficient	6	2	3	8	3	6
Wages are performance, merit or experience-based	2	-	*	4	-	2
Conducted by Head Office	2	1	2	2	-	2
Men and women employed in different roles	1	1	4	*	-	1
Workforce largely male	1	2	5	*	-	1
Haven't thought about it/wasn't aware of the problem	1	1	*	*	-	1
Workforce largely female	1	-	-	2	3	1
Small company	1	*	-	1	*	1
Pay rates fixed by industry/unions/government	1	1	3	-	2	*
Recent change in ownership/management	*	*	-	*	*	*
Have concerns about what such a review would find	*	1	3	-	-	*
Base: All businesses that have not conducted, are not currently conducting and do not plan to conduct an EPR	596	161	156	154	125	471

Source: Equal pay reviews survey 2008.

Those operating in the construction sector were slightly more likely than average to have pay rates that were fixed by the industry, unions or government. Significantly more employers from this sector than average also cited having a largely male

workforce and men and women employed in different job roles as reasons for not having involvement in EPRs.

4.6 Reasons for not conducting an EPR by size

Variations in the reasons given for not conducting an EPR by size are shown in Table 4.7.

Table 4.7 Reasons for having no involvement with an EPR by size, 2008

			Per cent	:
	GB	25-99	100-499	500+
Consider they already provide equal pay	93	95	89	78
Organisation has an analytic job evaluation system	42	45	29	40
Do not have the financial resources to carry out a review	12	12	13	6
Are implementing or planning to implement a new pay or grading system	12	11	15	22
Do not have time to carry out a review	11	11	11	10
Base: All businesses that have not conducted, are not currently conducting and do not plan to conduct an EPR	596	321	176	99

Source: Equal pay reviews survey 2008.

The belief that the organisation already has a non-discriminatory pay system was still the most commonly given reason across all size bands. At least seven in ten employers felt this to be the case.

The largest employers (with 500+ employees) were significantly more likely than GB employers as a whole to state that they are implementing or planning to implement a new pay or grading system. More than one in five cited this as a reason for not being involved in an EPR compared to just over one in ten at GB level.

A significantly lower proportion of the largest employers stated lack of financial resources as a reason for a lack of EPR activity – 6%, as compared with 12% of all employers. This is encouraging given that, in the previous survey, larger employers commonly cited this reason for not being engaged in EPR activity. This would suggest that larger companies have resolved this issue since 2005.

4.7 Reasons for not conducting an EPR by country

Table 4.8 shows the differences given for not conducting an EPR by country.

Table 4.8 Reasons for having no involvement with an EPR by country, 2008

			Per cent:	
	GB	England	Scotland	Wales
Consider they already provide equal pay	93	93	94	98
Organisation has an analytic job evaluation system	42	42	41	37
Do not have the financial resources to carry out a review	12	11	16	21
Are implementing or planning to implement a new pay or grading system	12	12	13	7
Do not have time to carry out a review	11	10	17	17
Feel current processes are sufficient	6	7	2	4
Wages are performance, merit or experience-based	2	3	-	-
Conducted by Head Office	2	2	-	-
Men and women employed in different roles	1	1	3	*
Workforce largely male	1	1	1	6
Haven't thought about it/wasn't aware of the problem	1	1	3	3
Workforce largely female	1	2	-	-
Small company	1	1	-	*
Pay rates fixed by industry/unions/government	1	*	3	1
Recent change of ownership/management	*	*	-	*
Have concerns about what such a review would find	*	*	-	2
Other	1	1	*	3
Don't know	1	1	*	*
Base: All businesses	596	393	102	101

Source: Equal pay reviews survey 2008.

Table 4.8 shows that employers in Wales were more likely than those in England and Scotland to be convinced that their pay systems were not discriminatory. Employers in both Scotland and Wales reported shortage of financial resources as a reason for a lack of EPR activity; 21% of employers in Wales and 16% of employers in Scotland cited this reason, as compared with only 11% of those in England.

4.8 Equal pay questionnaires

Equal pay questionnaires are intended to help individuals who believe they may not be receiving equal pay to request information from their employers to establish whether this is the case and if so, the reasons why. These questionnaires were drawn up by the Women and Equality Unit, a unit within the Department for Trade and Industry, and only came into effect in April 2003. The purpose of the questionnaire is to make asking such questions easier for individuals, and answering them easier for employers. The questionnaire as presented to an employer would include:

- A statement of why the individual thinks they are not receiving equal pay, followed by a statement of who they believe their comparators are.
- Factual questions to ascertain whether they are receiving less pay than their comparator and, if so, the reasons why.
- A question about whether the employer agrees that the people being compared are doing equal work or work of equal value.
- The individual's own questions.

When a questionnaire is presented to an employer, its completion is not compulsory, although tribunals are entitled to draw conclusions from a refusal or evasive responses.

As shown in Table 4.9, the proportion of employers that had been presented with an equal pay questionnaire was very low (2% in the GB as a whole). That said, this proportion has marginally improved since 2004 and 2005 when just 1% of employers had been presented with a questionnaire. However, the relationship between the questionnaires and EPRs is unclear – we do not know whether the questionnaire tipped the employer into carrying out an EPR, or whether the information coming out of the EPR led to the questionnaire being served.

Table 4.9 also shows that the largest organisations were more likely than their smaller counterparts to have been presented with an equal pay questionnaire. This difference is much more marked than in 2005, where less than one in twenty of the largest organisations had been presented with one as compared with more than one in ten in 2008.

Public sector employers were far more likely to have been presented with an equal pay questionnaire than employers in other sectors. Of those surveyed, 7% reported this occurrence, more than three times the GB average.

There was no significant variation in the proportion of organisations to which an equal pay questionnaire had been presented by country (as also demonstrated by Table 4.9).

Table 4.9 Incidence of organisations presented with an equal pay questionnaire, 2004-08

		Per cent:	
	2004	2005	2008
GB	1	1	2
Size			
25-99	*	*	1
100-499	3	2	2
500+	11	3	11
Sector			
Manufacturing	1	*	2
Construction	-	*	3
Private services	1	1	1
Public sector	4	2	7
All private services	1	1	1
Country			
England	1	1	2
Scotland	1	2	*
Wales	3	1	1
Base: All businesses	650	872	866

Source:

Equal pay reviews survey 2008; Adams et al (2006), Table 4.9.

4.9 Conclusions

The most common reason for conducting an EPR was seeing doing so as representing good business sense (87%); 51% said this was the main reason. A similarly high proportion said they had made their decision because they saw it as good practice (82%). In both cases, these are general principles rather than reasons specific to the organisation. By contrast, very few employers (4%) mentioned equal pay cases being brought against the business. The Government, the EOC and employer bodies were seldom stated as the main reason for conducting an EPR.

Interestingly, 5% of employers said their decision to conduct an EPR was due to a wish to investigate or close pay gaps, demonstrating an encouraging engagement with the issue.

The great majority of employers that reported no EPR activity whatsoever said that the reason for this was that they believed that they already had equal pay in their organisation. Although this belief remained the most common reason for having not carried out an EPR across all sub-sectors of employers, a number of employers cited a lack of time (11%) and financial resources (12%) to carry out a review.

In 2008, 2% of employers had been presented with an equal pay questionnaire by one of their employees (compared with 1% in 2005). The largest organisations were more likely than other organisations to have been presented with an equal pay questionnaire, as were public sector than private sector organisations

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5. THE EPR PROCESS AND RESULTS

As in previous surveys, in 2008 respondents with some EPR involvement were asked a series of follow-up questions to draw out more detail about the process they went through and the methods they used, as well as information about the timing of their EPR and its scope. This chapter discusses the key findings of this section of the survey.

Organisations that had completed an EPR, had an EPR in progress or were planning an EPR, were asked the dates that these reviews had started or were expected to start. Where organisations fell into more than one of these categories, they were asked about just the most recent (i.e. any in progress, then any completed and then any planned).

It is important to note that the 2008 survey took place in February/March, rather than October/November as had been the case for the previous surveys. This has an impact on the likelihood of EPRs being conducted in 2008. All things being equal, the likelihood of an EPR being started in 2008 is less likely than for it was for an EPR to have been conducted in 2006 at the time of the 2006 survey.

5.1 Start date of completed EPR

Table 5.1 shows the dates that those discussing completed EPRs had started that EPR. In 2008, a very low proportion of employers discussing a completed EPR had started the EPR under discussion that same year – just 3% reported that this was the case. This will be partly due to the timing of the survey as explained previously. This pattern is somewhat different from that observed in previous surveys. In 2004, almost half (47%) of those discussing a completed EPR had started it that year. While this reduced to 27% of completed EPRs in 2005, this has since dropped dramatically to the proportion in 2008. There is no doubt that the earlier start of the survey in 2008 makes this unrepresentative of EPR activity in 2008 as a whole. The proportion of EPRs started in the 12 months preceding the survey (i.e. April 2007 to March 2008) was 10% which is still considerably lower than the figures for 2004 and 2005.

Of completed EPRs currently being discussed in 2008, 15% were begun in 2007 and 27% in 2006. By contrast, 38% of employers stated that their completed EPRs began in 2004 or earlier (some of course started in 2005). The proportion of employers discussing a completed EPR reporting that this began two years before has steadily risen from just 23% in 2004 to 65% in 2008. While it could be interpreted that this is due to the increasing period of time that EPRs have been in operation and an

increased amount of EPR activity, it is also a possible indication that the process of EPR is slowing down.

Table 5.1 Start date of completed EPR, 2008

	Per cent:
2008	3
2007	15
2006	27
2005	11
2004	2
2003	8
2002	*
2001	2
1996 - 2000	8
1991 - 1995	1
1990 and earlier	6
Don't know	16
Base: All businesses discussing a completed EPR	118

Source:

Equal pay reviews survey 2008.

5.2 Start date of EPR in progress

Those discussing an EPR in progress (which was all employers that had an EPR in progress) were asked when this EPR was started (Table 5.2). Almost half (41%) of those discussing an EPR in progress had started the EPR in 2008 (62% had started their EPR in the 12 months preceding the survey). In total 41% had begun between 2005 and 2007.

A relatively small proportion (11%) of employers discussing an EPR in progress began in 2003 or earlier. In comparison, in 2005, more than a quarter (28%) had begun five years previously or more. This suggests that the process of completing an EPR is becoming more of a continuous one.

Table 5.2 Date EPR in progress was started, 2008

	Per cent:
2008	41
2007	11
2006	22
2005	8
2004	1
2003	2
2002	-
2001	-
2000 and earlier	9
Don't know	5
Base: All businesses discussing an EPR in progress	72

Source:

Equal pay reviews survey 2008.

5.3 Date planned EPR is likely to start

Those discussing a planned EPR, who had neither completed an EPR nor had one in progress, were asked the date at which they expected to start this EPR (Table 5.3).

Table 5.3 Date planned EPR is likely to start, 2008

	Per cent:
Within the next six months	56
Within the next year, but not in the next six months	16
At a point over 12 months away	11
No fixed start date yet	14
Other	1
Don't know	2
Base: All businesses discussing a planned EPR	80

Source:

Equal pay reviews survey 2008.

The majority of employers (56%) discussing their first planned EPR anticipated starting the review within six months of the interview (placing the EPR date before Autumn 2008). This proportion has doubled from 2005 when just 26% envisaged beginning an EPR within such a short timescale.

Similarly, in 2005 more than two-fifths of employers (44%) had no fixed start date for their planned EPR at the time of interview. In 2008, this reduced to just 14%, suggesting that an increasing proportion of employers have fixed plans for future EPRs within a relatively short period of time.

5.4 Plans to repeat EPRs

The great majority of organisations that had completed an EPR or were already in the process of conducting one expected to repeat the review, with nearly half saying they planned to do so every year (47%). A further fifth had plans to repeat the EPR every two years (19%) or every three years (19%). Just 6% had no plans to repeat their EPR. This is markedly lower than was seen in 2005 when one in five said that they had no plans to repeat their EPR.

Table 5.4 Plans to repeat EPRs, 2008

	Per cent:
Every year	47
Every two years	19
Every three years	19
Every four years	1
Every five or more years	6
Ongoing	1
Dependent on company review of policy/external factors	1
Other	*
Don't know	1
No plans to repeat	6
Base: All businesses that had conducted or were conducting an EPR	190

Source: Equal pay reviews survey 2008.

5.5 Approaches taken to conducting an EPR

The 190 respondents (unweighted) that had either completed an EPR, or were in the process of conducting one, were asked about the methods they had used, or were using, to do this (Table 5.5). Initially, all methods involved in their review were recorded. Where more than one method was mentioned, respondents were then asked to nominate the most important of these methods. The results of this question are summarised below at an overall level; where only one method was mentioned, it was automatically recorded as being the most important.

The use of review processes devised by the organisation themselves was by far the most common approach taken for implementing EPRs (66%). Moreover, it was felt to

be the most important approach by more than half (55%) of those that had conducted, or were conducting, an EPR. In addition, 42% of employers mentioned having sought the advice of consultants as part of the process of conducting an EPR, with just under one in four citing this as the most important approach.

Just over one in six employers (16%) had used the EOC's Equal Pay Review Kit (12% had used the kit designed for smaller employers, with a further 4% using the equivalent for larger organisations). ³ More than one in ten cited it as the most important part of their overall approach to conducting an EPR.

Table 5.5 Approaches taken to conducting an EPR overall, 2008

	Per cent:		
	All approaches mentioned	Most important approach	
Own review process	66	55	
The advice of consultants	42	23	
The EOC Small Employers Equal Pay Review Kit	12	7	
The EOC Equal Pay Review Kit (designed for larger employers)	4	5	
Model/standard for NHS, LEA, council etc.	2	1	
The advice of trade unions or industry bodies	2	1	
The advice of ACAS/Business Link/BERR	1	*	
Industry models (various)	*	-	
Other	1	*	
Don't know	11	11	
Base: All businesses that have conducted or are conducting an EPR	190	190	

Source: Equal pay reviews survey 2008.

As Table 5.5 shows, employers appear to be becomingly increasingly likely to seek the advice of consultants. Since 2005, this means of implementing an EPR has increased significantly in popularity. In 2008, 42% of employers cited this as a method used to action an EPR, an increase of 17 percentage points. The proportion of employers using an Equal Pay Review Kit (particularly those designed for smaller businesses) has similarly increased.

Methods to conduct an EPR that use external agencies are therefore increasing in popularity. In line with this pattern, reliance on an organisation's own review

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³ A small proportion of employers stated that they used both kits.

processes has declined. In 2008, just 66% cited this as their means of implementing an EPR, compared with at least 71% in previous surveys.

Table 5.6 Main approaches taken to conducting an EPR, 2003-08

	Per cent:			
	2003	2004	2005	2008
Own review process	83	71	71	66
The advice of consultants	14	19	25	42
The EOC Small Employers Equal Pay Review Kit	n/a	1	3	12
The EOC Equal Pay Review Kit (designed for larger employers)	4	7	6	4
Model/standard for NHS, LEA, council etc.	n/a	2	3	2
The advice of trade unions or industry bodies	n/a	n/a	n/a	2
The advice of ACAS/Business Link/BERR	n/a	n/a	n/a	1
Industry models (various)	n/a	n/a	8	*
Base: All businesses that have conducted, are conducting or plan to conduct an EPR	75	181	198	190

Source: Equal pay reviews survey 2006; Adams et al, Table 5.6.

5.6 Approaches taken to conducting an EPR by sector

Base sizes when looking at variation by sector are also low, and findings should be viewed as indicative only (Table 5.7). It is, however, clear that the private sector organisations were much more likely than those in the public sector to have used their own review process; 68% of the former, compared with only 52% of the latter, had done so.

As in 2004 and 2005, public sector employers were more likely than private sector employers to draw upon help and advice from outside their organisation when performing an EPR. They were also more likely to make use of the EOC Equal Pay Review Kit or models and standards for the NHS, LEA etc.

Compared with employers in construction and private services, employers in the manufacturing sector were the most likely to rely on their own review processes and least likely to seek the advice of consultants.

Table 5.7 Approaches taken to conducting an EPR by sector, 2008

		Per cent:				
	GB	Manuf.	Constr.	Private services	Public sector	All Private sector
Own review process	66	88	79	37	52	68
The advice of consultants	42	16	32	47	42	25
The EOC Small Employers Equal Pay Review Kit	12	7	2	14	12	12
The EOC Equal Pay Review Kit (designed for larger employers)	4	4	1	2	21	3
Model/standard for NHS, LEA, council etc.	2	-	-	1	20	1
The advice of trade unions or industry bodies	2	11	-	-	4	2
The advice of ACAS/Business Link/BERR	1	1	-	-	3	*
Industry models (various)	*	3	1	-	-	1
Other	1	-	-	-	-	-
Don't know	11	1	*	9	17	5
Base: All businesses that have conducted or are conducting an EPR	190	36	27	48	79	111

Source:

Equal pay reviews survey 2008.

5.7 Approaches taken to conducting an EPR by size

Table 5.8 shows that review processes designed by the organisations themselves constituted the most popular approach taken to conducting EPRs across all three size brackets. As might be expected, the use of the EOC's Equal Pay Review Kit for larger employers was significantly higher than average amongst the largest employers (20%, compared with 4% of GB employers as a whole).

This variation by size band is similar to that observed in 2005, although the overall increase in the use of consultants when conducting an EPR would appear to be driven by organisations with 25-99 employees (2004 – 16%, 2005 – 27%, 2008 – 47%). This may well provide evidence that the reviews described as EPRs by these smaller organisations are more likely to be serious and/or thorough (and hence to warrant the use of external support) than has previously been the case.

Table 5.8 Approaches taken to conducting an EPR by size, 2008

		Per cent:			
	GB	25-99	100-499	500+	
Own review process	66	61	79	68	
The advice of consultants	42	47	33	31	
The EOC Small Employers Equal Pay Review Kit	12	16	8	4	
The EOC Equal Pay Review Kit (designed for larger employers)	4	*	7	20	
Model/standard for NHS, LEA, council etc.	2	1	3	8	
The advice of trade unions or industry bodies	2	-	7	3	
The advice of ACAS/Business Link/BERR	1	1	*	-	
Industry models (various)	*	-	-	4	
Other	1	*	1	3	
Don't know	11	14	5	7	
Base: All businesses that have conducted or are conducting an EPR	190	47	58	85	

Source:

Equal pay reviews survey 2008.

5.8 The scope of the EPR

Employers conducting an EPR were asked about the scope of this review, both in terms of which of their sites were covered and precisely what aspects of pay policy were looked at by the review. Table 5.9 compares the overall findings from 2004, 2005 and 2008.

As in 2004 and 2005, the EPRs in the vast majority (96%) of organisations in 2008 applied to all of their employees throughout Great Britain. Over a third of EPRs (37%) examined differences in pay by ethnic origin and over four-fifths (84%) involved checking a job evaluation system.

Employers that had conducted, or were conducting, an EPR were more likely in 2008 than in 2004 and 2005 to have examined differences in pay by disability. However, they were less likely to have checked for differences in pay by sex where men and women are doing the same jobs in 2008 compared with 2005 (77% and 84% respectively). There was little variation between 2008 and 2005 in the proportion of organisations which checked for differences where men and women are doing different jobs but of equal value (76% and 77%).

Table 5.9 Scope of the EPR overall, 2004-08

	Per cent:		
	2004	2005	2008
Applied to all employees in Great Britain	94	90	96
Examined differences in pay by ethnic origin	30	29	37
Examined differences in pay by disability	26	38	41
Involved checking that a job evaluation system is free from discrimination*	71	72	84
Checked for differences in pay by sex where men and women are doing the same jobs	66	84	77
Checked for differences in pay by sex where men and women are doing different jobs but of equal value	66	77	76
Base: All businesses that have conducted or are conducting an EPR	181	198	190

Notes: *This code changed slightly between 2004 and 2005.

Source: Equal pay reviews survey 2008; Adams et al, Table 5.10.

The EOC's Code of Practice on Equal Pay stated explicitly that amongst other features, an equal pay review should involve:

Comparing the pay of men and women doing equal work. Here employers need to check for one or more of the following: like work; work rated as equivalent; work of equal value. These checks are the foundation of an equal pay review

EOC (2003): 15.

Moreover, the EOC's Code of Practice added that:

A pay review process that does not include these features cannot claim to be an equal pay review

EOC (2003): 15.

5.9 Satisfaction with methods used to check for pay gaps

Employers that had conducted, or were conducting, an EPR were asked how satisfied they were that the methods used to check for pay gaps met their objectives. The results at an overall level are presented in Table 5.10, while Table 5.11 examines the data by employer size.

Table 5.10 shows that over half (55%) of all employers were very satisfied with the methods used. A further 41% were fairly satisfied. No employer stated that they were dissatisfied.

Table 5.10 Satisfaction with methods used to check for pay gaps, 2008

	Per cent:
Very satisfied	55
Fairly satisfied	41
Neither satisfied nor dissatisfied	2
Fairly dissatisfied	-
Very dissatisfied	-
Don't know	1
Base: All businesses that have conducted or are conducting an EPR	190

Source: Equal pay reviews survey 2008.

Table 5.11 reveals that employers in the largest organisations were less likely to say they were very satisfied with the methods used (51%, compared with 54% and 60%) than employers in smaller organisations, but combined levels of satisfaction (i.e. those who were very or fairly satisfied) were comparable, with organisations in the medium size band the most satisfied overall.

Table 5.11 Satisfaction with methods used to check for pay gaps by size, 2008

		Per cent:			
	GB	25-99	100-499	500+	
Very satisfied	55	54	60	51	
Fairly satisfied	41	45	32	39	
Neither satisfied nor dissatisfied	2	-	7	6	
Fairly dissatisfied	-	-	-	-	
Very dissatisfied	-	-	-	-	
Don't know	1	1	1	4	
Base: All businesses that have conducted or are conducting an EPR	190	47	58	85	

Source: Equal pay reviews survey 2008.

5.10 Establishing which jobs are of equal value

The organisations that checked for pay gaps for different jobs of equal value as part of the scope of an EPR they had conducted or were conducting, were asked how they were checking for equal value. Results are shown in Table 5.12 for 2004, 2005 and 2008.

In 2008, almost two-thirds (67%) of those determining whether jobs are of equal value used a review of job titles to do so and a higher proportion (75%) used an analytic job evaluation, making these by far the most common approaches to the task.

Table 5.12 Method of determining which jobs are of equal value, 2004-08

	Per cent:			
	2004	2005	2008	
An analytic job evaluation	78	67	75	
A review of job titles	77	69	67	
Comparative job evaluation	n/a	4	27	
Other	20	23	33	
Undecided/don't know	11	6	30	
Base: All businesses that checked or are checking for equal value	126	142	150	

Source:

Equal pay reviews survey 2008; Adams et al, Table 5.21.

The only significant sectoral variation in the method of determining which jobs are of equal value is that public sector organisations were less likely than other organisations to use a review of job titles than GB employers as a whole.

5.11 Pay gaps identified

The key first result of any EPR is the determination of whether pay gaps do in fact exist in the organisation. As noted in Chapter 1, an EPR is concerned with unequal pay for equal work and does not directly address other aspects of inequality, such as occupational segregation, or the lack of flexible working in higher paid jobs.

Nevertheless, such aspects – which may well contribute to the overall pay gap – may be highlighted by the review, especially if the employer is experienced in dealing with equality issues. However, the EPR focus on whether or not a pay system may be giving rise to pay gaps that could be the subject of legal challenge means that responses to questions about the pay gap will under-report the extent of the broader gender, ethnicity or disability pay gap. Moreover, since only 16% of organisations had done, or were currently doing, an EPR that includes checking for both equal pay and equal value, there will also have been under-reporting of the extent of pay discrimination - unequal pay for equal work.

As discussed in section 2.5, the 2008 questionnaire differed from preceding years by seeking to ascertain whether pay gaps were found based on ethnicity and disability

as well as gender, further to previous questionnaires which only established whether an EPR examined differences in pay by ethnic origin and disability. The 2008 questions followed the same principle as 2005 by looking at the pay gap both in terms of differences in overall average salary and differences in the same occupation or in occupations found to be of equal value, but asked separately whether gaps were found based on the three criteria of gender, ethnicity and disability.

The responses to these questions are shown in Table 5.13.

Table 5.13 Pay gaps identified, 2008

	Per cent:			
	Yes	No	Don't know	
Identified any pay gaps in overall average salary based on:				
Gender	7	91	2	
Ethnicity	*	97	3	
Disability	5	93	2	
Identified any pay gaps between the average salary of staff working either in the same occupation or in occupations of equal value based on:				
Gender	14	84	2	
Ethnicity	*	98	1	
Disability	-	98	2	
Base: All businesses that have conducted or are conducting an EPR		190		

Notes: Row percentages used.

Source: Equal pay reviews survey 2008.

In 2008, fewer organisations reported gaps in average salary than in 2005 (7% and 10% respectively). By contrast, slightly more organisations in 2008 reported gaps in the same occupation or in occupations of equal value than in 2005 (14% and 13% respectively), though the difference is not statistically significant. Despite this, it seems to be in line with the view expressed elsewhere that respondents now have a better understanding of the proper conduct of an EPR that the proportion of 'Don't know' responses dropped from 2005 (9% and 4%) to 2008 (2% and 2%) for both pay gap questions.

There is not a statistically significant variation in the proportion reporting having found pay gaps by the type of EPR being discussed. In total, 14% of those employers who discussed an EPR in progress reported having found a pay gap, compared with 17%

of those who discussed a completed EPR. It is possible, however, that those EPRs in progress could still turn up pay gaps even if they have yet to do so.

As Table 5.14 shows, pay gaps were slightly more commonly identified by organisations in the public sector than in the private sector – 17% reported having found pay gaps at one or both of the pay gap questions, compared with 6%. Private services organisations were the least likely to identify a pay gap, with only 1% having done so.

Table 5.14 Pay gaps identified by sector, 2008

		Per cent:				
	GB	Manuf.	Constr.	Private services	Public sector	All Private sector
Identified any pay gaps in overall average salary based on:						
Gender	7	22	15	1	17	6
Ethnicity	*	-	-	-	2	-
Disability	5	-	-	6	1	5
Identified pay gaps between the avera salary of men and women working eith in the same occupation or in occupation of equal value based on:	ner					
Gender	14	20	3	13	13	14
Ethnicity	*	-	-	-	3	-
Disability	-	-	-	-	-	-
Base: All businesses that had conducted or were conducting an EPR	190	36	27	48	79	111

Source: Equal pay reviews survey 2008.

5.12 Pay gaps identified by gender

In those organisations which were able to give an average salary (six for both men's and women's salaries) the range of men's salaries ranged from £22,000 to £50,000 and women's from £20,000 and £30,000, with the gap in overall average salary between men and women averaging around £9,000 (albeit this average is based on too few cases to be considered anything more than very broadly indicative). Qualitative research commissioned by the EOC at the end of 2004 (consisting of case studies with employers that had conducted an EPR) found that nine out of the fourteen organisations interviewed had identified a pay gap of 5 per cent or greater (with one organisation identifying a gap as great as 40%).

Of those employers that identified a pay gap by gender, the most commonly cited reason for this gap was women not getting into senior positions and other highly paid jobs (12 employers). Connected to this, nine employers reported that women start from a lower base salary and a further 7 commented that the time that it takes for women to progress through the pay scale was a contributing factor.

Table 5.15 Reasons for gaps in earnings by gender, 2008

	Number of employers:			
	Yes	No	Don't know	
Differences in the length of time that women take to progress through the pay scale	7	31	2	
Women coming in on lower starting salaries	9	31	0	
Women not getting into jobs that attract bonus or other performance related payments	7	32	1	
Women not getting into the senior, more highly paid jobs	12	27	1	
Other	23	17	0	

Source: Equal pay reviews survey 2008.

Qualitative information provided by the 2008 survey can add to the story told by these figures. Employers considered that differences in the types of roles that men and women were working in accounted, in part, for the pay gaps identified. This included the lack of women in senior management positions and the low turnover of staff at this level. Occupations commonly reported as affected by pay gaps included catering positions, secretarial and administrative roles, cleaning staff and care assistants.

Differences were also reported in the way women were employed. In particular, employers felt that the higher incidence of women employed on a part-time basis contributed to the pay gaps identified. A number of employers also reported that pay gaps were a result of embedded 'historical' attitudes and practice.

Table 5.16 shows that two-thirds of organisations that had identified a pay gap planned to address the issue. A further nine reported that they were planning action. Those planning action typically said that action had not yet been taken because of the length of time the process takes with most still in the process of completing the review itself or follow-on work regarding occupations.

The one (construction sector) organisation reporting that it had neither taken action to eliminate gaps it had discovered, nor planned to do so, said that this was because it believed that doing so was not relevant to its industry.

Table 5.16 Whether action taken to eliminate pay gaps by gender, 2008

	Number of employers
Yes	27
Not yet, but action planned	9
No action planned	1
Don't know	3

Source: Equal pay reviews survey 2008.

5.13 Pay gaps identified by ethnicity and disability

Only two employers indicated that their EPR had identified pay gaps by ethnicity. The reason given was that ethnic minority employees do not reach senior and more highly paid jobs. Respondents gave no indication of specific roles that were affected by pay gaps in relation to ethnicity. One of the two organisations had already taken action to eliminate the gaps; the other was unsure whether action had been taken.

A further two employers had identified pay gaps by disability. They considered that the amount of time taken to progress through the pay scale, as well as not gaining positions that attracted bonus (or other performance related) payments, as the reasons for these differences. One respondent was unable to provide an indication of specific roles that were affected by pay gaps, while the other cited managers and manual labourers. One organisation had taken action, while the other had not and did not plan to do so, saying that company performance was unaffected and therefore it did not see the need.

5.14 Conclusions

The majority of completed EPRs had been started in the last three years while those currently in progress were typically more recent, with 41% having been started in 2008. Those planning EPRs were typically expecting to start the process within the next six months (56%). The majority of those organisations that had completed or were currently conducting EPRs had plans to repeat – just 6% said that they did not plan to repeat the process, down substantially from 20% in 2005. Most commonly, these organisations planned to repeat their EPR yearly.

Organisations conducting EPRs were most likely to report using their own review processes (66%) though over two-fifths reported planning to use the advice of

consultants (42%). As in previous years, analytic job reviews (75%) and reviews of job titles (67%) were the methods most commonly used for EPRs and employers were typically satisfied that the methods they used were sufficient to determine if any pay gaps discovered were lawful – 55% were very satisfied. As in previous years, the great majority of EPRs discussed covered all GB employees (96%) though only around two in five examined differences in pay by ethnic origin (37%) and differences in pay by disability (41%).

Only a small proportion of those conducting EPRs identified pay gaps: 7% had found a gap in overall average salary by gender, and 5% by disability, while 14% had discovered a gap in the average salary of men and women working either in the same occupation or in occupations of equal value. In unweighted terms, this is equivalent to 20 employers identifying gender pay gaps, two discovering pay gaps by ethnicity and two by disability. This means base sizes are too small for reliable quantitative analysis of gaps identified, as has been the case in previous EPR surveys.

CONCLUSIONS

There is evidence that after a fall in activity in 2005, engagement with EPRs is increasing (although it remains lower than in 2004). In 2008, the overall proportion of organisations reporting a completed EPR increased from 12% in 2005 to 17% in 2008. In 2005, 82% of employers reported no involvement whatsoever with EPRs, a proportion which fell to 76% in 2008.

Larger employers continue to show the greatest involvement with EPRs, although it would appear that levels of activity among this group have stagnated to an extent.

Public sector organisations were the most likely to report EPR activity (43% did so). This is likely to be driven by the fact that two-fifths (63%) report an objective relating to closing the pay gap.

The most common motivation for conducting an EPR is that it represents good business sense; 51% said this was the main reason for becoming involved with EPRs.

The great majority of employers that reported no EPR activity whatsoever said that the reason for this was that they believed that they already had equal pay in their organisation. This was far more commonly given as a reason than either a lack of time (11%) or financial resources (12%) to carry out a review. This would seem to indicate that there is still work to be done to convince employers that there may be unconscious/institutional bias in their pay structures.

In 2008, 2% of employers had been presented with an equal pay questionnaire by one of their employees (compared with 1% in 2005). Hence it is still relatively uncommon for employees to seek to tackle employers over equal pay issues.

It is encouraging that the majority of those organisations that had completed or were currently conducting EPRs had plans to repeat – just 6% said that they did not plan to repeat the process, down substantially from 20% in 2005. Most commonly, these organisations planned to repeat their EPR yearly. This would seem to indicate that once they are involved with the process, employers do derive value from conducting EPRs.

Organisations conducting EPRs were most likely to report using their own review processes (66%). Although employers themselves commonly report that they are

satisfied with these processes it is perhaps worth investigating further whether these in-house approaches are adequate for the conduct of EPRs.

Only a small proportion of those conducting EPRs identified pay gaps: 7% had found a gap in overall average salary by gender, and 5% by disability, while 14% had discovered a gap in the average salary of men and women working either in the same occupation or in occupations of equal value. Although this may seem a relatively small proportion, if those who have conducted EPRs were to be representative of the employer population as a whole, this would imply that a considerable number of individuals are employed in workplaces where pay gaps persist.

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APPENDIX: Survey questionnaire

PRIVATE& CONFIDENTIAL	Equal pay reviews survey 2008	J4497	
Start Time:			
Company Name:			
Respondent:			
Job Title:			
Interviewer:			

ASK TELEPHONIST

1) Good morning/afternoon, my name is ____calling from IFF Research, an independent market research company on behalf of the **Equality and Human Rights Commission**. Please can I speak to your Human Resources or Personnel Manager or Director?

IF NECESSARY: I need to speak to the person who handles reviews of salary levels for your organisation

INTERVIEWER NOTE – if respondent states that no reviews have been undertaken, then explain that would still like to continue but the interview will be very short.

INTERVIEWER NOTE: If no HR manager/director – ask to speak to most senior person with responsibility for HR.

Transferred	1	CONTINUE	
Make appointment to call back	2	SET APPOINTMENT TIME/DATE	
Refused	3	THANK AND CLOSE	
Unobtainable Number	4	THANK AND CLOSE	
Reviews of salary levels undertaken by another site or part of the organisation	5	TAKE DETAILS AND CLOSE (NEED TEL NO, CONTACT NAME, WHETHER ENGLAND, SCOTLAND OR WALES, NEW COMPANY NAME)	
Other (RECORD)	0	SUPERVISOR TO ASSESS	

ASK RESPONDENT

2) Good morning/afternoon, my name is ____calling from IFF Research, an independent market research company. We are conducting a very short survey on behalf of the **Equality and Human Rights Commission**. My questions will take between 5 and 10 minutes depending on your answers, and everything you say will be strictly confidential.

First can I just check that you are the most appropriate person to ask about any reviews of salary levels that your organisation has undertaken or might undertake?

INTERVIEWER NOTE – if respondent states that no reviews have been undertaken, then explain that would still like to continue but the interview will be very short.

ADD IF NECESSARY: The survey just involves a few questions about salary reviews.

Is now a convenient time to talk?

()

Yes – OK to interview now	1	CONTINUE
No – More appropriate person	2	TRANSFER AND RE-INTRODUCE
Make appointment to call back	3	SET APPOINTMENT TIME/DATE
Reviews of salary levels undertaken by another site or part of organisation	4	TAKE DETAILS AND CLOSE (NEED TEL NO, CONTACT NAME, WHETHER ENGLAND, SCOTLAND OR WALES, NEW COMPANY NAME)
Refused	5	THANK AND CLOSE
Unobtainable Number	6	THANK AND GLOSE
Other (RECORD)	0	SUPERVISOR TO ASSESS

REASSURANCES

- The survey is voluntary and completely confidential
- The interview will take up to 10 minutes
- IFF Research is an independent research company which is bound by the Code of Conduct of the Market Research Society. This means that all your answers to the survey will be treated in strict confidence and will not be attributed to you.
- If you would like to confirm that IFF Research is a bona fide Market Research company, you can call the Market Research Society, free of charge, on 0500 39 69 99
- If you have any queries about the research, you can contact Peter Hall or Stefan Schäfer at IFF Research on 020 7250 3035
- If you would like to confirm that IFF is working for the **EHRC**, then you can contact David Perfect at the **EHRC** on **0161 829 8510**.

INFORMATION TO RECORD FROM SAMPLE:

/ \

RECORD 2-DIGIT SIC CODE

RECORD COUNTRY

RECORD SECTOR

()

	()
ENGLAND	1
SCOTLAND	2
WALES	3

MANUFACTURING	1
SERVICES	2
PUBLIC	3

To start with, can you tell me how many people your organisation employs in Great Britain (i.e. across England, Scotland and Wales)?

ADD IF NECESSARY – An approximate figure would be fine.

WRITE IN NUMBER OF STAFF	
--------------------------	--

IF GIVE ABSOLUTE NUMBER - RECORD TO RANGES BELOW

IF DON'T KNOW ABSOLUTE NUMBER - PROMPT WITH RANGES

()

	· ,		
24 or fewer	1	THANK AND CLOSE	
25-49	2	SET TO QUOTA '25-99'	
50-99	3	SET TO QUOTA 25-99	
100-249	4	SET TO OLIOTA '100 400'	
250-499	5	SET TO QUOTA '100-499'	
500-999	6	SET TO OLIOTA (FOO.)	
1000+	7	SET TO QUOTA '500+'	
Don't know	8	THANK AND CLOSE	

4) And is this the only site that your organisation has or do you have other sites?

()

Only site	1	
Have other sites	2	

IF HAVE OTHER SITES (Q4/2)

5) I'd like to know approximately how many sites your organisation has in Great Britain. Can you tell me how many sites you have in....?

IF DON'T KNOW ABSOLUTE NUMBER OF SITES - PROMPT WITH RANGES

England	1	2	3	4	5
Scotland	1	2	3	4	5
Wales	1	2	3	4	5

ASK ALL

6a) Would you classify your organisation as one <u>mainly</u> seeking to make a profit; as a charity/voluntary sector organisation; as a local-government financed body, or as a central government financed body?

CODE ONE ONLY

Seeking a profit	1
Charity/voluntary sector	2
Local government financed body	3
Central government financed body	4
None of the above/other	5

6bi) Does your organisation have an objective related to closing the gender pay gap within your workforce? This might be as part of a 'mission statement', a pay or remuneration policy or an equality scheme, or any other document that sets out strategic goals for the organisation.

CODE ONE ONLY

	()	
Yes	1	
No	2	
Don't know	3	

ASK IF Q6bi=1; OTHERS CONTINUE TO Q7

6bii)	What	is	that	obi	ective?
-------	------	----	------	-----	---------

PROBE FOR FULL DETAILS. PROBE FOR DATES BY WHICH THE ORGANISATION HOPES TO CLOSE THE GAP ALLOW DK

-		

7) Has your organisation ever completed an equal pay audit or equal pay review - by an equal pay review, we mean comparing the pay of people doing equal work, identifying any equal pay gaps and eliminating those pay gaps that cannot satisfactorily be explained on grounds other than sex, ethnicity or disability.

IF NECESSARY: If you have undertaken a job evaluation scheme/review, comparing pay of men and women, those from ethnic minorities and those with disabilities, please only include this as an equal pay review if the job evaluation is analytical (i.e. factor based and free from gender, ethnic or disability bias). Factor-based means where a job is broken down into demands such as effort, skill and decision-making. The demands are then scored and this is used to create an overall score for the job.

INTERVIEWER NOTE: If organisation is in process of conducting its first EPR – then record as 'no'.

	()	
Yes	1	
No	2	
Don't know	3	

8) Is your organisation currently in the process of conducting an equal pay audit or equal pay review?

	()	
Yes	1	
No	2	
Don't know	3	

IF NOT IN PROCESS OF CONDUCTING AN EPR (Q8/2 OR 3)

9) Does your organisation currently have any plans to conduct an equal pay audit or equal pay review in the future?

	()	
Yes	1	
No	2	
Don't know	3	

IF HAVE NOT CONDUCTED AN EPR, NOT CURRENTLY CONDUCTING ONE AND HAVE NO PLANS TO DO SO (Q7/2-3 AND Q8/2-3 AND Q9/2-3)

10) Which of the following are reasons why your organisation has no plans to conduct an equal pay audit or equal pay review. Is it because.....? READ OUT AND CODE ALL MENTIONED

	()	
You consider you already provide equal pay	1	
You have an analytical job evaluation system	2	
You do not have time to carry out a review	3	
You are implementing or planning to implement a new pay or grading system	4	
You do not have the financial or other resources to carry out a review	5	
You have concerns about what such a review would find	6	
Other (Specify)	7	

11) DUMMY QUESTION – EPR TO ASK ABOUT (SINGLE)

()

	()	
COMPLETED EPR	1	Q7/1 AND Q8/NOT 1
EPR IN PROGRESS	2	Q8/1
PLANNED EPR	3	Q9/1 AND Q7/NOT 1 AND Q8/NOT 1
NO EPR	4	Q9/NOT 1 AND Q7/NOT 1 AND Q8/NOT 1

IF ASKING ABOUT COMPLETED EPR (Q11/1)

12a) When did the process of conducting the equal pay review that your organisation has now completed start?

RECORD YEAR	RECORD MONTH	
-------------	--------------	--

12b) Roughly what were the costs of completing your equal pay review? Please consider costs such as staff and management time, as well as any external consultancy costs.

Please do not include any costs associated with actually IMPLEMENTING equal pay in your organisation

ALLOW DK

RECORD AMOUNT IN £	

IF ASKING ABOUT EPR IN PROGRESS (Q11/2)

13) When did you start the process of conducting the equal pay review that is currently in progress?

IF ASKING ABOUT PLANNED EPR (Q11/3)

14) When do you think you are likely to start the equal pay review that you have planned? Do you think you will start the process.....?

()

	()	
Within the next 6 months	1	
Within the next year but not the next 6 months	2	
At a point over 12 months away	3	
No fixed start date yet	4	
Other (WRITE IN)	5	

ASK ALL WHO HAVE CONDUCTED, ARE CONDUCTING OR PLANNING AN EPR (Q11/1-3), OTHERS GO TO Q17

15) What prompted your organisation to conduct the equal pay review that you (TEXT SUBSTITUTION: Q11/1: have now completed;Q11/2: are in the process of conducting; Q11/3: are planning)? Was it because....? READ OUT AND CODE ALL MENTIONED

ASK ALL WHO MENTION MORE THAN ONE REASON AT Q15

15a) And which of these would you describe as being the main reason? READ OUT ALL MENTIONED AT Q15 AND CODE ONE ONLY

	Q15	Q15a
You wanted to be a good practice employer	1	1
As a result of leadership from employer bodies	2	2
You saw it as good business sense	3	3
You were responding to a request from trade unions	4	4
As a result of government policy or publicity	5	5
As a result of equal pay cases being raised in your organisation or sector	6	6
As a result of EOC policy or publicity	7	7
For other reasons (SPECIFY)	8	8

IF MENTION GOVERNMENT POLICY AT Q15 (Q15/5)

16) You said that government policy or publicity was at least part of the reason why you decided to conduct an equal pay review. Can I just check, by 'government' do you mean....?

ALLOW MULTI-CODE.

	()	
The Scottish Executive	1	
The Welsh National Assembly	2	
The Westminster Parliament	3	
Other (WRITE IN)	4	

ASK ALL

17a) Has your organisation been presented with an Equal Pay Questionnaire by any of your employees?

	()	
Yes	1	
No	2	
Don't know	3	

17b) Has your organisation ever had equal pay claims filed against it?

	()	
Yes – in the past	1	
Yes - currently	2	
No	3	
Don't Know	4	

ASK IF Q17b/1 or 2

17c) How many cases would you say have been filed in total?

	()	
Less than 20	1	
20-100	2	
100-500	3	
Over 500	4	
Don't Know	5	

17d) Are you aware of any employees who have used legal representation (either trade union or independent) to assist in an equal pay dispute?

	()	
Yes	1	
No	2	
Don't know	3	

ASK ALL

17e) Have your employees been canvassed by contingency fee (no win/no fee) lawyers?

	()	
Yes	1	
No	2	
Don't know	3	

ASK IF EMPLOYEES HAVE BEEN CANVASSED (Q17e/1)

17f) By what means have they been canvassed?DO NOT READ OUT. PROBE FULLY. MULTICODE

By letter or email	1
By word of mouth	2
At meetings or conferences	3
Other (specify)	4
Don't now	5

18) We are interested to know how you (TEXT SUBSTITUTION: Q11/1: went about; Q11/2: are going about) conducting an equal pay review. (TEXT SUBSTITUTION: Q11/1: Did you take; Q11/2: are you planning to take) any of the following approaches...? READ OUT AND CODE ALL MENTIONED

IF MENTION MORE THAN ONE APPROACH AT Q18

18a) And which of these would you say was most important in determining the approach that you (TEXT SUBSTITUTION: Q11/1: ended up taking; Q11/2: are going to take)? CATI TO SHOW LIST FROM Q18: INTERVIEWER READ LIST OUT.

Q18	Q18a
1	1
ı	ı
C	2
2	۷
o	3
3	3
4	4
4	4
E	F
ວ	5
	Q18 1 2 3 4 5

ASK ALL WHO HAVE CONDUCTED OR ARE CONDUCTING AN EPR (Q11/1-2)

19) I'd just like to ask you a few details about the scope of your equal pay review. (TEXT SUBSTITUTION: Q11/1: Did your review; Q11/2: Will your review)..?

	YES	NO	UNDECIDED	DON'T KNOW
Apply to ALL your employees in Great Britain	1	2	3	DK
(IF NOT COVERING ALL EMPS AND HAVE SITES IN ENGLAND (Q19_1/2-3 AND Q5_1>0) Cover your sites in England	1	2	3	DK
(IF NOT COVERING ALL EMPS AND HAVE SITES IN SCOTLAND(Q19_1/2-3 AND Q5_2>0) Cover your sites in Scotland	1	2	3	DK
(IF NOT COVERING ALL EMPS AND HAVE SITES IN WALES (Q19_1/2-3 AND Q5_3>0) Cover your sites in Wales	1	2	3	DK
Examine differences in pay by ethnic origin	1	2	3	DK
Examine differences in pay by disability	1	2	3	DK
Involve checking that a Job Evaluation system is free from discrimination	1	2	3	DK
Check for differences in pay by sex where men and women are doing the same jobs	1	2	3	DK
Check for differences in pay by sex where man and women are doing different jobs but of equal value **	1	2	3	DK

19a) How satisfied are you that the methods you used would allow you to decide if any pay gaps you found were justifiable – i.e. lawful?

READ OUT

Very satisfied
1
Fairly satisfied
2
Neither satisfied nor dissatisfied 3
Fairly dissatisfied 4
Very dissatisfied 5
Don't know X

ASK ALL WHO HAVE/PLAN TO CHECK FOR EQUAL VALUE (Q19/9-1) **

20) We are interested to know how you (TEXT SUBSTITUTION: Q11/1: went about determining; Q11/2: will go about determining) which jobs are of equal value. As part of this process (TEXT SUBSTITUTION: Q11/1: did you; Q11/2: will you)....?

	YES	NO	UNDECIDED
Conduct a review of job titles	1	2	3
Conduct analytical job evaluation	1	2	3
Use another method of job analysis or of comparing job demands (SPECIFY)	1	2	3

ASK ALL WHO HAVE CONDUCTED OR ARE CONDUCTING AN EPR (Q11/1-2)

- 21) As a result of your equal pay review, (TEXT SUBSTITUTION: Q11/1: did you identify; Q11/2: have you so far identified) any gaps in OVERALL average salary paid based on...?
- 21a) And have you identified any gaps in average salary, either in the SAME OCCUPATION or in OCCUPATIONS FOUND TO BE OF EQUAL VALUE, based on...?

		Q21	Q21a
i) Gender	Yes	1	1
	No	2	2
	Don't know	3	3
ii) Ethnicity	Yes	1	1
	No	2	2
	Don't know	3	3
iii) Disability	Yes	1	1
	No	2	2
	Don't know	3	3

IF HAVE IDENTIFIED A GAP IN AVERAGE SALARY BY GENDER (Q21i/1)

22a) Please can you tell me the overall average salary earned by men and the average salary earned by women?

AVERAGE ANNUAL SALARY FOR MEN (WRITE IN)	ALLOW NUMERIC ANSWER
RECORD SALARY FOR MEN IN SOME OTHER WAY (WRITE IN)	ALLOW TEXT ANSWER
AVERAGE ANNUAL SALARY FOR WOMEN (WRITE IN)	ALLOW NUMERIC ANSWER
RECORD SALARY FOR WOMEN IN SOME OTHER WAY (WRITE IN)	ALLOW TEXT ANSWER

ASK IF Q21i/1 OR Q21ai/1

22b) Have these gaps in earnings come about as a result of differences between men and women in terms of?

	YES	NO	DK
Differences in the length of time that women take to progress through the pay scale	1	2	3
Women coming in on lower starting salaries	1	2	3
Women not getting into jobs that attract bonus or other performance related payments – for example bonus payments for manual workers	1	2	3
Women not getting into the senior, more highly paid jobs – for example women clustering at the top pf the junior grades, but not getting through into management	1	2	3
Some other reason	1	2	3

22c) And can you tell me what occupations the women affected by pay gaps are working in...? RECORD UP TO 4 DIFFERENT OCCUPATIONS

INTERVIEWER NOTE: CODE NULL WHEN NO MORE OCCUPATIONS TO ENTER

OCCUPATION 1 (WRITE IN)	
OCCUPATION 2 (WRITE IN)	
OCCUPATION 3 (WRITE IN)	
OCCUPATION 4 (WRITE IN)	

22d) And has action been taken to eliminate these pay gaps by gender ...?

	()
Yes	1
Not yet but action planned	2
No action planned	3
DON'T KNOW	4

IF NO ACTION PLANNED FOR GAP (Q22d/3)

22e)	Why is it that no action is planned to address these gaps?	
	IF ACTION PLANNED BUT NOT YET TAKEN (Q22d/2)	

22f) Why is it that action has not yet been taken to address these gaps?

IF ACTION TAKEN (Q22d/1)

22g) Roughly what has been the total annual cost of eliminating these pay gaps by gender? ALLOW DK

|--|

IF HAVE IDENTIFIED A GAP IN AVERAGE SALARY BY ETHNICITY (Q21ii/1)

23a) Please can you tell me the overall average salary earned by white staff and the average salary earned by staff from ethnic minorities?

AVERAGE ANNUAL SALARY FOR WHITE PEOPLE (WRITE IN)	ALLOW NUMERIC ANSWER
RECORD SALARY FOR WHITE PEOPLE IN SOME OTHER WAY (WRITE IN)	ALLOW TEXT ANSWER
AVERAGE ANNUAL SALARY FOR ETHNIC MINORITY EMPLOYEES (WRITE IN)	ALLOW NUMERIC ANSWER
RECORD SALARY FOR ETHNIC MINORITY EMPLOYEES IN SOME OTHER WAY (WRITE IN)	ALLOW TEXT ANSWER

ASK IF Q21ii/1 OR Q21aii/1

23b) Have these gaps in earnings come about as a result of differences between white and ethnic minority employees in terms of?

	YES	NO	DK
Differences in the length of time that ethnic minority employees take to progress through the pay scale	1	2	3
Ethnic minority employees coming in on lower starting salaries	1	2	3
Ethnic minority employees not getting into jobs that attract bonus or other performance related payments – for example bonus payments for manual workers	1	2	3
Ethnic minority employees not getting into the senior, more highly paid jobs – for example women clustering at the top of the junior grades, but not getting through into management	1	2	3
Some other reason	1	2	3

23c) And can you tell me what occupations the ethnic minority employees affected by pay gaps are working in...? RECORD UP TO 4 DIFFERENT OCCUPATIONS

INTERVIEWER NOTE: CODE NULL WHEN NO MORE OCCUPATIONS TO ENTER

OCCUPATION 1 (WRITE IN)	
OCCUPATION 2 (WRITE IN)	
OCCUPATION 3 (WRITE IN)	
OCCUPATION 4 (WRITE IN)	

23d) And has action been taken to eliminate these pay gaps by ethnicity ...?

	()
Yes	1
Not yet but action planned	2
No action planned	3
DON'T KNOW	4

IF NO ACTION PLANNED FOR GAP (Q25a/3)

23e)	Why is it that no action is planned to address these gaps?
	IF ACTION PLANNED BUT NOT YET TAKEN (Q25a/2)
23f)	Why is it that action has not yet been taken to address these gaps?

IF ACTION TAKEN (Q22d/1)

23g) Roughly what has been the total annual cost of eliminating these pay gaps by ethnicity?

ALLOW DK

IF HAVE IDENTIFIED A GAP IN AVERAGE SALARY BY DISABILITY (Q21iii/1)

24a) Please can you tell me the overall average salary earned by staff without disabilities and the average salary earned by staff with disabilities?

	,
AVERAGE ANNUAL SALARY FOR EMPLOYEES WITHOUT A DISABILITY (WRITE IN)	ALLOW NUMERIC ANSWER
RECORD SALARY FOR EMPLOYEES WITHOUT A DISABILITY IN SOME OTHER WAY (WRITE IN)	ALLOW TEXT ANSWER
AVERAGE ANNUAL SALARY FOR EMPLOYEES WITH A DISABILITY (WRITE IN)	ALLOW NUMERIC ANSWER
RECORD SALARY FOR EMPLOYEES WITH A DISABILITY IN SOME OTHER WAY (WRITE IN)	ALLOW TEXT ANSWER

ASK IF Q21iii/1 OR Q21aiii/1

24b) Have these gaps in earnings come about as a result of differences between employees with and without a disability in terms of?

	YES	NO	DK
Differences in the length of time that disabled people take to progress through the pay scale		2	3
Disabled people coming in on lower starting salaries		2	3
Disabled people not getting into jobs that attract bonus or other performance related payments – for example bonus payments for manual workers		2	3
Disabled people not getting into the senior, more highly paid jobs – for example women clustering at the top pf the junior grades, but not getting through into management		2	3
Some other reason	1	2	3

24c) And can you tell me what occupations the disabled people affected by pay gaps are working in...? RECORD UP TO 4 DIFFERENT OCCUPATIONS

INTERVIEWER NOTE: CODE NULL WHEN NO MORE OCCUPATIONS TO ENTER

OCCUPATION 1 (WRITE IN)	
OCCUPATION 2 (WRITE IN)	
OCCUPATION 3 (WRITE IN)	
OCCUPATION 4 (WRITE IN)	

24d) And has action been taken to eliminate these pay gaps for disabled people ...?

	()
Yes	1
Not yet but action planned	2
No action planned	3
DON'T KNOW	4

Why is it that no action is planned to address these gaps?

IF NO ACTION PLANNED FOR GAP (Q25a/3)

24e)

24f)

IF ACTION PLANNED BUT NOT YET TAKEN (Q25a/2)	
Why is it that action has not yet been taken to address these of	a

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IF ACTION TAKEN (Q22d/1)

24g) Roughly what has been the total annual cost of eliminating these pay gaps by disability?

ALLOW DK

AMOUNT IN £	RECORI
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ASK ALL WHO HAVE CONDUCTED OR ARE CONDUCTING AN EPR (Q11/1-2)

26) How regularly do you think your organisation is likely to conduct equal pay reviews?

	()	
Every year	1	
Every two years	2	
Every three years	3	
No plans to repeat	4	
Other (SPECIFY)	5	

ASK ALL

27) Roughly what proportion of your workforce is...

- a) Female
- b) From an ethnic minoriy
- c) Disabled

	Female	From an ethnic minority	Disabled
None	1	1	1
Between 1 and 5%	2	2	2
Between 6 and 10%	3	3	3
Between 11 and 20%	4	4	4
Between 21 and 30%	5	5	5
Between 31 and 40%	6	6	6
Between 41 and 50%	7	7	7
Between 51 and 60%	8	8	8
Between 61 and 70%	9	9	9
Between 71 and 80%	10	10	10
Between 81 and 90%	11	11	11
More than 90%	12	12	12
100%	13	13	13
Don't know	14	14	14

The Equality and Human Rights Commission may be interested in conducting further research into issues relating to equal pay. Would you be willing for the EHRC or their contractors to contact you to invite you to take part in further research?

ADD IF NECESSARY: Your contact details will not be used for any other organisation

		()	
Yes		1	
No		2	
29)	Finally, can I take your name, please?		
,			
	ALLOW REFUSED		
30)	And can I take your job title?		
	ALLOW REFUSED		

THANK AND CLOSE

I declare that this survey has been carried of the MRS Code of Conduct.	out under IFF instructions and within the r	ules of
Interviewer signature:	Date:	
Finish time:	Interview Length	mins

This report presents the findings of the most recent national survey of equal pay reviews (EPRs) in Britain, comparing these with those from earlier surveys. It reveals that while one in six organisations in 2008 had completed an EPR, three-quarters of organisations had had no involvement with EPRs whatsoever.

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