

Gender pay gap reporting survey 2009

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IFF Research

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Executive summary

The Equality Bill aims to both simplify and strengthen equality legislation. Central to the aims of the Bill is to ensure men and women receive 'equal pay for equal work'. One of the prerequisite requirements for a move towards equal pay is seen to be increasing the transparency of pay data through encouraging organisations to report publicly on whether they have a gender pay gap and if so how large the gap is. The Bill proposes that this will be a legislative requirement on public sector organisations employing more than 150 employees, with the expectation that private and voluntary sector organisations will follow suit and voluntarily report their data as well. However if take-up is not sufficient, Clause 78 of the Bill is an enabling clause allowing government to require this of these private and voluntary sector organisations employing more than 250 employees as well.

The Equality and Human Rights Commission (the Commission) has been asked by the government to report annually on the progress made towards gender pay transparency and to advise the government on what the trigger might be to activate Clause 78. This research was carried out to determine what employers in the private and voluntary sectors are currently doing to measure and report on gender pay gaps, that is, before any voluntary measures are developed, and to explore the reasons for measuring and reporting (or for not doing so) among these employers. These figures will act as a baseline for future studies. Furthermore the research sought to ascertain what could be done to encourage these employers to measure and report on their gender pay gap.

The population that the activation of this Clause could affect is the 7,000 or so employers with more than 250 staff in Great Britain. Just over half of these organisations employ between 250 and 499 staff while the remainder are evenly split between those organisations with 500-999 staff and those with more than 1,000 staff.

Workforce composition and culture

Half of organisations in the survey stated that reducing the pay gap between women and men was either a very or fairly high priority for them.

Government encouragement to report on gender pay gap data on the back of the Equality Bill will take place against a backdrop of relative silence on the subject of pay. Currently only four per cent of employers formally make employees aware of how much colleagues in the same role are paid. A further third (35 per cent) make employees aware of what pay band they are in, but 49 per cent give no information

at all to staff and almost a fifth (18 per cent) discourage or even forbid staff from discussing pay with colleagues.

In two-fifths of organisations (39 per cent), a designated individual has been appointed with responsibility for 'ensuring equal pay between men and women'. Just over a third of employers (35 per cent) provide training for their employees in avoiding sex bias when setting rates of pay.

Analysis of gender pay gap data

Two-fifths of organisations (43 per cent) had conducted or were conducting some sort of analysis of pay gaps. When organisations planning future analysis are added, the figure rose to 57 per cent.

Charities and voluntary organisations were more active in their efforts to reduce the gender pay gap and more open to measuring and reporting than the profit-seeking organisations.

Employers who had the information that they would need to report on a pay gap 'to hand' were in the minority. Around half had carried out some form of job evaluation. Just under a quarter (23 per cent) had completed a formal review to examine the gap between men's and women's pay and a further seven per cent were in the process of completing their first review at the time of interview. In addition, a further 15 per cent said they had plans to conduct their first review at some point in the future. Hence over half (56 per cent) of non-public employers with in excess of 250 staff had no involvement or planned involvement in formal pay reviews, showing there continues to be a task to perform in encouraging the measurement of the pay gap, let alone its external reporting.

In addition to involvement with formal reviews of women's and men's pay, some employers stated that they carried out informal analysis of employee records to investigate their gender pay gap but just over two-fifths had not carried out either formal or informal analysis and had no plans to do so in future.

The key barrier to measurement of the gender pay gap is that employers do not feel it is necessary within their organisation. The vast majority of those who had no engagement with formal pay reviews (85 per cent) stated that they had no plans to conduct a review because they considered that they already provided equal pay. In some cases, organisations felt that they could be confident in the fact that they provided equal pay because they had an analytical job evaluation system in place but these were in the minority (29 per cent). Non-attitudinal barriers were mentioned

by much smaller numbers as barriers to conducting a formal review; 13 per cent mentioned a lack of resources and the same proportion mentioned a lack of time to carry out a review.

Reflecting this perceived lack of need for formal pay gap measurement, most employers with no current or planned analysis of their pay gap felt that they would only be encouraged to measure the gap by 'push' factors, such as employees complaining or taking action against them or if legislation required it. The proportions reporting that they would be influenced by a business case for measurement or a desire to be a good practice employer were much lower. Hence the indications are that it will be hard work to persuade those employers not currently measuring their pay gap to do so voluntarily.

Reporting of gender pay gap data

Very few of those organisations which have conducted a formal gender pay review have chosen to report the findings of these reviews either internally or externally. At an overall level, just 3.7 per cent of employers report their gender pay gap internally to their own staff, and 1.3 per cent report externally, most commonly on websites or in annual reports. That said, all who had reported, whether internally or externally found it a positive experience, with no employers suffering any negative impacts. The main benefits employers described were that it created a greater sense of openness with staff (and through this increasing trust and loyalty) and brought the issue to the attention of senior management.

When asked for their reactions to the idea of reporting data on their gender pay gap, half of those employers (47 per cent) not currently reporting data stated that they would be open to the idea of reporting internally while only 30 per cent stated that they would be open to the idea of reporting externally. In terms of reporting externally, those who were not open to the idea were evenly split between those who felt indifferent and those who were actively opposed to the idea of reporting their data.

When asked what made them feel open towards the idea of reporting their gender pay data, the most common reason given was that employers believed they did not have a pay gap, so had nothing to hide. With a large proportion of these employers not actually having conducted a formal review of men's and women's pay, this does indicate that their openness would be conditional on their finding that there was no gap between men's and women's pay within their organisation.

As with measuring the gender pay gap, employers reported that the circumstance most likely to encourage them to start reporting their pay gap externally would be an

employee taking action against them or making a complaint. However, around half agreed that they would be encouraged to take action if their competitors were doing the same, indicating that the fear of being the first to present such data does act as a barrier to a certain extent.

Conclusions and implications

The key barrier to encouraging more employers to measure their gender pay gap is attitudinal. The vast majority of those who have no engagement with formal measuring and reporting processes feel that they already provide equal pay and would not benefit from investigating the issue further. If employers are informed that processes leading to unequal pay can be introduced inadvertently, then their views may begin to change. However, encouraging employers to consider this will be a challenge.

Since this attitude is so widespread, the vast majority of employers can only envisage that they would decide to measure and report on their gender pay gap if they were obliged to do so either because of action from employees or if it were a legislative requirement. This suggests that in addition to making the case to employers, employee-focused campaigns aimed at raising awareness of the potential for challenging unequal pay and the routes for doing so may also have a role to play.

Only a minority (30 per cent) of those not currently reporting data stated that they would be open to the idea of doing so. Hence, it seems likely that any government suggestion that employers should report pay gap data externally is likely to be met with some resistance and there will be a challenge to win over hearts and minds. Among those not open to reporting data, the most commonly cited barrier was a company policy not to disclose salary levels. Negative attitudes towards external reporting might be countered to some extent by clear communication on the extent of pay reporting that is suggested and reassurances that organisations are not required to disclose individual salary information and that they can offer explanations of how gender pay gaps have come into being if appropriate.

On balance, the evidence suggests that it will be hard to persuade employers of the value of the exercise to them as a business. However, there is some evidence that peer pressure could play a role in encouraging employers to report pay gap data. There may be a role for supporting some trailblazer organisations to report their data early in the hope that others will follow suit. At the moment levels of external reporting are so low that it seems likely that many organisations will not be aware of any others that report their pay gap data. Encouraging employers to look at the pay gap data of

their competitors may also have value in persuading some of those who believe that they already provide equal pay that they may have issues to investigate.

The majority of employers considered that they would also require guidance on how to report gender pay gap data clearly.

1. Introduction

1.1 Background

In April 2009 the Government Equalities Office (GEO) published the Equality Bill, a Bill aiming to both simplify and strengthen equality legislation. One of the central tenets of the Equality Bill is transparency, that is, the extent to which organisations publish information on the diversity of their workforce and on whether or not there is a gender pay gap within it. It is very difficult for employers to measure inequality (and hence to decide on a strategy to tackle it) if it is hidden; conversely, transparency paves the way for reducing gender pay inequalities.

The Bill proposes to require public sector organisations with 150 or more employees to publish such information, and the intention is to encourage private and voluntary organisations with more than 250 employees to follow suit. Clause 78 of the Bill is an enabling clause which, if activated, would mean private and voluntary sector organisations with 250 or more employees would also be required to publish information on their gender pay gap. The clause might be activated if insufficient numbers of organisations voluntarily publish their data.

The Equality and Human Rights Commission (the Commission) has been asked by the government to report annually on the progress made towards gender pay transparency, and to advise the government on what the trigger might be to activate Clause 75. In order to inform them in doing so, the Commission asked IFF Research to:

- Establish baseline information on the number of non-public sector employers who are taking steps to measure and report on the gender pay gaps in their organisations, to serve as a basis for comparison over the next three years.
- Investigate how steps taken by non-public sector employers to measure and report on gender pay gaps differ by country (England, Scotland and Wales), sector and size of organisation.
- Explore reasons for measuring or reporting, or not doing so, among these organisations.
- Ascertain what can be done to encourage non-public sector employers to measure and report on their gender pay gap.

1.2 Methodology

A telephone survey was completed with 900 private and voluntary sector employers using CATI (Computer Aided Telephone Interviewing) technology. Interviews were on average 22 minutes in length, and interviewing took place between 3 September and 1 October 2009. The respondents to the survey were human resources (HR) directors or other senior managers who were in a position to talk about their organisation's HR strategy.

Sampling was undertaken at the enterprise level (rather than at the level of individual sites or divisions within organisations) since it is at this level that HR strategy is most commonly directed. Quotas were set to try to ensure a sufficient number of interviews were achieved in each broad sector, country and size band to allow for sub-group analysis, and then data were weighted to give findings that are representative of all private and voluntary sector employers with 250 or more employees in Great Britain.

1.3 Profile of survey population

The population of private and voluntary sector organisations in Great Britain with 250 or more employees is relatively small: there are only around 7,000 or so of them (Department for Business, Enterprise and Regulatory Reform (BERR), 2007). The survey sample of 900 participating organisations therefore represents a relatively high proportion of them.

The population of private sector organisations is more or less evenly distributed across three broad sectors: (1) manufacturing and construction, (2) distribution, hotels and restaurants, and (3) banking, finance and insurance sectors. A smaller number can be classified as operating within 'other private services' (Table 1.1). Hence the sample was drawn from these four sectors. The voluntary organisation sector breakdown is not given by the BERR statistics. However, the survey data indicate an approximately even split between banking, finance and insurance (in the form of charitable trusts) and other private services.

Table 1.1 Private and voluntary sector organisations in Great Britain by sector and size

	Number of employees		
	250-499	500+	Total
Manufacturing and construction	1,030	912	1,942
Distribution, hotels and restaurants	835	938	1,773
Banking, finance and insurance	745	756	1,501
Other private services	315	274	589
Total	2,925	2,880	5,805
Charity/Voluntary organisations	520	550	1,070
Grand total	3,445	3,430	6,875

Source: BERR, 2007.

Most employers in Great Britain with 250 or more employees have their headquarters in England (90 per cent), with 7 per cent in Scotland and 3 per cent in Wales.

Although there are relatively few organisations in Great Britain with 250 or more employees, they collectively account for a very large proportion of the workforce: around 10.3 million of Britain's 25.7 million employees work in these large private and voluntary sector organisations (BERR, 2007). As such they have a key role to play in advancing the equal pay agenda in Great Britain.

Tables 1.2 to 1.5 show the breakdown of the numbers of interviews achieved by size, sector and country. Data were weighted and grossed up to be equivalent to the numbers shown in Table 1.1.

Table 1.2 Sample achieved in Great Britain

	Number of employees		
	250-499	500+	Total
Manufacturing and construction	131	159	290
Distribution, hotels and restaurants	70	127	197
Banking, finance and insurance	39	77	116
Other private services	124	173	297
Total	364	536	900

Table 1.3 Sample achieved in England

	Number of employees		
	250-499	500+	Total
Manufacturing and construction	105	135	240
Distribution, hotels and restaurants	58	111	169
Banking, finance and insurance	35	61	96
Other private services	104	154	258
Total	302	461	763

Table 1.4 Sample achieved in Scotland

	Number of employees		
	250-499	500+	Total
Manufacturing and construction	15	19	34
Distribution, hotels and restaurants	10	9	19
Banking, finance and insurance	4	13	17
Other private services	16	14	30
Total	45	55	100

Table 1.5 Sample achieved in Wales

	Number of employees		
	250-499	500+	Total
Manufacturing and construction	11	5	16
Distribution, hotels and restaurants	2	7	9
Banking, finance and insurance	-	3	3
Other private services	4	5	9
Total	17	20	37

Most employers in the survey (84 per cent) are private sector organisations seeking a profit; the remaining 16 per cent are charities or voluntary sector organisations.

As the number of private and voluntary sector organisations in Wales with 250 or more staff is quite small (190 in total from which 37 interviews were achieved), it is difficult to draw reliable comparisons with the rest of Great Britain.

1.4 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 (that is, organisations based in England, Scotland or Wales with 250 or more employees, across the private and voluntary 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 per cent confidence level. That is to say, there is a 95 per cent 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 per cent and the symbol “-” indicates a finding of exactly 0 per cent. 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.

1.5 Report structure

Chapter 2 of the report profiles the survey organisations and their business culture; it adds context to the findings and looks at the incidence of situations which might introduce bias into the system or make it difficult to calculate equal pay for equal work. Chapter 3 looks at the actions currently being undertaken by employers to measure the pay gap, differentiating between formal pay reviews of men’s and women’s pay and informal gender pay gap analysis. Chapter 4 examines what gender pay data are already being reported by employers and the motivations behind reporting or not reporting the data both internally and externally. Chapter 5 presents the conclusions and the implications of the research findings.

2. Employer contexts and cultures

One of the objectives of the equal pay provisions of the Equality Bill is to facilitate greater equality in pay between men and women by encouraging more employers to analyse and report data on the gender pay gap.

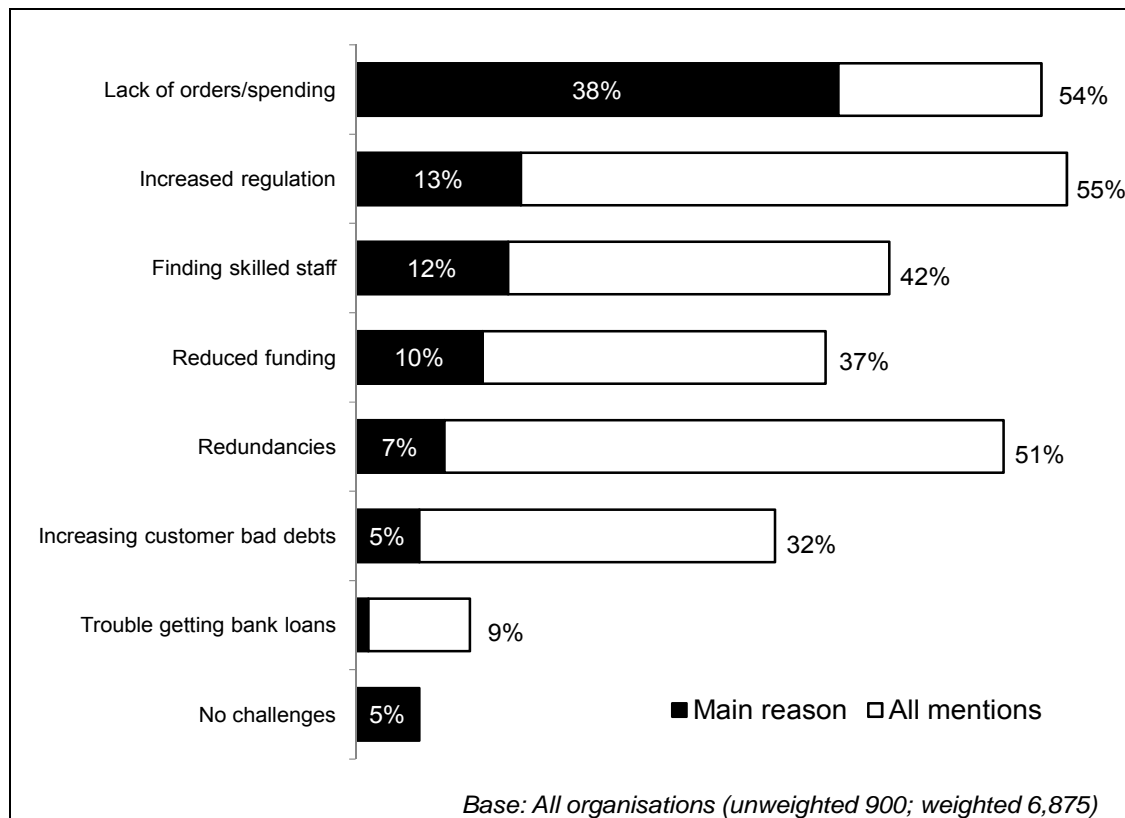
This chapter explores the extent to which organisations have a culture and context which supports gender pay gap reporting and also the means to analyse pay gap data. More specifically, it considers:

- the challenges that non-public sector employers are currently facing, and the extent to which they already feel burdened by legislation;
- the complexity of the working arrangements and patterns employed to manage the workforce;
- the state and structure of the HR function within the organisation;
- the extent to which equal pay and the avoidance of sex bias are built into workforce development and training, and the culture around publicising employee pay; and
- the extent to which payroll and human resources systems are structured and aligned in a way which allows for analysis of gender pay gaps.

In exploring these questions, the chapter sets a context as to how fertile the ground is for encouraging greater proportions of employers to analyse and report pay gap data.

2.1 Perceived future challenges

All employers were asked whether they expected to face each of a number of challenges over the next 12 months and which of these was likely to present the largest challenge.

Figure 2.1 Challenges perceived in the next 12 months

As one would expect, the economic environment represents the main challenge to these large employers. The single greatest challenge that they anticipate having to meet in the next 12 months is a lack of orders or customers spending less (anticipated by 54 per cent of employers, with 38 per cent focusing on this as their biggest challenge). Half of employers (51 per cent) foresee the prospect of having to make redundancies or otherwise reduce their headcount, with two in five (37 per cent) concerned about reduced funding and one in 10 (nine per cent) anticipating difficulty getting bank loans.

The challenge of increased regulation is anticipated by just over half of all employers, and for one in eight (13 per cent) it was the main challenge. In this context, the prospect of further Equal Pay legislation is likely to be of concern to these employers in particular.

From a different angle, difficulties finding skilled staff are anticipated as a challenge by two in five employers (42 per cent) and for one in eight this is the main challenge they anticipate. For these employers, demonstrating a transparent equal pay strategy can serve as a powerful tool in recruiting talent and could be a particularly persuasive message.

2.2 State and structure of the HR function

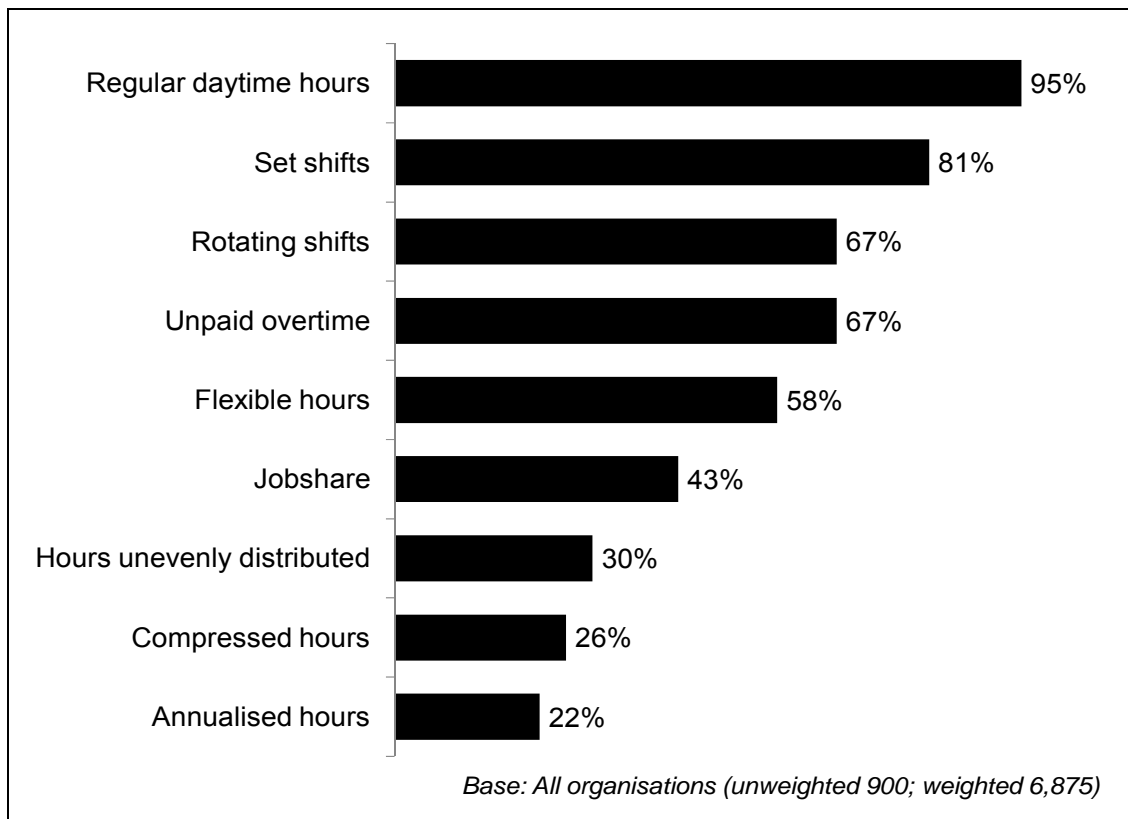
The culture of human resources (HR) in these employers is important as it demonstrates how central HR is to the business and how seriously equality issues are taken. Of the non-public sector employers in Great Britain, most heads of HR either report directly to the board (59 per cent) or actually sit on the board (28 per cent). The head of HR is more likely to sit on the board in organisations with 1,000 or more employees (45 per cent).

Half of the employers (50 per cent) manage all of their HR function centrally, whereas six per cent say everything is determined at site level. Of those who have some central functions and some functions at site level, it is recruitment (83 per cent) and appraisals (84 per cent) that are most likely to occur at site level. Two-fifths (43 per cent) state that pay reviews are determined at site level.

2.3 Working arrangements and working patterns

By definition, the population of large employers each has a large workforce to manage, and this workforce adopts a range of working patterns. Figure 2.2 shows the proportion of employers who have at least some staff working these patterns.

Figure 2.2 Number of employers whose staff work different patterns



Employers with a higher proportion of women in their staff are far more likely to have staff working irregular hours. On average, 43 per cent of the population's workforce are women. Among employers for whom women make up over 50 per cent of their staff, a larger than average proportion offer flexitime (66 per cent), job share (52 per cent), compressed hours (36 per cent), annualised hours (26 per cent) or hours unevenly distributed in some other way (50 per cent).

Of the 20 per cent of the workforce who work part-time in the sampled organisations, 70 per cent are women and 30 per cent are men. In comparison, in the workforce as a whole in the UK in August to October 2009, 79 per cent of part-time employees were female and 21 per cent were male.

2.4 Prioritising tackling the gender pay gap

To understand how fertile the ground is for increasing the proportion of organisations analysing and reporting gender pay gaps, it is valuable to know their current attitudes towards pay gaps and how important the issue is to them as a business.

All organisations were asked how much of a business priority reducing the gap between men's and women's pay was. They were asked to state whether it was a very high priority, fairly high priority, fairly low priority, very low priority or not a priority at all. Half of all organisations stated that it was either a very or fairly high priority (50 per cent). However, a quarter stated that it was a low priority and a further quarter stated that reducing their gender pay gap did not figure in their list of priorities at all.

Perhaps unsurprisingly, those employers who had their first formal review of their gender pay gap in progress at the time of interview were the most likely to state that the issue had a very high or fairly high priority within their organisation (67 per cent compared with an average of 50 per cent). Organisations that had completed a review were less likely to see it as a high priority indicating perhaps that some of these organisations felt that their review had addressed any issues regarding their pay gap. Over two-thirds of those employers who stated that they had their first formal review planned (69 per cent) felt that reducing their pay gap had a low priority in their organisation or was not a priority at all (Table 2.1). With a low priority attached to the issue, it seems likely that some of these planned reviews will take some time to come to fruition. However, just over half of the organisations which had not conducted a review and did not have one planned (55 per cent) stated that reducing the pay gap was either a very or fairly high priority within their organisation.

Organisations with no engagement with formal pay reviews of men's and women's pay to date and which considered the issue to have low/no priority within their

organisation accounted for a total of 22 per cent of all private and voluntary sector organisations with 250 or more staff.

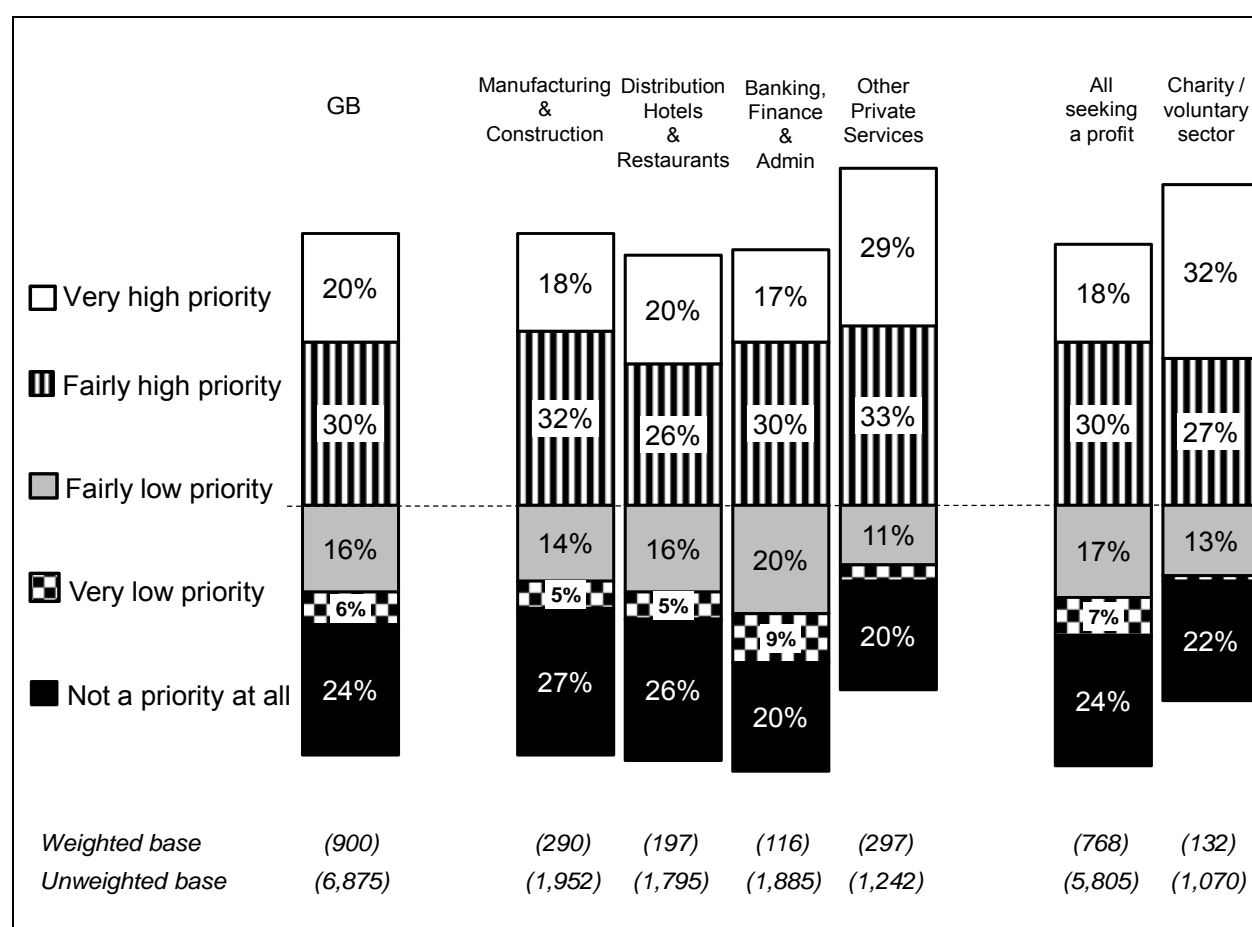
Table 2.1 Level of priority attached to reducing the gender pay gap by formal review status

	GB total	%			
		Completed	In process	Plans to conduct	None
Very high priority	20	16	18	6	26
Fairly high priority	30	31	49	21	29
Fairly low priority	16	16	21	36	10
Very low priority	6	7	5	7	5
Not a priority at all	24	27	8	25	24
Don't know	4	2	-	3	6
<i>Base: All organisations</i>	<i>900</i>	<i>211</i>	<i>57</i>	<i>121</i>	<i>504</i>

Source: Gender Pay Gap Reporting Baseline 2009.

Two-fifths (39 per cent) of organisations had a designated individual with responsibility for ensuring equal pay. Those who did were more likely to consider reducing the gender pay gap a very high priority (27 per cent compared with 17 per cent of those without a designated individual in this role).

There were also some variations by sector (Figure 2.3) with those in the 'other private services' sector and those with charity or voluntary status attaching a higher priority to the issue.

Figure 2.3 Priority attached to reducing the gender pay gap by sector

There were no significant differences by size, as shown in Table 2.2.

Table 2.2 Level of priority attached to reducing the gender pay gap by size

	GB total	%		
		250-499	500-999	1,000+
Very high priority	20	22	21	16
Fairly high priority	30	29	26	37
Fairly low priority	16	18	13	15
Very low priority	6	4	9	7
Not a priority at all	24	23	27	19
Don't know	4	4	5	6
<i>Base: All organisations</i>	900	364	238	298

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

2.5 Plans for reducing the gender pay gap

Just under a quarter of all organisations (23 per cent) stated that they had a planned approach for reducing the gap between men's and women's pay with a further 17 per cent stating that they did not have a planned approach but were informally looking into developing a strategy. This leaves half of the organisations (49 per cent) which definitely did not have a planned approach and a further 10 per cent who were unsure whether or not they had a plan in place.

As might be expected, those employers who stated that reducing the pay gap was a very or fairly high priority within their organisation were more likely to have a planned approach to reducing their pay gap than those where the issue was considered of low/no priority (38 per cent compared with eight per cent).

Those who were undertaking their first formal review of women's and men's pay at the time of interview were the most likely to state that they were informally looking at developing a plan to reduce the gender pay gap (43 per cent compared with 17 per cent on average). However, those who had completed a formal gender pay review were no more likely than average to have a formal plan in place indicating that the reviewing process does not always result in the formulation of a plan to ensure equal pay. (Some of these reviews may well have found that the organisation offers equal pay and hence there is no pay gap to be reduced but in others it is possible that an active or passive decision has been taken not to address a gap.)

Table 2.3 Existence of plans to tackle the gender pay gap by formal review status

	GB total	%			
		Completed	In process	Plans to conduct	None
Have planned approach	23	23	24	12	26
Do not have planned approach but are informally looking into developing one	17	20	43	28	10
No planned approach	49	50	26	52	51
Don't know	10	7	6	9	12
<i>Base: All organisations</i>	<i>900</i>	<i>213</i>	<i>57</i>	<i>122</i>	<i>508</i>

Source: Gender Pay Gap Reporting Baseline 2009.

Those organisations with a designated individual responsible for ensuring equal pay (which to some extent might be considered to be a step towards tackling a pay gap)

were more likely to state that they had a planned approach for reducing their pay gap (31 per cent compared with 19 per cent of those without a designated individual in this role).

There were no notable differences in the likelihood to have a planned approach for reducing the pay gap by size or business sector of organisation. However, those in the charity or voluntary sector were more likely to have a plan in place or at least to be looking to develop one than profit-seeking organisations (51 per cent compared with 39 per cent). Table 2.4 shows the breakdown by sector, profit-seeking status and size.

Table 2.4 Existence of plans to tackle the gender pay gap by sector, profit-seeking status and size

	Base:		%			
	<i>Unwtd</i>	<i>Wtd</i>	Have a planned approach	Do not have – but informally looking into developing	No planned approach	Don't know
Sector						
Manufacturing and construction	290	1,952	23	16	52	9
Distribution, hotels and restaurants	197	1,795	21	18	51	10
Banking, finance and insurance	116	1,885	21	19	47	13
Other private services	297	1,242	30	16	45	9
Profit-seeking status						
Seeking a profit	768	5,805	22	17	51	11
Charity/voluntary	132	1,070	32	19	40	9
Size						
250-499	364	3,445	24	15	54	8
500-999	238	1,794	22	19	50	9
1,000+	298	1,636	24	20	39	17
Total	900	6,875	23	17	49	10

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

Where organisations had planned approaches for reducing their gender pay gap, they were asked about the level of detail contained within these plans (Table 2.5). Almost two-fifths of those which had a plan (39 per cent) stated that it detailed the strategy for closing the gap between men's and women's pay at the level of individual job roles. However, it was much more common for plans simply to detail a strategy at the overall level (60 per cent).

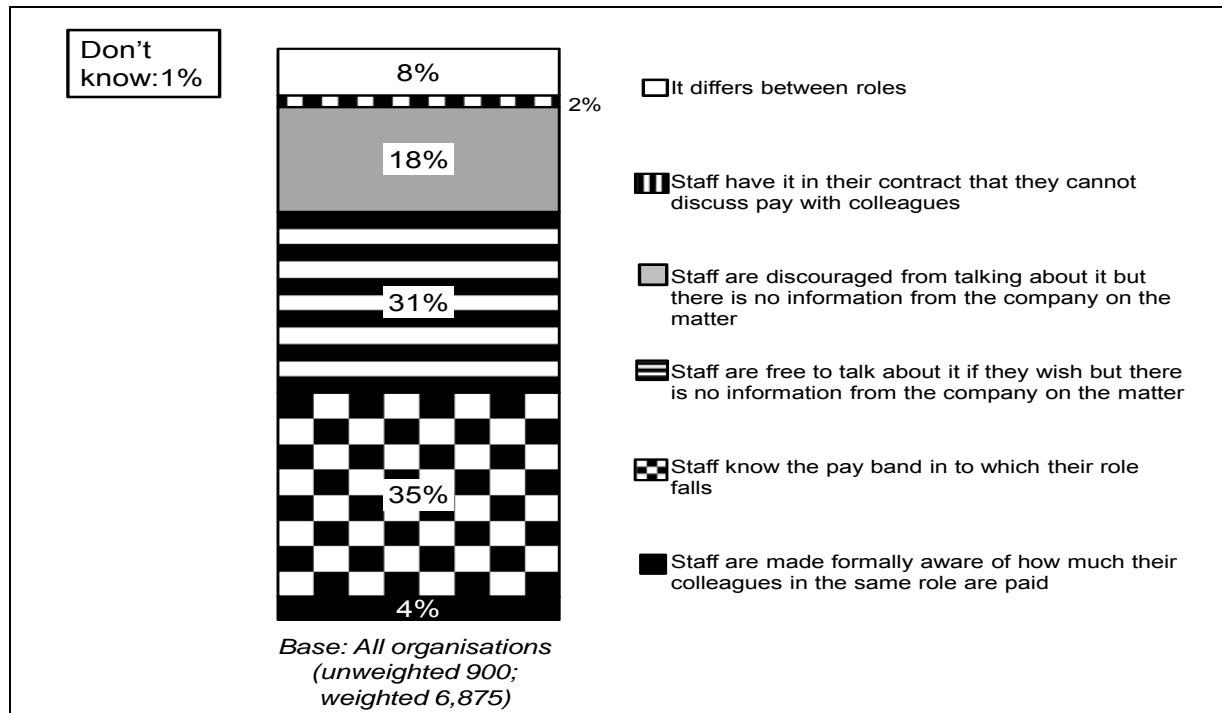
Table 2.5 Detail of plans to reduce the gender pay gap

	%
	GB
Detailed by job role	39
Detailed at site level	16
Detailed at departmental level	19
Detailed at the overall level only	60
Don't know	12
<i>Base: All organisations with a planned approach</i>	<i>217</i>

Source: Gender Pay Gap Reporting Baseline 2009.

2.6 Openness about pay

The research found that very few employers encourage a general culture of openness around salary and remuneration. Just four per cent of all employers formally make employees aware of how much colleagues in the same role are paid. A further third (35 per cent) make staff aware of the pay band they fall into, but the remaining 51 per cent do not give staff any information and a fifth discourage (18 per cent) or even forbid staff (two per cent) from discussing pay with colleagues (Figure 2.4).

Figure 2.4 Employer openness about pay

Among the eight per cent of employers who state that the extent of openness differs between job roles, there is far more openness in terms of sharing colleagues' pay information with less senior employees, with 19 per cent formally doing so, compared with just one per cent who tell their managerial and senior employees.

A culture of openness is more common in the charity and voluntary sector, with 12 per cent formally telling employees what their colleagues are paid and 69 per cent telling staff which pay band different roles fall into, compared with three per cent and 28 per cent of those seeking a profit. This may reflect a greater degree of accountability among charities which often rely on donations from the public or from funding bodies.

Employers for whom women make up between 11 per cent and 50 per cent of their workforce were the most likely to discourage or forbid staff from talking about pay with 24 per cent compared with 20 per cent overall. Conversely, those in which over 50 per cent are women were least likely to discourage or forbid it (13 per cent).

2.7 Workforce development and training

A sign of employers taking gender pay issues seriously is whether anybody has this issue as part of their defined job role. Thirty-nine per cent of employers do have a member of staff responsible for 'ensuring equal pay between men and women'. This

is more likely to be the case in the charity and voluntary sector, where 55 per cent of employers have such a role defined, compared with just 36 per cent of those seeking a profit. It is also more likely to be the case in organisations where over 50 per cent of the workforce is women, with 50 per cent of these employers defining such a role. It is also more likely where the head of HR actually sits on the board (47 per cent). Table 2.6 shows the sector and size breakdowns.

Table 2.6 Employers with a designated person responsible for equal pay

	<i>Base:</i>		% with a designated person
	<i>Unwtd</i>	<i>Wtd</i>	
Sector			
Manufacturing and construction	290	1,952	43
Distribution, hotels and restaurants	197	1,795	36
Banking, finance and insurance	116	1,885	37
Other private services	297	1,242	43
Size			
250-499	364	3,445	41
500-999	238	1,794	35
1,000+	298	1,636	41
Total	900	6,875	39

Just over a third of employers (35 per cent) provide training in avoiding sex bias when setting rates of pay. Table 2.7 shows that this was more likely to be the case among the largest of the employers (those with 1,000 or more employees); there was little difference by sector. Charities and voluntary organisations were no more likely than the average to provide such training. Those who had a member of staff designated as responsible for 'ensuring equal pay between men and women' were more likely to provide such training (52 per cent).

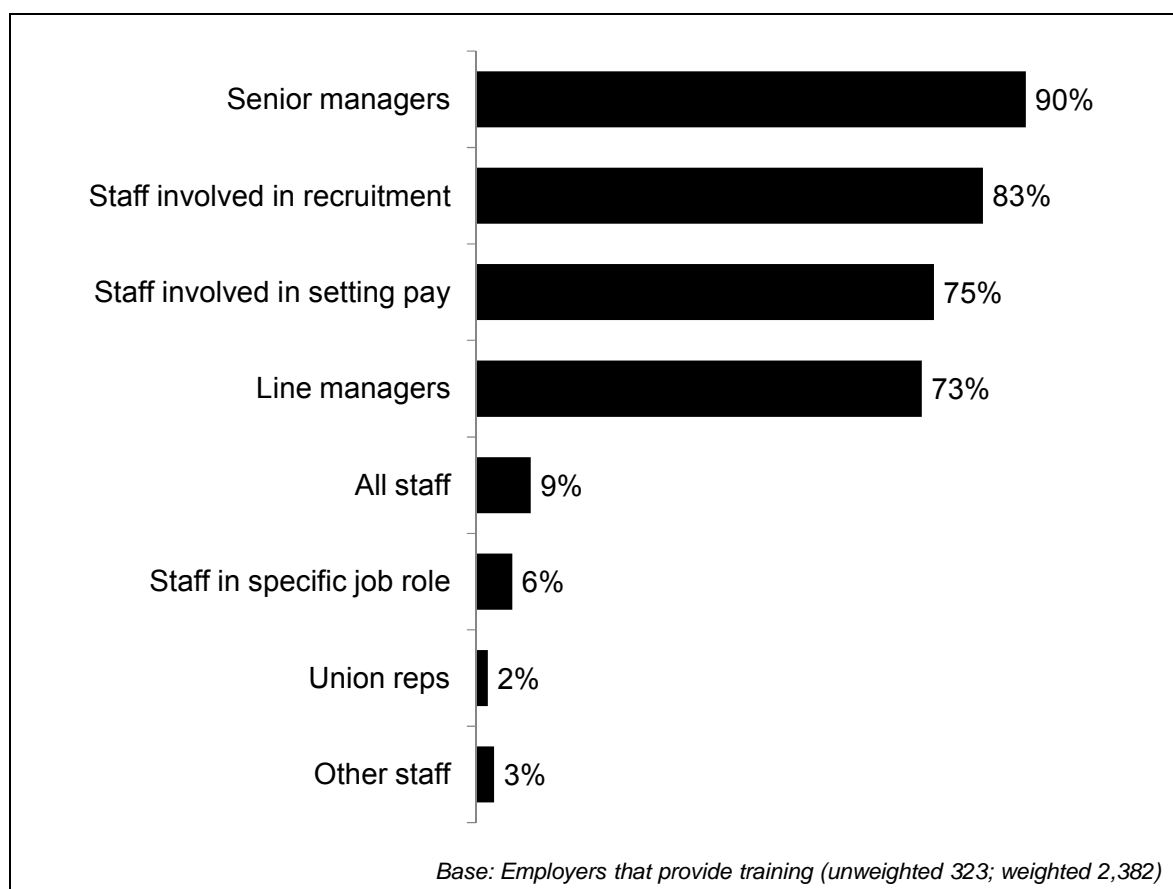
Table 2.7 Employers providing training in avoiding sex bias in setting pay rates

	<i>Base:</i>		% providing training
	<i>Unwtd</i>	<i>Wtd</i>	
Sector			
Manufacturing and construction	290	1,952	35
Distribution, hotels and restaurants	197	1,795	35
Banking, finance and insurance	116	1,885	35
Other private services	297	1,242	32
Size			
250-499	364	3,445	32
500-999	238	1,794	33
1,000+	298	1,636	42
Total	900	6,875	35

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

Of those organisations that provide training in avoiding sex bias when setting rates of pay, two-thirds (67 per cent) run this as one-off or occasional training sessions, while 36 per cent run a regular training programme. There is some overlap in these figures; this could indicate that some employers run a regular programme for some staff (for example, those involved in setting pay) and one-off training for other staff. Figure 2.5 shows what staff groups attend this training. One in 11 (nine per cent) provide training to all staff, most however focus on managers and those involved in recruiting and setting rates of pay.

Figure 2.5 Staff that attend training on avoiding sex bias in setting rates of pay

2.8 Structuring and alignment of payroll and HR systems

The actual process of measuring and calculating gender pay differences can be made easier or can be made more complicated by the HR systems. Variables such as what information on the employee is kept, where it is kept, and the type of system used for this can all affect how simple the calculation is. To ease the process, employers would ideally have all the information on gender and pay in one place, on an electronic system capable of running reports on aggregated data. This is more likely among these large employers than it would be among small organisations, however it is by no means a given. Table 2.8 presents this by sector and size, showing that over half of organisations with 1,000 or more employees, compared with two-fifths of those with 250-499 or 500-999 employees, have combined systems.

Table 2.8 HR and payroll structure by sector and size

	<i>Base:</i>		<i>%</i>		
	<i>Unwtd</i>	<i>Wtd</i>	Separate	Combined	Don't know
Sector					
Manufacturing and construction	290	1,952	56	44	*
Distribution, hotels and restaurants	197	1,795	55	43	2
Banking, finance and insurance	116	1,885	56	42	2
Other private services	297	1,242	53	45	2
Size					
250-499	364	3,445	60	39	1
500-999	238	1,794	56	43	1
1,000+	298	1,636	45	52	3
Total	<i>900</i>	<i>6,875</i>	55	43	1

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

Nearly all employers (99 per cent) keep their HR records electronically, and 43 per cent have HR and payroll combined on one system. Of the 55 per cent that keep them separately, most (61 per cent) say it would be fairly or very easy to combine the two. This is important as to analyse pay gap data the records for salary and benefits and for gender would have to all be in one place to ease the process. That said, current salary was kept on 96 per cent of employers' HR records so if that were the only variable under consideration there would not be a logistical problem tying the salary data to the gender data.

2.9 Job evaluation activity

Around three-fifths (61 per cent) of employers have already carried out a job evaluation to compare roles within the company. While 21 per cent had simply looked at job titles, 36 per cent had carried out a full analytical job evaluation (the remaining four per cent of employers said they had used another method). This is encouraging as non-discriminatory analytical job evaluation is the most reliable and objective way to assess whether work being done by women is of equal value to work being done by men. Non-analytical job evaluation, which looks at whole jobs rather than at job

demands, provides only a rank order of jobs and so looking at job titles alone does not provide a measure of equal work.

Table 2.9 show the breakdown by size and sector. Larger companies are slightly more likely to have carried out an analytical job evaluation. Those whose main activity is in distribution, hotels and restaurants were least likely to have done so.

Table 2.9 Job evaluation activity by size and sector

	Base:		Yes – review of job titles	Yes – analytical job evaluation	%			Don't know
	Unwtd	Wtd			Yes- other method	No - but intend to in future	No	
Sector								
Manufacturing and construction	290	1,952	21	37	5	9	33	3
Distribution, hotels and restaurants	197	1,795	17	26	3	10	42	6
Banking, finance and insurance	116	1,885	27	42	4	8	25	4
Other private services	297	1,242	20	39	4	7	33	7
Size								
250-499	364	3,445	20	32	5	11	33	5
500-999	238	1,794	21	36	4	7	40	1
1,000+	298	1,636	25	44	3	6	27	7
Total	900	6,875	21	36	4	9	33	5

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

2.10 Overview

Employers are facing a number of challenges to their businesses in these economically uncertain times, such as the potential of decreasing orders from customers, which may lead to gender pay gap analysis not being their highest priority. The challenge of increased legislation is anticipated by over half of the employers, with a fifth of these seeing it as their biggest challenge in the next 12 months, suggesting further Equal Pay legislation may be of particular concern for these employers.

Challenges, however, also throw up opportunities, and for the 42 per cent who regard finding skilled staff as a challenge they are anticipating there is an opportunity to demonstrate that having a transparent equal pay strategy can be a powerful recruiting tool. This may persuade them to think about measuring and reporting on their pay gap.

On a purely practical level, non-public sector employers of this size are in general well set up to be able to measure their pay gap, with most holding salary and gender on the same system. However, only around half have carried out a job evaluation of any kind and there are a number who devolve responsibility for pay to their different sites which could make measurement more difficult.

There is still work to do in ingraining specific action on equal pay into the culture of HR of these organisations. Almost half of the employers do have a member of staff with specific responsibility for 'ensuring equal pay between men and women', but this leaves over half who do not. Just over a third provide training in avoiding sex bias when setting pay, which is an important part of the process as it gets staff who are not in HR to understand the issues and the potential for bias.

Half of all organisations considered that reducing the gap between men's and women's pay was either a very or fairly high priority for them. This was especially the case among those currently conducting their first formal review of men's and women's pay; however, those which had completed a review in the past stated that this was less of a priority for them, suggesting that they consider they have dealt with the issue now. Two-thirds of those which planned to carry out a formal pay review said that it was of low priority, suggesting that these planned reviews may take some time to come to fruition.

Just under a quarter of organisations said they had plans for reducing their pay gap and a further 17 per cent were informally looking into developing a strategy. Those in the charity and voluntary sector were more likely to have a plan. Half of organisations had no planned approach. Those which had completed a formal gender pay review were no more likely than average to have a formal plan in place indicating that the review process does not always result in action.

Increasing transparency by encouraging employers to report on their gender pay gap should result in employees knowing whether they are getting equal pay or not. Currently not many employers are openly telling their employees what their colleagues earn, and around a fifth either forbid or actively discourage staff from talking to each other about pay.

3. Analysis of gender pay gap data

This chapter looks at the extent to which organisations have analysed the data that they hold on the pay of men and women, differentiating between formal reviews of women's and men's pay (that is, formal gender pay gap reviews) and more informal gender pay gap analysis. The chapter begins by examining the differences between the formal and informal approaches. It then presents data on the overall extent of gender pay gap analysis, that is both formal and informal. This is followed by a discussion of informal gender pay gap analysis and then of formal reviews of men's and women's pay. The next section looks at the barriers to conducting pay reviews of this nature and the kind of support that organisations would like or need in order to be encouraged to conduct this analysis. The final section of the chapter looks at the importance attached to reducing the gap between the pay of men and women and the plans that organisations have in place to approach this.

3.1 Formal and informal approaches to gender pay gap analysis

Organisations were asked about both formal and informal analyses of the difference between men's and women's pay. Formal analysis would be a full pay review of men's and women's pay, perhaps - although not necessarily - undertaken by a specialist, using a set formula to compare the difference between men's and women's pay in equivalent job roles. The outcome would be a figure or set of figures showing the percentage or numeric difference. Informal analysis on the other hand might just comprise a member of the HR team having a quick look through the pay data, or setting up a spreadsheet to compare the two. This is typically less rigorous than a full formal review, and it may not result in an actual figure of the difference; it is most likely to be a topline check whether anything stands out in the pay data that suggests there might be a difference.

It should be noted that the definition of a full pay review used in this survey differs from that used in previous surveys of equal pay reviews (EPRs) carried out by IFF Research for the Equality and Human Rights Commission and before that for the Equal Opportunities Commission, most recently in 2008 (Adams et al., 2008).

Most organisations which stated that they had carried out a formal review to examine the gap between men's and women's pay under the definition used in this study would no doubt similarly have stated that they had carried out an EPR. However, it is possible that some would have considered that they had considered a formal review of pay, but not an EPR, and vice versa. For that reason, no comparisons are made here with the results of the 2008 EPRs survey.

3.2 Overall analyses of pay

As Table 3.1 shows, 43 per cent of organisations had conducted or were conducting some sort of analysis of their gender pay gap. When organisations planning future analysis are added, the figure rises to 57 per cent. The table also shows that activity was higher in the charity/voluntary sector (57 per cent) than in profit-seeking organisations.

Table 3.1 Incidence of any type of gender pay gap analysis by private or voluntary sector

	GB total	Seeking a profit	% Charity/voluntary sector
Currently doing or have done gender pay gap analysis (formal or informal)	43	40	57
Have plans to do gender pay gap analysis, never have previously	14	15	9
Have never done and have no plans to do gender pay gap analysis	33	34	26
Don't know	10	10	7
<i>Base: All organisations</i>	<i>900</i>	<i>768</i>	<i>132</i>

Source: Gender Pay Gap Reporting Baseline 2009.

Table 3.2 shows that 52 per cent of organisations with over 1,000 staff reported some form of activity, compared with 41 per cent of those employing 500-999 staff and 40 per cent of those with 250-499 staff.

Table 3.2 Incidence of any type of gender pay gap analysis by size

	GB total	250-499	500-999	1,000+
Currently doing or have done gender pay gap analysis (formal or informal)	43	40	41	52
Have plans to do gender pay gap analysis, never have previously	14	15	15	12
Have never done and have no plans to do gender pay gap analysis	33	38	33	24
Don't know	10	8	11	13
<i>Base: All organisations</i>	<i>900</i>	<i>364</i>	<i>238</i>	<i>298</i>

Source: Gender Pay Gap Reporting Baseline 2009.

Table 3.3 shows that gender pay gap analysis activity is highest in banking, finance and insurance (51 per cent) and lowest in distribution, hotels and restaurants (37 per cent).

Table 3.3 Incidence of any type of gender pay gap analysis by sector

	GB total	%			
		Manufacturing and construction	Distribution, hotels and restaurants	Banking, finance and insurance	Other private services
Currently doing or have done gender pay gap analysis (formal or informal)	43	38	37	51	46
Have plans to do gender pay gap analysis, never have previously	14	14	12	20	10
Have never done and have no plans to do gender pay gap analysis	33	38	39	22	34
Don't know	10	10	12	7	10
<i>Base: All organisations</i>	<i>900</i>	<i>290</i>	<i>197</i>	<i>116</i>	<i>297</i>

Source: Gender Pay Gap Reporting Baseline 2009.

Table 3.4 examines gender pay gap analysis by country.

Table 3.4 Incidence of any type of gender pay gap analysis by country

	GB total	%		
		England	Scotland	Wales
Currently doing or have done gender pay gap analysis (formal or informal)	43	43	37	55
Have plans to do gender pay gap analysis, never have previously	14	14	15	6
Have never done and have no plans to do gender pay gap analysis	33	33	39	31
Don't know	10	10	9	8
<i>Base: All organisations</i>	<i>900</i>	<i>763</i>	<i>100</i>	<i>37*</i>

Notes: * Low base size. Data to be treated with caution.

Source: Gender Pay Gap Reporting Baseline 2009.

Organisations in Wales appear more likely from the table to be in the process of completing or to have previously conducted gender pay gap analysis in any form than those in England and Scotland. However, it should be emphasised that due to the small base size, the difference is not significant. Organisations in Scotland were less likely to be carrying out or have completed gender pay gap analysis than those in England, and were more likely to have no plans for doing so.

Table 3.5 shows that gender pay gap analysis activity is much higher in organisations with a designated individual responsible for equal pay (62 per cent), compared with 31 per cent of those without.

Table 3.5 Incidence of any type of gender pay gap analysis by whether a designated individual is responsible for equal pay

	%	
	Designated individual	No designated individual
Currently doing or have done gender pay gap analysis (formal or informal)	62	31
Have plans to do gender pay gap analysis, never have previously	9	18
Have never done and have no plans to do gender pay gap analysis	23	41
Don't know	6	10
<i>Base: All organisations</i>	<i>370</i>	<i>489</i>

Source: Gender Pay Gap Reporting Baseline 2009.

3.3 Informal gender pay gap analysis

Organisations which stated that they recorded details such as gender, age, ethnicity, disability status, current salary and salary history on their employees' individual personnel records were asked whether they ever analysed this data in any way to explore the gap between men's and women's average pay.

Just over a third of organisations (36 per cent) stated that they conducted an informal analysis and a further one in eight (12 per cent) stated that they intended to do so in the future. Of those organisations that had no engagement with a formal review of men's and women's pay, 16 per cent stated that they conducted a more informal analysis and eight per cent stated that they planned to do so in the future (Table 3.6).

Table 3.6 Incidence of informal gender pay gap analysis by formal review activity

	GB total	%			
		Completed	In process	Plans to conduct	None
Conduct informal analysis	36	80	56	32	16
Do not conduct informal analysis but plan to in future	12	3	35	30	8
No plans to conduct informal analysis	46	14	6	32	68
Don't know	6	3	3	5	8
Do not collect data to analyse	0	0	0	0	1
<i>Base: All organisations</i>	<i>900</i>	<i>211</i>	<i>57</i>	<i>121</i>	<i>504</i>

Source: Gender Pay Gap Reporting Baseline 2009.

Those organisations conducting this informal analysis are more likely to be:

- those with a designated individual responsible for equal pay (54 per cent);
- in the charity or voluntary sector (46 per cent);
- the largest (46 per cent of those with 1,000 or more staff);
- in the banking, finance and insurance sector (40 per cent); and
- those where a HR representative sits on the board (42 per cent).

The organisations which said that they were already analysing their pay data were asked how frequently they conducted this analysis and which department was responsible for ensuring that the reports are run.

Most commonly gender pay gap analysis was run annually (58 per cent of those conducting informal reviews stated that this was the case). A fifth of organisations running analysis (20 per cent - equating to seven per cent of all organisations with 250 or more staff) run analysis more than once a year. One in five organisations (19 per cent) are looking at this data less frequently than annually. The very large companies (with over 1,000 employees) ran their data with the lowest frequency: 26 per cent ran the analysis less often than once a year, and significantly fewer ran data annually. Table 3.7 shows the breakdown. There were no significant differences by sector

Table 3.7 Frequency of gender pay gap analysis by size and sector

	Base:		%						
	Unwtd	Wtd	Every month or two	Quarterly	Twice per year	Annually	Less often	Other	Don't know
Sector									
Manufacturing and construction	92	604	4	6	13	54	20	1	3
Distribution, hotels and restaurants	67	589	1	10	17	56	14	-	2
Banking, finance and insurance	52	755	2	3	7	64	23	-	2
Other private services	109	481	1	8	13	55	18	2	4
Size									
250-499	115	1,086	1	7	12	64	16	*	1
500-999	83	607	3	7	8	61	19	1	1
1,000+	122	736	3	5	14	46	26	1	6
Total	320	2,430	2	6	12	58	19	1	2

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

The responsibility for running this informal analysis almost always fell to HR departments. This was the case for 94 per cent of those organisations conducting informal gender pay gap analysis. In small minorities of organisations responsibility lay with either the finance department (four per cent) or individual department heads (two per cent). Individual department heads responsible were all from organisations with 250-499 employees. There were no significant differences by sector or size.

Table 3.8 Department responsible for ensuring that gender pay gap data reports are run by size and sector

	<i>Base:</i>		% Individual department heads				
	<i>Unwtd</i>	<i>Wtd</i>	HR	Finance	Other	Don't know	
Sector							
Manufacturing and construction	92	604	94	4	1	-	-
Distribution, hotels and restaurants	67	589	91	5	4	-	-
Banking, finance and insurance	52	755	99	1	-	-	-
Other private services	109	481	92	5	1	2	1
Size							
250-499	115	1,086	94	2	3	-	-
500-999	83	607	94	5	-	-	-
1,000+	122	736	95	4	-	1	-
Total	320	2,430	94	4	2	*	*

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

3.4 Formal gender pay gap reviews

Incidence of formal gender pay gap reviews

All organisations were asked whether they had conducted a formal review to examine the gap between men's and women's pay, whether they were in the process of conducting a review and whether they had plans to conduct a review in the future (Table 3.9). Just under a quarter of all organisations (23 per cent) had completed a formal review and one in seven (12 per cent) were in the process of conducting one at the time of interview. A quarter of organisations had plans in place to conduct a formal review in the future.

Table 3.9 Incidence of formal gender pay gap reviews

		%	
	Yes	No	Don't know
Completed a formal gender pay review	23	63	14
In the process	12	82	6
Plans to conduct	28	53	11
<i>Base: All organisations</i>		<i>900</i>	

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

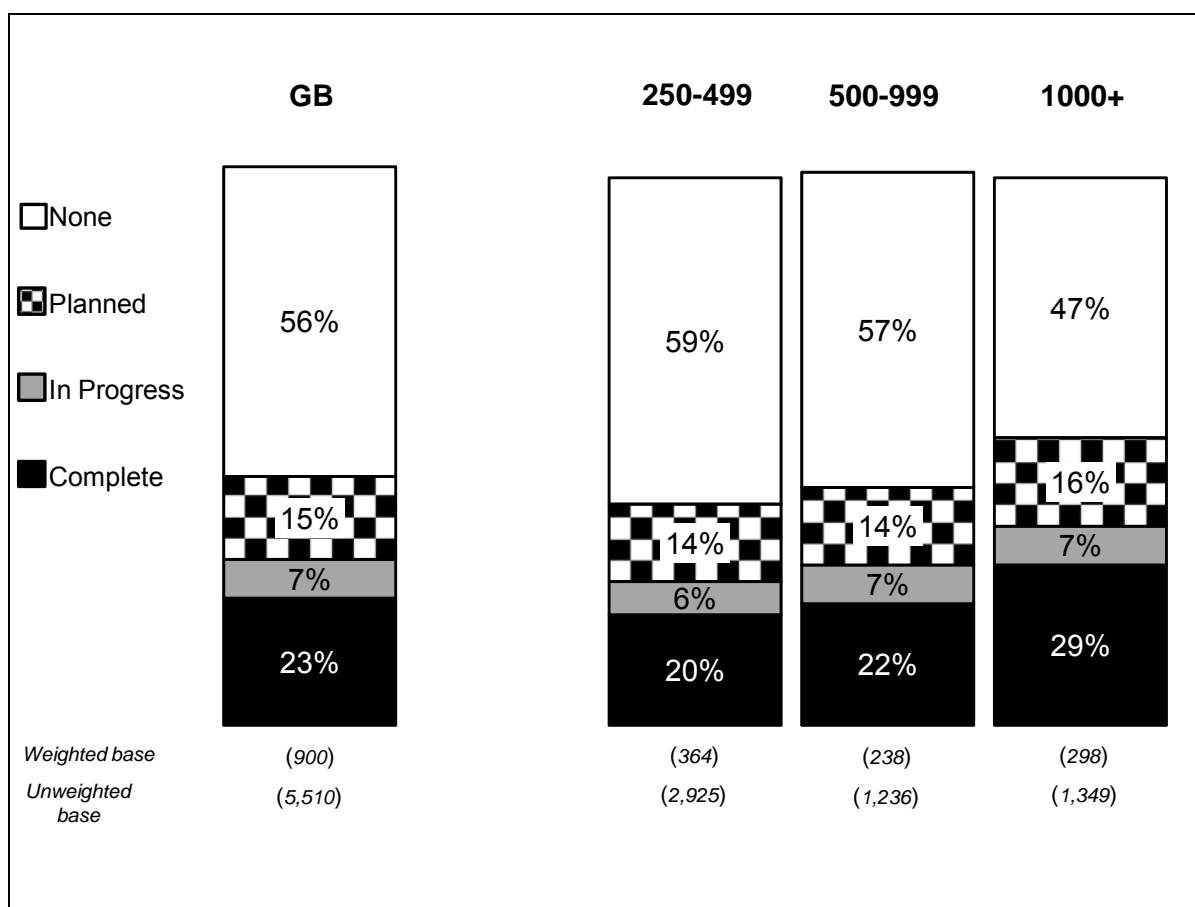
Some organisations appear in more than one category in Table 3.9 (for example, those who were conducting a review at the time of interview but had also completed a review in the past). For the next part of this chapter, results have been combined so that organisations are allocated to only one category of equal pay activity. This shows that just under half of those organisations that had a formal review of men's and women's pay in progress (seven per cent of all organisations) were completing their first review. As shown in Table 3.9, a quarter of all organisations had a formal gender pay gap review planned for the future; for just over half of these (15 per cent of all organisations) this would be the first review of pay while the remainder were planning to update a previous review. However, over half of organisations (56 per cent) had no engagement with reviewing men's and women's pay.

Incidence of formal gender pay gap reviews by size

Figure 3.1 shows the extent of formal review activity by size of organisation.

This shows that the likelihood of having completed a review increases with size of organisation (from 20 per cent of those with between 250 and 499 staff to 29 per cent of those with in excess of 1,000 staff). The proportions which either had their first review in progress or had their first review planned for the future were broadly similar across all three size bands indicating that the gap in the number of completed reviews by size is likely to remain constant for the foreseeable future. The proportion with no involvement in review activity falls to 47 per cent of the very largest organisations.

Figure 3.1 Incidence of formal gender pay gap reviews by size

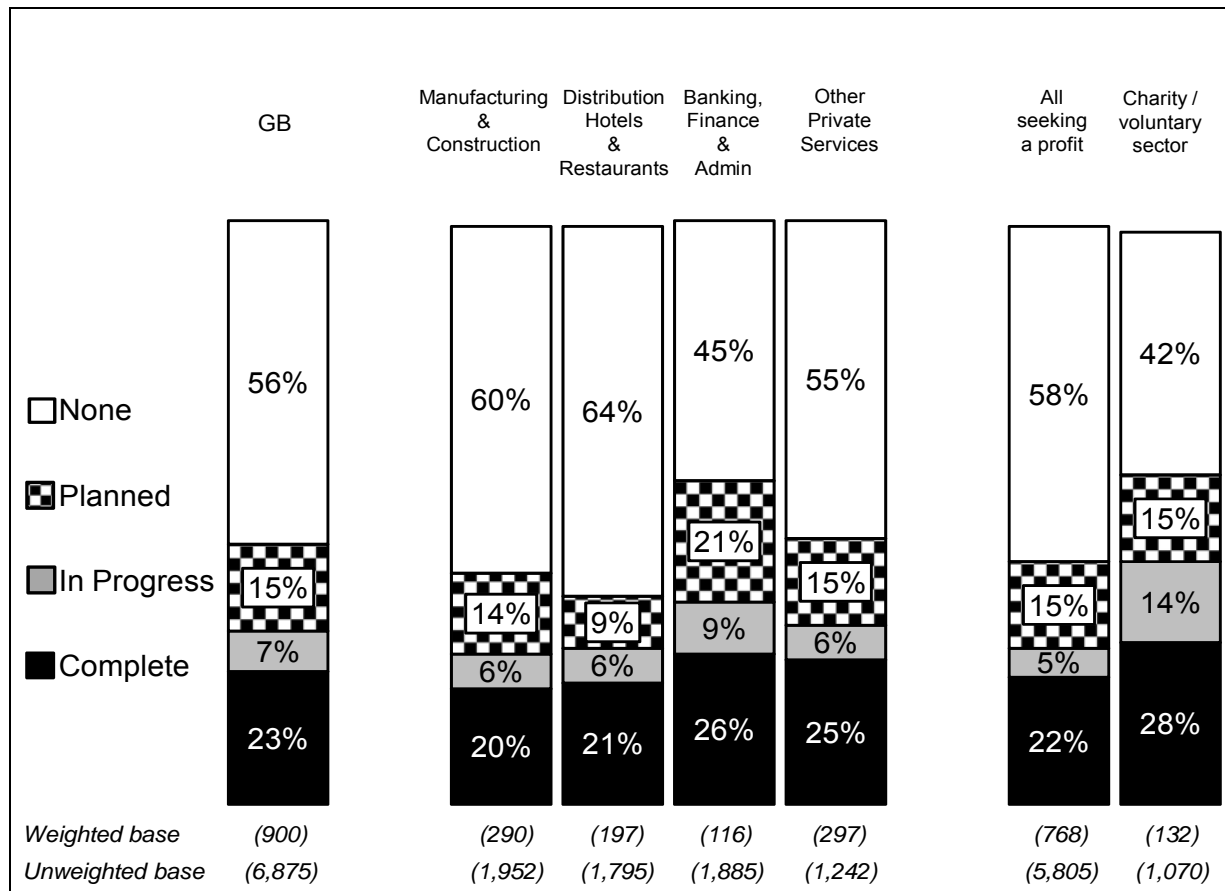


Incidence of formal gender pay gap reviews by sector

Figure 3.2 shows the same analysis by sector. Levels of reviewing activity are highest in the banking, finance and insurance sector. These organisations are most likely to have completed a review, to have their first review in progress and also to have their first review planned. Just under half of banking, finance and insurance sector organisations (45 per cent) have no engagement with review activity. Organisations in the distribution, hotels and restaurants sector were the least likely to have a formal review planned indicating that, even though levels of completed reviews and first reviews in progress were currently in line with the rest of the economy, in the future levels of review activity will fall behind other sectors.

As well as differences by the nature of their activity, there are also differences between organisations by whether or not they are seeking to make a profit. Organisations in the charity or voluntary sector show higher levels of review activity than those in the commercial sector. Just under three in 10 charity or voluntary sector organisations had completed a review (28 per cent) compared with a fifth of those seeking a profit (22 per cent).

Figure 3.2 Incidence of formal gender pay gap reviews by sector



Incidence of formal gender pay gap reviews by country

There was little difference in the level of formal review activity between organisations in England and those in Scotland. The number of private and voluntary sector organisations in Wales with 250 or more staff is quite small (190 in total from which 37 interviews were achieved) making it difficult to draw reliable comparisons with the rest of Great Britain. However, findings indicate a higher level of completed reviews among Welsh organisations (and a correspondingly lower proportion of organisations with no engagement with pay review activity).

Table 3.10 Incidence of formal gender pay gap reviews by country

	GB total	%		
		England	Scotland	*Wales
Completed a formal gender pay review	23	22	25	31
In the process of conducting a pay gap review (and do not have one completed)	7	7	3	8
Plans to conduct a pay gap review but do not currently have one in progress	15	15	14	9
No pay gap review activity	56	56	58	52
<i>Base: All organisations</i>	<i>900</i>	<i>763</i>	<i>100</i>	<i>37</i>

Notes: * Base sizes for findings for Wales are small and results should be interpreted with caution.

Source: Gender Pay Gap Reporting Baseline 2009.

Incidence of formal gender pay gap reviews by workforce composition

The likelihood of having completed a formal gender pay gap review, having one in progress or planning one for the future increases with the proportion of the workforce that are women. Of organisations where women account for fewer than 10 per cent of all employees, 73 per cent have no engagement with review activity compared with 62 per cent of those where women account for between 11 and 25 per cent of staff and half of those organisations where women account for 26 per cent or more of the workforce. In this top category, there were some distinctions in how far advanced review action was between those where women accounted for between 26 and 50 per cent of staff and those where women were in the majority. Of organisations where women were the majority, nine per cent had their first review in progress and 10 per cent had their first one planned. Where women accounted for between 26 and 50 per cent of the workforce, only five per cent had their first review in progress and 22 per cent had their first one planned. However in both groups, the proportion of organisations with completed reviews was not significantly different (22 per cent, compared with 27 per cent). Table 3.11 shows this in full.

Table 3.11 Incidence of formal gender pay gap reviews by proportion of the workforce that is female

	GB total	%			
		< 10%	11-25%	26-49%	50%+
Completed a formal gender pay review	23	13	23	22	27
In the process of conducting a pay gap review (and do not have one completed)	7	4	7	5	9
Plans to conduct a pay gap review but do not currently have one in progress	15	10	8	22	10
No pay gap review activity	56	73	62	51	53
<i>Base: All organisations</i>	<i>900</i>	<i>97</i>	<i>153</i>	<i>338</i>	<i>303</i>

Source: Gender Pay Gap Reporting Baseline 2009.

Incidence of formal gender pay gap reviews by approach to HR

In Chapter 2, organisations were categorised by their approach to HR into those which had a HR representative on the board, those which had a HR representative reporting directly to the board (although not sitting on it) and those not falling into either of these groups. There is some differentiation in the likelihood to have undertaken a formal review of the gap between men's and women's pay between these groups. Table 3.12 shows the breakdown.

Table 3.12 Incidence of formal gender pay gap reviews by position of HR representative

	GB total	%		
		Sit on board	Report to board	Neither
Completed a formal gender pay review	23	31	22	10
In the process of conducting a pay gap review (and do not have one completed)	7	6	7	4
Plans to conduct a pay gap review but do not currently have one in progress	15	14	16	12
No pay gap review activity	56	49	55	74
<i>Base: All organisations</i>	<i>900</i>	<i>286</i>	<i>497</i>	<i>109</i>

Source: Gender Pay Gap Reporting Baseline 2009.

Those with a HR representative on the board are more likely than those where the HR representative reports directly to the board to have completed a review (31 per cent compared with 22 per cent) although the proportions with a review in progress or a planned review are similar. The organisations where the HR representative neither sits on the board nor reports directly to it were much less likely to be engaged with review activity. Almost three quarters (74 per cent) had no engagement with review activity and only 10 per cent had completed a review. We cannot tell whether it is board level status which drives this review, or vice versa.

As perhaps would be expected, an even sharper distinction is evident when comparisons are drawn in review activity between those organisations with a designated equal pay representative (that is, an individual who had as part of their job role ensuring equal pay between men and women) and those without (Table 3.8). Almost half of those who employ someone in this role (47 per cent) had either completed a review or had their first one in progress compared with only 17 per cent of those without a representative. That said, it is perhaps surprising that as many as half of those with a designated representative had not conducted a review and had none planned. There is some evidence that the gap between levels of review activity between those with and without an equal pay representative may start to close in the future since a fifth (21 per cent) of those without a representative were planning their first review compared with six per cent of those who did employ someone in this role.

Table 3.13 Incidence of formal gender pay gap reviews by whether a designated individual is responsible for equal pay

	GB total	%	
		Designated individual	No designated individual
Completed a formal pay gap review	23	38	12
In the process of conducting an pay gap review (and do not have one completed)	7	9	5
Plans to conduct a review but do not currently have one in progress	15	6	21
No pay gap review activity	56	47	61
<i>Base: All organisations</i>	<i>900</i>	<i>371</i>	<i>494</i>

Source: Gender Pay Gap Reporting Baseline 2009.

3.5 Barriers to conducting formal gender pay gap reviews

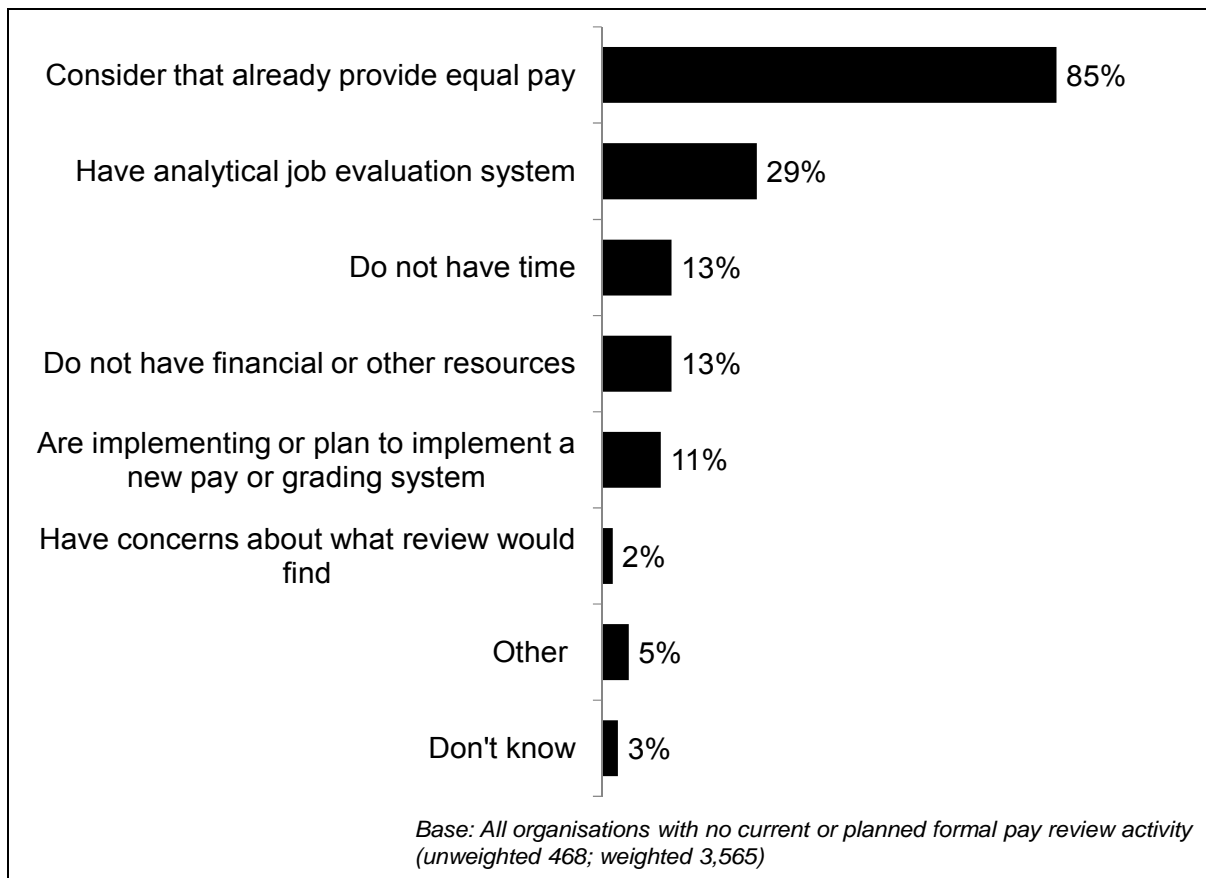
Those organisations which had not undertaken a formal review of men's and women's pay and did not have one in progress or planned for the future were asked

why they had no plans to examine the gap between men's and women's pay. The reasons given are shown in Figure 3.3 below.

The most common reason given for not formally reviewing pay differences was simply that organisations believed that they already provided equal pay for men and women and hence did not need to conduct a formal review. This was mentioned by 85 per cent of those who had not undertaken a review and did not have one in progress or planned.

Just over a quarter (29 per cent) stated that they had not carried out a formal pay review because they already had an analytical job evaluation system in place, and issues such as time and resources factored for a minority (13 per cent mentioned each of these). Only a very small proportion (two per cent) stated that they had not reviewed pay because of fears over the potential findings from the process.

Figure 3.3 Reasons for not undertaking formal gender pay gap reviews



The only notable difference in reasons given by size of organisation was that the very largest organisations (those with in excess of 1,000 staff) were considerably more likely to state that they did not need to measure the gender pay gap because they

already used an analytical job evaluation system (42 per cent stated that this was the case).

Table 3.14 looks at the variation in reasons given by sector. This analysis shows that organisations in the banking, finance and insurance sector were less likely to state that they considered that they already provided equal pay and more likely to state that they had an analytical job evaluation system in place to ensure that this is the case. However, the base size is small for this sector and hence results should be interpreted with caution. Job evaluation systems were least common in the distribution, hotels and restaurants sector and these organisations (along with those in the 'other financial services' sector) were the most likely to state that financial resources posed a barrier to measuring and reporting on the gender pay gap.

Organisations in the charity or voluntary sector were more likely than average to state that the fact that they used an analytical job evaluation system (48 per cent compared with 27 per cent of organisations seeking to make a profit).

Table 3.14 Reasons for not undertaking formal gender pay gap reviews by sector

	GB total	%			
		Manufacturing, construction	Distribution, hotels and restaurants	Banking, finance and insurance	Other private services
Consider that already provide equal pay	85	85	87	77	90
Have an analytical job evaluation system	29	32	19	40	30
Do not have time to do so	13	16	11	7	18
Implementing or planning to implement a new pay or grading system	11	9	12	8	15
Do not have financial or other resources	13	10	16	11	18
Concerns over what a review would find	2	3	1	-	1
Other	5	3	2	15	2
Don't know	3	3	5	1	2
<i>Base: All organisations with no current or planned activity to review pay gap</i>	468	158	113	41	156

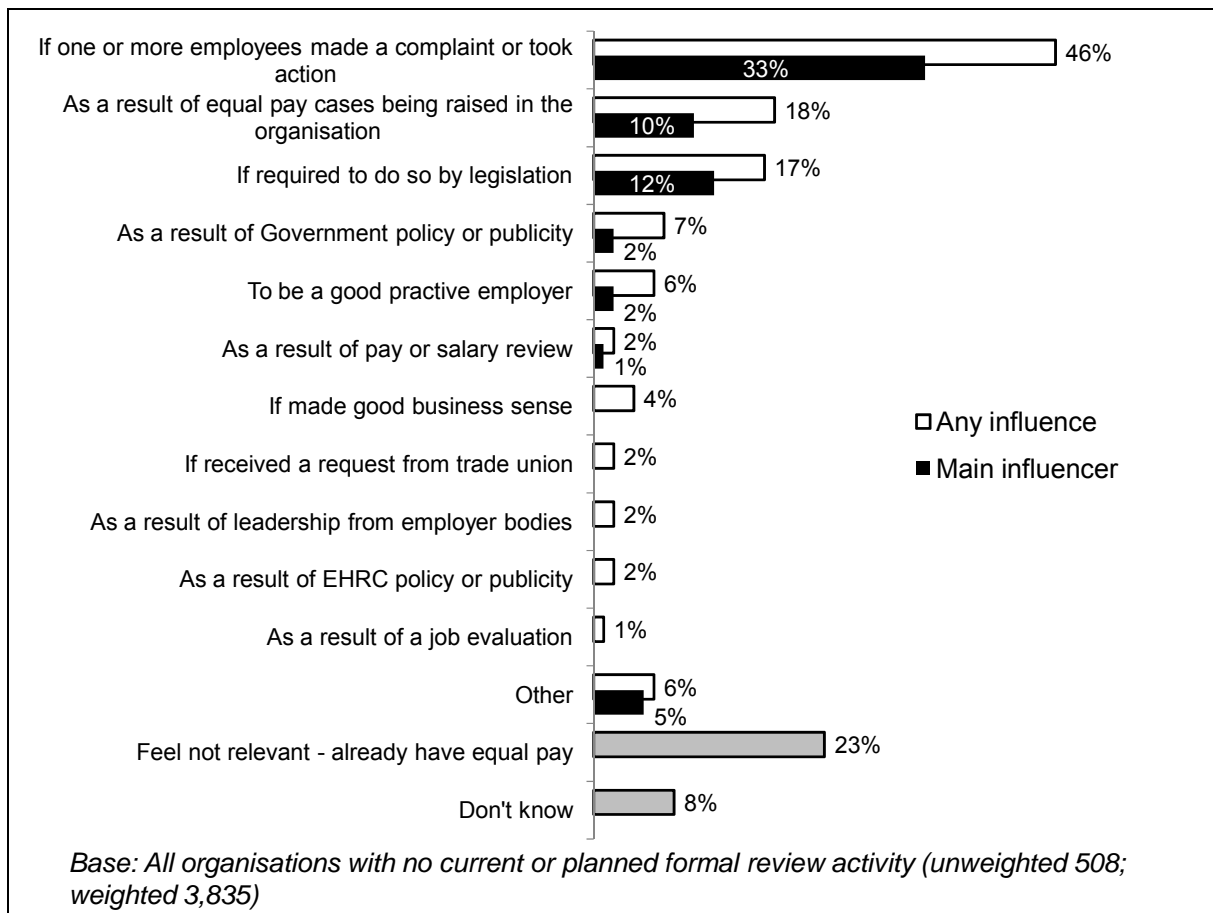
Notes: * Base size for findings for banking, finance and insurance are small and results should be interpreted with caution.

Source: Gender Pay Gap Reporting Baseline 2009.

3.6 Factors that would encourage formal gender pay gap reviews

Organisations with no involvement with formal reviews of men’s and women’s pay were asked whether a series of possible interventions would prompt them to undertake a review. They were asked to list all those that would encourage them to review pay and also to comment which would have the most impact in prompting them to examine the difference between men’s and women’s pay. Figure 3.4 shows these data with the lighter bars showing the proportions stating that each factor would have a role in influencing them and the darker bars showing the proportion stating that each factor was the most likely to prompt them to take action.

Figure 3.4 Factors that would encourage formal gender pay gap reviews



The factors that organisations were most likely to acknowledge as motivators to analysing were ‘push’ factors with the most commonly mentioned being if employees made a complaint or took action, if an equal pay case was raised at their organisation or if they were required to do so by legislation. ‘Pull’ factors such as seeing a good business case for conducting a review or to be a good practice employer were only mentioned by very few. A quarter of employers with no involvement with gender pay

gap analysis stated that none of the suggested motivators would influence them because they are convinced that they already provide equal pay.

There were no differences of note in stated motivators between organisations by size or sector.

3.7 Support that would encourage formal gender pay gap reviews

Organisations which had no involvement with formal reviews of men's and women's pay were asked, on an unprompted basis, what support they would need to encourage them to measure the gap between men's and women's pay. Half of the sampled organisations (49 per cent) stated explicitly that they did not require any support and a further quarter (23 per cent) were unable to think of any support that would be of benefit to them. Those that felt that additional support would encourage them to conduct a formal gender pay gap review were most likely to state that the help they required was additional internal resources (9 per cent). In addition to this, a wide range of support mechanisms was mentioned by small minorities including: a website with advice on how to measure the gap (four per cent), consultancy advice (five per cent), helpline advice (three per cent) and advice printed as hard copy written materials (three per cent). A full list of responses is shown in Table 3.15. These responses would seem to indicate that the barriers to conducting formal reviews of men's and women's pay are more about a lack of motivation rather than a need for external support.

Table 3.15 Support that would encourage formal gender pay gap reviews

	%
	GB total
Having extra internal resources	9
Consultancy advice	5
A website with advice on how to measure the gap	4
Helpline advice	3
Hard copy written materials	3
More time	2
Internal commitment	2
Financial support/funding	1
Advice from a professional body	1
Other	5
Would not need any support	49
Don't know	23
<i>Base: Organisations that have not conducted a review</i>	<i>508</i>

Source: Gender Pay Gap Reporting Baseline 2009.

Organisations which had no involvement with measuring and reporting on the gender pay gap (and which did not state that they would be able to do so unaided) were also asked which bodies they would contact if they needed support to help them measure the difference between men's and women's pay. The two sources of advice that organisations were most likely to make use of were the Chartered Institute of Personnel and Development (CIPD) and the Advisory, Conciliation and Arbitration service (Acas). These were mentioned by 63 per cent and 60 per cent of organisations respectively. The fact that Acas was among the sources most likely to be mentioned perhaps reflects the fact that these organisations were also the most likely to envisage conducting a pay review in response to an employee complaint or an equal pay case being raised in the organisation. Trade bodies, the Equality and Human Rights Commission, the Department for Business, Innovation and Skills (BIS) and business associations were each mentioned by around a third of organisations and the Government Equalities Office (GEO) by around one in five. Table 3.16 shows how this breaks down by size and sector; there are few differences by size but those in banking, finance and insurance are more likely to turn to the CIPD for support.

Table 3.16 Sources of support to help measure the difference between men's and women's pay by size and sector

	Base:		CIPD	ACAS	EHRC	Trade assoc./ Industry body	%			
	Unwtd	Wtd					BIS	Bus. assoc.	GEO	Not needed
Sector										
Manufacturing and construction	200	1,342	58	59	36	47	27	30	24	15
Distribution, hotels and restaurants	148	1,334	57	56	34	32	28	25	15	14
Banking, finance and insurance	89	1,388	71	62	39	28	36	33	19	8
Other private services	221	935	66	63	42	41	33	27	27	7
Size										
250-499	248	2,340	60	56	37	40	32	30	20	12
500-999	177	1,350	65	6	37	29	27	28	18	10
1,000+	233	1,309	67	61	40	39	34	27	25	10
Total	658	4,999	63	60	38	37	31	29	21	11

Notes: Either sources of support that organisations go to now or would do so in the future.

Source: Gender Pay Gap Reporting Baseline 2009.

3.8 Overview

Just under a quarter of all non-public organisations with 250 or more staff have completed a formal review of men's and women's pay. A further seven per cent of all organisations were completing their first review at the time of interview and 15 per cent had their first review planned. However, over half of organisations (56 per cent) had no engagement with reviewing pay on a formal basis.

The most common reason given for not conducting formal gender pay gap reviews was simply that organisations believed that they already provided equal pay for men and women and hence did not need to conduct a formal review. This perhaps makes a case for communication to challenge employers on this issue.

For the most part, the factors that organisations envisaged could persuade them to conduct a formal pay review were 'push' factors such as if employees made a complaint or took action, if an equal pay case was raised at their organisation or if they were required to do so by legislation. This indicates that formal reviews of pay are unlikely to be undertaken voluntarily by the majority of organisations.

Of those organisations that had no engagement with a formal review of their pay, 16 per cent stated that they analysed the difference between men's and women's pay on a more informal basis and eight per cent stated that they planned to so in the future.

4. Reporting of gender pay gap data

This chapter looks at the extent of reporting of gender pay gap data. It draws a distinction between the reporting of data 'internally' (that is, within their own organisation) and reporting 'externally' (so that people other than those within their own organisation can access the data freely). This chapter looks at incidence of both, along with the motivations for each level of reporting and the experience of employers who have reported externally including whether they have seen any negative effects.

Reasons for not reporting the data openly either externally or internally are examined, along with the extent to which the employer would be prepared to do so. Finally, possible ways to encourage those who do not currently report their pay gap to begin doing so are examined.

4.1 Reporting results of formal gender pay gap reviews

The 23 per cent of organisations that had conducted a formal review of the difference between men's and women's pay were asked about their reporting of the findings from these exercise. The proportion of private and voluntary sector businesses reporting this data either internally or externally was extremely low (Table 4.1).

Only six per cent of organisations that had carried out a formal review of men's and women's pay stated that they reported its findings externally – this means that just 1.3 per cent of all organisations stated that they reported externally. Slightly more report internally - 3.7 per cent - equating to 16 per cent of all those who had carried out a formal review. With such low levels of reporting at present, a legislative requirement to report on the size of the pay gap between men and women for companies within excess of 250 staff would mean a change in practice for the vast majority.

There was little difference in the incidence of internal reporting of gender pay gap data by size of organisation; slightly more (two per cent) of the larger employers (with 1,000 or more employees) were reporting externally.

Table 4.1 Employers reporting gender pay gaps internally and externally by size

Sector	Base:			Internal reporting	External reporting
	Unwtd	Wtd			
GB (All)	900	6,875	%	3.7	1.3
250-499 employees	364	3,445	%	3.6	1.1
500-999 employees	238	1,794	%	2.6	1.2
1,000 or more employees	298	1,696	%	4.8	2.0

Notes: Row percentages.

Source: Gender Pay Gap Reporting Baseline 2009.

Table 4.2 shows the incidence of gender pay gap reporting by sector. Charity or voluntary organisations were more likely to report externally compared with those seeking a profit (2.6 per cent compared with 1.1 per cent). Proportions were low across all sectors, with organisations in 'other private services' the most likely to report both internally and externally.

Table 4.2 Employers reporting gender pay gaps internally and externally by sector

Sector	Base:			Internal reporting	External reporting
	Unwtd	Wtd			
GB (All)	900	6,875	%	3.7	1.3
Manufacturing and construction	290	1,952	%	2.4	1.4
Distribution, hotels and restaurants	197	1,795	%	1.7	0.9
Banking, finance and insurance	116	1,885	%	4.3	1.2
Other private services	297	1,242	%	7.5	1.9
Organisations seeking a profit	768	5,805	%	2.6	1.1
Charities and voluntary organisations	132	1,070	%	9.5	2.6

Notes: Row percentages.

Source: Gender Pay Gap Reporting Baseline 2009.

Employers in Scotland were more likely than those in Britain as a whole to be reporting with 4.5 per cent of all employers reporting externally and 4.9 per cent internally (Table 4.3).

Table 4.3 Employers reporting gender pay gaps internally and externally by country

Sector	Base:			Internal reporting	External reporting
	<i>Unwtd</i>	<i>Wtd</i>			
GB (All)	900	6,875	%	3.7	1.3
England	763	6,176	%	3.6	1.1
Scotland	100	509	%	4.9	4.5
Wales*	37	190	%	0.0	0.0

Notes: Row percentages used. * Base sizes for findings for Wales are small and results should be interpreted with caution.

Source: Gender Pay Gap Reporting Baseline 2009.

As described in Chapter 3, the seniority of the head of HR and whether or not a designated individual had responsibility for equal pay in the organisation had an impact on the likelihood of organisations to conduct a formal review of men's and women's pay. Largely as a result of this difference in likelihood to have conducted a review, there is a difference in the proportion of organisations which are reporting pay gap data internally. The more senior the head of HR was, the more likely the employer was to report internally with 6.5 per cent of employers whose head of HR sat on the board reporting internally compared with 2.9 per cent if they reported directly to the board and 1.3 per cent if the head of HR was not near board level (see Table 4.4). Although the different levels of likelihood to have conducted a review account for much of this difference, there is also some indication that even among those who have conducted a gender pay gap review, a more senior head of HR increased the likelihood of reporting internally.

Table 4.4 Employers reporting internally and externally by role of HR representative

	<i>Base:</i>			Internal reporting	External reporting
	<i>Unwtd</i>	<i>Wtd</i>			
GB (All)	900	6,875	%	3.7	1.3
Sit on board	286	1,893	%	6.5	1.0
Report to board	497	4,080	%	2.9	1.8
Neither	109	851	%	1.3	-

Notes: Row percentages.

Source: Gender Pay Gap Reporting Baseline 2009.

Again reflecting different levels of likelihood to have conducted a formal review of men's and women's pay, the likelihood of reporting pay gap figures also increased if the organisation had a dedicated person responsible for ensuring equal pay between women and men, with significantly more of those who do (3.2 per cent) reporting externally and slightly more of those who do (7.4 per cent) reporting internally.

4.2 Internal reporting of management information on gender pay gaps

In addition to their approach to reporting the results of formal gender pay gap reviews, organisations were also asked whether they collected data on the gender pay gap as part of their management information (MI) and, if so, at what level these data were reported internally. The inclusion of data in the organisation's MI suggests that it does consider it should be important, even if the information is not published more widely or at present nothing is done with the information.

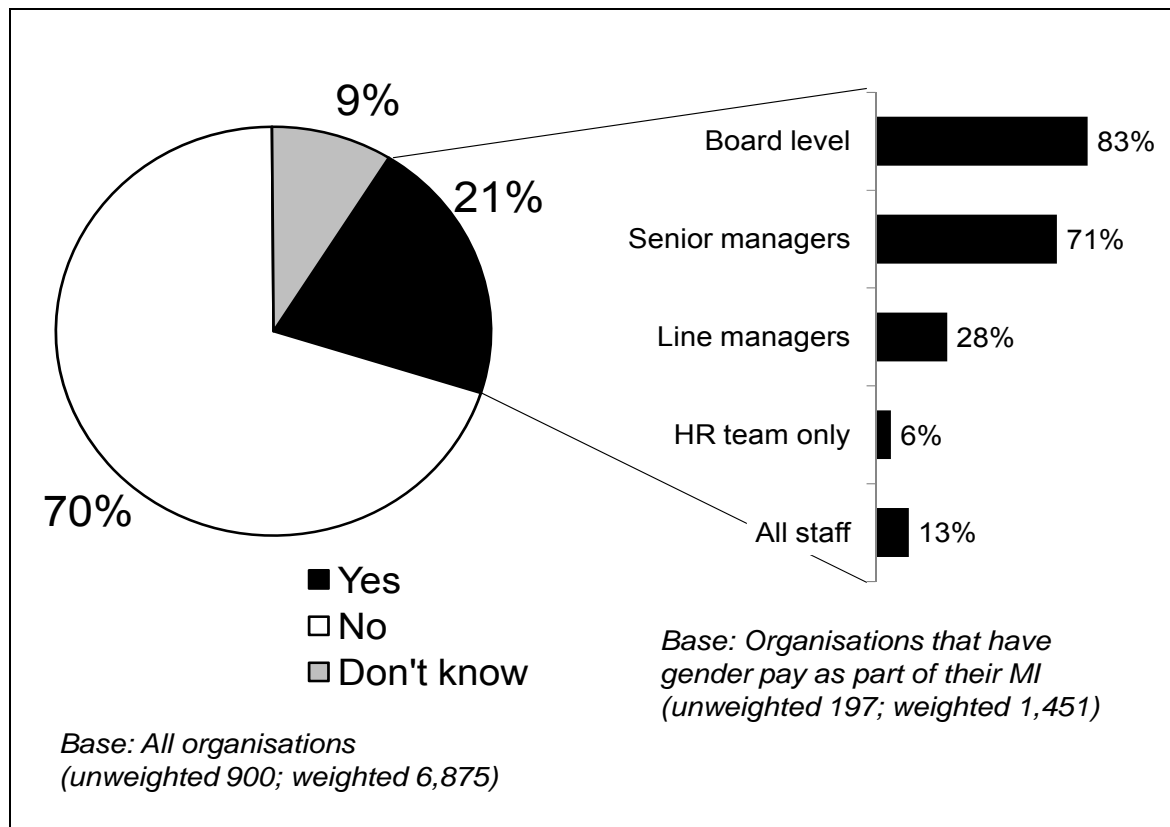
A fifth of all organisations (21 per cent) stated that they did collect data as part of their management information (Figure 4.1). Just over half of these were organisations which had already completed a formal review of men's and women's pay, but the remainder were made up of those which had their first review in progress at the time of interview, had their first review planned for the future and those who had no plans for conducting a formal review (in fact, just over a quarter of all those collecting gender pay gap data as part of their MI – 28 per cent – had no plans for a formal review of their gender pay gap).

The charity and voluntary sector was more likely than average to include data on the gender pay gap in its MI (30 per cent), as was the banking, finance and insurance sector (26 per cent). The larger the company the more likely it was to do so as well with just 17 per cent of those with 250–499 employees collecting it as part of MI compared with 29 per cent of those with 1,000+. Again, the likelihood of inclusion of

these data as part of company MI was strongly linked to HR culture, with 36 per cent of those with a designated person for reducing the gender pay gap likely to hold these data in their MI.

Of those employers who do collect gender pay gap data as part of their MI, 83 per cent share the information at board level and 71 per cent with senior managers. Sharing data below the level of senior management is much less common: only a third of those who collect these data in their MI (28 per cent) share it with line managers and only 13 per cent share it with all salaried staff. At an overall level, this means that 19 per cent of all employers shared some information about their gender pay gap with staff outside of HR, albeit largely limited to the board and senior managers.

Figure 4.1 Employers with gender pay gap data as part of their management information



4.3 External reporting of gender pay gap data

Since the base size is so small for this group (just 14 out of the 900 organisations interviewed), it is not possible reliably to quantify the proportions providing each type of information, but it is clear that most of those choosing to report on their gender pay gap include details and some form of explanation rather than just a single figure.

Those who were reporting the results of formal gender pay reviews externally most commonly reported the figures in their annual reports or on their websites, with one organisation mentioning they had a specific pay gap review report, and a couple of others mentioning industry forums and unions. Most included at least some detail with the report, with just a couple saying they reported a single figure of the overall average pay gap. Some employers broke down the figures by job role, or by full-time and part-time status, and some of those who had developed a formal job evaluation scale reported the different levels determined by the scale. A number also said that they included a narrative with the figures, explaining why any differences might be present and what was being done to address the gap.

4.4 Experience of reporting gender pay gap data externally

On balance, no employers who had published data felt that reporting their gender pay gap data either internally or externally had been negative for the organisation. Over two-thirds said that reporting internally had been a positive experience, and around two-thirds stated the same for reporting externally. (The remainder were neutral.) While reporting is currently entirely voluntary, this is perhaps not surprising, as negative experiences may well have caused an organisation to stop publishing its data.

The main benefits that employers felt they had received from reporting their gender pay gap were developing a sense of transparency and openness (which in turn helped to build a strong relationship of trust between staff and management) and the possibility of benchmarking their performance against competitors. Others said that it has helped bring the issue to the attention of senior management, or has been a call to action to reduce the pay gap. Another mentioned that it provided data to back up any pay claims.

Only three employers mentioned any drawbacks. One was concerned that they may have unsettled employees who had previously assumed that there was no pay gap; the other two were concerned about the time it had taken to analyse the data in depth, and the difficulties of determining what depth of analysis was appropriate. As this employer stated:

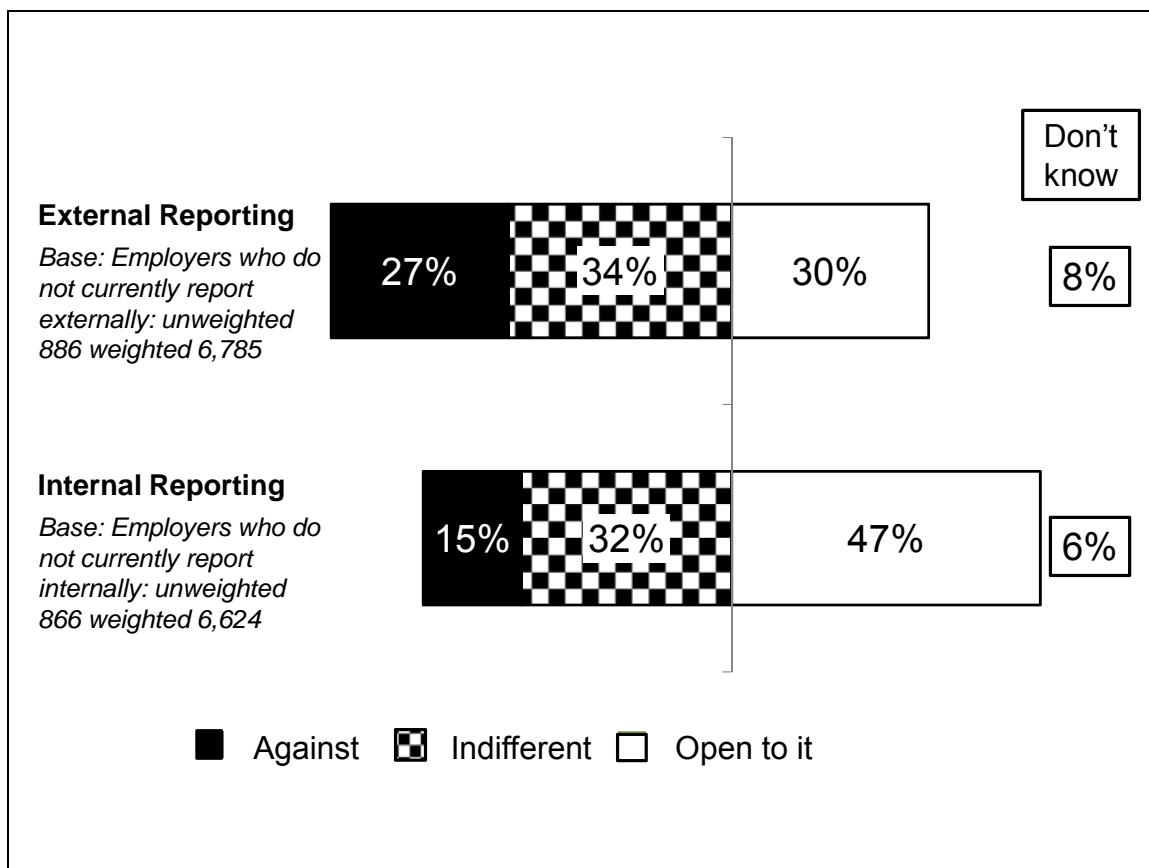
The more information we publish, the more they want ... it takes time to do it.

4.5 Non-reporting of data

Employers who were not currently reporting were asked how open they were to the idea of reporting on their gap between men's and women's pay. On the whole,

organisations were more positive about reporting internally than externally (Figure 4.2). Almost half (47 per cent) felt that they would be open to the idea of reporting gender pay gap data internally but under a third (30 per cent) stated that they would be open to the idea of external reporting. In the case of internal reporting, those who were not positive about the idea were much more likely to be indifferent than negative. However, attitudes towards external reporting were almost equally as likely to be negative as indifferent. Charities and the voluntary sector were more open than their profit-seeking counterparts to both levels of reporting, with 73 per cent open to the idea of internal reporting and 50 per cent to external reporting.

Figure 4.2 Openness to reporting on the gender pay gap



There is no significant difference in the likelihood to be open to internal reporting of gender pay gap data by size of organisation. However those in the smallest sizeband (with between 250 and 499 staff) are slightly (although not significantly) more likely to be positive about reporting data externally (32 per cent of those who do not currently report externally state that they would be open to doing so compared with 28 per cent of their larger counterparts).

Those in the 'other private services' sector were more likely than average to be open to internal reporting (64 per cent) and also to external reporting (39 per cent). Those in the manufacturing and construction sector are likely to be the most difficult to persuade of the benefits of internal reporting on gender pay gap data (only 39 per cent stated that they would be open to this and 20 per cent would be opposed to doing so). Those in the distribution, hotels and restaurants sector were the least likely to be open to external reporting (24 per cent of those not currently reporting data).

Table 4.5 Employers open to reporting gender pay gaps by sector

Sector	% Internal reporting		% External reporting	
	Base:		Base:	
GB (All not currently reporting)	866	47	886	30
Manufacturing and construction	282	39	285	29
Distribution, hotels and restaurants	194	47	195	24
Banking, finance and insurance	110	43	113	31
Other private services	280	64	293	39
Organisations seeking a profit	747	42	758	26
Charities and voluntary organisations	119	73	128	50

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

The attitude towards reporting gender pay gap data was also linked to HR culture. Those with a designated person with responsibility to reduce the difference between men and women's pay were more open to reporting data, with 53 per cent open to internal reporting and 37 per cent to external.

Those who had published data and were positive about their experience or who had not published data but stated that they would be open to doing so were asked why they were broadly positive about reporting their gender pay gap information. The most commonly given reason for being open to the idea of reporting, either internally or externally, was that the employer was confident they had no pay gap and so had nothing to hide (64 per cent for internal reporting and 71 per cent for external). Interestingly, this was a reason particularly likely to be given by those who had not conducted a formal pay review, at 71 per cent for internal reporting and 76 per cent for external. It seems likely that if a formal review were to show the existence of a pay

gap then at least some of those organisations stating that they would be open to publishing data would revise their view.

For internal reporting, other reasons for being open to the idea included that it was in the organisation's culture to be fair (32 per cent); particularly in the case of the largest employers (with over 1,000 employees) of whom 44 per cent gave this reason and of the banking, finance and insurance sector (41 per cent). The idea that it is good practice to do so was only mentioned by a very small minority (two per cent), as was the idea that reporting the gender pay gap could help them start to address reducing it (six per cent).

The other reasons for being open to external reporting were very similar with 27 per cent stating that it was their company culture to be transparent and fair, and that it was good practice to do so (three per cent). Three per cent also liked the idea of having a comparative measure with other companies, and two per cent said it would help them address the issue. There were no significant differences by sector in reasons for being open to the idea of external reporting of gender pay gap data.

The main reason given for being opposed to both internal and external reporting was a stated policy not to discuss pay with 37 per cent citing this as a reason that they were against internal reporting and 48 per cent external. This was, for both levels of reporting, particularly true of the employers with 250-499 employees, who gave it as a reason for opposing internal reporting in 45 per cent of cases and for opposing external reporting in 58 per cent of cases. Table 4.6 shows fully how this splits by size and sector.

Table 4.6 Reasons for being against the idea of reporting on the gender pay gap internally by sector and size

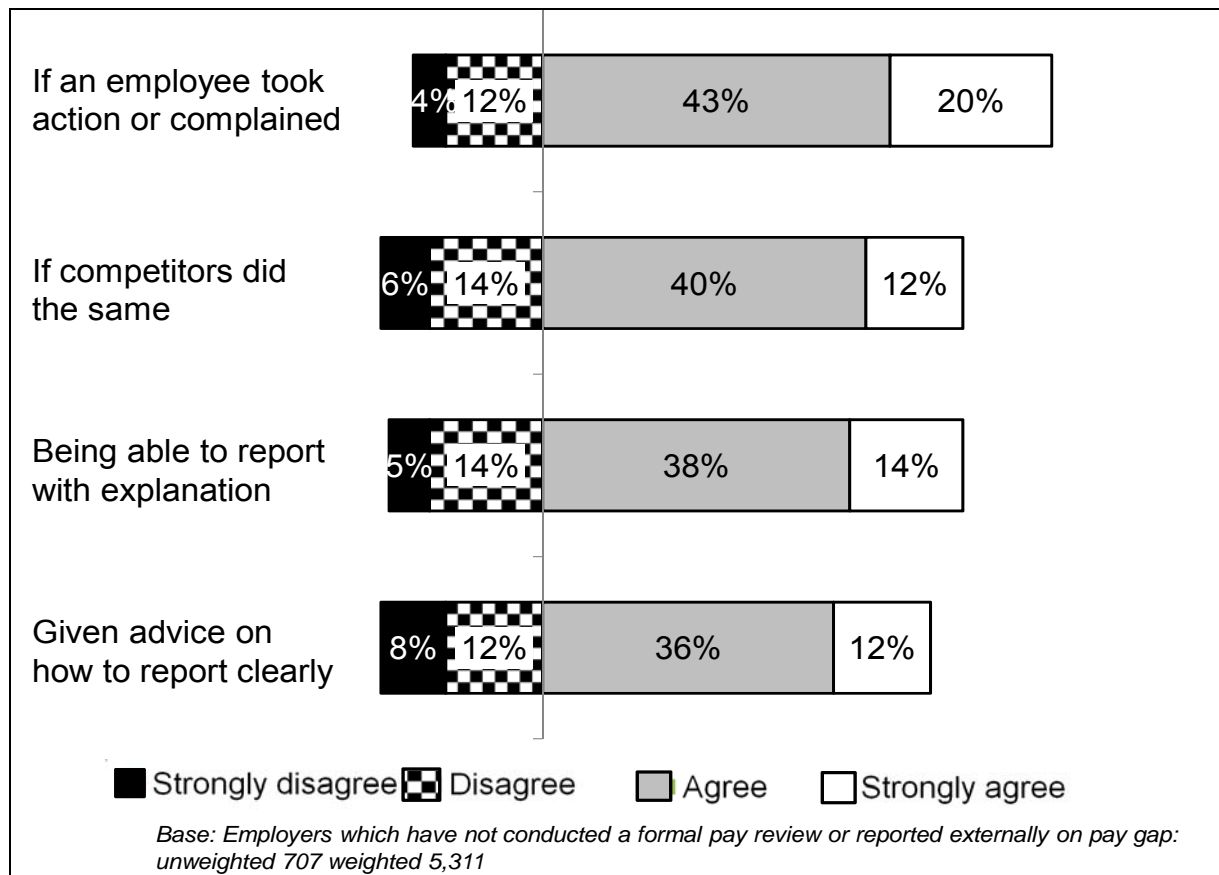
	Base:		%						
	Unwtd	Wtd	Company policy	Worries / concerns	Confident there is no gap	Would be problematic for staff	Difficult to compare	Fail to see value	Other
Sector									
Manufacturing and construction	56	387	43	20	15	12	4	2	9
Distribution, hotels and restaurants	32	282	24	32	14	9	7	2	18
Banking, finance and insurance	14	290	46	21	-	8	9	9	16
Other private services	33	96	26	26	8	8	4	5	19
Size									
250-499	51	454	45	24	8	3	7	2	15
500-999	36	296	35	20	6	7	16	8	18
1,000+	48	265	25	29	17	10	10	3	9
Total	135	1,014	37	24	10	6	11	4	14

Notes: Row percentages used.

Source: Gender Pay Gap Reporting Baseline 2009.

Other common reasons for opposing internal reporting were worries or concerns about uncovering problems (24 per cent), concerns that it would damage relationships with staff through generating ill feeling (10 per cent) and simply a conviction that the organisation had no gap to report (11 per cent). This perceived lack of relevance was slightly more likely to be cited in relation to reasons for opposing external reporting, with 16 per cent stating that the issue was simply irrelevant to them. A small number also mentioned being worried about uncovering problems in relation to external reporting (12 per cent) and a few mentioned the work involved (five per cent) or concerns that reporting the data might put them at a competitive disadvantage (six per cent).

Those employers who did not report gender pay gap data externally were given a number of scenarios and asked the extent to which they agreed that this would encourage them to publish data externally. Figure 4.3 shows the agreement to each statement. Note that 'neither agree nor disagree' and 'don't know' responses are not displayed.

Figure 4.3 Agreement scenarios which would encourage external reporting

Of those discussed, the trigger that employers felt would be most likely to lead them to report their gender pay gap data was an employee making a complaint or taking action (63 per cent agree or strongly agree), which was also the most commonly mentioned event that would encourage measurement of the pay gap in the first place (Chapter 3). This reinforces the fact that the majority of employers will not move towards publishing gender pay gap data proactively. Again, it does highlight the importance of ensuring that employees are aware that they can challenge employers on equal pay if they believe that there is a case to answer.

Half of employers stated that they would be more likely to report gender pay gap data externally if competitors did the same (52 per cent agree or strongly agree). This highlights a fear among employers of being the first to make these data available and a concern that data will be interpreted negatively if it is not possible to compare pay gap findings against those of other organisations. Larger companies, of 1,000+ employees, were most likely to agree this would encourage them (60 per cent either agree or strongly agree).

Similar proportions of organisations agreed that they would be more likely to report data externally if they were able to provide narrative justifying or explaining their pay gap data (52 per cent agree or strongly agree) and also if they were given advice on how to report the data clearly (47 per cent agree or strongly agree). Levels of agreement with these potential triggers indicate that there is a need for these steps to be taken. But the stated attitudes actually to conducting formal gender pay gap reviews in the first place explored in the previous chapter suggest that these steps on their own are unlikely significantly to increase levels of publication of gender pay gap data.

Employers in the manufacturing and construction sector were least likely to agree that any of the triggers suggested would lead them to report on their gender pay gap data, with 27 per cent disagreeing or being neutral to each of the four. Other private services were most likely to agree with at least one trigger, with just 13 per cent of them disagreeing or being neutral about all four. The only difference by size was that larger companies (with 1,000 or more employees) were least likely to agree any of the triggers would motivate them to report, with 23 per cent being neutral or disagreeing to all four.

The 20 per cent of employers who felt that none of the suggested triggers would motivate them to publish gender pay gap data suggested to them were asked what would encourage them to do so. Most said that they would only do so if it were a legal requirement and that there was nothing that could be done to encourage them (55 per cent); a further 35 per cent said that they did not know what would encourage them (see Table 4.7 for a full breakdown by size and sector).

Table 4.7 Factors that would encourage organisations to report externally on the gender pay gap by size and sector

	Base:		If it was a legal requirement	%	
	Unwtd	Wtd		Other	Don't know
Sector					
Manufacturing and construction	63	411	47	10	42
Distribution, hotels and restaurants	36	314	63	5	27
Banking, finance and insurance	15	228	63	11	33
Other private services	36	130	50	9	39
Size					
250-499	60	516	57	7	37
500-999	39	285	51	12	37
1,000+	51	282	57	11	32
Total	150	1,083	55	9	35

Notes: Row percentages used.

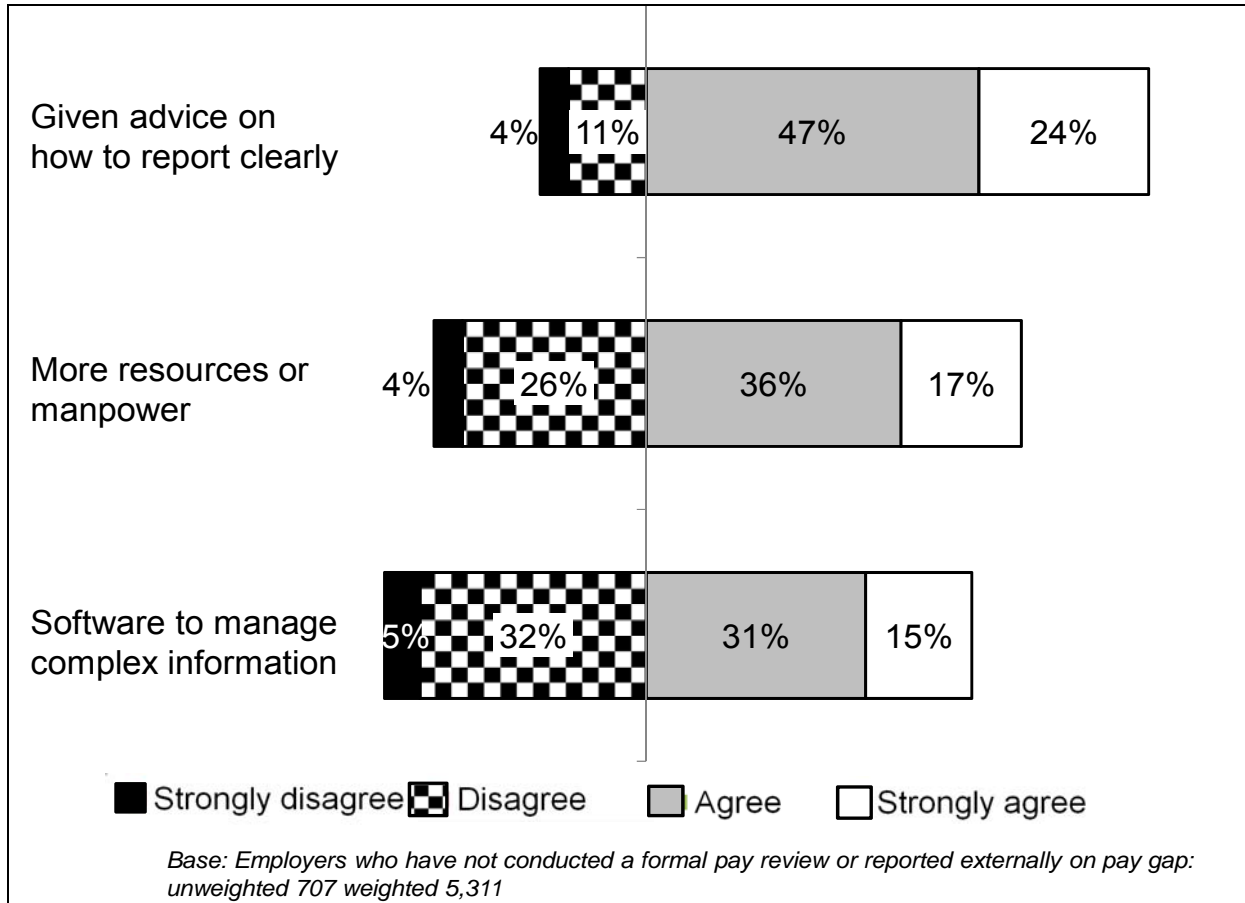
Source: Gender Pay Gap Reporting Baseline 2009.

Having asked employers about factors that would persuade them to publish data on their gender pay gap voluntarily, they were then asked to consider the support that they would require in the event that reporting externally became a legal requirement. They were asked about the extent to which they agreed that they would then require advice on how to report clearly, additional resources/manpower and software to manage complex information. Figure 4.4 shows the agreement for each; again 'neither agree nor disagree' and 'don't know' responses are not displayed.

Under this scenario, employers were most likely to state that they would need advice on how to report clearly (72 per cent agreed or strongly agreed that they would require this support). Around half stated that they would require additional resources or manpower (54 per cent agreed or strongly agreed) and a similar proportion that they would need software requirements (46 per cent agreed or strongly agreed). Findings discussed in Chapter 3 show that the key barriers were motivational (such as simply believing that the organisation already offered equal pay). However, once

the influence of these motivational barriers is removed by suggesting that there would be a legislative requirement to report data, employers are more likely to mention a need for resources to conduct the analysis and report on the findings.

Figure 4.4 Support required by employers to publish externally



Those organisations which disagreed that they would need any of these three types of support (19 per cent of all employers not currently publishing externally) largely felt either that they would not need any support to report their gender pay gap externally or that they did not know what support they would require.

4.6 Overview

The incidence of reporting on gender pay gap data among large non-public sector employers is low, both for internal and external reporting. Just 3.7 per cent report internally and 1.3 per cent externally. Employers from the banking, finance and insurance sector, or those who were charities or voluntary organisations, were slightly more likely to report but the numbers were still very low.

Among those organisations which were reporting externally, most did so through their company websites or annual reports. Only a few reported just one single figure of the overall gender pay gap; most included some breakdown by job role or similar, and some narrative explaining the figures and any differences that arose.

All who had reported internally or externally had found it a positive experience, with no employers suffering any negative impacts. The main benefits employers found were that the transparency and openness helped them to build trust among staff, and also that it brought the issue to the attention of management.

Employers who were not currently reporting were on the whole more open to internal reporting than they were to external reporting but in both cases it was only a minority who were open to the idea.

When a range of potential triggers to reporting externally were suggested to employers, they were most likely to agree that an employee making a complaint or taking action against them would prompt them to report their pay gap indicating that employers see publication of data as a reactive step rather than an approach that would be beneficial to them.

If they were required by legislation to report on gender pay gap data externally, the majority of employers feel that they would require guidance on how to report clearly and around half feel that they would need additional resources/manpower as well as specialist software.

5. Conclusions and implications

One of the key aims of the research was to determine a baseline figure for how many employers in the private and voluntary sectors with 250 or more employees were currently measuring and reporting on their gender pay gap.

Almost a quarter of employers (23 per cent) had already completed a formal review of men's and women's pay at the time of interview. Including those who had their first review in progress at the time of interview increases the proportion already engaged with formal gender pay reviews to 29 per cent. Incidence levels are highest among larger organisations, those in the banking, finance and insurance sector and among charitable and voluntary organisations.

However, very few of those organisations which conduct formal gender pay gap reviews are choosing to report the findings. Just 3.7 per cent of all employers report data on their pay gap internally, and 1.3 per cent do so externally. There is little difference by size of employer, although those with 1,000 or more employees are marginally more likely to report externally (2.0 per cent).

There appears to be a relationship between the seniority of the head of HR within an organisation and likelihood to measure and report on gender pay gap data. Those organisations in which the head of HR was at board level were more likely to have completed a review and reported internally on the data than those whose head of HR reported to the board. In turn, the latter were more likely to have done either than organisations whose head of HR did not sit on or report to the board.

Similarly organisations that had a designated individual with 'reducing the gap between men's and women's pay' as part of their job role were more likely to have conducted a formal gender pay review and were more likely to report gender pay gap data both internally and externally than those who did not have a designated person. However, this may well be a result of a greater commitment to measuring and reporting equal pay data rather than a cause of it.

The key barrier to encouraging more employers to measure their pay gap is attitudinal. The vast majority of those who have no engagement with measuring the gender pay gap feel that they already provide equal pay and would not benefit from investigating the issue further.

Since this attitude is so widespread, the vast majority of employers can only envisage that they would decide to measure and report on their gender pay gap if they were obliged to do so because of action from employees or a legislative requirement.

When asked about the support that they would require to conduct the necessary analysis, most employers stated that they either did not need any support or could not think of any support that would be of use to them when measuring their gender pay gap.

Despite the fact that none of those who had reported their gender pay gap data externally had had negative experiences as a result, only a minority of those not currently reporting data stated that they would be open to the idea (30 per cent). The most commonly mentioned barrier to reporting was a policy not to discuss pay information. Hence a view that discussion of pay is unsavoury or might provoke ill feeling among employees is currently serving as a barrier to equal pay or at least to understanding where a gender pay gap exists.

The majority of employers also felt that they would require guidance on how to report pay gap data clearly.

There is some evidence that peer pressure will play a role in encouraging employers to report gender pay gap data. If competitors were reporting their data, around half of employers state that they would be encouraged to report too. At the moment, levels of external reporting are so low that it seems likely that many organisations will not be aware of any others that report their pay gap data. Encouraging employers to look at the gender pay gap data of their competitors may also have value in persuading some of those who believe that they already offer equal pay that they may have issues to investigate.

References

Adams, L., Hall, P. and Schafer, S. (2008) *Equal pay reviews survey*. Equality and Human Rights Commission Research Report no. 2. Manchester: EHRC.

Department for Business, Enterprise & Regulatory Reform (2007) *Small and Medium-sized Enterprise Statistics for the UK and Regions*. Available at: <http://stats.berr.gov.uk/ed/sme/>

Appendix: Questionnaire

PRIVATE & CONFIDENTIAL Gender Pay Gap Reporting: J4760
Baseline survey 2009

ASK TELEPHONIST

A1) 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 [INSERT NAME FROM SAMPLE / IF NO NAME: your Human Resources or Personnel Manager or Director]?

INTERVIEWER NOTE: IF NO HR MANAGER / DIRECTOR – ASK TO SPEAK TO MOST SENIOR PERSON WITH RESPONSIBILITY FOR HR.

Yes – speaking	1	CONTINUE
Yes – transfer	2	
Hard appointment	3	MAKE APPOINTMENT
Soft appointment	4	
HR based at another site	5	TAKE DETAILS (TEL NO, CONTACT NAME, “REGION”, NEW COMPANY NAME) AND CLOSE (DP CREATE NEW QUEUE: qsite)
Refusal (Taken part in recent survey)	6	THANK AND CLOSE
Refusal (Company Policy)	7	
Refusal (Other – specify)	8	
Not available in deadline	9	
Engaged	10	CALL BACK
No reply / answering phone	11	
Residential number	12	THANK AND CLOSE
Dead line	13	CLOSE
Company closed	14	THANK AND CLOSE

WHEN SPEAKING TO HR MANAGER:

A2) IF A1=2 SHOW REINTRODUCTION TEXT: Good morning/afternoon, my name is calling from IFF Research, an independent market research company.

ALL: We are conducting a project on behalf of the Equality and Human Rights Commission (the EHRC) to help them to understand how, if at all, businesses such as yours are analysing and reporting on the pay gap between men and women.

INTERVIEWER ADD IF NECESSARY: **The EHRC are the statutory body with responsibility for promoting equality by providing advice and guidance, raising awareness and working to implement an effective, proportionate and flexible legislative framework.**

INTERVIEWER ADD IF NECESSARY i.e. ONLY IF ASKED SPECIFICALLY ABOUT THE BILL: **This is your opportunity to give feedback on this important area of government policy and possible legislation – we would like to get your views on the wider issues and we will explain the relevant areas you need to know about.**

Can I just check that you are an appropriate person to speak to regarding your company’s HR strategy, including your remuneration and equality & diversity policies? IF NOT: CODE 2 AND ASK TO BE TRANSFERRED.

The interview should take between 15 and 20 minutes, depending on your answers. Are you available to speak now?

REASSURE IF NECESSARY:

- EHRC are not checking up on companies, and you are under no legal obligation to be doing anything in this area at present. The study is to look at current business practice and opinions and how the current drive towards greater transparency of reporting on the gender pay gap would impact businesses such as yours.
- All your responses will be treated in the strictest confidence, and nothing will be attributed to any individual or company - The EHRC will not be told the names of organisations participating in the survey.
- Contact at IFF Research is Peter Hall or Katie Gore if they would like to find out more about the survey (020 7250 3035) or contact at EHRC is Dr David Perfect, 0161 828 8510 or research@equalityhumanrights.com.
- IFF is a Market Research Society Partner and work strictly within the Market Research Society Code of Conduct. If you would like to check IFF’s credentials, you can call the Market Research Society, free of charge, on 0500 39 69 99.
- Establishments have been randomly selected from a list provided by Dunn and Bradstreet

Yes – continue	1	CONTINUE
Not the most appropriate person (TAKE DETAILS AND TRANSFER)	2	RE-ASK A2
Hard appointment	3	MAKE APPOINTMENT
Soft appointment	4	
Refusal (Taken part in recent survey)	5	THANK AND CLOSE
Refusal (Company Policy)	6	
Refusal (Other – specify)	7	
Not available in deadline	8	

ASK ALL

A3) Would you classify your organisation as one MAINLY 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	CONTINUE
Charity / voluntary sector	2	
Local government financed body	3	THANK AND CLOSE
Central government financed body	4	
None of the above / other (SPECIFY)	5	CONTINUE

A4) How many employees does your company currently employ in Great Britain? IF NECESSARY: Please include all full and part time staff, but exclude agency workers or self-employed contractors.

WRITE IN NUMBER (1-999999) _____

Don't know X

IF DK PROMPT WITH RANGES / IF ANSWER GIVEN CODE RANGES AUTOMATICALLY

Under 250	1	THANK AND CLOSE
250-499	2	CONTINUE. CHECK QUOTAS
500-999	3	
1000+	4	
Don't know	5	THANK AND CLOSE

THANK AND CLOSE IF UNDER 250

A5) I have [INSERT SIC DESCRIPTION FROM SAMPLE] as a description of your main business activity. Is this correct?

Yes	1	CHECK QUOTAS AND MOVE TO A6
No	2	ASK A5a
Don't know	3	

IF DESCRIPTION INCORRECT (A5=2 OR 3) ASK:

A5A) Please could you describe to me your main business activity?

WRITE IN

A5RAN) INTERVIEWER: CODE TO SECTOR BASED ON DESCRIPTION OF MAIN BUSINESS ACTIVITY

Manufacturing and construction	1	CHECK QUOTAS AND MOVE TO A6
Distribution, hotels and restaurants	2	
Banking, finance and insurance	3	
Other private services	4	

ASK ALL

A6) And is this the only site that your organisation has or do you have others?

Only site	1	GO TO SECTION B
Have other sites	2	ASK A7

IF HAVE OTHER SITES (A6=2) ASK:

A7) I'd like to know approximately how many sites your organisation has. Can you tell me how many sites you have in....?

DP ALLOW 0-99999

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

WRITE IN
NUMBER None 1 2 to 5 6 to 9 10 to 49 50+
OF SITES

		1	2	3	4	5	6
a. England							
b. Scotland							
c. Wales							
d. Northern Ireland							

ASK IF A6=2

A8) Do you have any sites outside of the UK?

Yes	1	
No	2	
Don't know	3	

SECTION B: UNDERSTANDING THE BUSINESS

ASK ALL:

B1) I'm interested to get a bit of an understanding of the nature of your workforce – that is, who works in your organisation and what they do. Does your organisation employ any staff in the following job roles? READ OUT IN FULL; CODE ALL THAT APPLY

	Yes	No
Managerial or senior official posts	1	2
Professional or technical roles	1	2
Administrative or secretarial	1	2
Skilled Trades (Such as electricians, mechanics, chefs)	1	2
Customer Facing (Sales, customer service, personal service)	1	2
Blue Collar or Manual Labour (Elementary occupations, or process, plant or machine operatives)	1	2

INTERVIEWER NOTE – IF ANSWERED 'NO' (CODE 2) TO ALL PARTS OF B1:
THE INTERVIEW IS ABOUT TO BE TERMINATED BECAUSE YOU HAVE ANSWERED 'NO' TO ALL TYPES OF JOB ROLES. DO YOU WISH TO RE-ASK B1, OR CLOSE THE INTERVIEW?

RE-ASK B1	1	RE-ASK B1
CLOSE THE INTERVIEW	2	THANK AND CLOSE

IF EMPLOY STAFF IN MORE THAN ONE OCCUPATIONAL CATEGORY

B1A) I would like to find out how your workforce is distributed across these categories. Would you prefer to talk about this in terms of numbers of staff, or percentages of your workforce?

Prefer numbers of staff	1	
Prefer percentages	2	

IF EMPLOY STAFF IN MORE THAN ONE OCCUPATIONAL CATEGORY (AT B1) AND PREFER TO GIVE PERCENTAGES (B1A=2)

B2) Please could you tell me the approximate percentage of your workforce that fall into each of these categories? If you are not sure a “best guess” will do.

DP NOTE: PLEASE ADD ‘RUNNING TOTALS’. SHOW ONLY OCCUPATIONS MENTIONED AT B1

INTERVIEWER NOTE: There is [% REMAINING] remaining to allocate between [NUMBER OF OCCUPATIONAL CATEGORIES REMAINING] categories

	% [DP ALLOW 0-100 FOR EACH]
Managerial or senior official posts	
Professional or technical roles	
Administrative or secretarial	
Skilled Trades (Such as electricians, mechanics, chefs)	
Customer Facing (Sales, customer service, personal service)	
Blue Collar or Manual Labour (Elementary occupations, or process, plant or machine operatives)	

CATI CHECK SUMS TO 100%. IF NOT GO BACK TO B2(1) TO CHECK ANSWERS.

IF EMPLOY STAFF IN MORE THAN ONE OCCUPATIONAL CATEGORY (AT B1) AND PREFER TO GIVE NUMBERS (B1A=1)

B2A) Please could you tell me the approximate numbers of staff that fall into each of these categories? If you are not sure a “best guess” will do.

DP NOTE: **IF GIVEN A SPECIFIC NUMBER AT A4**, PLEASE ADD ‘RUNNING TOTALS’. SHOW ONLY OCCUPATIONS MENTIONED AT B1

INTERVIEWER NOTE: There is [NUMBER REMAINING] remaining to allocate between [NUMBER OF OCCUPATIONAL CATEGORIES REMAINING] categories

	NUMBERS OF STAFF [DP – TOTAL MUST NOT EXCEED FIGURE AT A4/A4RAN]
Managerial or senior official posts	
Professional or technical roles	
Administrative or secretarial	
Skilled Trades (Such as electricians, mechanics, chefs)	
Customer Facing (Sales, customer service, personal service)	
Blue Collar or Manual Labour (Elementary occupations, or process, plant or machine operatives)	

IF GAVE A SPECIFIC NUMBER AT A4, CATI CHECK SUMS TO SPECIFIC NUMBER AT A4. IF NOT GO BACK TO B2A(1) TO CHECK ANSWERS.

IF GAVE A RANGE AT A4RAN, CATI CHECK SUM FALLS WITHIN RANGE AT A4RAN. IF NOT, GO BACK TO B2A(1) TO CHECK ANSWERS.

B3DUM) DP: SET LARGEST EMPLOYEE GROUP FROM B2 OR B2A. IF TWO OR MORE ARE EQUAL, PICK ONE OF THOSE AT RANDOM TO BE “LARGEST” – PRIORITISE 2-6 OVER MANAGERIAL / SENIOR

SAME RESPONSE LIST AS B2 / B2A

ASK ALL

B4) I’d like now to understand how your employees are split by gender, that is, the number of men and women you have working for you at this organisation. Please could you tell me what percentage of your workforce **OVERALL** are women? If you do not know a “best guess” will do.

WRITE IN NUMBER [DP ALLOW 0-100%]. IF DK PROMPT WITH RANGES

0%	1
10% or less	2
11-25%	3
26-50%	4
51-75%	5
76-90%	6
91-99%	7
100%	8
Don't know	X

EXCLUDE IF CORE GROUP IS ‘**Managerial or senior official posts**’ (B3DUM=1)

B5) And of all those working as [ANSWER FROM B3DUM], what percentage of these are women?

WRITE IN NUMBER [DP ALLOW 0-100%]. IF DK PROMPT WITH RANGES

0%	1
10% or less	2
11-25%	3
26-50%	4
51-75%	5
76-90%	6
91-99%	7
100%	8
Don't know	X

ASK IF B1_1=1 (IF ORGANISATION HAS MANAGERS OR SENIOR OFFICIALS)

B6) And of all those working in Managerial or other senior official posts, what percentage of these are women?

WRITE IN NUMBER [DP ALLOW 0-100%]. IF DK PROMPT WITH RANGES

0%	1
10% or less	2
11-25%	3
26-50%	4
51-75%	5
76-90%	6
91-99%	7
100%	8
Don't know	X

There is no B7 and B8

ASK ALL

B9) Approximately what percentage of your workforce work part time, that is, fewer than 30 hours per week on average?

WRITE IN NUMBER [DP ALLOW 0-100%]. IF DK PROMPT WITH RANGES

0%	1
10% or less	2
11-25%	3
26-50%	4
51-75%	5
76-90%	6
91-99%	7
100%	8
Don't know	X

IF B9>0

B10) And approximately what percentage of these part time workers are female?

WRITE IN NUMBER [DP ALLOW 0-100%]. IF DK PROMPT WITH RANGES

0%	1
10% or less	2
11-25%	3
26-50%	4
51-75%	5
76-90%	6
91-99%	7
100%	8
Don't know	X

ASK ALL

B11) Do any of your staff work...:

READ OUT; CODE ALL THAT APPLY

Flexible working hours / flexitime (that is, where the employee has a set number of hours they must work per day or per week, but decide themselves when they will work these)	1
Set shifts (that is, shifts at the same time each day)	2
Rotating or alternating shifts (that is, shifts which vary)	3
Regular daytime hours (that is, 9-5 or 8-6 or similar)	4
Unpaid overtime	5
In a Jobshare	6
Compressed hours	7
Annualised hours	8
Hours otherwise unevenly distributed throughout year for example term time working	9
Other (SPECIFY)	10
Don't know	X

SECTION C: UNDERSTANDING THE STYLE OF THE BUSINESS

ASK ALL

C1) Changing the subject slightly now, I'd like to understand a bit about how HR is organised and approached in your organisation. First, is the Head of HR at your organisation on the overall company board, or do they report directly to the board?

INTERVIEWER NOTE – YOU MIGHT BE SPEAKING TO THE HEAD OF HR

Sit on board	1
Report directly to board	2
Neither	3
Other (SPECIFY)	4
Don't know	X

IF MULTISITE ORGANISATION (A6=2)

C2) Is your organisation's HR function all based centrally or are any responsibilities devolved to the individual sites?

READ OUT; CODE ONE ONLY

All central	1
Most central, some devolved	2
Some central, most devolved	3
None central, all devolved	4
DO NOT READ OUT - Don't know	X

IF SOME OR MOST CENTRAL (C2=2-3)

C2A) Which functions are not determined centrally?

READ OUT; CODE ALL THAT APPLY

Pay determined at site level	1
Recruitment done at site level	2
Training organised at site level	3
Appraisals at site level	4
Pay reviews at site level	5
Benefits administered at site level	6
Other functions done at site level (SPECIFY)	7
Don't know	X

ASK ALL:

C3) Does anyone have “ensuring equal pay between women and men” as a defined part of their role?

Yes	1
No	2
Don't know	3

C4) Does your organisation provide training in avoiding sex bias in setting rates of pay?

Yes	1
No	2
Don't know	3

IF PROVIDE TRAINING (C4=1)

C5) Which of the following groups attend this training?

READ OUT; CODE ALL THAT APPLY

	Yes	No	DK
Senior managers	1	2	3
Staff involved in setting rates of pay	1	2	3
Staff involved in recruitment	1	2	3
Line managers	1	2	3
Other staff members (SPECIFY)	1	2	3

C6) And does this training take the form of...?

READ OUT, CODE ALL THAT APPLY

One off or occasional training sessions	1
A regular training programme	2
Or some other form? SPECIFY	3
DO NOT READ OUT - Don't know	X

SECTION D: UNDERSTANDING REMUNERATION STRUCTURES

I'd like to think now about the pay and benefits package you offer your staff.

D1) In terms of the total salary (excluding any other benefits such as bonuses, share options, health insurance etc) you offer your staff, how do you think you compare to other organisations in your industry?

READ OUT; CODE ONE ONLY

Significantly above average	1
A bit above average	2
Around average	3
A bit below average	4
Significantly below average	5
DO NOT READ OUT: Don't know	X

D2) Do you offer any other benefits on top of salary? IF YES: What benefits do you offer?

READ OUT; CODE ALL THAT APPLY

Bonuses based on the overall performance of the company	1
Bonuses based on individual performance	2
Bonuses based on team performance	3
Health insurance	4
Life insurance/assurance	5
Pension	6
Subsidised crèche	7
Subsidised canteen	8
Free subsidised further education, e.g. evening classes	9
Child care vouchers	10
Company cars	11
Interest free season ticket loans	12
Share options	13
DO NOT READ OUT – None	14
DO NOT READ OUT – Don't know	X

ASK FOR EACH OF D2_1, D2_2 & D2_3 MENTIONED AT D2

D3) And what staff members qualify for [BENEFIT FROM D2]?

READ OUT. MULTICODE ON CODES 1-3 and 5.

All staff who have been with the company for a certain number of years	1
All staff above a certain grade / level	2
All full time staff (not part time staff)	3
All staff	4
Other (SPECIFY)	5
DO NOT READ OUT – Don't know	X

IF D3=1

D3A) How many years do staff have to be with the organisation to qualify for [BENEFIT]?

WRITE IN NUMBER (DP ALLOW 0-99)

Don't know X

IF D3A=0

D3B) How many months?

WRITE IN NUMBER (DP ALLOW 0-11)

Don't know X

IF D3=2

D3C) What grade / level do staff need to reach to become eligible for [BENEFIT]?

Supervisory	1
Management	2
Senior Management/Director	3
Board level	4
Other (SPECIFY)	5
DO NOT READ OUT – Don't know	X

ASK ALL

D4) When you review salaries, do you tend to review according to performance, or do you tend to have uniform reviews where everyone in a job gets the same review / increase?

CODE ONE ONLY. IF PERFORMANCE RELATED, PROBE: ARE SALARIES REVIEWED WITHIN SET PAY BANDS OR NOT

Performance related	1
Uniform across job roles	2
Combination of uniform across role and performance related	3
Varies - depends on the job role	4
DO NOT READ OUT - Don't know	X

IF PERFORMANCE RELATED (D4=1)

D4A) Are there set pay bands for each job role into which an employee's salary must fall?

Yes	1
No	2
It varies by job role	3
DO NOT READ OUT: Don't know	X

IF IT VARIES (D4=4) EXCLUDE IF CORE GROUP IS 'Managerial or senior official posts' (B3DUM=1)

D4B) Are salary reviews for [LARGEST EMPLOYEE GROUP FROM B3DUM] performance related or uniform across job roles?

CODE ONE ONLY

Performance related	1
Uniform across job roles	2
Combination of uniform across role and performance related	3
DO NOT READ OUT - Don't know	X

ASK IF VARIES AND HAVE MANAGERS OR SENIOR OFFICIALS (D4=4 & B1_1=1)

D4C) Are salary reviews for Managerial and Senior posts performance related or uniform across job roles?

CODE ONE ONLY

Performance related	1
Uniform across job roles	2
Combination of uniform across role and performance related	3
DO NOT READ OUT - Don't know	X

ASK ALL

D4D) How long does it take to make adjustments to salary following a review? (i.e. for the new salary to arrive in the employee's pocket).

READ OUT; CODE ONE ONLY

Within 1 month / immediately	1
1-3 months	2
4-6 months	3
7-12 months	4
Over 12 months	5
DO NOT READ OUT - It varies by job role	6
DO NOT READ OUT - Don't know	X

ASK ALL

D5) Which ONE of the following statements best describes how open your organisation is when it comes to salary levels. Would you say that ...?

READ OUT; CODE ONE ONLY

Staff are formally made aware of how much their colleagues in the same role are paid	1
Staff know the pay band into which their role falls	2
Staff are free to talk about it if they wish but there is no information from the company on the matter	3
Staff are discouraged from talking about it but there is no information from the company on the matter	4
Staff have it in their contract that they cannot discuss pay with colleagues	5
It differs between roles	6
DO NOT READ OUT - Don't know	X

IF IT DIFFERS BETWEEN ROLES (D5=6) EXCLUDE IF CORE GROUP IS 'Managerial or senior official posts' (B3DUM=1)

D5A) How open is your organisation when it comes to salary levels within [ANSWER FROM B3DUM]?

READ OUT; CODE ONE ONLY

Staff are formally made aware of how much their colleagues in the same role are paid	1
Staff know the pay band into which their role falls	2
Staff are free to talk about it if they wish but there is no information from the company on the matter	3
Staff are discouraged from talking about it but there is no information from the company on the matter	4
Staff have it in their contract that they cannot discuss pay with colleagues	5
DO NOT READ OUT - Don't know	X

IF IT DIFFERS BETWEEN ROLES AND HAVE MANAGERS OR SENIOR OFFICIALS (D5=6 & B1_1=1)

D5B) And how open is your organisation when it comes to salary levels within Managerial and Senior roles? READ OUT; CODE ONE ONLY

Staff are formally made aware of how much their colleagues in the same role are paid	1
Staff know the pay band into which their role falls	2
Staff are free to talk about it if they wish but there is no information from the company on the matter	3
Staff are discouraged from talking about it but there is no information from the company on the matter	4
Staff have it in their contract that they cannot discuss pay with colleagues	5
DO NOT READ OUT - Don't know	X

SECTION E: COLLECTING, MONITORING AND MEASURING SALARY INFORMATION

ASK ALL

E1A) I'd now like to ask a few questions about how your organisation records information about your employees' pay.

Do you keep your HR and payroll information on a computerised system?

Yes	1
No, it's entirely manual	2
DO NOT READ OUT - Don't know	X

E1B) Are your HR and payroll records on separate systems, or are they combined into one?

Separate	1
Combined	2
DO NOT READ OUT - Don't know	X

ASK IF RECORDS SEPARATE (E1B=1)

E1C) How easy is it, or would it be, for you to combine these HR and payroll records to look at data across the two?

READ OUT

Very easy	1
Fairly easy	2
Fairly difficult	3
Very difficult	4
DO NOT READ OUT - Don't know	X

ASK ALL

E2) Which of the following pieces of information are recorded on each employee's individual personnel/HR record? READ OUT; CODE ALL THAT APPLY. DP ROTATE STATEMENTS

Gender	1
Age / Date of birth	2
Ethnicity	3
Whether or not they have a disability	4
Current Salary	5
Previous salary / details of pay rises	6
DO NOT READ OUT - Don't know	X
DO NOT READ OUT – None of these / Do not hold individual records for employees	7

IF KEEP CURRENT SALARY (E2=5)

E2A) And is data on individual employees' rates of pay kept...READ OUT

CODE ONE ONLY

On the HR record ONLY	1
On payroll ONLY	2
On both HR record and payroll	3
Or somewhere else? SPECIFY	4
DO NOT READ OUT - Don't know	X

IF HAVE RECORDS (E2=1-6)

E3) Do you ever analyse any of your pay data to explore the gap between men's and women's average pay? PROBE FULLY

Yes	1
No, but have definite plans to in future	2
No, have no definite plans at present	3
DO NOT READ OUT - Don't know	X

IF ANALYSE DATA (E3=1)

E3A) How frequently do you run this analysis?

READ OUT CODE ONE ONLY

Every month or two	1
Quarterly	2
Twice per year	3
Annually	4
Less often	5
DO NOT READ OUT Other – SPECIFY	6
DO NOT READ OUT - Don't know	X

E3B) Which individual department is responsible for ensuring these reports are run?

DO NOT READ OUT; CODE ONE ONLY

HR	1
Finance	2
Equality / Diversity team	3
Individual Departmental heads	4
DO NOT READ OUT Other – SPECIFY	5
DO NOT READ OUT - Don't know	X

ASK ALL

E4) Have you ever completed a job role evaluation in your organisation to determine which job roles are equivalent to each other? MULTICODE ON CODES 1-3.

Yes – review of job titles	1
Yes – analytical job evaluation (INTERVIEWER: INCLUDES HAY EVALUATION)	2
Yes – by another method (SPECIFY)	3
No but intend to in future	4
No	5
DO NOT READ OUT - Don't know	X

ASK ALL

E5) Does your organisation collect data on the gender pay gap as part of its Management Information?

Yes	1
No	2
Don't know	X

IF E5=1

E6) And is this sort of information shared with staff through corporate communications at any of the following levels? READ OUT, CODE ALL THAT APPLY

At board level	1
To senior managers	2
To line managers	3
To all salaried staff	4
To contractors and agency workers / temps	5
Not communicated outside HR team	6
DO NOT READ OUT: Other (WRITE IN)	7
DO NOT READ OUT: Don't know	X

SECTION F – EQUAL PAY ACTIVITY

F1) Is your organisation currently in the process of conducting a formal review to examine the gap between men’s and women’s pay?

Yes	1
No	2
Don’t know	3

F2) Has your organisation ever conducted a formal review in the past to examine the gap between men’s and women’s pay?

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

Yes	1
No	2
Don’t know	3

IF NOT IN PROCESS OF CONDUCTING AN EPR (F2=2 OR 3)

F3) Does your organisation currently have any plans to conduct a review in the future to examine the gap between men’s and women’s pay?

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 (F1=2-3 AND F2=2-3 AND F3=2-3) BUT NOT IF F1 AND F2 AND F3=3.

F4) Which of the following are reasons why your organisation has no plans to examine the gap between men’s and women’s pay? 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 do so	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 do so	5
You have concerns about what you would find	6
Other (Specify)	7

ASK ALL

F5) Has your organisation been presented with an Equal Pay Questionnaire by any of your employees?

Yes	1
No	2
Don't know	3

F6) 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

IF HAVE NOT CONDUCTED AN EPR, NOT CURRENTLY CONDUCTING ONE AND HAVE NO PLANS TO DO SO (F1=2-3 AND F2=2-3 AND F2=2-3)

F7) What would prompt your organisation to examine the gap between men's and women's pay?

PROBE: Anything else? PROBE FULLY. DO NOT PROMPT. CODE ALL THAT APPLY.

ASK ALL WHO MENTION MORE THAN ONE REASON AT F7

F8) And which of these would you describe as being the one thing which would have the most impact in prompting you to examine the difference between men's and women's pay?

READ

OUT ALL MENTIONED AT F7 AND CODE ONE ONLY

READ OUT ALL MENTIONED AT F7

	F7	F8
You would have to do so in order to comply with legislation	1	1
You want to be a good practice employer	2	2
As a result of leadership from employer bodies	3	3
You see it as good business sense	4	4
You were responding to a request from trade unions	5	5
As a result of Government policy or publicity	6	6
As a result of equal pay cases being raised in your organisation or sector	7	7
As a result of EHRC policy or publicity	8	8
As a result of one or more employees making a complaint or taking action	9	9
For other reasons (SPECIFY)	10	10

Not applicable – we already have equal pay	11	11
Don't know	X	X

IF HAVE NOT LOOKED INTO THE GENDER PAY GAP (F1=2-3 AND F2=2-3 AND F2=2-3)

F9) What support would you need to encourage you to measure the gap between men's and women's pay?

DO NOT READ OUT; CODE ALL THAT APPLY

A website with advice on how to measure the gap	1
Help-line advice	2
Hard copy written materials to aid you	3
Consultancy advice	4
Having extra internal resources	5
Would not need any support	6
Other (SPECIFY)	7
DO NOT READ OUT - Don't know	X

IF WOULD LIKE SUPPORT (F9#6)

F10) Where would you or do you go for support to help you measure the difference between men's and women's pay?

READ OUT; CODE ALL THAT APPLY

ACAS (Advisory, Conciliation and Arbitration Service)	1
BIS (Dept for Business, Innovation and Skills) / BERR / DTI	2
CIPD (Chartered Institute of Personnel and Development)	3
EHRC (Equality and Human Rights Commission)	4
GEO (Government Equalities Office)	5
Trade association / industry body	6
Business association	7
No support required	8
Other (SPECIFY)	9
DO NOT READ OUT - Don't know	X

SECTION G – DATA REPORTING AND FUTURE PLANS

G1) I'd now like to explore issues surrounding the objective of reducing inequality between men's and women's pay.

How much of a business priority is it in your organisation to reduce the gap between men's and women's pay?

READ OUT

Very high priority	1
Fairly high priority	2
Fairly low priority	3
Very low priority	4
Not a priority at all	5
DO NOT READ OUT - Don't know	X

ASK ALL

G1A) Does your organisation have a planned approach for reducing the gap between men's and women's pay?

Yes	1
No, not a planned approach but are informally looking into it	2
No, not at all	2
DO NOT READ OUT - Don't know	X

IF YES (G1A=1)

G1B) Does this planned approach detail how the pay gap between men and women will be closed...?

READ OUT; CODE ALL THAT APPLY

At the overall level	1
[IF A6=2] At site level	2
At departmental levels	3
By job role	4
Other (SPECIFY)	5
DO NOT READ OUT - Don't know	X

IF HAVE DONE REVIEW (F1=1)

G2) Do you report or publish the difference between men’s and women’s pay INTERNALLY, that is, within your organisation? (for example, on the company intranet or staff handbook)

Yes	1
No	2
Don't know	X

IF REPORT INTERNALLY (G2=1)

G2A) Has reporting INTERNALLY on the difference between men’s and women’s pay been a positive or a negative thing for your organisation? Would you say it’s been...? READ OUT

Very positive	1
Quite positive	2
Indifferent	3
Quite negative	4
Very negative	5
DO NOT READ OUT - Don't know	X

IF HAVE NOT DONE REVIEW OR DO NOT PUBLISH INTERNALLY ((F1=2-3) OR (F1=1 AND G2=2-3))

G3) And how open are you to the idea of reporting on the gap between men’s and women’s pay INTERNALLY that is within your organisation?

READ OUT

Would be open to it	1
Would be indifferent to it	2
Would be against it	3
DO NOT READ OUT – It would depend on the figures	4
DO NOT READ OUT - Don't know	X

IF AGAINST IT (G2A=4-5 OR G3=3)

G4) Why are you against the idea of reporting on the gap between men's and women's pay internally?

DO NOT READ OUT. PROBE FULLY. CODE AS MANY AS APPLY.

Company policy is not to discuss pay	1
Worries / concerns about uncovering problems	2
Other (specify)	3
DO NOT READ OUT - Don't know	X

IF FOR IT (G2A=1-2 OR G3=1)

G5) Why are you positive about reporting on the gap between men's and women's pay internally?

DO NOT READ OUT. PROBE FULLY. CODE AS MANY AS APPLY.

Confident we have no pay gap, so nothing to hide	1
Company culture is to be transparent / fair	2
Other (specify)	3
DO NOT READ OUT - Don't know	X

IF HAVE DONE REVIEW (F1=1)

G6) Do you report or publish the difference between men's and women's pay EXTERNALLY, that is, outside of your organisation? (for example, on the company website or annual report)

Yes	1
No	2
Don't know	X

IF REPORT EXTERNALLY (G6=1)

G6A) Has reporting EXTERNALLY on the difference between men’s and women’s pay been a positive or a negative thing for your organisation? Would you say it’s been...? READ OUT

Very positive	1
Quite positive	2
Indifferent	3
Quite negative	4
Very negative	5
DO NOT READ OUT - Don't know	X

IF HAVE NOT DONE REVIEW OR DON'T PUBLISH EXTERNALLY ((F1=2-3) OR (F1=1 AND G6=2-3))

G7) And how open are you to the idea of reporting on the gap between men’s and women’s pay EXTERNALLY that is outside of your organisation?

READ OUT

Would be open to it	1
Would be indifferent to it	2
Would be against it	3
DO NOT READ OUT – It would depend on the figures	4
DO NOT READ OUT - Don't know	X

IF AGAINST IT (G6A=4-5 OR G7=3)

G8) Why are you against the idea of reporting on the gap between men’s and women’s pay externally?

DO NOT READ OUT. PROBE FULLY. CODE AS MANY AS APPLY.

Company policy is not to discuss pay	1
Worries / concerns about uncovering problems	2
Other (specify)	3
DO NOT READ OUT - Don't know	X

IF FOR IT (G6A=1-2 OR G7=1)

G9) Why are you positive about reporting on the gap between men's and women's pay externally?

DO NOT READ OUT. PROBE FULLY

Confident we have no pay gap, so nothing to hide	1
Company culture is to be transparent / fair	2
Used to / comfortable with reporting to Government	3
Other (specify)	4
DO NOT READ OUT - Don't know	X

IF G6=1 AND G6A=(1-3)

G10) Have you seen any negative effects from reporting your gap between men's and women's pay externally?

Yes (SPECIFY)	1
No	2
DO NOT READ OUT - Don't know	X

IF REPORT ON EQUAL PAY (G6=1)

G11_1) How do you report externally on the gap between men's and women's pay within your organisation?

DO NOT READ OUT. PROBE FULLY. CODE AS MANY AS APPLY.

On our website	1
In our annual report	2
Other (specify)	3
DO NOT READ OUT - Don't know	X

G11_2) And do you report any of the following?

READ OUT; CODE ALL THAT APPLY

One single figure of the average difference overall	1
Pay gap figures broken down by part time and full time workers	2
Pay gap figures broken down by job role or pay grade	3
Pay gap figures by formal job evaluation scale	4
Full equal pay audit	5
A narrative explaining why any difference may be present	6
A narrative explaining actions being taken to address any differences	7
Other (SPECIFY)	8
DO NOT READ OUT – Don't know	X

G11A) What benefits do you find from reporting at this level?

PROBE FULLY

WRITE IN

Don't know X

G11B) And what drawbacks have you found?

PROBE FULLY

WRITE IN

Don't know X

ASK IF DO NOT REPORT EXTERNALLY ((F1=2-3 AND F2=2-3 AND F2=2-3) OR G6=2-3)

G12) To what extent do you agree or disagree that the following would encourage you to report EXTERNALLY on the gap between men's and women's pay within your organisation?

READ OUT EACH STATEMENT. READ OUT SCALE AND REPEAT AS NECESSARY

	Strongly agree	Agree	Neither agree nor disagreed	Disagree	Strongly disagreed	DO NOT READ OUT: Don't know
Advice on how to report clearly	1	2	3	4	5	6
Competitors doing the same	1	2	3	4	5	6
Being able to report with an explanation of the figures	1	2	3	4	5	6
If an employee took action or complained	1	2	3	4	5	6

ASK IF DISAGREE OR NONCOMMITTAL TO EVERY STATEMENT ((G12(1)=3-6) AND (G12(2)=3-6) AND (G12(3)=3-6) AND (G12(4)=3-6))

G12A) What, if anything, WOULD encourage you to report EXTERNALLY on the gap between men's and women's pay within your organisation?

PROBE FULLY. RECORD VERBATIM:	
OR SINGLE CODE:	
Nothing – we would only report externally if required to by law	1
Don't know	2

G13) And if you WERE required to report EXTERNALLY on the gap between men’s and women’s pay within your organisation, to what extent do you agree or disagree that you’d need the following support to make that happen?

READ OUT EACH STATEMENT. READ OUT SCALE AND REPEAT AS NECESSARY

	Strongly agree	Agree	Neither agree nor disagreed	Disagreed	Strongly disagree	DO NOT READ OUT: Don't know
Advice on how to report clearly	1	2	3	4	5	6
Resources / manpower	1	2	3	4	5	6
Software to manage complex information	1	2	3	4	5	6

ASK IF 'DISAGREE' OR NONCOMMITTAL TO EVERY STATEMENT ((G13(1)=3-6) AND (G13(2)=3-6) AND (G13(3)=3-6))

G13A) What, if any, support would you need to make this happen?

PROBE FULLY. RECORD VERBATIM:	
OR SINGLE CODE:	
No support needed	1
Don't know	2

ASK ALL

G14) I'd now like to ask a couple of questions to understand a little more about your company's situation. Which of the following challenges do you see your organisation facing in the next 12 months?

READ OUT. CODE ALL THAT APPLY. DP ROTATE LIST

IF >1 ANSWER GIVEN AT C11, ASK C12 / OTHERWISE CODE AUTOMATICALLY

G15) And what do you see as the MAIN challenge to your business in the next 12 months?

READ OUT, CODE ONE ONLY

DP SHOW ONLY RESPONSES GIVEN AT C11

	C11	C12
Lack of orders / customers spending less	1	1
Increased regulation	2	2
Finding skilled staff	3	3
Trouble getting bank loans	4	4
Increasing customer bad debts	5	5
Reduced funding	6	6
Redundancies/reduced headcount	7	7
Other (Specify)	8	8
No challenges	9	9
Don't know	X	X

IF G14=2 OR G15=2 ONLY ASK:**G16) What are the main challenges to your business brought about by increased regulation?**

PROBE FULLY

WRITE IN

Don't know X

ASK ALL

Thank you, that concludes the questions I have for you.**G17) Occasionally, it is necessary to call people back to clarify information or answers to questions. May we call you back if required?**REASSURE IF NECESSARY: **We would only re-contact you with regards to this survey. Your details will not be used for any other purpose.**

Yes	1
No	2

G17A) EHRC are working with the Institute for Employment Studies (IES) to conduct further research in this area. Would you be prepared to answer further questions about future practice in measuring the gender pay gap?

Yes	1
No	2

IF G17A=1

G17B) May we pass on your contact details to the Institute for Employment Studies (IES) for this purpose? REASSURE IF NECESSARY: Your details would NOT be sent to EHRC or be linked to the survey results in any way. Your details would ONLY be used by IES for the purposes of this specific follow up project, and not for any other reason. You would still be able to decline to take part in the research if called.

Yes	1
No	2

IF G17B=1

G18A) Can I just confirm your details?

NAME:

TELEPHONE:

COMPANY NAME:

Contacts

England

Equality and Human Rights Commission Helpline
FREEPOST RRLG-GHUX-CTR
Arndale House, Arndale Centre, Manchester M4 3AQ

Main number 0845 604 6610
Textphone 0845 604 6620
Fax 0845 604 6630

Scotland

Equality and Human Rights Commission Helpline
FREEPOST RSAB-YJEJ-EXUJ
The Optima Building, 58 Robertson Street, Glasgow G2 8DU

Main number 0845 604 5510
Textphone 0845 604 5520
Fax 0845 604 5530

Wales

Equality and Human Rights Commission Helpline
FREEPOST RRLR-UEYB-UYZL
3rd Floor, 3 Callaghan Square, Cardiff CF10 5BT

Main number 0845 604 8810
Textphone 0845 604 8820
Fax 0845 604 8830

Helpline opening times:

Monday to Friday: 8am - 6pm

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www.equalityhumanrights.com

This report, which is based on a telephone survey of 900 employers with 250 or more staff, explores what employers in the private and voluntary sectors are currently doing to measure and report on gender pay gaps and their reasons for doing so. It shows that two-fifths of organisations had conducted or were conducting some analysis of pay gaps, while the vast majority of employers who have no engagement with formal measuring and reporting processes feel that they already provide equal pay and would not benefit from investigating the issue further.