



10 top tips on gender pay gap reporting

Organisations can benefit from gender pay gap reporting by viewing it not as regulatory compliance, but an opportunity to understand the causes of their gender pay gap and identify barriers to progression and, by taking action to close the gap, improve organisational performance. First they have to get the basics right.

1 Check your organisation's in scope

Organisations with 250 or more employees working in England, Scotland or Wales* on a 'snapshot date' of 31 March (for public sector employers) or 5 April (for private and voluntary sector employers) are covered by the regulations. The headcount is of individuals, not full-time equivalents.

2 Publish in time

Your gender pay gap report, and a statement confirming the figures are accurate, must be published on your own website, and a government website, within one year of the 'snapshot date' – at the latest 30 March for the public sector, or 4 April for the private and voluntary sectors. Make sure you are reporting this year's figures.

3 Count the right people

Employees, workers (and self-employed people carrying out work personally) on full pay on the 'snapshot date', including part-timers, apprentices, casual workers and zero-hours workers, must be in the calculation. Partners, directors, agency workers and those on reduced pay are excluded, but you might want to include them for your own information if not for publication in the report.

4 Get the sums right

You must calculate the mean and median hourly gender pay gap, the mean and median gender pay gap, the proportion of males and females receiving a bonus, and the proportion of males and females in each pay quartile. Employees not identifying as male or female may be excluded. Pay includes allowances, shift premiums, piecework pay, and pay for leave. Excluded are overtime pay, pay in lieu of leave, redundancy pay and any other termination payments.

5 Penalties for non-compliance

The Equality and Human Rights Commission can take action against any employer failing to comply, including taking out a court order which could result in an unlimited fine.

6 Gender pay not equal pay

A gender pay gap reflects workplace or labour market disadvantage and is measured using a range of data. Equal pay is measured at an individual level by comparing the pay for men and women whose work is assessed as being equal. Gender pay gap reporting is a reporting requirement intended to spur organisations into addressing inequality between men and women at work; equal pay is a contractual right which, if breached, could lead to a tribunal claim.

7 Include a narrative report

Not compulsory but recommended, as it can explain the organisational reasons, both internal and external, for a gender pay gap. If your figures are skewed because, for example, your industry has more women than men working in certain jobs, and has tended to undervalue 'female' work, it is important to explain this context to your employees and other stakeholders.

8 Draw up an action plan

Not compulsory but recommended. It shows you are not complacent about your gender pay gap, and are actively engaged in trying to close it. Successive action plans can also help you map progress towards closing the gap or explain why it is widening.

9 Put out the right messages

Developing a communications plan allows you to identify the key messages to accompany your gender pay gap report, who your main audiences are and how to reach them. You need to prepare it well in advance. It should help you identify reputational risks and deal with them.

10 Closing the gap

Reviewing pay and bonuses not only by gender, but also by ethnicity and disability, may reveal additional pointers to keeping your reward policies objective and fair. Gender monitoring (to see if men and women behave or are treated differently in your organisation) in recruitment, reward, take-up of flexible working and promotion should reveal any barriers to women reaching their full potential and making equal progress to men.

* Northern Ireland is currently excluded from the regulations.