

UK Gender Pay Gap: Are You Ready for the 4 April 2019 Reporting Deadline?

There is now less than a month to go before private sector employers with 250 or more employees must publish their second gender pay gap reports.

So far, only one in five affected employers have uploaded their gender pay gap statistics for the year to April 2018 to the government website. It seems that, as was the case last year, most employers are leaving it to the last minute to publish their data. This in itself is not a problem — there is no legal obligation to publish the information before 4 April 2019.

Once again, there is likely to be media scrutiny of any published data. Realistically, the statistics this year are unlikely to be significantly different from last year, as eliminating the gender pay gap is not something that can be achieved in 12 months, but there is still likely to be some public discussion around the extent of any changes in the pay gap (up or down) for higher profile employers and the steps they are taking to reduce any such gap.

Have you prepared a narrative to accompany your data this year? Did you receive any feedback on last year's from employees, shareholders or job candidates? Or is this your first year falling under the regulations such that you are preparing one from scratch? Narratives are not a legal requirement, but the Equality and Human Rights Commission (EHRC) is encouraging all in-scope employers to publish detailed narratives, including action plans to address any issues highlighted by the analysis of their gender pay gap data.

According to research conducted by EHRC on last year's data, around half of employers in its sample produced an accompanying narrative alongside their gender pay gap figures. Only 11% of those employers had set targets that would enable them to measure the progress of their plans year-on-year. Ultimately, employers are more likely to make progress in this area if they have a clear understanding of the causes of any gender pay gap in their organisation and have identified specific and measureable targets to address it. We may see in the coming weeks whether those employers who missed their self-imposed targets are as keen to talk about them this time!

In February 2019, the Government Equalities Office released new <u>guidance</u> to help organisations diagnose why they have a gender pay gap and what they can do to develop an effective action plan to tackle it. Employers should review this guidance, to the extent they have not already done so.

If you are currently analysing your statistics or putting the final touches to your narrative and would like to discuss any last minute questions, please get in touch with one of the following or your usual contact in the Labour & Employment team.

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