The Committee invites written evidence on the following questions:

This submission is based on assisting employers prepare for and report their GPG data by 4th April 2018.

- Whether the annual information related to pay required under the Equality Act 2010 is sufficient? Should any further information be required?

I believe that the first submission for the reporting of GPG’s has, by and large, been a success with relatively few major employers failing to file their data.

At the same time it has raised the public awareness of gender issues and got companies talking about how they defend their positions and/or begin a change process for righting obvious disparities.

The required data are only the most basic elements of a remuneration package and, for preference we should be comparing an holistic total but it is recognised that this may be too time consuming. However, the comparison / ratio of a CEO’s compensation with that of the company’s average means that such information should become available.

The lack of group reporting has meant that some employers have been able to exclude very senior management that may be “employed” through a separate entity of fewer than 250 staff. Also some professional practices trading as LLPs have been able to exclude Partners and again do not show the true gap in their firm.

A big test of the reporting will be in 2019 when April 2018 information is disclosed. Will there have been big changes? It is now too late to make retrospective adjustments to information as at the “snap shot date”.

- What is the extent of compliance? Is the information accurate?

Undoubtedly there will have been errors in the data provided whether deliberate or accidental. There are also omissions as 29% of the sample on cut off day had not provided a narrative on their website, others had not given a contact name and a small number had not declared the staff numbers affected.

On the whole however, after a shaky start, and with some companies stating, apocryphally, they would not make a submission the total of over 10,000 was pretty good.

- How effective are the sanctions for non-compliance with reporting requirements?
Many companies did not believe, initially, that there would be sanctions which may eventually include fines. Some still do not believe they will be hurt.

However, we recognised right from the beginning that the most important effect would be on a company’s reputation and their ability to recruit and retain the top level of talent that they need, of whatever gender, to develop the business.

- **What requirements, if any, should there be on companies to address gender pay gaps?**

As there is already equal opportunity and equal pay legislation in place I would suggest that the gender pay gap issues are far more difficult to address, and certainly in the short term. There are cases pending for equal pay that may throw further light on definitions and structures.

I believe we need to see at least one more year of reporting and possibly two before considering further statutory requirements.

In some cases the gaps have developed historically but are changing with new working practices. Depending on the

**What further measures should be considered?**

Reduce the company size for reporting to 150 and after three years make reporting every two years.

9 April 2018