Close the Gap

Positive shifts, persistent problems

A five year analysis of Scottish employer gender pay gap reporting

Contents

1. Executive summary

The UK gender pay gap reporting regulations were introduced in 2017, with the aim of encouraging employers to take action to tackle gender inequality in their workplace. Since the first pay gap information was published in 2018, Close the Gap has been monitoring employer reports to identify any progress. This paper sets out the findings of Close the Gap's assessment of Scottish employer pay gap reporting in 2021 and 2022. While there is evidence of positive shifts in some areas, the majority of employers are still not taking meaningful action to address the causes of their pay gap.

Key findings:

- There has been little progress made in narrowing the gender pay gap: the average pay gap of employers assessed remains stubbornly at 12%. In 2022, the vast majority of employers (80%) have a gender pay gap in favour of men, up from 78% in 2021.
- The prevalence of bonus gaps has not changed, while the average bonus gap itself has narrowed significantly from 33% to 11%. However, as most employers did not describe any changes in their approach to bonuses, it was not possible to identify why this gap has narrowed.
- In 2021 there were high pay gaps of up to 60% in male-dominated sectors such as sport, construction, finance and manufacturing, and up to 80% in the same sectors in 2022. The average pay gap in the most male-dominated organisations in 2022 was 24%. This is double the headline average of 12%, and an increase from 21% in 2021.
- There remain very high bonus gaps of up to 100% in male-dominated sectors such as sport, manufacturing, wholesale and retail trade, and transport and storage. This aligns with existing evidence on the causes of the gender pay gap. In the wider labour market female-dominated organisations generally do not have high pay gaps.
- Since 2018 there has been a significant increase in the proportion of employers publishing a narrative report alongside their pay gap information, up from 30% in 2018 to 48% in 2022. This is positive, as publishing data alone will not lead

to change. However, the vast majority of analysis (76%) was found to be of poor quality, indicating employers may still need to build their understanding of how to use their data.

- The proportion of employers that have committed to action to tackle their pay gap has almost doubled from around one in five (19%) in 2018 to more than a third (36%) in 2022. Encouragingly that the quality of actions has also increased with just over a fifth (21%) considered satisfactory and another fifth (21%) considered good. There has also been a doubling in the proportion of employers setting targets, albeit from a very low base, from 5% in 2018 to 11% in 2022.
- Despite some green shoots, we are still a long way from seeing the level of consistency and commitment needed to tackle women's inequality in the workplace. Most employer action remains small-scale and untargeted, which is not enough.
- When the gender pay gap reporting regulations were first introduced, Close the Gap highlighted a fundamental weakness: they do not mandate employers to take action. The UK Government asserted that organisations would be motivated to act by their pay gap data, however it is clear that this theory of change is flawed.

The evidence shows that reporting alone does not create change. Close the Gap calls for a strengthening of the regulations to require employers to use their data to develop and publish an action plan, and to report on progress against it.

2. Introduction

It is now five years since the introduction of gender pay gap reporting for large private and third sector organisations. The UK Government suspended this requirement in 2020 due to the pandemic, reintroducing it in 2021, albeit with an effective six month extension in the reporting deadline[1]. Employers covered by the regulations have therefore now been required to report their gender pay gap information four times.

Gender pay gap reporting regulations

The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 requires private and third sector employers with 250 or more employees to report a range of information including:

- Mean and median gender pay gap figures;
- The gender gap in bonus earnings, and the proportion of men and women receiving bonuses; and
- The proportion of men and women in each pay quartile.

English public bodies, non-devolved public bodies, cross-border bodies, and the Scottish Parliament are obliged to report their gender pay gap information under the separate Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017. Scottish public bodies with more than 20 employees already report their gender pay gap under the Equality Act 2010 (Specific Duties) (Scotland) Amendment Regulations 2016.

This paper sets out the findings of Close the Gap's assessment of Scottish employer pay gap reporting in 2021 and 2022. It enables a comparison with our previous assessments in 2019 and 2018, allowing for the identification of themes over time and the extent to which the regulations have achieved their purpose of encouraging action to tackle the pay gap.

[1] The reporting deadline was effectively shifted from April 2021 to October 2021, as the Equality and Human Rights Commission announced it would not be enforcing reporting until 6 October 2021.

3. Methodology

The assessment included a cross-sectoral sample, including different-sized employers from 250+ to 10,000+ employees. This represents 50% of all Scottish employers who reported their gender pay gap information in October 2021 (n243). The same sample was assessed in April 2022, however 26 companies from the 2021 sample were not required to report in this period[2], leaving a sample of 217.

In 2021, 173 employers in the sample had published data on the gender gap in bonus earnings. In 2022, this figure was 151.

The data used was that submitted by employers to the UK Government's gender pay gap viewing service[3]. The assessment looked at:

- gender pay gap information,
- bonus gap information,
- whether a narrative had been published,
- whether an action plan had been published,
- whether targets had been set, and
- evidence of employer action since the previous reporting deadline.

[2] These employers may have had fewer than 250 employees at the snapshot date.
[3] https://gender-pay-gap.service.gov.uk/

4. Key findings

Gender pay gap information

In 2021:

- The average gender pay gap was 12%, while the average gender gap in bonus earnings was 33%.
- 82% of employers reported a pay gap in favour of men, 17% in favour of women and 1% had a zero pay gap.
- 78% of employers had a bonus gap in favour of men, 20% in favour of women and 2% had a zero bonus gap.

On average, men were one percentage point more likely to receive a bonus than women.
In 2022:

- The average gender pay gap was 12%, while the average gender gap in bonus earnings was 11%.
- 80% of employers had a pay gap in favour of men, 19% in favour of women and 1% had a zero pay gap.
- 81% of employers had a bonus gap in favour of men, 19% in favour of women and 1% had a zero bonus gap.
- On average, men were one percentage point more likely to receive a bonus than women.

Gender pay gap comparison		
Indicator	2021	2022
Average gender pay gap	12%	12%
% employers with pay gap in favour of men	82%	80%
% employers with pay gap in favour of women	17%	19%
% employers with no pay gap	1%	1%

Gender bonus gap comparison		
Indicator	2021	2022
Average gender bonus gap	33%	11%
% employers with bonus gap in favour of men	78%	80%
% employers with bonus gap in favour of women	20%	19%
% employers with no bonus gap	2%	1%
% male employees receiving bonus	47%	47%
% female employees receiving bonus	46%	46%

It is clear there has been little progress made in narrowing the gender pay gap, with the only shift being a slightly smaller proportion of employers having a pay gap in favour of men. The bonus gap information presents a similar picture in terms of the prevalence and direction of bonus gaps, however the average bonus gap itself has narrowed significantly from 33% to 11%. This is an ostensibly positive shift, however it was not possible to identify which factors influenced this reduction. The analysis of reports did not identify any organisations who provided a clear analysis of their bonus gap, or who described changing their bonus allocation processes.

One possibility is that this shift is analogous to the recent narrowing of the pay gap, which is not caused by an increase in women's average pay but rather a fall in men's average pay. Similarly, bonuses may be generally lower in 2022 resulting in a drop in men's bonus pay, with a smaller or no drop in women's bonus pay. It is also possible that organisations reduced some of their highest bonuses, which are more likely to be paid to men, due to economic uncertainty arising from the pandemic. It is not possible to identify this for certain as the vast majority of employers do not report the average bonus sums paid.

Sectoral breakdown

A sectoral analysis showed a similar picture in both reporting periods, with a positive correlation identified between high levels of occupational segregation, male-dominated sectors, and high pay and bonus gaps.

In 2021 there were high pay gaps of up to 60% in male-dominated sectors such as sport, construction, finance and manufacturing, and up to 80% in the same sectors in 2022. The average pay gap in the most male-dominated employers in 2022 was 24%. This is double the headline average of 12%, and an increase from 21% in 2021.

In both periods there were very high bonus gaps of up to 100% in male-dominated sectors such as sport, manufacturing, wholesale and retail trade, and transport and storage.

This aligns with existing evidence on the causes of the gender pay gap. In the wider labour market female-dominated organisations generally do not have high pay gaps.

Furlough

A significant proportion of Scottish employers participated in the furlough scheme during the pandemic. This did not affect whether or not an organisation had to report its gender pay gap, however it did affect some employers' pay gap calculations. Furloughed employees receiving less than full pay were excluded from gender pay gap and quartile calculations, as they were not counted as full-pay relevant employees. Bonus gap calculations were unaffected.[4]

It was therefore to be expected that furlough would impact on many companies' gender pay gap information, narrowing some and widening others. The assessment sought to identify any examples of this. However, only a small number of organisations mentioned furlough in their report: 18 in 2021 and 11 in 2022. A small number of those employers provided a fuller analysis that explained the impact of furlough on their gender pay gap and quartile information. However, most asserted that furlough had negatively impacted their gender pay gap but provided no analysis to substantiate this.

This assessment therefore was not able to generate any substantive findings in relation to the impact of furlough.

Analysis and action

The gender pay gap reporting regulations require employers to publish their pay gap information, however there is no requirement to publish an analysis of this data, nor actions to address any issues identified. Close the Gap's assessments have consistently identified that, while action remains voluntary, the regulations are unlikely to meaningfully tackle women's inequality in employment.

[4] Close the Gap (2021) Gender pay gap reporting and Covid-19: How to deal with furloughed staff Available at https://www.closeyourpaygap.org.uk/files/briefing-6.-furlough-and-pay-gap-reporting.pdf

Employer narratives

The assessment sought to identify how many organisations had published a narrative setting out an analysis of their pay gap information. The results present a mixed picture.

There was an increase in the proportion of organisations that had published a narrative describing their pay gap information. In 2021 over half of employers (55%) published a narrative, up on 30% in 2018, however in 2022 this had fallen back to 48%.

The assessment identified a small increase in the proportion of employers publishing better quality analysis. In 2022 almost a fifth (19%) of employer narratives were assessed as satisfactory, up on 13% in 2021, while 5% of 2021 narratives were assessed as good, compared to just 2% in 2021.

However, the findings indicate a decrease in the overall quality of the analysis set out. In 2021 the vast majority (84%) of narratives were assessed as poor quality with superficial and inaccurate analysis, an increase on 71% in 2019. In 2022 around three-quarters (76%) of narratives were rated poor. It is certainly positive that quality has increased since 2021, however there has still been a decline in quality overall since the first employer reports were published. Therefore, while more organisations are voluntarily publishing a narrative, this is not leading to an improvement in their analysis of their pay gap.

Quality of narrative		
Quality rating	2021	2022
Good	2%	5%
Satisfactory	13%	19%
Poor	84%	76%

Employer action

Looking at employer action, there is a slightly more positive picture. In 2021 one in three organisations (34%) published actions, a slight increase on 31% in 2019. In 2022 this had increased again to 36% of organisations, representing slow but steady progress.

It is still the case that a majority of actions set out by employers are poor quality and unlikely to narrow pay or bonus gaps, or tackle gender segregation in the workplace. However, there has been a significant improvement in the quality of actions overall. In 2020-2021, almost three-quarters (71%) of actions were assessed as poor. This fell to 59% of actions in 2021-2022, with 21% of actions rated satisfactory and 21% rated good: an encouraging shift.

Quality of actions		
Quality rating	2021	2022
Good	6%	21%
Satisfactory	23%	21%
Poor	71%	59%

The assessment also identified an increase in the proportion of organisations that had published targets, and that those employers tended to have better quality actions. In 2022, one in ten employers (11%) published targets, up on 7% in 2021, and 5% in 2018.

Many of those organisations reported progress towards the targets they had set. One in ten employers (11%) had demonstrated evidence of action they had taken since their last report, up on 8% in 2021. This aligns with good practice on tackling the gender pay gap: appropriate targets, accompanied with targeted action, can help drive activity and accountability which is more likely to lead to change.

5. Positive shifts

More meaningful actions

There is still much room for improvement in the level and quality of employer action on the gender pay and bonus gaps and occupational segregation. However, in 2022 the assessment identified a small number of organisations that had set better quality actions which have the potential to advance gender equality in the workplace, with some already seeing progress.

These actions focused on specific factors that underpin the gender pay gap, set out below.

Examples are based on a description of actions described in gender pay gap reports. There is no publicly available information on how these actions have been implemented in individual organisations. Close the Gap is therefore not able to comment on this.

While actions described here may represent improved practice, no single action is sufficient to tackle gender inequality. Employers must develop an action plan with a range of activity targeted at the most pressing issues in their organisation in order to achieve progress on tackling their gender pay gaps.

Pay

Analysis of pay and roles is a necessary step to identifying any equal pay issues, or if jobs typically done by women may be underpaid. These are key contributors to the gender pay gap.

Examples

The Cancer Research UK Beatson Institute **undertook a review of grades in order to identify any discrepancies in pay between men and women.** As a result, they made a small number of adjustments to the salaries of women in some roles.

Natural Power **completed a job evaluation exercise,** introducing a revised grading structure in order to ensure they are delivering equal pay.

Recruitment

Recruitment processes where there is a significant level of discretion involved in selection and appointment decisions, this can exclude women. Standardised recruitment processes can help to reduce bias and discrimination, and gender equality training for hiring managers is crucial as they are gatekeepers of the decision-making process.

Examples

Harper Collins UK has introduced **a blind recruitment process using a standardised application process instead of CVs alongside structured panel interviews.** They also have **mandatory inclusive hiring training for managers involved in recruitment** and they share recruitment data across the business so all departments are aware of any issues. Standardised recruitment processes can help to reduce bias in the recruitment process, and training on equality for hiring managers is crucial as they are gatekeepers of the decision-making process.

First Bus (First Group) has taken long-term action to attract more women and has doubled its female workforce since 2017. A significant contributor to this has been a **trial of part-time bus driver roles** (15-25 hrs per week) which has resulted in 50% of new hires being women, up from 2%. This is a good example of tackling barriers faced by women to male-dominated roles by increasing flexible working in better paid jobs.

Progression and promotion

Positive action is a lawful and impactful step that employers can take to increase the proportion of women in roles where they are underrepresented, and can help to tackle occupational segregation.

Examples

First Bus (First Group) has introduced a Step Up **development programme for women looking for their first line manager role:** 180 women have participated and 27% have been promoted. They also have a Step Forward **development programme for female line managers in preparation for more senior roles;** 45% of participants have achieved a promotion. As a result of these initiatives they have reduced vertical occupational segregation in the organisation.

As part of its 'IN, ON, UP' strategy, which focuses on attraction, retention and promotion, SSE have developed a **leadership management programme to help women advance.** As a result, the percentage of women applying for and getting senior roles has increased from 10% to 17%. This is a good example of developing measurable action and using indicators to chart progress towards a goal.

Occupational segregation

Occupational segregation is a key cause of the gender pay gap. The assessment found that many employers in highly segregated sectors described this as a sector- or society-wide issue and failed to set out actions for their own organisation. This creates a vicious circle, as occupational segregation in individual organisations is a cause and consequence of both sector- and society-level inequalities. Employers can help tackle this by taking action in their own organisation.

Example

CalMac Ferries has established **a working group to identify barriers to working at sea faced by women,** including around caring responsibilities and returning from maternity leave. They have held focus groups with female employees to understand their experiences and identify how they can improve practices. They have also placed **targeted advertising during Modern Apprentices Week to encourage young women into the organisation.**

Flexible working

Persistent gender norms mean that women still do the majority of unpaid care. Ensuring flexible and part-time options are available at all levels can help attract and retain more women, and close the pay gap.

Examples

HarperCollins UK has introduced a **day one right to request flexible working.** This may help to increase the use of flexible working in an employer, however a right to request is not a guarantee of flexible work. Line manager training on managing flexible working is key to improving access to flexible work for all employees.

As part of its process for deciding which roles were placed on furlough, CalMac Ferries prioritised staff who had caring responsibilities. As part of their support for homeworking, they **enabled staff to work flexibly around home schooling and additional care requirements.** This is a good example of identifying how particular practices have a disproportionate impact on women, and taking action to accommodate this.

Maternity/parental leave and return to work

The level of shared parental leave uptake by men remains low, and women spend longer periods out of the workforce after having a baby. This makes it harder for women to return to work, with many unable to access the flexible working they need, and moving into lower paid roles or out of the workforce altogether. Action to support women returners and encourage men to take parental leave can help tackle this.

Examples

In 2021, as part of a range of actions on maternity and parental policies, abrdn introduced **40 weeks of paid paternity leave.** As a result of this they have achieved an increase in men taking parental leave, and in the length of parental leave taken. This can help to tackle gender norms in the workplace.

Natural Power have introduced **a scheme to contribute to the cost of childcare for employees returning to work after maternity or parental leave,** which pays returners a £400 bonus payment per month for 12 months.

for leaving. This can help to identify if there are particular workplace issues that lead to women being more likely to leave.

SSE's Group Executive Committee holds **monthly meetings to discuss inclusion and diversity**, making senior commitment to equality visible.

Targets and accountability

The assessment identified that more employers are reporting on actions they have taken, including progress against targets where they have been set. This indicates that setting measurable actions and targets can increase accountability on tackling the gender pay gap. However, it was also identified that a number of employers that have previously set low-level targets that they have already met are retaining those targets, rather than setting a new, more ambitious goal.

Targets should be realistic, but they should also be stretching and have a focus on future improvement, rather than maintaining a status quo where issues remain. Having a consistent and medium-long term action plan is more likely to create change in an organisation, as focus is retained on long-term solutions instead of smaller-scale actions.

Examples

First Bus (First Group) has **reported on the same four commitments since their first pay gap report in 2018.** These are increasing the number of female applicants; improving retention through creating policies that enable employees to combine work and caring roles; supporting and developing women to enable them to progress to higher paid roles, and creating a more inclusive workplace. As set out in previous examples of First Bus's actions, they have made measurable progress across these commitments.

Edrington identified that women were underrepresented in their job applicants, and they **set a target to have 50% female candidates at interview stage for all permanent roles.** This has driven an increase in women being interviewed for roles from 33% in 2020 to 45% in 2021. As they still have progress to make, Edrington has retained this target and actions to work towards it.

6. Persistent problems

Overstating the difference between the gender pay gap and equal pay

Most organisations which published a narrative alongside their gender pay gap information included a statement along the lines of: *"It is important to understand that the gender pay gap is not the same as equal pay, which focuses on men and women being paid the same for equal work."*

This is evidence of the widespread misunderstanding about what the gender pay gap is, which often results in its conflation with equal pay. The gender pay gap and unequal pay are two different but related issues. In attempting to clarify the distinction this appears to have had the effect of many employers ruling out unequal pay entirely as a cause of their pay gap. While discriminatory pay practice does not explain all of the gender pay gap, it is still a significant cause across many workplaces.

Superficial and incorrect analysis

A majority of companies correctly identified occupational segregation as a key cause of their gender pay gap. However, this was often the limit of their analysis, with most failing to interrogate this further or identify any other contributing factors. Occupational segregation looks different in different organisations, levels and roles, and has a range of causes. Limited analysis leads to less targeted actions, representing a poor return on the resources employers put into gathering and reporting data, and a missed opportunity.

The assessment also identified a number of cases of flawed analysis where employers incorrectly cited particular factors as causes of their gender pay gap. For example, one large organisation[5] had hired fewer than ten new employees at the lowest grade who were all women, and stated that this accounted for a 4% increase in their gender pay gap. The number of employees hired represented no more than 1% of its workforce, therefore it is statistically impossible for such a small percentage of employees to exert

[5] This organisation was listed in the 'employer size' category of '1000-4999 employees'

an increase of this size. Bad analysis is unlikely to drive good quality actions, and could lead to employer complacency on the causes of their pay gaps.

Some gender pay gap information suggested issues with the reliability of the data. For example:

- gender pay gap information in employer reports differing from the data they reported on the UK Government portal,
- quartile sets reporting a 75/25 split in every quartile,
- a 0% pay gap but significant reported occupational segregation.

This reflects the limitations of the regulations, as companies are only considered for enforcement action if they have not published their gender pay gap information. Poor quality analysis has been the focus of previous enforcement work by the Equality and Human Rights Commission, however there is no substantive assessment made of the reliability of employer data. This means organisations are not getting the support they need to address any issues, and could encourage complacency among employers due to a lack of accountability.

Ongoing widespread complacency

In every reporting period Close the Gap's assessment has found that most pay gap reports state "we have no issue with equal pay", while at the same time, providing no information on the steps they had taken to ensure equal pay for women. Evidence shows that the vast majority of Scottish employers have not done an equal pay review[6], and in this assessment, only one organisation mentioned plans to do a pay review. We also identified a number of pay practices that could create equal pay issues, such as pay supplements that are paid predominantly to male workers in an organisation.

Complacency is evident in a majority of employer narratives. Many organisations included statements such as "equality is at the heart of everything we do" and "we are committed to gender equality" but failed to describe any action they had taken. A significant proportion state that they "compare favourably" with the sectoral or national pay gap. There is a similar picture on occupational segregation, with many employers describing this as an "industry" or "national" issue, stating they have "no direct control over the gender of applicants", and taking no responsibility to tackle it in their own organisation.

[6] *IFF Research* (2015) *Company Reporting: Gender pay data, Goverment Equalities Office* and Winterbotham et al (2014) Company *Reporting: gender pay gap data,* Government Equalities Office: London'

The assessment also identified that the presentation of pay and bonus data in organisations' reports frequently focuses on the lower or more favourable data points. For example, those whose median pay gap is higher have focused their narrative on the mean, and vice versa. Framing the data in this way suggests some employers' primary focus is the reputational risk associated with gender pay gap reporting.

This complacency remains a significant impediment to employer action. Having a lower gender pay gap than the national figure is not necessarily an indicator of good employer practice. The presence of occupational segregation at industry or national level does not mean an employer cannot create change in their own company. Gender inequality at the labour market level is a product of inequalities in individual organisations. Without action from employers, the cycle of women's inequality in employment will persist.

Actions that are unlikely to create change

While the assessment identified an increase in good quality actions, the majority of actions were small-scale initiatives and unlikely to tackle systemic gender inequality in the workplace. For example:

- Employee networks focused on diversity and inclusion, that are unlikely to have the influence to secure meaningful practice change;
- Mentoring programmes that seek to build women's confidence, suggesting the primary issue lies with women and not employer practice; and
- One-off, short equality and diversity or unconscious bias training – a model that is shown to be ineffective and build complacency[7].

Many organisations had signed up to industry charters, such as the Women in Aviation and Aerospace Charter and the Finance Charter, however few had set out what action they were taking as a result. Many employers also described the same generic, gender-blind interventions which had been committed to in previous reports, with no indication of the success of these initiatives in the past year.

There were limited actions which demonstrated recognition of the barriers women face in the workplace. Employer practice is a key factor underpinning women's labour market inequality: it is critical that organisations recognise their role in closing the gender pay gap and commit to change. If employers fail to take responsibility for their contribution to the pay gap it will prevent progress on gender inequality.

[7] Equality and Human Rights Commission (2018) Unconscious bias training: an assessment of the evidence for effectiveness Available at https://www.equalityhumanrights.com/en/publication-download/unconscious-bias-training-assessment-evidence-effectiveness

7. Conclusion

The findings of this assessment indicate that, despite a small number of organisations demonstrating progress, the vast majority are still not taking substantive action to tackle the gender pay gap. Four years on from the first employer reports, over half have not published a narrative to explain their pay gap information, and two thirds have not committed to action.

Although the quality of actions published has improved, we are still a long way from seeing the level of consistency and commitment needed to tackle women's inequality in the workplace. Employers need to move from small-scale, generic initiatives to longer term action plans that target the gendered inequalities evident in their organisations.

In 2018, the first assessment highlighted that the fundamental weakness of the regulations is that organisations are not required to take action. The rationale for not requiring employer action on the pay gap was that calculating and publishing their pay gap would itself compel them to take action. In 2022 it is evident that this theory of change is flawed and is simply sustaining the gender pay gap and women's inequality at work.

The findings of Close the Gap's assessments of employer pay gap reporting in the public, private and third sectors[8], along with international evidence on pay gap reporting regimes[9], shows that reporting alone does not create change. Close the Gap calls for a strengthening of gender pay gap reporting regulations to require organisations to use their data to develop and publish an action plan, and to report on progress against it.

[8] Close the Gap (2020) One year on and little change: An assessment of Scottish employer gender pay gap reporting, Close the Gap (Unpublished) 2020 *Internal assessment of public bodies' compliance with the public sector equality duty,* and IFF Research (2015) *Company Reporting: Gender pay data,* Government Equalities Office

[9] Global Institute for Women's Leadership (2021) *Bridging the gap? An analysis of gender pay gap reporting in six countries*

Close the Gap works in Scotland on women's labour market participation. We work with policymakers, employers and unions to influence and enable action that will address the causes of women's inequality at work.

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Close the Gap

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