

# Gender Pay Strategy and Pay Reporting

Summary of Policy Recommendations

## 1. Executive Summary

We call for prompt action by Government to bring Section 19 of the Employment Act (Northern Ireland) 2016 ('the Act')<sup>1</sup> into force, and to introduce a gender pay strategy and associated action plan, in tandem with the introduction of Gender Pay Gap Reporting Regulations ('the GPGR Regulations'), in Northern Ireland.

### *Our recommendations:*

- **Employment Act (Northern Ireland) 2016:** Bring Section 19 of the Act into force, updated as required; and support good practice prior to its enactment.
- **Gender Pay Strategy:** Implement a gender pay strategy and action plan for Northern Ireland, beginning work without further delay to allow this to occur in tandem with GPGR Regulations.
- **Gender Pay Gap Reporting (GPGR) Regulations:** Introduce GPGR Regulations; *initially* apply requirements to large employers; review after 5 years; and encourage all employers to address gender pay gaps.
- **Employer Duties:** Require publication of gender pay gap data; consider additional pay gap reporting requirements; and clarify provisions of the Act.
- **Employer Gender Pay Action Plans:** Ensure gender pay strategy supports employer actions; clarify employer requirements; and ensure employers: consult on, and publish action plans widely; consider actions to address ethnicity/ disability pay gaps; and review annually.
- **Guidance, Compliance, Enforcement:** Ensure support for employers; highlight benefits of alignment with existing equality reviews; ensure effective enforcement mechanisms; and consider roles and resourcing.

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<sup>1</sup> See Section 19, [Employment Act \(Northern Ireland\) 2016](#)

### 2. Introduction and Context

- 2.1 The Equality Commission for Northern Ireland ('the Commission') calls for prompt action by Government to bring Section 19 of the Employment Act (Northern Ireland) 2016 ('the Act') into force, and to introduce a gender pay strategy and associated action plan for Northern Ireland, in tandem with the introduction of Gender Pay Gap Reporting Regulations ('the GPGR Regulations'), in Northern Ireland.
- 2.2 We set out below a number of recommendations. These have been informed by the views of a number of stakeholders, including representatives from trade unions, the women's sector and employer organisations.
- 2.3 The Act provides for the making of GPGR Regulations (by 30 June 2017), and requires the publication of a gender pay strategy/action plan within 18 months of the Act receiving Royal Assent. However, to date, these provisions have not been brought into force, nor has any underpinning consultation on draft GPGR Regulations or on a gender pay strategy/action plan been commenced.
- 2.4 In Great Britain (GB), 2017 gender pay gap reporting regulations ('the GB GPGR Regulations') require large public, private, and voluntary sector employers (with 250 employees or more) to publish gender pay gap information<sup>2</sup>. As a result of provisions in the Act, as yet not in force, there are already variations between the requirements to be placed on employers in Northern Ireland and those in place for large employers in GB.
- 2.5 It is also important at the outset to stress that a consideration of 'gender pay gaps' is separate from, and different to, that of 'equal pay'.<sup>3</sup>

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<sup>2</sup> See [The Equality Act 2010 \(Gender Pay Gap Information\) Regulations 2017](#). Public sector employers with 250 or more employees that are listed in [The Equality Act 2010 \(Specific Duties and Public Authorities\) Regulations 2017](#) are also required to publish information on their gender pay gap.

<sup>3</sup> A gender pay gap is a measure of *overall average differences* in the earnings of men and women in an organisation, sector, or society etc. Equal pay requires that men and women performing the same work in the same organisation must receive *equal pay ('equal pay for equal work') for individuals*. Further contextual information can be found in the full version of this paper (see end of paper for link to website).

### **3. Employment Act (Northern Ireland) 2016: Bring Section 19 of the Act into force, updated as required; and support good practice prior to its enactment.**

Government should urgently bring into force Section 19 of the Act, updating provisions where required, including timelines for compliance with the duties and responsibility for implementing the duties. Given delays to enactment, immediate action should be taken to encourage and support employers to proactively address pay gaps.

#### ***Urgently bring Section 19 of the Act into force, updated as required - including timelines for compliance with the duties and responsibility for implementing the duties.***

- 3.1 We recommend that Section 19 of the Act is brought into force as a matter of urgency. These provisions provide for the making of the GPGR Regulations by the former Office of the First Minister and Deputy First Minister ('OFMDFM') [now The Executive Office ('TEO')], and place a duty on TEO to make the first set of Regulations within a certain time period. There is also a duty to publish a gender pay strategy and action plan within a specified timeframe.
- 3.2 The timelines set out in the Act as regards compliance with the duties have now expired. Any updated timelines as regards the making of the first set of GPGR Regulations and publishing a gender pay strategy and action plan should be consistent with the broad timelines originally envisaged<sup>4</sup>.
- 3.3 We understand that it is intended that the Department for Communities ('the Department') be allocated responsibility for delivery of these provisions, in the event that the provisions are brought into force. As such, the Act would require amendment so as to formally transfer powers and statutory responsibility for compliance with the duties therein, from OFMDFM (now TEO) to the Department.
- 3.4 Further, as set out in more detail below, there is a need for clarification as regards certain provisions in Section 19 of the Act; for example, clarification as regards the term '*workers*', which is used in contrast to other provisions in the Act which place a requirement to publish information relating to the pay of '*employees*'.

#### ***Take steps to encourage and support good practice by employers to tackle pay inequalities, including prior to enactment of the Act's provisions.***

- 3.5 Given delays to bringing into force Section 19 of the Act, and to the introduction of GPGR Regulations, immediate action should be taken to encourage and support employers across all sectors to proactively identify and address pay gaps, including by publishing pay data.

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<sup>4</sup> For example, the Act provided that the first set of Regulations were to be made by OFMDFM by June 2017 and the gender pay strategy and action plan were to be made within 18 months of the Act receiving Royal Assent. The Act received Royal Assent on 22 April 2016.

- 3.6 Actions by employers could, for example, include collecting and analysing gender pay gap data and implementing, on a voluntary basis, a gender pay action plan aimed at addressing any identified pay gaps. It could also include publishing gender pay gap data, as well as data on ethnicity and disability pay, provided it does not breach data confidentiality, and the data allows for reliable and meaningful assessment.
- 3.7 We recommend public bodies, including Government Departments, lead by example, including by voluntarily publishing pay data and by implementing measures to address pay inequalities.

### **4. Gender Pay Strategy: Implement a gender pay strategy and action plan for Northern Ireland, beginning work without further delay to allow this to occur in tandem with GPGR Regulations.**

Government should promptly implement a gender pay strategy and action plan for Northern Ireland to address structural factors within society and the workplace; and should commit to introducing this strategy and action plan in tandem with the implementation of the GPGR Regulations, beginning work without further delay to allow this to occur.

#### ***Promptly implement a gender pay strategy and action plan for Northern Ireland to address structural factors within society and the workplace.***

- 4.1 A gender pay strategy and action plan for Northern Ireland is required to address structural factors both within society and within the workplace.
- 4.2 Wider structural actions should include addressing, for example, gender stereotyping; education and career choices<sup>5</sup>; caring roles; occupational segregation with women working in lower grades and being concentrated in low paid occupational sectors; women's concentration in part-time work where they are at risk of low pay; access to childcare, etc.<sup>6</sup>.
- 4.3 Actions within the workplace should include tackling, for example, gender stereotyping; the lack of well-paid part-time flexible work; that women are less likely to progress to senior levels in an organisation; direct/indirect discrimination against women, including due to pregnancy / maternity<sup>7</sup> and unequal pay; and that there are fewer women working in certain more highly paid professions.
- 4.4 The Commission's 2016 '*Gender Priorities and Recommendations*'<sup>8</sup>, sets out a range of recommendations that will assist directly and indirectly with tackling gender pay disparities.

<sup>5</sup> See ECNI (2017) *Statement on Key Inequalities in Education* on the barriers experienced by women in education.

<sup>6</sup> See ECNI (2018) *Statement on Key Inequalities in Employment* which highlights the inequalities experienced by women in employment.

<sup>7</sup> See ECNI (2016) *Expecting Equality-Summary: A Formal Investigation into the treatment of pregnancy workers and mothers in Northern Ireland workplaces*.

<sup>8</sup> ECNI (2016) *Gender Equality Policy Priorities and Recommendations*, Summary version. Recommendations include, for example, in the area of gender law reform, prohibiting 'pay secrecy clauses' and introducing mandatory equal pay audits.

***Government should commit to developing and introducing this strategy and action plan in tandem with the implementation of the GPGR Regulations, beginning work without further delay to allow this to occur.***

- 4.5 To ensure the delivery of coordinated actions at both societal and employer level, we recommend that the Department publishes, following public consultation, an effective gender pay strategy and action plan *in parallel with* the development and implementation of the GPGR Regulations.
- 4.6 We recommend the Department progresses work to develop a gender pay strategy and action plan without further delay.

### **5. Gender Pay Gap Reporting (GPGR) Regulations: Introduce GPGR Regulations; *initially* apply requirements to large employers; review after 5 years; and encourage all employers to address gender pay gaps**

The GPGR Regulations should be introduced as a matter of urgency. The GPGR requirements should *initially* apply to employers with 250 or more employees. The Regulations should be reviewed after 5 years, to include a review of employer threshold size and their general operation. Employers **not** subject to GPGR requirements should be encouraged to proactively address gender pay gaps.

#### ***Introduce GPGR Regulations as a matter of urgency.***

- 5.1 Government should commit to introducing, as a matter of urgency, GPGR Regulations in Northern Ireland. These Regulations should be effective in helping to tackle the specific nature and extent of the gender pay gap in Northern Ireland; reflect the specific structure and nature of the Northern Ireland workforce, and ensure that any requirements are proportionate, including being mindful of potential costs on employers and to the public purse.
- 5.2 There is a strong economic case for tackling gender pay disparities and promoting gender equality in the workplace. Any consideration of costs should therefore also consider their investment value in advancing equality and improving workforces and work places.

#### ***Initially apply the GPGR requirements to employers with 250 or more employees.***

- 5.3 If broadly similar gender pay gap reporting requirements are introduced in Northern Ireland to those under the GB GPGR Regulations, then we recommend that the GPGR requirements should initially apply to public, private, and voluntary sector employers with 250 or more employees.
- 5.4 However, as set out further below, we consider there is a need for clarity on what specific requirements are envisaged in this area at this stage.



5.5 For example, should the intent of the legislation be to require employers to publish cross-tabulated information by quartile, gender, disability, and ethnicity, then balancing this requirement with retaining the anonymity of individual employees will be increasingly problematic as disaggregation increases or employer size decreases.

***Review the GPGR Regulations after 5 years, including a review of their general operation and employer threshold size.***

5.6 Government should commit to reviewing the GPGR Regulations promptly after 5 years of operation, to include a consideration of their general operation and the merits or otherwise of lowering the employer threshold size.

5.7 Specifically, we recommend that the five-year review should include, as a minimum, a consideration of:

- an overall assessment of the impact and effectiveness of the GPGR Regulations in helping to eliminate gender pay differences, particularly as regards requirements that are unique to Northern Ireland;
- the merits or otherwise of lowering the employer threshold, with particular consideration being given to the specific composition of the private sector workforce in Northern Ireland;
- recommendations arising from Parliamentary Committees in GB; as well as from international best practice, including from the European Commission;
- the merits or otherwise of employers publishing gender pay gap information by the Standardised Occupation Classification (SOC) categories<sup>9</sup>;
- the degree of compliance with the GPGR Regulations, including as regards the publication of gender pay information and gender pay action plans;
- a review of the effectiveness of gender pay action plans, including the degree to which employers have taken steps to eliminate gender pay differentials;
- the level and effectiveness of advice and support for employers so as to enable them to comply with the GPGR requirements;
- actions, including wider structural actions, that should be taken to assist employers and others to eliminate gender pay gaps including through the Department's gender pay strategy and action plan (a review of actions should also form part of the evidence base for a review of the gender pay strategy);
- any review arising out of the implementation of the GB GPGR Regulations.

***Encourage, via Guidance, employers not subject to GPGR Regulations to proactively assess and address gender pay gaps.***

5.8 Guidance on gender pay reporting should encourage employers who are not subject to the GPGR Regulations, to proactively assess and address any gender pay gaps and adopt good practice.

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<sup>9</sup> In particular, consideration should be given to employers publishing additional figures showing the gender pay gap by SOC categories or major occupation groups, such as managers, directors, senior officials; professional occupations, skilled trade occupations, etc. Such information would enable employers to assess the nature and degree of the gender pay gap within different occupation groups within their organisation.

- 5.9 This should include encouraging such employers to implement, on a voluntary basis, the robust assessment of appropriately collated gender pay data; the implementation of a gender pay action plan aimed at addressing any identified pay gaps; appropriate engagement with employees and employee representatives when developing and/or reviewing their action plans; and voluntarily publishing their gender pay data, provided it does not breach data confidentiality.
- 5.10 Employers should also implement the Commission's good practice recommendations relating to equal pay, including as set out in the Commission's Code of Practice on Equal Pay<sup>10</sup>.

## **6. Employer Duties: Require publication of gender pay gap data; consider additional pay gap reporting requirements; and clarify provisions of the Act.**

Action is required to: require employers to publish data on gender pay gap, bonus gender pay gap, and proportion of males / females receiving bonuses and in each quartile band; consider requiring employers to publish full-time and part-time gender pay gap figures; clarify rationale for limiting requirements to publish data on ethnicity and disability; clarify the specific intent of the requirement to publish pay data on ethnicity and disability; consider data to be published versus a wider set of data that employers can collect/ analyse; clarify rationale for the focus on 'employees' and/or 'workers'; require publication of gender pay data on a common fixed date on employer/government websites; and consider coding of employers by SIC.

### ***Require employers to publish data on gender pay gap, bonus gender pay gap, and proportion of males / females receiving bonuses and in each quartile band.***

- 6.1 Employers subject to the GPGR Regulations should be required to publish data relating to their organisations' gender pay gap (mean and median); bonus gender pay gap (mean and median); proportion of males / females receiving bonus payments; and proportion of males / females in each quartile band.
- 6.2 As set out in more detail further below, we also consider that there is a wider set of data which employers subject to the GPGR Regulations can usefully collect, analyse and/or publish in order to develop their evidence base and to assist them with understanding the nature and extent of any gender pay disparities within the workplace.

### ***Consider requiring employers to publish full-time and part-time gender pay gap figures.***

- 6.3 The Department should consider requiring employers to analyse and publish additional discrete gender pay gap figures for each of full-time, and part-time work; and the proportion of males / females in each quartile thereof, where sufficient numbers make it robust to do so.

<sup>10</sup> ECNI Code of Practice on Equal Pay (2013).



### **Clarify rationale for limiting requirements to publish data on only ethnicity and disability.**

- 6.4 The Department should clarify the rationale for limiting the requirement in the Act to publish pay information in relation to only *ethnicity* and *disability*, and consider including wider characteristics that may impact on gender pay differences, for example, ‘age’ and ‘with or without dependants’.
- 6.5 We note, for example, there is evidence that the gender pay gap for women over 40 is significantly higher than for women under 40<sup>11</sup> and that the arrival of children accounts for the gradual widening of the gender wage gap with age<sup>12</sup>.

### **Clarify the specific intent of the requirement to publish pay data on ethnicity and disability.**

- 6.6 The Department should clarify the intended purpose and focus of the information to be published in relation to the requirement under the Act to publish pay information that includes statistics on ‘workers within each pay band’ in relation to *ethnicity* and *disability*.
- 6.7 Specifically, it is not clear what statistics are to be included and if this requirement is intended to mean that the gender data for each pay band should be further cross-tabulated / disaggregated. There is also a need for clarity and guidance for employers on how data in relation to ethnicity and disability should be collected/reported on.

### **Consider data to be published versus a wider set of data that employers can collect/ analyse.**

- 6.8 The Department should consider the specific content and format of data and statistics that employers are required to publish, versus a wider set of data that they may be permitted to collect and analyse.
- 6.9 We consider that there is a wider set of data which employers subject to the GPGR Regulations can usefully collect/ analyse in order to develop their evidence base and to assist them with understanding the nature and extent of any gender pay disparities within the workplace. For example, employers in those sectors where overtime is a significant element of remuneration, should be encouraged to voluntarily collect and analyse details of overtime pay, including within different quartiles.
- 6.10 A distinction between which headline figures / data must be published versus data which may be collected solely for the purpose of underlying analysis may aid the understanding of trends without impacting on individual anonymity.

### **Clarify rationale for the focus on ‘employees’ and/or ‘workers’.**

- 6.11 The Department should clarify the purpose and rationale for the focus of separate parts of the Act on ‘employees’ and ‘workers’.

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<sup>11</sup> For example, as highlighted in the Women and Equalities Committee’s Inquiry Report, the UK Government has recognised that women over 40 experience the most pronounced gender pay gap. The Committee recommended that gender pay gap figures are broken down by age. See Women and Equalities Committee Inquiry report on the Gender Pay Gap (2016), 2<sup>nd</sup> Report of Session 2015/16.

<sup>12</sup> See IFS (2016) Gender Wage Gap, Briefing Note, BN186.

6.12 We note the requirement for pay information to also include statistics on “workers within each pay band in relation to ethnicity, and disability”<sup>13</sup>. The term ‘workers’ in this context is used in contrast to other provisions in the Act which place a requirement to publish information relating to the pay of ‘employees’ (to see if there is a difference of pay between male and female employees).

***Require publication of gender pay data on a common fixed date on employer/ government websites.***

6.13 Employers subject to the GPGR Regulations should be required to publish gender pay data on a common fixed date on their own website and a designated government website; and consideration should be given to the merits of the date being consistent with the publication dates under the GB GPGR Regulations.

6.14 While we are recommending that the date of publication should be consistent with the dates used in GB, the Commission has not at this time formed a view as to a frequency for the publication of gender pay statistics in Northern Ireland (e.g. annual or triennial).

***Consider coding of employers by Standard Industrial Classification (SIC).***

6.15 The Department should consider coding employers by Standardised Industrial Coding (SIC).

6.16 SIC provides a framework for the collection, tabulation, presentation and analysis of data by industry, and provides an established and convenient way of classifying industrial activities into a common structure<sup>14</sup>.

**7. Employer Gender Pay Action Plans: Ensure gender pay strategy supports employer actions; clarify employer requirements; and ensure employers: consult on, and publish action plans widely; consider actions to address ethnicity/ disability pay gaps; and review annually.**

Action is required to ensure that actions required by employers are supported by the content and delivery of a gender pay strategy and action plan for Northern Ireland; to clarify requirements on employers as regards action plans; and ensure employers should: publish action plans on employer/government websites; consult with employees on action plans; consider actions to address ethnicity/ disability pay gaps; and review action plans at least annually.

***Ensure that actions required by employers are supported by the content and delivery of a gender pay strategy and action plan for Northern Ireland.***

7.1 We welcome the requirement under the Act for employers with gender pay gaps to develop and publish action plans to eliminate gender pay differences.

<sup>13</sup> Section 19 (6) (f) of the Act.

<sup>14</sup> See ONS (2007) [UK Standard Industrial Classification of Economic Activities 2007](#).

- 7.2 Government must however ensure that the delivery of a gender pay strategy and action plan for Northern Ireland complements the actions required from employers, by delivering on a wider set of actions to address structural barriers (for example, childcare; careers advice; stereotyping; caring roles, etc.).

### ***Clarify requirements on employers as regards action plans.***

- 7.3 The Department should clarify whether or not the GPGR Regulations can impose *requirements* on employers as regards the content/ implementation of gender pay action plans under the Act, and if not, if it intends to bring forward legislation to enable it impose such requirements.
- 7.4 We recommend a number of specific inclusions (set out further below) as requirements, where possible, or failing that as good practice recommendations, to be placed on employers in relation to the development, implementation, monitoring and review of a gender pay action plan.

### ***Employers should publish action plans on employer/ government websites.***

- 7.5 We recommend that employers publish their gender pay action plans on a designated government website, as well as on their own website, at the same time as, and alongside their pay data.
- 7.6 We note that there is no timetable in the Act for the publication of gender pay action plans.

### ***Employers should consult with employees on action plans.***

- 7.7 We recommend that employers consult with employees and/or employee representatives during the development and review of their gender pay action plans.

### ***Employers should consider actions to address ethnicity/ disability pay gaps.***

- 7.8 Depending on the specific intended focus of the GPGR requirements, in addition to actions to address any gender pay gap, we recommend that employers consider including measures in action plans designed to address gender pay gaps (or pay gaps) related to the grounds of ethnicity and disability, where such pay differences exist.

### ***Employers should review action plans at least annually.***

- 7.9 We recommend that employers review progress on implementing gender pay action plans at least annually. The review should include an outline of progress made, lessons learnt and any revised actions to address identified gender pay gaps.
- 7.10 The publication of any subsequent gender pay action plan should include a review of the efficacy of the earlier action plan (to include progress made, lessons learnt and any revised actions to address identified gender pay gaps).

**8. Guidance, Compliance and Enforcement: Ensure support for employers; highlight benefits of alignment with existing equality reviews; ensure effective enforcement mechanisms; and consider roles and resourcing.**

Action is required to ensure effective support and guidance for employers; to highlight *via* Guidance potential benefits of aligning action planning with existing employer equality reviews; clarify enforcement and compliance provisions and ensure effective enforcement mechanisms; set out advice/ guidance roles and remit and resourcing; and set out enforcement roles and remit, and resourcing.

***Ensure effective support and guidance for employers.***

- 8.1 The Department should ensure that employers have effective support, training and guidance, and allow a sufficient lead in time to the introduction of the GPGR Regulations in order to give employers time to prepare for compliance.
- 8.2 A sufficient lead in time to the introduction of the GPGR Regulations is also particularly important in light of the unique and additional requirements under the Act that will apply to employers in Northern Ireland who are to be subject the Regulations<sup>15</sup>; including the requirements to produce a gender pay action plan and to publish pay information that includes statistics on ethnicity and disability.

***Highlight, via Guidance, potential benefits of aligning action planning with existing employer equality reviews.***

- 8.3 Guidance on gender pay gap reporting should make clear the potential for increased efficiency and effectiveness by developing/ publishing gender pay actions plans *in parallel with* existing employer equality reviews.
- 8.4 We consider that there is potential for such an approach to not only allow for operational efficiencies, but also add to the potential effectiveness of analyses and target interventions. The potential for increased efficiency and effectiveness by developing/ publishing gender pay actions plans *in parallel with* existing employer equality reviews should therefore be highlighted in any Guidance produced on gender pay gap reporting.

***Clarify enforcement and compliance provisions and ensure effective enforcement mechanisms.***

- 8.5 The Department should clarify how the provisions in the Act will be enforced and what constitutes compliance with the Act and the GPGR Regulations.

<sup>15</sup> Subject to provisions in Act being brought into force.

- 8.6 The Department should give consideration to introducing other measures to ensure effective enforcement; for example, the introduction of sanctions, such as loss of Government grants and exclusion from public contracts, in line with provisions under the fair employment legislation.
- 8.7 In light of the need to ensure that the publication of data will not result in a breach of data confidentiality and the identification of individuals, we also recommend that there is clarity for employers on when they are *not* required to publish gender pay information, as well as pay information on disability and ethnicity, particularly when small numbers are involved.

### ***Set out advice/ guidance roles and remit, and resourcing.***

- 8.8 The Department should give consideration to the specific roles and responsibilities to be delivered in relation to the provision of advice and guidance aligned to the Act and the GPGR Regulations, to ensure its effective implementation and the commensurate resourcing required to deliver this remit.
- 8.9 An advice and guidance role aligned to the Act could, if appropriately and adequately resourced, be added to the Commission's remit.
- 8.10 We consider there is scope to work jointly with partners, where this work is relevant to, and within, their remit, on activities related to raising awareness of employer obligations under the GPGR Regulations.

### ***Set out enforcement roles and remit, and resourcing.***

- 8.11 The Department should set out the specific roles and responsibilities to be delivered in relation to the enforcement under the Act and the GPGR Regulations; and the commensurate resourcing required to deliver this remit.
- 8.12 An enforcement role aligned to the Act could, if appropriately resourced, be added to the Commission's remit.



## 9. Conclusion

9.1 We call for prompt action to bring Section 19 of the Act into force, and to introduce a gender pay strategy and associated action plan, in tandem with the introduction of the GPGR Regulations, in Northern Ireland.

### *Our recommendations:*

- **Employment Act (Northern Ireland) 2016:** Bring Section 19 of the Act into force, updated as required; and support good practice prior to its enactment.
- **Gender Pay Strategy:** Implement a gender pay strategy and action plan for Northern Ireland, beginning work without further delay to allow this to occur in tandem with GPGR Regulations.
- **Gender Pay Gap Reporting (GPGR) Regulations:** Introduce GPGR Regulations; *initially* apply requirements to large employers; review after 5 years; and encourage all employers to address gender pay gaps.
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- **Guidance, Compliance, Enforcement:** Ensure support for employers; highlight benefits of alignment with existing equality reviews; ensure effective enforcement mechanisms; and consider roles and resourcing.

### *Further Information*



For further information, including our key point briefing and full versions of this document, visit: [www.equalityni.org/GenderPayPolicy](http://www.equalityni.org/GenderPayPolicy)

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**August 2019**

**Equality Commission**

FOR NORTHERN IRELAND