

Encouraging compliance with the gender pay gap regulations: a letter trial

Research report

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Executive Summary

Executive Summary

New legislation came into force in April 2018 requiring all UK organisations with 250 employees or more to report their annual gender pay gap (GPG) figures to the public through a designated government website.

In October 2017, the Government Equalities Office (GEO) commissioned the Behavioural Insights Team (BIT) to test whether different messages, delivered through letters, were more effective than others in encouraging employers to comply with the regulations. The letters aimed to encourage employers to report their figures and register on the government website ahead of the reporting deadline. This report presents the results of this trial.

This study was a randomised controlled trial (RCT). It had two outcome measures, both measured 7 and 10 weeks after the letters were sent out:

- the percentage of employers *reporting* their GPG figures,
- the percentage registering on the gender pay gap reporting service

The sample consisted of 7,015 relevant employers who had not yet registered on the government website a week before the letters were sent out, and who had not declared to GEO by that they are not in scope of the regulations, by the time the data was extracted (7 and 10 weeks after the letters were sent). These companies were randomly assigned, at the parent company level, to receive one of the four different letters described below.

The four letters

Condition 1 - control: This letter informed employers that they must report their gender pay gap figures by the set deadline. It stated that it was the second letter that GEO had sent to them, and that it had been noted that the employer hadn't registered online at time of issue. It also provided clear guidance on how to register. Unlike the treatment letters, it only provided *brief* guidance on how to report their figures. Finally, approaches that were found to be effective in similar contexts, such as using clear and authoritative language, were incorporated into the design of this letter.

Condition 2 - extra guidance: In addition to the information in the control letter, this letter provided employers with an additional single page of guidance on what they needed to do to report their gender pay gap, the deadlines for doing it, and links to more detailed guidance.

Condition 3 - social norms: In addition to the information in the control letter plus the extra guidance from Condition 2, this letter also included a social norm message highlighting that thousands of employers had already registered on the online service. The specific wording that was used was:

"Thousands of organisations like yours have already registered on the government's online reporting service and are preparing to publish their gender pay gap figures. If you do not act soon you could end up in a minority of organisations breaching the law."

Condition 4 - honest disclosure: In addition to the information in the control letter plus the extra guidance from Condition 2, this letter included a statement that most organisations had a pay gap, and that people prefer honest disclosure of negative information. The specific wording that was used was:

"Most organisations have a gender pay gap, and research shows that people prefer openness about this sort of information. Your << private sector: customers, employees and shareholders/ public sector: employees and the public>> want honest disclosure of your gender pay gap. Reporting it is the first step towards reducing it."

Results and conclusion

The treatment letters sent in October 2017 did not increase reporting levels or registration levels, compared to the control letter, 7 and 10 weeks after the letters were sent. This was a few months before the reporting deadline (of April 2018).

Based on the fact that all employers eventually reported their GPG figures (compliance reached 100% shortly after the deadline), we speculate in retrospect that the treatment letters did not have an effect, because employers were sufficiently informed, motivated, and focused on complying with the regulations. In other words, it is likely that the control letter that provided simple instructions was enough in itself to focus the attention of organisations on the task.

It is also plausible that employers did not feel that it was necessary to report so far in advance of the reporting deadline, and that they were concerned that early reporting might result in drawing negative media attention towards their organisation.

Introduction

Introduction

Policy background

New legislation came into force in April 2018 requiring all UK organisations with 250 employees or more to report their annual gender pay gap (GPG) figures to the public through a designated government website.

In October 2017, the Government Equalities Office (GEO) commissioned the Behavioural Insights Team (BIT) to test whether different messages, delivered through letters, were more effective than others in encouraging employers to comply with the regulations. The letters aimed to encourage employers to report their figures and register on the government website ahead of the reporting deadline. This report presents the results of this trial.

The trial was conducted as part of GEO's communications plan to employers, which consisted of three waves of letters to each employer that was subject to the new regulations. All letter variants informed employers about their legal duties and gave them instructions about how to register on the government portal. The three waves of letters were sent as follows:

- The first wave of letters was sent on the 1.10.2017
- The second wave was second on the 1.12.2017
- The third wave of letters was sent on the 9.2.2018

This trial tested different variants of letters during the *second wave* of letters only, with the intention that any findings from the trial would inform the design of the third wave of letters.

The Gender and Behavioural Insights programme

The trial was conducted as part of the Gender and Behavioural Insights programme (GABI) which is a two year research collaboration between BIT and GEO aiming to build the evidence base on how behavioural insights can improve gender equality.

Professor Katherine Decelles (University of Toronto) advised BIT on several relating to the design of the letters, for which we are very grateful.

Trial methodology and materials

Trial methodology and materials

This study was a randomised controlled trial (RCT). We used an RCT because it allows us to understand the way in which a particular intervention causes an effect on an outcome of interest.

In this study, employers in our sample were randomly assigned to receive one of four different letters. Importantly, randomisation into treatment groups was conducted at the parent company¹ level, meaning that private subsidiary companies that had the same parent company received the same letter. We had reason to believe that in many cases, different subsidiary companies that had the same parent company, were likely to have a unified approach for reporting their GPG figures. Issuing different letters would have not only confused them, but could have also undermined our ability to distinguish between the effects of different letters.

Sample

The trial sample consisted of employers who had not yet registered on the government website a week before the letters were sent out, and who had not declared to GEO that they were out of scope of the regulations, at the time the data was extracted. Because the number of companies declaring that they were not subject to the regulations grew with time, the sample size in this trial varies between time points, as outlined in Table 1 below. The corresponding number of unique parent companies is reported in this table as well.

Table 1. Sample size, 7 and 10 weeks after sending the letter

	Number of employers	Number of parent companies
Week 7	7,267	5,996
Week 10	7,015	5,797

The four letters

Condition 1 - control: This letter informed employers that they must report their gender pay gap figures by the set deadline. It stated that this is the second letter that GEO has sent to them, and that it has been noted that the employer hasn't registered online yet. It also provided clear guidance on how to register. Unlike the treatment letters, it only provided *brief* guidance on how to report GPG figures. Finally, approaches that were found to be effective in similar contexts, such as using clear and authoritative language, were incorporated into the design of this letter.²

¹ A parent company is a company that owns another company and can therefore control its operations.

² This was a central insight that was learnt in similar experiments that BIT ran with the pensions regulator when the new auto-enrolment regulations came into force.

Condition 2 - extra guidance: In addition to the information in the control letter, this letter provided employers with an additional single page of guidance on what they needed to do to report their gender pay gap, the deadlines for doing it, and links to more detailed guidance.

The hypothesis underlying this letter was that some employers were not fully aware of all the steps they needed to take to report their GPG figures. Also, in a different letter trial conducted by BIT, providing detailed guidance increased payments rates of corporation tax by companies in debt by 15%, compared to simply providing information.³ This demonstrates that companies do not always know what they need to do to comply with the law.

Condition 3 - social norms: In addition to the information in the control letter plus the extra guidance from Condition 2, this letter also included a social norm message highlighting that thousands of employers have already registered on the online service. The specific wording that was used was:

"Thousands of organisations like yours have already registered on the government's online reporting service and are preparing to publish their gender pay gap figures. If you do not act soon you could end up in a minority of organisations breaching the law."

The hypothesis underlying this letter was that employers were not sufficiently motivated to report their figures, and that informing them about the behaviour of other employers would encourage them to take action. This is based the evidence that social norm messages have been successful at influencing the behaviour of individuals in many settings, such as energy consumption⁴, organ donation⁵, and tax payments⁶. They have also been found to be effective at increasing corporation by companies in debt.⁷

Condition 4 - honest disclosure: In addition to the information in the control letter plus the extra guidance from Condition 2, this letter includes a message that states that most organisations have a pay gap, and that people prefer honest disclosure of negative information. The specific wording that was used was:

"Most organisations have a gender pay gap, and research shows that people prefer openness about this sort of information. Your << private sector: customers, employees and shareholders/public sector: employees and the public>> want honest disclosure of your gender pay gap. Reporting it is the first step towards reducing it."

The hypothesis underlying this letter was that employers were not considering the risks associated with not reporting their figures in the correct manner. Therefore, it was assumed that reminding them of those risks by mentioning likely expectations from their stakeholders could motivate them to report their GPG figures. Lastly, the statement in the wording mentioned above, that people

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³ BIT (2016). The Behavioural Insights Team: Update Report 2015-16/

⁴ Allcott, H. (2011). Social norms and energy conservation. *Journal of public Economics*, 95(9-10), 1082-1095.

⁵ Sallis, A., Harper, H., & Sanders, M. (2018). Effect of persuasive messages on National Health Service Organ Donor Registrations: a pragmatic quasi-randomised controlled trial with one million UK road taxpayers. *Trials*, *19*(1), 513.

⁶ Hallsworth, M., List, J. A., Metcalfe, R. D., & Vlaev, I. (2017). The behavioralist as tax collector: Using natural field experiments to enhance tax compliance. *Journal of Public Economics*, *148*, 14-31.

⁷ BIT (2016). <u>The Behavioural Insights Team: Update Report 2015-16</u>

prefer honest disclosure of (negative) information, was based on lab studies demonstrating that when people do not disclosure negative information, other people assume the worst about them.⁸

Copies of the letters can be found in Appendix 3.

Outcome measures

There were two outcome measures in this trial:

Primary outcome measure: GPG reporting, which indicates whether an employer has reported GPG data on the designated government portal.

Secondary outcome measure: registration, which indicates whether an employer has registered on the designated government online service.

Both outcome measures were examined in two points in time - 7 weeks and 10 weeks after the letters were sent out. These timeframes were chosen to allow sufficient time for employers to act on the letter, to compare the effect over a longer period (an extra 3 weeks) and to ensure that the findings from the trial were available early enough to be incorporated into improving the third wave of letters.

⁸ John, L. K., Barasz, K., & Norton, M. I. (2016). Hiding personal information reveals the worst. *Proceedings of the National Academy of Sciences*, *113*(4), 954-959.

Results

Results

Compared to the control letter, the treatment letters **did not** increase reporting or registration 7 and 10 weeks after the letters were sent.⁹ Though, ultimately, all relevant employers reported their GPG figures by or close to the official deadline' in April 2018 (26 weeks after the first wave of the trial).

Effects on reporting

The overall rate of reporting among the trial sample, at both 7 and 10 weeks after the letters were sent, was very low. Among the control condition, the reporting level was 1.19% after 7 weeks, and 2.61% after 10 weeks. This shows that reporting slightly increased with time.

However, as displayed in Figures 1 and 2, reporting levels did not differ between the different treatment conditions in either of the measurement points. ¹⁰ We therefore conclude that the treatment letters didn't not increase reporting levels, compared to the control letter.

Effects on registration

The overall rate of registration among the trial sample, at both 7 and 10 weeks after the letters were sent, was much higher than the reporting levels. Among the control condition, the registration level was 20.79%% after 7 weeks, and 28.98% after 10 weeks. This shows that registration levels increased with time.

However, as displayed in Figures 3 and 4, registration levels did not differ between the different treatment conditions at either of the measurement points.¹¹ Registration levels in the social norms arm were slightly lower than in the control arm, but this difference is only weakly significant (at a 10% level).

We therefore conclude that the treatment letters did not increase registration levels, compared to the control letter.

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⁹ While we do not report these results in this report, we also did an indicative check of the outcome measures immediately after the deadline had passed, and found no difference in outcomes between the letters.

¹⁰ The graphs report primary analysis. They are adjusted for covariates (company size, sector, and whether the company is part of the public sector or not) and clustered at parent company level. In other words, they report the reporting levels while keeping these covariates at their mean, and only varying the coefficient of the treatment arm.

These graphs report secondary analysis. They are adjusted for covariates (company size, sector, and whether the company is part of the public sector or not) and clustered at parent company level. In other words, they report the registration levels while keeping these covariates at their mean, and only varying the coefficient of the treatment arm.

Figure 1. The percentage of employers reporting after 7 weeks, by trial arm

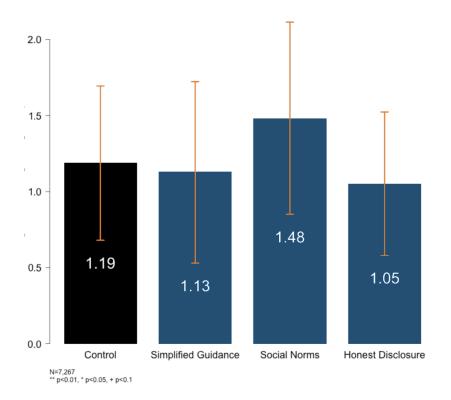


Figure 2. The percentage of employers reporting after 10 weeks, by trial arm

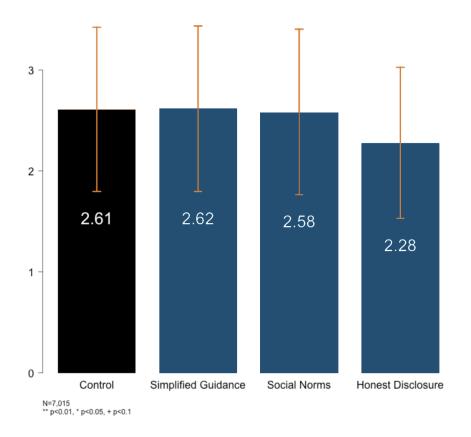


Figure 3. The percentage of employers registering after 7 weeks, by trial arm

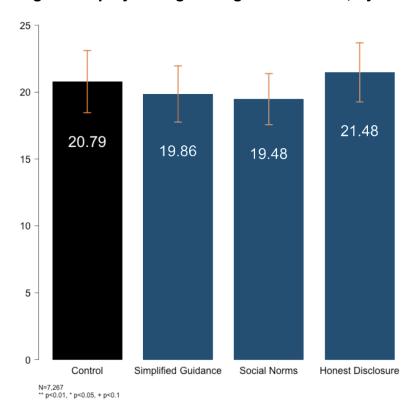
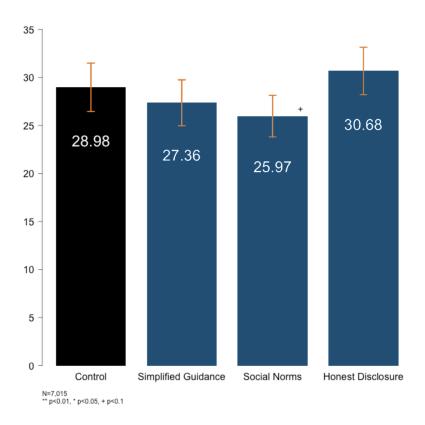


Figure 4. The percentage of employers registering after 10 weeks, by trial arm



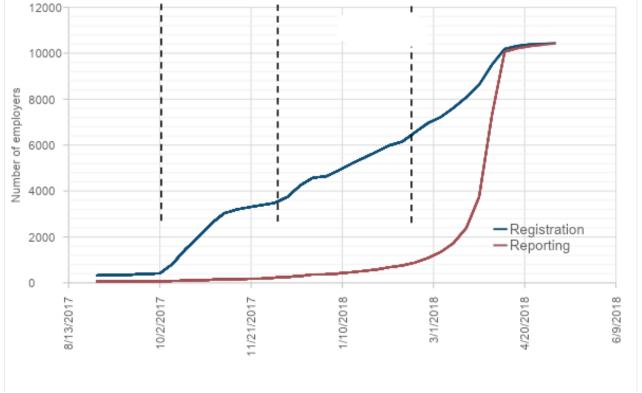
Discussion and conclusion

Discussion and conclusion

The UK government was the first in the world to require employers to publicly disclose their gender pay gap figures. Compliance with these regulations reached 100% shortly pub after the reporting deadline, exceeding expectations (Figure ZV).

The graph below displays the number of employers reporting and registering their numbers on the GPG reporting service, week by week, from late August 2017 until shortly after the reporting deadline (May 2018). Note that the number of employers subject to the regulations around the time of reporting was 10,200. The three waves of letters sent by GEO to employers are marked on the graph in Figure 5 by the black dotted vertical lines.

Figure 5. The number of employers reporting and registering on the gender pay gap reporting service, August 2017 – May 2018.



The vertical dotted lines represent the date when the letters were sent.

It is easy to detect that the letters themselves increased registrations, which is natural given that they were the first formal communication of their type from the Government. In addition, they contained a pin code that allowed employers to fast-track their registration (instead of registering online and waiting for a pin code in the post), which must also have speeded up registrations.

However, the trial reported in this document did not test whether the letters increased registrations and reporting in general, but whether different behaviourally informed messages could increase

compliance with the regulations, compared to simply providing employers with basic information and instructions (the control letter).

We conclude that the treatment letters did not increase reporting or registration levels compared to the simple control letter. Based on the fact that all employers eventually reported their GPG figures, we speculate in retrospect, that the treatment letters did not increase rates of registering or reporting because employers were sufficiently informed, motivated, and focused on complying with the regulations. Meaning that the attempt, reported upon in this trial, to encourage them to do so ahead of the reporting deadline, was probably not in line with their considered intentions to report at a later date. It is also plausible that employers did not feel that it was necessary to report so far in advance of the reporting deadline, and furthermore, that doing so was against their interests. For instance, they may have been concerned that early reporting would risk drawing negative media attention towards their organisation's reported GPG.

Appendices

Appendix 1: Balance checks

Table A1 displays the balance between trials arms across employee size, the reporting rules in force (public or private) and UK region. It also displays an imbalance on sector split. This imbalance on sector split is quite severe for some sectors (due to the large number of sectors).

Table A1 Balance checks (chi squared statistics)

Covariate	Employer Level Test Statistics (Chi-Squared) at Week 7	Employer Level Test Statistics (Chi-Squared) at Week 10
Tertile of employer size (in terms of employee numbers)	2.31	2.64
Public/Private Status	0.69	1.15
UK region (there are 17 regions of the UK in the data)	36.32	35.15
Sector (there are 22 sectors)	124.02**	121.17**

⁺ p<0.1, * p < 0.05, ** p < 0.01.

N=7,267 employers at Week 7 and N=7,015 employers at Week 10.

P-values are not adjusted for clustering on the parent company level.

These characteristics were chosen because reporting could plausibly vary by:

- How large the employer is (given the resources required to do the reporting or how profile these organisations are),
- The public/private status of the employer (as the reporting rules vary),
- Which region of the UK the employer is in (as social norms could vary by region along with economic differences between different areas), and
- By sector (again due to possible variation in sector-level social norms and differences by main occupations).

The full tables of these variables, which can be shared upon request, show that there is no substantial variation across arms except on sector. This is of concern because an F-test of a relationship between the outcome and sector is significant at a 1% level at both Week 7 and 10. Imbalance has occurred here because there are many characteristics to balance across.

We therefore control for all of these four characteristics throughout the analysis. We do this even though there are no statistically significant balance concerns for the other variables, and this will increase the efficiency of the standard error estimates.

There is some concern if there are unobservables correlated with sector, which may worsen the effect of the imbalance.

In terms of unobservables that are uncorrelated with sector, we believe that these will not be of much concern due to the randomisation.

Appendix 2: Analytical strategy

Primary analysis

In the primary analysis, we estimate the following FGLS (Feasible Generalised Least Squares) specification presenting findings at the average predicted levels of our control variables (at 7 and 10 weeks):

$$Y_{-}i = \alpha + \beta_{-}1 T_{-}i + \beta_{-}2 A_{-}i + \beta_{-}3 S_{-}i + \beta_{-}4 L_{-}(i) + \beta_{-}5 P_{-}i + u_{-}i$$

Where:

- *Y_i* is our outcome measure. This is a binary indicator, equalling 1 if the company reports their GPG data and 0 if not.
- α is a constant term, which can be interpreted as the average level of the outcome measure among the omitted category.
- T_i is our categorical treatment indicator, with each category corresponding to either, one
 of our three intervention letters, or our control "business as usual" letter.
- S_i is a categorical variable indicating the employer's sector,
- L_i is a categorical variable indicating the employer's size (tertile split on the number of employees),
- A_i is a categorical variable indicating region of the UK,
- P_i is a binary variable indicating if the company is subject to private or public regulations (taking the base category as the public companies),
- u_i is a clustered standard error (clustered at level of the parent company).

There are 21 sectors in our data, and some companies appear in multiple sectors. However, we found that those employers listed under "multiple sectors" completely overlap with the first sectors so for example every firm listed as a "compulsory social security" firm in its second listing is also listed as a "Public administration and defence" firm (so there is perfect multicollinearity and we cannot estimate the regression coefficients on these categories).

Secondary Analysis

The secondary analysis focuses on registrations to the GPG portal, which is an intermediary outcome measure, and can be considered as measuring the future intention of company to report to GPG data. It is measured as a binary variable, indicating if a company has registered to the online portal at 7 weeks or at 10 weeks after trial launch.

We estimate an identical FGLS specification to the primary analysis (again at both 7 and 10 weeks):

$$D_i = \alpha + \beta_1 T_i + \beta_2 A_i + \beta_3 S_i + \beta_4 L(i) + \beta_5 P_i + u_i$$

The only change from the primary analysis being:

• D_i is our secondary outcome measure. This is a binary indicator, equalling 1 if company registers for the online portal, and 0 otherwise.

Primary Analysis Findings

Table A2 below provides the main results of the primary analysis. In Columns 1 and 2 (without/with controls), we observe no significant effect of the treatments on Reporting GPG at 7 Weeks and the observed effect sizes are very small. In Columns 3 and 4 (without/with controls), we observe no significant effect of the treatment on Reporting GPG at 10 Weeks and the observed effect sizes are very small.

Table A2. Primary analysis, full results

	(1) Reporting GPG at 7 Weeks without controls	(2) Reporting GPG at 7 Weeks with tertile, private/public company and sector controls	(3) Reporting GPG at 10 Weeks without controls	(4) Reporting GPG at 10 Weeks with tertile, private/public company and sector controls
Simplified Guidance Letter	-0.069 (0.399)	-0.061 (0.404)	0.035 (0.590)	0.007 (0.594)
Social Norms Letter	0.313 (0.145)	0.294 (0.412)	0.017 (0.589)	-0.026 (0.587)
Honest Disclosure Letter	-0.136 (0.352)	-0.136 (0.356)	-0.297 (0.564)	-0.332 (0.565)
Tercile 3 of Employee Numbers (Largest tercile)	NA	-0.551 (0.300)	NA	-0.499 (0.481)
Tercile 2 of Employee Numbers	NA	0.273 (0.340)	NA	0.268 (0.485)
Private Company (vs. Public Company)	NA	2.267 (1.957)	NA	2.359 (2.517)
Constant	1.185** (0.258)	0.157 ⁺ (2.200)	2.584** (0.413)	0.526 (2.799)
Observations	7,267	7,267	7,015	7,015

Primary Analysis of the percentage of eligible businesses that are reporting Gender Pay Gap (GPG) Figures (Effects are quoted in percentages).

Parent-Company Clustered Standard Errors in Parentheses.

Note the table here reports the coefficients of the regression, rather than using STATA's margins command, which is how the results are reported in graphs 1-4.

As there are 21 company sectors and 16 regions, these coefficients have been omitted, but can be shared on request. $^+p < 0.1$, $^*p < 0.05$, $^{**}p < 0.01$.

Secondary Analysis Findings

Table A3, below, provides results for the secondary outcome of registering to report GPG figures. Columns 1 and 2 provides the results of the regression specified in the Analysis section above at 7 weeks while Columns 3 and 4 are at 10 weeks. In all specifications and in both weeks, the treatments are insignificant at a 5% level and the effect sizes are moderate to small.

Table A3. Secondary analysis, full results

	(1) Registering to report GPG at 7 Weeks without controls	(2) Registering to report GPG at 7 Weeks with tertile, private/public company and sector controls	(3) Registering to report GPG at 10 Weeks without controls	(4) Registering to report GPG at 10 Weeks with tertile, private/public company and sector controls
Simplified Guidance Letter	-0.682 (1.595)	-0.923 (1.597)	-1.285 (1.776)	-1.617 (1.767)
Social Norms Letter	-1.567 (1.524)	-1.309 (1.534)	-3.168 ⁺ (1.691)	-3.005 ⁺ (1.694)
Honest Disclosure Letter	0.768 (1.633)	0.692 (1.626)	1.870 (1.812)	1.703 (1.792)
Tercile 3 of Employee Numbers (Largest tercile)	NA	0.896 (1.198)	NA	-1.115 (1.371)
Tercile 2 of Employee Numbers	NA	2.273+ (1.176)	NA	1.266 (1.336)
Private Company (vs. Public Company)	NA	-4.801 (3.432)	NA	-4.339 (3.935)
Constant	20.767** (1.166)	23.149** (4.399)	28.89** (1.272)	34.94** (5.162)
Observations	7,267	7,267	7,015	7,015

Secondary Analysis of the percentage of eligible businesses that are registering to report Gender Pay Gap (GPG) Figures (Effects are quoted in percentages).

Parent-Company Clustered Standard Errors in Parentheses.

As there are 21 company sectors and 16 regions, these coefficients have been omitted but can be shared on request. p < 0.1, p < 0.05, p < 0.01.

Appendix 3: The four letters

Letter 1: Control letter

Government Equalities Office 6th Floor Sanctuary Buildings 20 Great Smith Street London SW1P 3BT

www.gov.uk/geo

{full_name}
{job_title}
{company}
{address_1}
{address_2}{address_3}
{city}{postcode}

4 December 2017

Your personal codes - keep these safe		
Employer reference:	{employer_ref}	
Security code:	{pin}	

Dear {salutation}

Act now: you must report your gender pay gap by {expires}

We wrote to you in October 2017 to let you know that following the introduction of new regulations, employers with 250 or more employees must publish specific figures about their gender pay gap. Relevant employers who do not report by the deadline will be in breach of the law.

We are writing to you again because we note that you have not yet registered. In early 2018, we are planning to publish three separate lists of employers: those who have reported, those who have demonstrated that they are on track to report by registering, and those who have not yet taken action.

What do I need to do?

- Nominate someone to manage the reporting (e.g. an HR Director). This person needs to:
- Register your organisation on the government's online reporting service:
 https://gender-pay-gap.service.gov.uk/go/register. Use your employer reference and security code printed at the top of this letter to fast track your registration. Do this by 31 January 2018 your security code expiration date. It only takes 5 minutes.
- Prepare your organisation's gender pay gap information using the resources available at: www.acas.org.uk/genderpay.
- Publish this information on your organisation's website and on the government's online service: https://www.gov.uk/report-gender-pay-gap-data. You must do this by {expires}.

Not in scope?

If you are not in scope of the gender pay gap regulations please complete this online form: https://gender-pay-gap.service.gov.uk/scope/out. You will need to refer to this guidance: https://gender-pay-gap.service.gov.uk/go/guidance.

Yours sincerely,

Hilary Spencer

Director

Government Equalities Office

Letter 2: simplified extra guidance

Government Equalities Office 6th Floor Sanctuary Buildings 20 Great Smith Street London SW1P 3BT

www.gov.uk/geo

{full_name} {job_title} {company} {address_1} {address_2}{address_3} {city}{postcode}

4 December 2017

Your personal codes - keep these safe		
Employer reference:	{employer_ref}	
Security code:	{pin}	

Dear {salutation}

Act now: you must report your gender pay gap by {expires}

We wrote to you in October 2017 to let you know that, following the introduction of new regulations, employers with 250 or more employees must publish specific figures about their gender pay gap. Relevant employers who do not report by the deadline will be in breach of the law.

We are writing to you again because we note that you have not yet registered. In early 2018, we are planning to publish three separate lists of employers: those who have reported, those who have demonstrated that they are on track to report by registering, and those who have not yet taken action.

What do I need to do?

- Nominate someone to manage the reporting (e.g. an HR Director). This person needs to:
- Register your organisation on the government's online reporting service:
 https://gender-pay-gap.service.gov.uk/go/register. Use the personal codes printed at the top of this letter. Do this by 31
 January 2018 your security code expiration date. It only takes 5 minutes.
- Read and follow the steps you need to take on the other side of this page.

Not in scope?

If you are not in scope of the gender pay gap regulations please complete this online form: https://gender-pay-gap.service.gov.uk/scope/out. You will need to refer to this guidance: https://gender-pay-gap.service.gov.uk/go/guidance.

Yours sincerely,

Hilary Spencer

Director

Government Equalities Office

7 steps for reporting your gender pay gap

	What do I need to do?	By when?
1	Nominate someone in your organisation to manage your gender pay gap reporting, e.g. an HR director.	Register before your security code
2	Register your organisation on the government's online reporting service: https://gender-pay-gap.service.gov.uk/go/register. Use your employer reference and security code printed at the top of this letter to fast track your registration. If your organisation has a number of subsidiaries, each separate legal entity with 250 or more employees will need to register and report separately.	expires: 31 January 2018 It only takes 5 minutes.
3	Gather your pay data from the snapshot date, a year before the reporting deadline: • 5 April 2017 - private & voluntary sector • 31 March 2017 - public sector You will need: employee gender, working hours and any bonuses awarded.	
4	 Calculate your gender pay gap, including: Mean gender pay gap Median gender pay gap Mean bonus gender pay gap Median bonus gender pay gap Proportion of males and females receiving a bonus Proportion of males and females in each quartile band Full definitions can be found on page 11 onward of the ACAS guidance: www.acas.org.uk/genderpay. 	This can take some time. We recommend starting immediately.
5	Get senior sign-off . You need to provide a written statement confirming that your calculations are accurate. This must be signed by an appropriate senior person, such as a director or Chief Executive. This requirement does not apply to the public sector.	
6	Publish your gender pay gap figures on your own website.	You must report
7	Publish on the government's online reporting service: https://www.gov.uk/report-gender-pay-gap-data. For this you will need: • Your gender pay gap figures • The name and job title of senior person who signed them off (this requirement does not apply to the public sector)	by {expires}.

Letter 3: social norms

Government Equalities Office 6th Floor Sanctuary Buildings 20 Great Smith Street London SW1P 3BT

www.gov.uk/geo

{full_name} {job_title} {company} {address_1} {address_2}{address_3} {city}{postcode}

4 December 2017

Your personal code	
keep this safe	
Employer reference:	
Security code:	

Dear {salutation}

Thousands of organisations like yours have already registered on the government's online reporting service and are preparing to publish their gender pay gap figures. If you do not act soon you could end up in a minority of organisations breaching the law.

We wrote to you in October 2017 to let you know that, following the introduction of new regulations, employers with 250 or more employees must publish specific figures about their gender pay gap. Relevant employers who do not report by the deadline will be in breach of the law.

We are writing to you again because we note that you have not yet registered. In early 2018, we are planning to publish three separate lists of employers: those who have reported, those who have demonstrated that they are on track to report by registering, and those who have not yet taken action.

What do I need to do?

- Nominate someone to manage the reporting (e.g. an HR Director). This person needs to:
- Register your organisation on the government's online reporting service:
 https://gender-pay-gap.service.gov.uk/go/register. Use the personal codes printed at the top of this letter. Do this by 31
 January 2018 your security code expiration date. It only takes 5 minutes.
- Read and follow the steps you need on the other side of this page.

Not in scope?

If you are not in scope of the gender pay gap regulations please complete this online form: https://gender-pay-gap.service.gov.uk/scope/out. You will need to refer to this guidance: https://gender-pay-gap.service.gov.uk/go/guidance.

Yours sincerely,

Hilary Spencer

Director

Government Equalities Office

7 steps for reporting your gender pay gap

	What do I need to do?	By when?
1	Nominate someone in your organisation to manage your gender pay gap reporting, e.g. an HR director.	Register before your security
2	Register your organisation on the government's online reporting service: https://gender-pay-gap.service.gov.uk/go/register. Use your employer reference and security code printed at the top of this letter to fast track your registration. If your organisation has a number of subsidiaries, each separate legal entity with 250 or more employees will need to register and report separately.	code expires: 31 January 2018. It only takes 5 minutes.
3	Gather your pay data from the snapshot date, a year before the reporting deadline: • 5 April 2017 - private & voluntary sector • 31 March 2017 - public sector You will need: employee gender, working hours and any bonuses awarded.	
4	 Calculate your gender pay gap, including: Mean gender pay gap Median gender pay gap Mean bonus gender pay gap Median bonus gender pay gap Proportion of males and females receiving a bonus Proportion of males and females in each quartile band Full definitions can be found on page 11 onward of the ACAS guidance: www.acas.org.uk/genderpay. 	This can take some time. We recommend starting immediately.
5	Get senior sign-off . You need to provide a written statement confirming that your calculations are accurate. This must be signed by an appropriate senior person, such as a director or Chief Executive. This requirement does not apply to the public sector.	
6	Publish your gender pay gap figures on your own website.	You must report
7	Publish on the government's online reporting service: https://www.gov.uk/report-gender-pay-gap-data. For this you will need: • Your gender pay gap figures • The name and job title of senior person who signed them off (this requirement does not apply to the public sector)	by {expires}.

Letter 4: honest disclosure

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www.gov.uk/geo

{full_name}
{job_title}
{company}
{address_1}
{address_2}{address_3}
{city}{postcode}

4 December 2017

Your personal codes - keep these safe	
Employer reference:	{employer_ref}
Security code:	{pin}

Dear {salutation}

Act now: you must report your gender pay gap by {expires}

Most organisations have a gender pay gap and people prefer openness about this sort of information. Your {sector_para1} want honest disclosure of your gender pay gap. Reporting it is the first step towards reducing it.

We wrote to you in October 2017 to let you know that, following the introduction of new regulations, employers with 250 or more employees must publish specific figures about their gender pay gap. Relevant employers who do not report by the deadline will be in breach of the law.

We are writing to you again because we note that you have not yet registered. In early 2018, we are planning to publish three separate lists of employers: those who have reported, those who have demonstrated that they are on track to report by registering, and those who have not yet taken action.

What do I need to do?

- Nominate someone to manage the reporting (e.g. an HR Director). This person needs to:
- Register your organisation on the government's online reporting service:
 https://gender-pay-gap.service.gov.uk/go/register. Use the personal codes printed at the top of this letter. Do this by 31 January 2018 your security code expiration date. It only takes 5 minutes.
- Read and follow the steps you need to take on the other side of this page.

Not in scope?

If you are not in scope of the gender pay gap regulations please complete this online form: https://gender-pay-gap.service.gov.uk/scope/out. You will need to refer to this guidance: https://gender-pay-gap.service.gov.uk/go/guidance.

Yours sincerely,

Hilary Spencer

Director

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