Equal pay and pay discrimination

Submission to the Office for Equality and Opportunity

Chartered Institute of Personnel and Development (CIPD)
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About CIPD

The CIPD is the professional body for HR, learning and development, and the wider people profession, established by Royal Charter to promote and develop the art and science of people management for the public benefit. When people management is done well, organisations perform better. Productivity improves. People have greater opportunity to develop, progress and participate. And stronger organisations contribute to greater prosperity and better economic and social outcomes.

Our role is to set the standard for professional people practice, help our members reach it, and make the profession's impact impossible to ignore.

With more than 160,000 members globally, we are an independent, practitioner-focused and evidence-led voice for the people profession. We are advocates for what it achieves, trusted advisers to our members, and amplifiers of their work. We help people professionals build the capability, credibility and confidence to solve organisational problems, design better workplaces and drive performance and growth.

Public policy at the CIPD draws on our extensive research and thought leadership, practical advice and guidance, along with the experience and expertise of our diverse membership, to inform and shape debate, government policy and legislation for the benefit of employees and employers. It also seeks to promote and improve best practice in people management and development and to represent the interests of our members.

Introduction

In 2025, UK employers spent £1,233 trillion on employee pay. When pension contributions and employer national insurance contributions are included, this expenditure jumps to £1,519 trillion, which is around 50% of the UK's Gross Domestic Product.

Given this significant investment, it is important that employers of all sizes and sectors derive value from their reward spending by attracting, retaining and motivating the people they need to succeed. The proposals in this consultation could have important implications for how effectively employers achieve these outcomes.

Our members have mixed views on the benefits of requiring employers to provide pay information to include pay information in their job adverts, with some highlighting the significant practical challenges that many employers, particularly SMEs, would face in complying.

At a time when employers are having to comply with multiple changes to employment legislation through the Employment Rights Act 2025, any additional regulatory changes must be carefully considered to ensure they do not further increase the cost and complexity of hiring.

If the government decides to legislate, then we believe that it must commission clear guidance for employers on what information they should include in job adverts and how it should be presented well in advance of implementation. It should also phase any introduction of this requirement gradually, targeting the largest employers first and allow all organisations plenty of time to prepare and make the necessary changes to their recruitment and HR practices.

This would be particularly important for micro and small employers with limited experience of publishing pay and benefits information. For example, employer pension contributions are often an important part of the overall reward package but are frequently omitted from job adverts.

Clear guidance could also help applicants compare opportunities more effectively by improving consistency in the way pay information is presented. If the government decides to proceed, then we would welcome the opportunity to support the development of such guidance.

On job evaluation and equal pay audits, we are not convinced that an Employment Tribunal finding of an equal pay breach should automatically result in a requirement to conduct an equal pay audit or implement a non-discriminatory job evaluation scheme. For employers with 100 or fewer employees, this could be disproportionately burdensome. A lighter-touch approach, such as an equal pay review, may be more appropriate.

If the government decides to move ahead with its proposal to create a standardised questionnaire in pay discrimination disputes, then we would welcome the opportunity to contribute to its development. We support the creation of a properly funded Equal Pay Regulatory and Enforcement Unit, which we believe should sit within the EHRC.

While the Unit should have the power to require disclosure of evidence before launching a formal investigation, we believe employees should be given 35 working days, rather than 28, to provide the necessary information. While employers subject to an inquiry should report on progress, requests for updates should be proportionate and not create unnecessary administrative burdens.

In summary, it is important to note that small- and medium-sized employers operate very differently from larger organisations. However, our concern is that the government's approach to reform appears to assume that all businesses already understand and use pay structures, job evaluation, and similar practices.

Improving people practice is essential, but legislation alone will not take small- and medium-sized employers from their current position to the desired outcome. Given the scale of the challenge, reform will be unrealistic without a detailed implementation strategy, practical training, funded support, and education designed around the realities facing SME businesses.

Strengthening protection against race and disability pay discrimination

After more than 40 years since women secured the right to bring equal pay claim for work of equal value, not just identical work, ethnic minority and disabled workers still do not have an equivalent right. The pay gaps remain persistent and wide. Ethnicity pay gaps (2023) range from 16.9% lower for Pakistani workers to over 20% higher for some other groups relative to their White British colleagues. The disability pay gap was at 12.27% in 2023, rising to 17.1% for those whose conditions limits them "a lot". These figures illustrate where structural pay discrimination has gone undetected for years and the consequent cost to employers due to equal pay disputes. We welcome the aims of this chapter and suggest some practical recommendations around implementation.

We support strengthening protection against race and disability pay discrimination so that it is equivalent to sex- based equal pay claims and agree that this does not necessarily require identical legal processes. We recommend closing the gaps in protection, and for the government to address the complexity and delays associated with the existing pay framework.

We support giving Employment Tribunals clearly defined powers to correct discriminatory contractual terms and to require proportionate pay audits and job evaluation following a finding of discrimination. We also support allowing equal-pay value claims where jobs are different, the limited use of hypothetical comparators and discretion to extend time limits where equitable and justifiable. These measures should be accompanied by clear safeguards and practical guidance to minimise uncertainty and speculative claims.

The practical guidance should include details explaining the tests for choosing comparators, legitimate pay differences and examining pay by sex, race, and disability. The guidance should cover data quality, confidentiality, small sample sizes, intersectionality, bonuses, allowances, progression and benefits. It should also include accessible, user-friendly templates and checklists that employers can use when carrying out audits and job evaluations.

We recommend that implementation should be phased and proportionate. Smaller employers have limited HR or reward expertise, while larger organisations may need time to improve their data, grading arrangements and governance. Guidance and practical support should be available before the reforms are introduced or take effect.

We also agree that outsourcing should not be used to avoid equality obligations. All parties should take all reasonable steps to uphold pay equality, but their responsibilities should reflect their influence, resources and access to information. Model contract clauses, due-diligence tools and guidance on the relationship with TUPE and existing equality law would help employers meet the duty. Remedies should focus mainly on correcting problems and preventing recurrence, without removing workers' existing rights to compensation.

Finally, we support retaining a common framework across England, Wales and Scotland. The government should continue to work with devolved administrations, including the Northern Ireland Executive, to limit unnecessary divergence and minimise widening differences in worker protection.

Our response

To inform our response, we held two virtual roundtables covering the consultation questions: one focused on issues raised in parts 1 and 2, and the other on part 3. Participants included practitioners from organisations of various sizes and sectors, with expertise in areas such as HR, reward and EDI. A summary of the various discussions is included in this response. We also include data from a variety of CIPD surveys.

Section 1. Pay transparency

Pay transparency in recruitment

Question 1: Do you agree or disagree with the proposal to require employers to publish pay information either in job adverts, or in writing to the candidate before the interview (if there is no job advert)?

There are mixed views among our members on the proposal to require employers to publish pay information either in job adverts, or in writing to the candidate before the interview. While there are some positive arguments for the proposal, such as reducing pay inequality, there are also some significant practical implementation challenges for employers particularly for SMEs.

If the government wants to press ahead with this proposal, then we believe it should commission guidance about what pay information should be included in job adverts and how it should be presented, or how this is disclosed in writing to the candidates before the job interview if there is no job advert. This will help ensure that the right information is disclosed in the right way, and at the right time and balance the needs of the candidate to know not only what the job entails, but also the remuneration of offer.

Question 2: Please explain your answer

By giving job candidates more pay information at the start of the recruitment process, this can help reduce the risk that an applicant's previous salary, confidence during the job interview, or negotiating ability will negatively impact on the pay offered. In addition, providing pay information can potentially help employers, such in terms of encouraging job applications, setting candidate wage expectations, and managing pay budget growth.

In our submission to the Office for Equality and Opportunity's *Call for evidence - Equality Law*, the CIPD highlighted the findings from our 2024 Pay, Performance and Transparency survey. The research found that most employers in the public and voluntary sectors already included details about pay in their external job adverts.

However, workplaces in the private sector were far less likely to disclose this detail in their external job adverts. Overall, larger organisations were more likely to publish pay information in their external job adverts than small and medium-sized employers.

Also, our research showed that employers were more likely to include information in their external job adverts about salary ranges than they were about specific salaries. Yet this does not always indicate that employers are trying to deceive job candidates since, if pay is structured around

ranges for particular grades, this is how they are most likely to be advertised externally or internally, rather than the organisation highlighting the specific salaries paid to individuals.

However, just because organisations advertise salary ranges, either externally or internally, this does not necessarily mean that they are fully transparent about pay. This is because salary ranges, by definition, generally show only a minimum and a maximum, so such approaches can often conceal more than they reveal. This is particularly the case where ranges are broad (for example, greater than £10,000 wide), and there is no indication in the advert of the salary that a successful candidate would be offered.

For internal job adverts, our research shows that employers publish similar pay information to that shared externally.

CIPD's virtual roundtable

When asked how easy it would be for organisations to publish pay information in their job adverts, participants generally agreed that while this would be relatively straightforward for most from an operational perspective, it could be more challenging from a people, policy, and governance perspective.

According to our participants what makes it relatively straightforward is:

- *most large organisations already have salary bands, pay grades, spot salaries, or approved salary ranges for roles.*
- *recruitment processes can usually be configured to display salary ranges in job adverts with minimal technical changes.*
- *many employers already provide salary information to candidates later in the recruitment process, so moving that information into the advert is more a matter of transparency than creating new data.*
- *public sector employers and some private sector organisations already advertise pay ranges routinely.*

By contrast, our participants highlighted several challenges, such as:

- *some employers have inconsistent pay arrangements, with salaries varying due to location, market supplements, performance, recruitment difficulties, or legacy arrangements.*
- *organisations may discover that people doing similar jobs are paid differently. Publishing salaries and salary bands can therefore expose internal inconsistencies and increase employee questions about pay fairness.*
- *many micro- and small-businesses will have little experience of publishing pay information in recruitment adverts and may struggle to comply*
- *employers that rely heavily on individual negotiation may need to redesign their recruitment and reward approaches.*
- *there can be concerns about competitors using advertised pay information to benchmark or target talent. However, if everyone must publish their pay data, this should be less of a concern.*

From a HR perspective, the biggest challenges are not publishing pay information itself, but ensuring that:

1. *workplace pay structures are clear and up to date*
2. *salary ranges are genuinely reflective of what candidates can expect*
3. *line managers understand and apply pay policies consistently during recruitment*
4. *existing employees perceive pay decisions as fair*

It was felt that those employers with well-developed reward approaches are more likely to find it easy to adapt quickly than those with fragmented or highly negotiable pay practices.

If the government wishes to require employers to publish pay information either in job adverts, or in writing to the candidate before the interview, then we recommend that:

- it commission guidance for employers about the pay information to include in both external and internal job adverts, with a special focus on micro, small and medium-sized employers. Where organisations include a salary range, the advert should specify where in this range the successful candidate is expected to sit. Adverts for jobs that have variable hours should specify an hourly rate and an expectation of the number of paid hours per week. The CIPD would be willing to support this guidance.

- wage or salary advertised should be the basic amount. If the salary can be topped up by variable pay, such as bonuses or overtime, then this can be indicated in the job advert, but not used to inflate the pay on offer unless these payments are guaranteed, such as guaranteed overtime, a non-discretionary bonus, or a location allowance. Details of non-discretionary variable pay can be included in the job advert, or in writing to the candidate before the interview (if there is no job advert).

- the requirement to include pay information in job adverts is rolled out, starting with large employers in year one, and small and medium-sized organisations in year two. Employers are already facing very significant compliance challenges due to the multiple measures in the Employment Rights Act. So, any additional regulatory requirements must be carefully phased in to ensure employers are not over-whelmed and have the time and guidance needed to enable them to comply fully. Such a phased approach should allow SMEs enough time to change their recruitment processes, as well as becoming aware of this new legal requirement. Any issues that arise in year one, can also be dealt with in year two as the changes are introduced for SMEs.

- salary information should be included in both external and internal job adverts.

- communication about the new legal requirements about what to include in job adverts, should also highlight the potential benefits for employers. Such as increasing the pool of skilled applicants, improving trust in the recruitment process, or spending less time negotiating the starting salary.

The CIPD is carrying out research about the current state of play when it comes to including pay in job adverts, and we would be happy to share our findings.

Question 3: What pay information or conditions would be proportionate for this requirement? Examples might include salary, collective bargaining provisions, annual adjustments, or other financial benefits.

CIPD's virtual roundtable

When asked what pay information or conditions they thought would be proportionate to include in job adverts, the overall view of our roundtable participants was that job adverts should contain enough information for applicants to understand the likely financial value of the role but should not become a full statement of the employee value proposition.

The information that our participants thought should be given in job adverts included:

- *base pay: a specific annual salary or hourly rate, or a meaningful salary range. Terms such as "competitive salary" were regarded as unhelpful for candidates.*
- *the realistic starting point within a pay grade: where recruits normally start at the bottom of a band, then the advert should say so, rather than implying that the whole range is negotiable.*
- *guaranteed additions to pay, with their value where practicable, including:*
    - *London or other location allowances;*
    - *guaranteed bonuses;*
    - *shift allowances; and*
    - *contractual or routinely expected overtime.*

- *established pay progression, such as a contractual annual increments, where this genuinely applies.*

Information that participants thought job adverts could highlight more briefly included:
- *discretionary bonuses;*
- *performance-related wage rises;*
- *market supplements;*
- *overtime opportunities;*
- *commission or similar variable payments.*

However, participants said that employers should not be required to publish a precise amount where payment depends on performance, budgets, or other contingent factors. A short description, such as "discretionary quarterly bonus", would be proportionate, with further details provided on request, or as part of the job offer.

Collective bargaining and annual pay adjustments
There was no support for requiring detailed collective bargaining provisions in every job advert. Participants pointed out that collective bargaining would not apply to most employers and including it could create unnecessary complexity when advertising a role.

Participants were also cautious about requiring employers to state that pay is subject to an annual review or adjustment because:
- *an annual review does not guarantee an increase;*
- *referring to annual adjustments could create an unintended expectation or commitment; and*
- *it would be more appropriate to include this only where an increase or increment is established, contractual, and predictable.*

Wider financial benefits
Participants also thought employers should be encouraged to highlight voluntarily significant benefits, such as:
- *enhanced paid holiday entitlement;*
- *flexible or hybrid working opportunities;*
- *private medical insurance;*
- *a company car or car allowance;*
- *an especially valuable pension arrangement.*

A proportionate policy approach
The roundtable recommended that any legal requirement to include reward information in job adverts should focus on base pay, the genuine starting point with a range, and guaranteed additions. Wider reward information should mainly be supported through guidance and left to employers' discretion. This would give applicants a realistic picture of the package without overloading job adverts or requiring employers to describe contingent or highly technical provisions.

Should the government wish to proceed, then we recommend that:

- if employers publish a salary range in their job adverts, then they should indicate a salary within this pay range where the successful candidate is expected to sit. Again, there should be guidance on this for micro and small employers.

- if the job has variable hours, then the job advert should include an hourly rate as well as the minimum number of hours the employee is expected to work per pay period.

- bonus opportunities exist then they should be mentioned in the advert, because they can form an important part of the overall remuneration package for certain jobs, such as sales, or grades, such as executive director. Where the bonus is discretionary, then employers could quote, if they wish, an indicative amount for on target performance as well as a

bonus range. More details about discretionary payments can be given in supporting documentation, or at the interview.

- employer pension contribution information should be included in external job adverts, given the large amount of money spent by employers on workplace pension schemes.

The CIPD Pay, Performance and Transparency survey 2024 suggests that the transparency about workplace pensions is similar to that of salary ranges, with 41% of employers saying that pensions information is always included in job adverts. Public (59%) and voluntary (75%) sector employers were more likely to do this than private sector firms (33%). By employer size, small- and medium-sized organisations (38%) are a bit less likely to always do this than large employers (43%).

One consequence of not mentioning the pension in the job advert, is a lack of awareness among employees. The CIPD's UK Good Work Index 2026 survey finds that 16% of workers do not know which type of pension scheme they are members of, while among those who do know they are in a workplace pension, 33% of them were unsure how much their employer contributed.

This lack of transparency does not incentivise employers to offer to contribute more than the legal minimum. Interestingly, workers employed by micro-employers were less likely to do not know which type of pension scheme they are members of (12%) than those in workplaces with more than 1000 people (19%). However, those in micro firms were less sure how much their employer contributed to their pensions (44%) than those in the largest workplaces (32%).

In the CIPD's autumn Labour Market Outlook 2025, we asked respondents if workplaces were required by law to include pension contribution rates in all their job adverts whether this would encourage workplaces to contribute more. Overall, 58% of them said it would, 22% said it would not, while 20% were unsure. So, including this in job adverts, could not only improve the pension outcomes for workers as employers increase their contributions to remain competitive in the marketplace, but also help tackle various pension gaps, such as gender or ethnicity.

CIPD's virtual roundtable

When asked if pension information should be included in job adverts, our participants were generally opposed to requiring the inclusion of detailed pension terms because pension arrangements can be complicated. However, our participants were more open to employers specifying the value of their pension contribution as a percentage of employee pay. They also thought that an advert could state if the employer was willing to match employee contributions above the minimum and, if so, up to what percentage of employee pay.

More detailed information about things like salary sacrifice, eligibility, 'save more tomorrow' options, and scheme rules could be forwarded on request, or as part of the job offer.

Should the government wish to proceed, we recommend that:

- in their external job adverts, employers include the minimum workplace pension contribution that they make to the scheme that they use to automatically enrol their people into a pension. This is easier to do for those organisations that offer their employees a defined contribution pension scheme. If they wish, employers should be encouraged to highlight contribution matching schemes. More details can be provided through supporting information.
- for those employers that enrol eligible workers into a defined benefit pension scheme, they can highlight this in the job advert and give more details in supplementary information.
- we do not see the need to include pension information in internal jobs adverts, unless the new role includes a materially different pension deal.
- details of other employee benefits, such as paid annual leave, occupational sick pay, company car allowance, paid maternity leave, etc, can be provided through supporting information.

Question 4: What level of pay information should employers be required to publish in job adverts or disclose before an interview? For example, should a pay range, specific salary or benchmark rate be required?

Should the government wish to proceed, we recommend that:

- the wage or salary advertised should be the basic amount. If the salary can be topped up by variable pay, such as bonuses or overtime, then this should be indicated in the job advert, but not used to inflate the salary on offer unless these payments are guaranteed, such as guaranteed overtime, a non-discretionary bonus, or a location allowance. Details of discretionary variable pay can be included in supporting information.

- adverts for part-time jobs could specify a basic hourly pay rate and an expectation of the number of paid hours per week. Guaranteed or non-discretionary payments can be included in this rate, but non-guaranteed or non-discretionary payments should be excluded. The later can be mentioned in the job advert or disclosed before the interview.

- where employers include a salary range in the external or internal job advert, they should specify where in this range the successful candidate is expected to sit. More relevant detail about the pay range, and how employees can progress along it, can be disclosed before the job interview.

- as pensions are a form of deferred pay, then they should also be included in external job adverts, see our recommendation in question 3.

Job evaluations and pay audits

Exceptions to the requirement that an Employment Tribunal order an equal pay audit

Question 5: Do you agree or disagree with the proposal to reduce the list of current exceptions of when an Employment Tribunal must order an equal pay audit after finding an equal pay breach?

It rather depends on the size of the organisation.

Question 6: Please explain your answer

If the employer was a micro- or small business, then we are not convinced that a full-blown equal pay audit would be a worthwhile exercise. Instead, we would prefer an Employment Tribunal to follow EHRC guidance, which recommends that smaller workplaces should conduct an equal pay review, rather than an equal pay audit.

If the government decides to press ahead with this proposal, then we recommend that:

- if an employer employs fewer than 100 people, then an Employment Tribunal could order an equal pay review after finding an equal pay breach
- if an organisation employs 100 people, then an Employment Tribunal could order an equal pay audit after finding an equal pay breach

We believe that employers with fewer than 100 people would find it relatively costly to conduct an equal pay audit, while an equal pay review would be less expensive in terms of money and time. Workplaces with 100 people or more should find an equal pay audit less costly relatively, especially as AI technology can help cut costs and speed up the process. If there are concerns about the quality of equal pay reviews, then that could be overcome if there is a requirement that the results of an equal pay review must be signed off as accurate by a suitably qualified HR professional.

While the EHRC recommends an equal pay review for employers with fewer than 50 employees, we believe that fewer than 100 makes more sense given the limited resources available to this size of organisation.

Mandating that an employment tribunal must order the implementation of a non-discriminatory job evaluation scheme

Question 7: Do you agree or disagree with the proposal that an Employment Tribunal must also order the implementation of a non-discriminatory job evaluation scheme alongside an equal pay audit, where it has found an equal pay breach?

Again, it depends on the size of the employer, as well as what is meant by non-discriminatory.

Question 8: Please explain your answer

Analytical job evaluation schemes, where jobs are broken down into their core components, are less likely to be discriminatory. However, they can be costly to introduce in terms of time and money and are only affordable for large employers. By contrast, non-analytical schemes, where whole jobs are reviewed, are more cost effective for smaller employers, but there is more risk that they can be discriminatory.

As such, we are not sure requiring a workplace with fewer than 100 people to implement a non-discriminatory job evaluation scheme would be worthwhile in terms of financial and non-financial costs.

If the government decides to press ahead with this proposal, we recommend that:

- if an employer employs fewer than 100 people, then an Employment Tribunal should order an employer to conduct a job evaluation scheme, but allow that employer to decide which non-analytical scheme (such as job ranking or classification) to adopt
- if an organisation employs 100 people or more, then an Employment Tribunal could order the implementation of an analytical job evaluation scheme
- the government commission information and guidance aimed at supporting those employers required to implement a job evaluation scheme

If there are concerns about the quality of non-analytical job evaluation schemes, then this could be overcome if there is a requirement that the results must be signed off as accurate by a suitably qualified HR professional.

Standard questionnaire in pay discrimination disputes

Question 9: Do you agree or disagree with introducing a new statutory questionnaire for pay discrimination claims only?

Yes, if the new questionnaire is simple and effective

Question 10: Please explain your answer

We agree so long as the government is committed to adapt the previous questionnaire to make it simpler and more effective, and is designed in partnership with employers, trade unions, and other stakeholders to ensure that is fit for purpose and completion is not arduous.

Potentially, such a questionnaire could help reduce the number of spurious complaints that are being generated by AI, which is diverting the attention of HR away from developing people, performance, and productivity.

If the government after carefully considering all the evidence decides it wants to do this, then we recommend that:

- before being introduced, the revised questionnaires are piloted first to ensure they meet the needs of employers and employees. This would permit the questionnaire to be tested in the field and allow necessary changed to be made before the questionnaire was launched nationwide

Question 11: What questions do you think should be included in a statutory questionnaire to facilitate the early resolution of cases?

We look forward to submitting the ideas of our members during your design process.

Question 12: What steps would you recommend taking to ensure the questionnaire procedure is as efficient as possible?

As we mentioned in our response to Question 10, we believe that a rigorous pilot exercise is undertaken to ensure that the questionnaire procedure is as efficient as possible.

If the government wants to do this, then we recommend that:

- an employee is limited to how many times they can use the questionnaire in a year.

Pay transparency: impacts and scope

Question 13: If the proposals set out in this chapter were implemented, how might employers change how they operate? For example, regarding recruitment practices or pay and conditions

Recruitment practices – if employers were required to show the salary in their job adverts, then this would have the largest impact for the private sector, because many firms do not regularly include pay information. By contrast, for the public and voluntary sectors, the impact would be far less as most already publish this information. The impact on recruitment practices will also depend on employers (particularly micro and small-firms) being aware of the new requirements.

The CIPD's *Pay, Performance and Transparency survey 2024* finds that 41% of workplaces surveyed report that they always publish a salary range in their external job adverts. Public (80%) and voluntary (68%) sector employers were more likely to do this than private sector firms (30%). By employer size, small- and medium-sized organisations (34%) are less likely to always do this than large employers (44%).

As we mentioned above, guidance would help employers publish pay and benefits information in a consistent manner. This would help applicants to make better informed decisions when accepting jobs, not only in terms of the pay on offer, but in terms of the benefits and the other conditions of employment. For example, some might be more likely to apply because the job comes with a company car, while others because the workplace retirement plan is generous. Similarly, greater transparency would make it easier for employers to ensure that their offering remains market competitive.

Pay – with more wage information being included in external and internal job adverts, many employers would need to review their current pay practices to ensure that they could explain the rationale for their pay decisions, such as why certain jobs are paid more than others, or why certain individuals get paid more than others.

With more transparency about wages, we believe that more large employers would be encouraged to conduct voluntary equal pay audits or reviews, as well as explore how they value jobs, such as through a job evaluation scheme. This activity would help ensure pay decisions are driven by performance rather than prejudice.

The CIPD's *Pay, Performance and Transparency survey 2024* found that 32% of employers had conducted an equal pay audit in the past 12 months. Public sector organisations were more likely than those in other sectors to have carried out an equal pay audit (35%). Firms employing 1,000 or

more people were much more likely than companies with fewer than 250 people to have conducted equal pay audits (45% versus 14%).

The reason that public sector employers are more likely to do this is due, in part, to generally greater pay transparency and greater trade union activity, both making for an increased likelihood of equal pay challenges. The reason why big companies are much more likely to have conducted equal pay audits is because they have a wider range of jobs and so are potentially more likely to need an equal pay audit to help defend themselves from the risk of an equal pay claim.

Benefits – in terms of pensions, if workplaces with defined contribution workplace pensions disclosed how much the minimum employer contribution was, then we expect that this would lead to some employers having to increase their contribution rates to remain competitive in the labour market.

CIPD's virtual roundtable

The participants in our roundtable believed that if employers had to include pay information in every job advert, then while the direct cost of including this information would be low, this requirement could have a more substantial cost impact on underlying HR policies and procedures.

For example, the roundtable highlighted the potential consequences for HR practice:

- *Clearer salary structures: Organisations (typically SMEs) with informal or immature arrangements might need to introduce or improve pay bands, job levelling, and market-pricing processes. Publishing wide bands would not provide meaningful transparency.*
- *Defined starting-pay rules: HR policies would need to explain where successful candidates normally enter a grade, for example, at the bottom, and when exceptions could be made for scarce or specialist skills.*
- *More structured and consistent pay-setting: HR and line managers would need to agree and approve the salary or pay range before advertising, rather than basing pay on a candidate's salary history or individual negotiation skills.*
- *Standardised recruitment materials and approvals: Job advert templates, recruitment checklists, approval workflows and guidance for hiring managers or agencies would need updating so that pay information was included consistently in external and, where relevant, internal adverts.*
- *Greater consistency between recruitment and existing workforce pay: Before publishing a salary, HR would need to check how it compares with employees doing the same or equivalent work. Transparency could expose discrepancies, prompt internal pay reviews, and help reduce the risk of discrimination or employee dissatisfaction.*
- *Clear definitions of what must be disclosed: Employers would need to distinguish base pay from guaranteed additions, such as shift or location allowances, and from discretionary elements such as bonuses, overtime or performance-related payments.*
- *Review of benefits communications: Employers might develop a consistent approach to presenting pensions and other valuable benefits. Participants favoured brief headline information, particularly where the provision exceeded the legal minimum, with detailed scheme rules remaining in contracts, policies or handbooks.*
- *Alignment across documents and systems: Advertised pay and benefits would have to match employment contracts, payroll arrangements, grading structures, collective agreements, terms and conditions, and employee handbooks.*
- *Training and guidance: Recruiters and managers would need guidance on drafting meaningful ranges, discussing starting pay, explaining discretionary rewards, and avoiding commitments, such as offering a candidate a higher salary or extra paid leave than was advertised.*
- *Potential reconsideration of reward strategy: Publishing salaries could make an employer's market position visible to applicants, competitors, and existing staff. Organisations paying at the lower end of the market might therefore need to review either pay levels or the wider package offered, which would have cost implications.*

Question 14: If the proposals set out in this chapter were implemented, what costs do you think employers would face, if any? For example, wage, administrative or legal costs.

Before they are required to include pay information in job adverts, employers will need time to assess whether their salary rates can be justified. Some workplaces may need to revise how they value jobs, which could have cost implications. For example, an employer may use a job evaluation scheme that has not been updated to reflect changes in roles and tasks, meaning some pay outcomes may no longer be defensible. Employers may also incur costs for legal advice on previous pay decisions that retrospectively can no longer be justified.

Recruitment software might also need to be updated, to ensure that pay and other conditions are included in job adverts.

However, these are upfront costs, and we do not anticipate that these would significantly increase costs on an ongoing basis.

Employers that are required to conduct an equal pay audit, an equal pay review, or implement a job evaluation scheme by an Employment Tribunal will need to spend time and money on these. However, advances in AI could eventually cut the costs for large employers of carrying out an equal pay audit or conducting a job evaluation exercise, as well as speed up the process.

By contrast, employers may face ongoing costs in responding to the new statutory questionnaire for pay discrimination claims, depending on the volume received and the number of questions that must be answered.

CIPD's virtual roundtable

CIPD members that participated in our roundtable expected little or no direct cost from provisions requiring the inclusion of pay information in job adverts.

Administrative and advertising costs

- *Participants did not expect any quantifiable additional recruitment cost from adding salary or benefit information to an advert.*
- *The recruitment platforms used by our participants, such as Indeed and LinkedIn, did not impose an additional charge to include pay information in the job advert.*
- *Participants also said that some of the online recruitment platforms that they use require them to include salary information in job adverts, so disclosure was seen as part of the normal process rather than an additional administrative burden.*
- *They did not think that using a recruitment agency would become more expensive simply because pay appeared in the advert: agency commission is normally linked to the final salary, which the recruiter would already know.*
- *A possible exception highlighted was when job adverts were advertised in print and there was a charge by space or word count, where adding more detail could increase the cost. While participants did not think that many employers still advertised jobs in print, they did note that some micro and small-firms in retail or hospitality advertise job vacancies inside their stores. So, any guidance would need to reflect this.*

Wage and reward costs

Participants did not identify an automatic requirement to increase wages. However, they suggested some possible indirect cost pressures:

- *Publishing pay could expose that an employer pays towards the lower end of the market, potentially creating pressure to improve either pay or their wider reward package.*
- *Existing employees would be able to compare their pay with advertised rates. If new recruits appeared to be offered more for the same work, this could reduce productivity and potentially prompt the employer to carry out internal pay reviews or adjustments.*

- *Greater transparency might encourage employers with below the market pension and benefits offerings to move towards more appropriate provision, although this was framed as a possible beneficial effect rather than a cost.*

Overall cost impact of the change

In terms of overall employment costs, our survey of 2,051 HR senior decision makers (the CIPD's Labour Market Outlook autumn 2026) finds that 7% forecast that their organisation's employment costs would increase by a 'large extent' if they were required to include pay information in their job adverts, while 23% predicted it would increase them by 'some extent'. The rest either thought this would increase their employment costs by a small extent (12%), there would be no cost increase (46%), or were unable to say (13%).

By sector, workplaces in information and communications (16%), construction (13%), finance (12%), and legal and accounting (12%) were most likely to believe that including pay information in their job adverts would increase their employment costs by a large extent.

By firm size, 48% of SMEs predicted that having to include pay information in their job adverts would have no impact on their employment costs compared to 27% of large employers. Finance and insurance (22%) and construction (15%) had the highest proportion of private sector SMEs predicting that having to include pay information in job adverts would affect their employment costs to 'a large extent', compared with 8% of all private sector SMEs.

While 55% of organisations in Wales believed that this move would have no impact on their employment costs, just 33% of employers in London could report the same.

What are the barriers to pay transparency in job adverts

In the recent CIPD Labour Market Outlook (autumn 2026), out of 2,051 senior HR decision makers 27% responded that their organisation does not advertise all roles with salary information, with a particularly high proportion of employers not including salary information in legal and accounting services (50%) and other professional and scientific activities (48%).

Among the 572 senior decisions makers for HR who said that their employers were not currently transparent about pay in job adverts, 23% said it was because of worries that it may demotivate employees whose pay is below that being advertised.

Other common explanations for not including pay information in job vacancies included:

- concerns that pay transparency in job adverts may increase pay expectations unrealistically (22%);
- concern about staff backlash (such as staff resigning) (19%);
- reducing management discretion around starting pay (18%); and
- potential loss of talent to competitors (such as staff being poached) (18%).

However, 20% of respondents had never considered if they should include pay information in job adverts or not. This was far more common among SME firms (33%) than large firms (8%).

Among SME firms, the most common explanation for not including pay information was that they did not have a clear salary setting process (20%). Among large firms, the most common explanation was that it may demotivate employees whose pay was below that being advertised (33%).

Question 15: Are there any proposals set out in this chapter that may take employers more than a year to implement?

Yes

Question 16: Please explain your answer, including how long you think any proposal may take to implement?

If the government is going to proceed with this, then we recommend that:

- the requirement to include pay information in job adverts is phased in over time, starting with the largest workplaces. This would also provide an opportunity to check whether pay disclosure is happening as expected, and for the guidance to then be revised and disseminated to smaller employers as they prepare for the change. We think that the government should give all large employers (employing 250 or more) at least 12 months' notice that from a specific date (not earlier than April 2028), they will be required to include reward information in their job adverts. We think that the government should give all remaining employers a minimum of 24 months' notice that from a specific date (not earlier than April 2029), they will also be required to include reward information in their job adverts. This would also reflect the EU Pay Transparency Directive where the compliance has been phased in by employer size. This should also give enough time for a publicity campaign targeted at micro, small and medium employers to raise awareness of the new rules.

Question 17: Are there other changes to pay transparency that you would recommend the government considers?

We recommend that:

- pay information should be included in internal job adverts as well as for external roles.

Section 2. Pay discrimination enforcement

Equal Pay Regulatory and Enforcement Unit
Question 18: What specific steps or guidance should be taken to improve clarity about when an employer can lawfully pay people differently for equal work, particularly regarding the application of the material factor defence?

We recommend that:

Guidance should be commissioned that explains how employers can lawfully pay people for equal work. Employers should understand that they must be able to explain why any difference in pay is justified. For example, the difference could be due to location payments, so the employer needs to be able to explain why pay location allowances are paid and how these then work in practice. If an employer can reasonably justify to their employees why they pay a location allowance, then it is unlikely that their employees will then go onto pursue equal pay claims for this reason, allowing employers to focus on their purpose. The issue is ensuring that organisations know that they must have the evidence to explain why they pay such an allowance, how the amount is determined, and how the payment of the location allowance is meeting the needs of the organisation and its employees. This requires regular reviews of pay practices to see if they are achieving what they are supposed to achieve.

The challenge is not only clarity but also improving awareness. A micro, small- and medium-sized workplace often does not have a qualified HR professional within the business, and so will probably not be aware that claiming that a pay difference is due to 'market forces' or 'employee performance' is insufficient unless this can be backed up with evidence.

Significant steps need to be made to raise the awareness among employers in general, and SMEs specifically, around how to create reward systems that reduce the risk of paying people in a way that amounts to discrimination. Such steps could include online resources, webinars, and podcasts.

Question 19: Please explain your answer, including any specific elements, examples or guidance you think the government should consider.

For example, the guidance would need to give examples of the types of evidence that could be expected to demonstrate the extent to which pay was determined by 'market forces' and the impact that this was then having on the workforce. Similarly, if pay is determined by individual performance, again the guidance would give examples of the evidence that would be expected to support the claim that the difference was due to performance. This is not to say that employers cannot reward their people through such practices as location allowances, length of service pay increments, bonus awards, etc, but if they do so, then the guidance should give examples of what evidence they can reasonably be expected to provide to support the assertion. The CIPD would be willing to help develop the guidance.

Institutional home of the Unit
Question 20: Where do you think the Equal Pay Regulatory and Enforcement Unit should be based?

The EHRC

EHRC
Fair Work Agency
Other government agency
New, independent body
Other, please specify

Question 21: Please explain your answer.

The Fair Work Agency's remit at present (minimum wage, licensing, gangmasters, and potentially holiday and sick pay) is relevant but legally and evidentially distinct from discrimination law, which requires different investigatory expertise than wage underpayment enforcement.

While a new standalone body, may have the independence, it would also require set up costs and risks duplicating some overheads.

On balance locating the Unit within the Equality and Human Rights Commission (EHRC) seems the best option, as the EHRC holds the relevant statutory powers under the Equality Act 2006. Although it has, albeit limited, investigatory experience its remit covers the whole Equality Act, allowing pay discrimination enforcement to be considered alongside recruitment, promotion, and other drivers of inequality that can contribute to and compound pay disparities.

However, whichever option is chosen, we recommend effective resourcing and notably ring-fenced funding specifically for awareness raising, education and guidance, preventing pay discrimination, and enforcing the law in a proportionate way. This would also reduce the risk that the new unit defaults to the easier to evidence sex-based cases at the expense of race and disability pay enforcement activity.

CIPD's virtual roundtable

Our roundtable participants did not reach a unanimous view, but the strongest preference was for the Equal Pay Regulatory and Enforcement Unit to sit within the Equality and Human Rights Commission (EHRC).

The reasons given were:

- *The EHRC already has relevant equalities and human rights expertise.*
- *Equal pay is viewed as more nuanced and complex than much of the Fair Work Agency's (FWA) proposed remit.*
- *Locating the unit in the EHRC would make more sense than placing it in the FWA merely to achieve administrative efficiencies.*

However, participants attached important conditions:

- *The unit should remain a distinct, identifiable function, with clear leadership, responsibilities, accountability and reporting arrangements.*
- *It should be properly funded and resourced. Participants were concerned that, if absorbed into an existing organisation without additional funding, its work could be treated as a simple add-on and become ineffective.*
- *Its location should reflect how its work connects with the host organisation, rather than simply where it fits on an organisational chart.*
- *Its emphasis should include education and guidance, not only enforcement, given the complexity of equal pay issues.*

One participant was largely neutral about where the unit sat, arguing that what it does, who it is accountable to and how effectively it operates, matter far more than its formal institutional home.

Overall, the discussion leant towards the EHRC rather than a standalone body or the Fair Work Agency, provided the unit had sufficient independence, specialist expertise, as well as dedicated funding to raise awareness among employers of the new requirements, and provide relevant support and guidance.

New Unit powers to support enforcement activities
Question 22: Do you agree or disagree that the Unit should have the ability to require the disclosure of evidence before triggering a formal investigation process? For example, verbal evidence, pay data and information.

We agree with reservations and procedural safeguards. This mirrors the HSE and FWA powers and should reduce the number of full statutory investigations by allowing early proportionate resolution.

Question 23: Please explain your answer

Disclosure of such evidence will help the Unit decide whether, given its finite resources, it is worthwhile triggering a formal investigation process.

However, we have concerns regarding when the employer must respond to this request for evidence. Large employers, given the complexity of their business and history, will need sufficient time to gather the evidence required by the Unit. Similarly, small firms, while having less complexity, must also be given enough time to ensure that such requests do not divert their focus away from the business. Smaller employers, particularly those with no dedicated HR function, may also be completely unaware of the legal framework or what is required, and proper support should be made available for those businesses, many of whom will have no idea that they have been acting unlawfully, to ensure that they can respond to such a request.

It is also worth noting that many of these smaller employers may not have understood their obligations in advance and are unable to provide the documentation required. We understand that there may be a minority of employers which will take deliberate steps to conceal their pay decisions and so attempt to disguise unlawful behaviour. We do not condone such action. However, significant anecdotal evidence from our members, particularly those in HR consultancy who will be brought in by smaller businesses to deal with particular issues, suggests that many smaller employers need to be made aware much sooner of the sorts of documentation they need to retain, and the audit trails they will need to demonstrate to show that they are paying equally.

We recommend that:

If the Unit is given the ability to require the disclosure of evidence, then employers should be given at least 35 working days to respond to this request. However, employers can respond sooner if they are able to do so. Also, the Guidance should set out clear thresholds for ‘reasonable suspicion’ to

prevent speculative requests and confirm confidentiality protections for commercially sensitive data.

Question 24: Do you agree or disagree that the existing investigation powers should be strengthened to enable the Unit to require that a job evaluation scheme and/or equal pay audit be undertaken as part of the investigation process, where this would help to establish whether pay discrimination has occurred?

We agree, but with reservations

Question 25: Please explain your answer

While we agree that the existing investigation powers should be strengthened to enable the Unit to require that a job evaluation scheme and/or equal pay audit be undertaken as part of the investigation process, we also have reservations about the amount of time that employers will be given to undertake such a review.

We recommend that:

- firms with fewer than 100 workers should carry out an equal pay review, rather than an equal pay audit, for the reasons set out earlier in our response
- firms with fewer than 100 workers should only be required to use a non-analytical job evaluation scheme (such as job ranking or classification), rather than an analytical scheme, for the reasons set out earlier in our response

For large employers, job evaluation schemes and equal pay audits can be time-consuming and costly, although future advances in AI may help to reduce both the time and expense involved.

Question 26: Do you agree or disagree that the Unit should have the ability to require those subject to inquiry recommendations to respond to them and provide updates on implementation?

Yes, though the requests for updates on implementation should be proportionate.

Question 27: Please explain your answer

The Unit's recommendations should be implemented promptly. However, requests for progress updates must be proportionate: too many could distract employers from their business purpose, while too few could suggest that implementation is not a priority. Non-binding recommendations have limited the practical impact of past inquiries. Consideration should be given to a duty to respond and report on implementation.

Question 28: Do you think the Unit should have additional new powers or capabilities to help secure remedies for workers beyond our proposal?

No with caveat

Question 29: Please explain your answer

We recommend that:

- After a reasonable period of operation, say 2-3 years, the government should review the Unit's operation to assess whether it needs additional powers or capabilities to help secure remedies for workers.
- The Unit should have powers (directed) to publish anonymised sectoral benchmarking data drawn from its audit and investigation activity, to help other employers in the same sector benchmark their own pay structures without needing to be investigated. This would be an effective and preventative use of aggregated data.

Pay discrimination enforcement: impacts
Question 30: If the proposals set out in this chapter were implemented, how might employers change how they operate? For example, regarding recruitment practices or pay and conditions

If implemented, the proposals could prompt more large employers to review how they set pay levels, structures and progression, as well as other pay elements such as overtime rates and bonuses. We expect increased investment in in-house reward, data and HR analytics capability as employers prepare for possible scrutiny, alongside more proactive internal pay audits.

This would consequently lead to greater use of job evaluation, equal pay audits, and equal pay reviews. The extension of gender pay gap reporting to ethnicity and disability, alongside the introduction of employer action plans, should also encourage employers to assess whether their pay practices are both legally compliant and aligned to their business/organisational needs.

The key challenge will be ensuring that small and medium-sized firms are aware of the changes and receive the support they need to comply, including practical guidance on how to respond to the enforcement activities of the Equal Pay Regulatory and Enforcement Unit.

Question 31: If the proposals set out in this chapter were implemented, what costs do you think employers would face, if any? For example, wage, administrative or legal costs.

We anticipate that large employers will spend money to reduce the risk of a pay discrimination enforcement, such as reviewing their approach to pay management. High-profile litigation cases demonstrate that where systemic pay discrimination exists and is only identified through late-stage litigation, wage/back-pay costs can be organisation-threatening. Earlier detection through the Unit's proposed powers should, over time, convert these tail-risk costs into smaller, earlier corrective costs. This is precisely the shift, from reactive to preventative enforcement, that is the intent of this regulation.

Question 32: Are there any proposals set out in this chapter that may take employers more than a year to implement?

Yes

Question 33: Please explain your answer, including how long you think any proposal may take to implement.

Building internal capability to respond to Unit evidence requests and potential audits at scale. For large, multi-site employers, establishing the data infrastructure to respond promptly and comprehensively to a pre-investigation evidence request would likely be a costly, multi-month to multi-year undertaking, particularly for organisations without existing HR analytics maturity.

Section 3. Making the right to equal pay effective for ethnic minority and disabled people

Question 35: Do you agree or disagree that the Equality Act 2010's protections against pay discrimination on the basis of race and disability, and those it provides under the equal pay scheme against pay discrimination on the basis of sex, should be broadly levelled-up to provide equal protection as far as possible?

Agree with levelling up race and disability pay discrimination protections to match sex.

Question 36: Please explain your answer

Levelling-up direct and indirect discrimination provisions relating to race or disability
Modification of contractual terms

Disabled and ethnic minority pay gaps have materially weaker legal remedies than the sex-based equal pay scheme. However, we have concerns relating to sequencing, timetable and the adequacy of some proposed mechanisms given the distinctiveness of race and disability pay disadvantage. We agree maintaining three distinct regimes while levelling up their practical effect is more workable than wholesale extension of the equal pay scheme to race and disability, which as the consultation itself notes stakeholders warned about the risks of importing the equal pay scheme's own documented delays and complexity into new areas of law.

Levelling up should mean equivalent protection, not identical legal machinery. Some features of the existing equal-pay framework are highly technical and have generated substantial litigation. government's own consultation recognises that simply extending the existing regime could increase complexity and delay. The objective should therefore be to remove unjustified differences in protection while simplifying the overall system.

CIPD's virtual roundtable
Members supported the policy intent of strengthening routes for disabled and ethnic minority workers to challenge pay discrimination, while emphasising that levelling up should mean equivalent protection rather than wholesale replication of the existing sex equal pay regime. Roundtable evidence underlined wide variation in organisational readiness. Larger and public-sector employers are more likely to have grading, job evaluation and benchmarking arrangements in place, while many SMEs lack dedicated HR or reward capability, formal job descriptions or the systems needed to undertake technical pay analysis.

This reinforces CIPD's wider recommendations that implementation should be proportionate and phased, with practical guidance, template tools and targeted SME support available before commencement.

CIPD recommends a package which combines stronger individual rights with greater employer transparency, better access to information, preventative measures and more effective regulatory enforcement.

Question 37: Do you agree or disagree that Employment Tribunals should be able to require the modification of the terms of a claimant's contract in successful discrimination claims relating to pay on the grounds of race or disability?

Agree.

Question 38: Please explain your answer

An Employment Tribunal should have targeted/limited power to require modification of contractual terms following a successful disability or race discrimination claim. Without such a remedy, a successful claimant may obtain a finding of discrimination on compensation for past loss while the discriminatory contractual term remains unchanged – which does not necessarily resolve the underlying problem or prevent the disparity from continuing in the future.

This addresses an important inequality with sex equal pay regime, under which an equality clause can automatically modify contractual terms. The consultation proposes that a Tribunal could achieve this through a declaration or recommendation specifying the terms needed to correct the discrimination, or by treating the claimant's contract as incorporating equally favourable terms. CIPD considers this a proportionate form of levelling up because it is directed at correcting an established unlawful pay disparity rather than giving Tribunals a general power to rewrite employment contracts.

Question 39: What limitations or safeguards should be considered for this power, if any?

CIPD considers safeguards essential. The power should arise only where the Tribunal has made a finding of unlawful race or disability discrimination relating to pay, and there is a clear correlative or causal connection between the unlawful discrimination and the contractual term requiring correction.

The Tribunal should identify the particular term or terms requiring modification and should have regard to the comparator or objective benchmark established in the case. The remedy should be proportionate to the discriminatory finding and should not confer a general jurisdiction to rewrite contracts. There should also be procedural fairness. Employers should have an opportunity to make representations about the proposed modification, particularly where the contractual term is part of a wider remuneration structure or collective arrangement.

The legislation and accompanying guidance should make clear the purpose of the power – that it is remedial correction and not retrospective restructuring of an employer's reward system.

Equal pay audits

Question 40: Do you agree or disagree that existing requirements should be widened so that employers found to have discriminated in terms of pay on the basis of race or disability can be required to undertake an equal pay audit and job evaluation scheme?

Agree

Question 41: Please explain your answer

We support the proposal, provided the requirement is proportionate and focused on preventing recurrence rather than imposing unnecessary procedural requirements on employers.

An audit can identify whether the finding reflects a wider pattern, while job evaluation can provide a more objective basis for assessing whether jobs are being valued consistently. The consultation recognises that existing equal-pay audits can be less effective where grading structures are not supported by a robust, non-discriminatory job evaluation scheme.

The preventative value of an audit is particularly important because race and disability pay discrimination is significantly under-detected. Government research, understanding pay discrimination, identifies a substantial evidence gap and highlights the difficulties individuals face in obtaining the information needed to establish a claim. An audit following a finding of discrimination can therefore perform two functions. It can establish whether the problem is isolated or systemic, and it can identify changes required to prevent recurrence.

We recommend a risk-based approach to implementation. The audit should be proportionate to the size of the employer, the context and circumstances of the case and the seriousness of the finding. The legislation should avoid creating a prescriptive methodology that prevents employers from using established, credible reward and job-evaluation systems.

Question 42: To support employers with pay audits covering sex, race and/or disability, what main areas should the guidance cover?

The guidance should be practical enough for HR, reward, people professionals and people managers to use. It should explain how to define and categorise the population (with specific reference to disaggregated disability and ethnicity data) being audited; identify appropriate comparators; analyse base pay and other contractual elements; assess allowances, bonuses, overtime, progression and benefits; and identify differences by grade, job family, location, working pattern and length of service.

The guidance should address data quality, confidentiality, small-number analysis, intersectionality and statistical interpretation. Employers should be cautioned against treating a statistical pay difference as proof of discrimination, while also being encouraged to investigate unexplained differences rather than simply dismissing them as statistical noise.

For disability, the guidance should expressly address the impact of reasonable adjustments, disability-related absence, reduced hours, flexible working and performance-management arrangements where these have implications for pay. Capturing non-visible and fluctuating

disabilities without incentivising under-declaration, CIPD's own research shows 31% of neurodivergent employees have not disclosed to their line manager or HR, and 65% fear management discrimination if they do.

CIPD's virtual roundtable

Members stressed that job evaluation is uncommon in many SMEs and can be perceived as technical and onerous. This supports CIPD's recommendation that guidance should include simplified job evaluation templates, benchmarking primers, step-by-step audit checklists and advice on managing incomplete ethnicity and disability disclosure data.

Members highlighted the need for employers to document the rationale for pay differences, particularly where these arise from market supplements, specialist skills, performance, attendance, bonuses or discretionary uplifts. This should be reflected in guidance on the material-factor defence and on proportionate audit practice.

Members also underlined the importance of documenting explanations for pay differences, particularly where they relate to market supplements, specialist skills, performance, attendance, bonuses or discretionary uplifts. Without clear records, otherwise legitimate pay decisions can create or entrench internal disparities over time.

For race, the government should provide guidance on the treatment of different ethnic groups and the risks of aggregating categories so extensively that important disparities disappear. ONS data shows pay gaps ranging from -16.9% (Pakistani) to +23% (Chinese) relative to White British employees, so a single/broad 'ethnic minority' category would mask, rather than reveal, the groups facing the greatest disadvantage.

The guidance should include how to undertake intersectional analysis (e.g. disabled ethnic minority women), There is no current audit methodology.

Finally, it should explain and provide a tool kit as to what employers should do following an audit: identify causes, develop an action plan, assign accountability, monitor progress, report and communicate appropriately with employees and relevant stakeholders.

Equivalence of work
Question 43: Do you agree or disagree with the proposal to allow claims for race and disability pay discrimination where the work is not materially similar but is of equal value?

Strongly Agree

Question 44: Please explain your answer

This is an important element of genuine levelling up. The current distinction means that a race or disability discrimination claimant can face difficulty bringing a claim where the comparator's job is materially different, even though the two roles may be assessed as being of equal value. The consultation identifies this because of section 23 of the Equality Act, which requires no material difference in circumstances for direct and indirect discrimination claims, whereas the equal-pay framework expressly accommodates work rated as equivalent and work of equal value.

This closes a structural gap that leaves disabled and ethnic minority workers, who are more likely to be concentrated in different, lower-graded roles than in identical roles paid less, without a viable claim route that women have had since 1983 (when 'work of equal value' claims became available following the UK's compliance with EU law in Equal Pay (Amendment) Regulations 1983).

The purpose of job evaluations is to precisely assess jobs that can make different demands while nevertheless being of equivalent value. Skill, responsibility, effort and decision-making can be assessed across very different occupations. The consultation gives examples of roles that have been found to be of equal value, including clerical and warehouse work and nursery nursing and architectural technician roles.

We recommend this measure be commenced at the earliest point within Phase 2, ahead of the outsourcing duty (Chapter 4) if a choice must be made, given its direct relevance to the pay gaps evidenced in Section 1 of this response.

CIPD's virtual roundtable

Members noted that formal grading and job evaluation can reduce subjective decision-making and give employers a stronger basis for assessing whether different roles are of equal value. In their absence, manager discretion, candidate negotiation and local market pressures are more likely to shape pay outcomes.

Members also identified bonus, commission and discretionary reward systems as higher-risk areas because they are often less structured and less well documented than base pay. This reinforces the need for practical guidance on assessing equal value and explaining variable pay decisions across different roles.

Levelling up the equal pay scheme
Hypothetical comparators
Question 53: Do you agree or disagree with the proposal to allow hypothetical comparators in equal pay claims in the 2 prescribed, limited scenarios described above (successor comparisons and improvement in terms)?

Agree

Question 54: Please explain your answer

We support the proposal for the two specific scenarios: successor comparisons and cases where an improvement in terms is triggered by the appointment of a person who does not share the claimant's protected characteristic. The benefit is that both scenarios involve a reasonably identifiable factual benchmark rather than a wholly hypothetical exercise. In the successor situation, there is an actual person occupying the same role. In the second scenario, the employer's own subsequent decision to improve the claimant's terms provides evidence of the value attached to the work.

The consultation is right to caution against a wholesale introduction of hypothetical comparators. A general hypothetical-comparator jurisdiction could make cases substantially more speculative and complex, because Tribunals would have to determine what a comparator who does not actually exist would have been paid.

The reform would also address situations in which the existing requirement for an actual comparator can produce an artificial result. For example, a worker should not necessarily lose the ability to challenge a historical pay difference simply because the person who subsequently occupied the role was appointed after the claimant had moved elsewhere. At the same time, the legislation should make clear that the burden of establishing the factual circumstances remains with the claimant and that the normal employer defences remain available.

Question 55: Are there any other scenarios where the use of a hypothetical comparator should be considered?

No

Question 56: If yes, what are those scenarios?

Not applicable. If government subsequently considers extending the approach, it should consult separately and undertake a proper assessment of the evidential and procedural consequences. Expansion should not occur incrementally without understanding whether the original reform has increased complexity and or litigation.

Time limits
Question 57: Do you agree or disagree with providing discretion to the judiciary to extend time limits for bringing equal pay claims 'on a just and equitable basis'?

Agree

Question 58: Please explain your answer

The current six-month time limit following the end of employment is significantly more rigid than the approach applying to many other discrimination claims. The consultation identifies circumstances such as ongoing negotiations, grievance procedures, personal circumstances and case complexity which can contribute to delay. Disabled claimants can face delay linked to fluctuating or progressive conditions or managing reasonable adjustments and claimants from ethnic minority backgrounds may experience delay due to fear of workplace victimisation in less diverse environments.

The government's own separate impact assessment work 2025 (Employment Tribunal Extended Times) identified limitations, lack of awareness, lack of information, evidential difficulties and recommended extension of Employment Tribunal time limits. A carefully framed judicial discretion would improve consistency across the Equality Act without removing the importance of bringing claims promptly.

Making the right to equal pay effective for ethnic minority and disabled people: impacts
Question 59: If the proposals set out in this chapter were implemented, how might employers change how they operate? For example, regarding recruitment practices or pay and conditions.

The principal change would influence/drive employers to move towards more structured and evidence-based pay governance. Employers would have stronger incentives to ensure that job descriptions, grading structures, salary bands and starting salaries are objectively determined and consistently applied. Recruitment processes would need clearer controls around starting salaries and recruitment premiums, while discretionary decisions on progression, allowances, bonuses and other contractual benefits would be subject to greater transparency and need to be capable of explanation.

Employers would also need stronger workforce data and more systematic analysis of pay outcomes by sex, race and disability. This should not necessarily mean that every employer conducts a audit/statistical analysis every year, but employers should have sufficient information to identify unexplained disparities and investigate them. This is consistent with the direction of travel in CIPD's own research. CIPD's 2024 research on pay, performance and transparency found that pay transparency remains limited, with only 41% of organisations always publishing salary ranges in external job adverts, while only 54% reported checking whether employees understand their pay. The reforms should therefore encourage better reward governance.

CIPD's virtual roundtable

Large employers may be able to build on existing reward frameworks, but members warned that many SMEs would need basic support to create job descriptions, understand job evaluation, gather pay data and benchmark roles. Members also noted that incomplete ethnicity and disability disclosure would limit the accuracy of pay analysis unless employers are supported to build trust and improve data quality.

Question 60: If the proposals set out in this chapter were implemented, what costs do you think employers would face, if any? For example, wage, administrative or legal costs.

There would be costs, but these should be distinguished between the cost of complying with new regulatory requirements and the cost of correcting unlawful or inequitable pay practices. The main

implementation costs are likely to involve reviewing pay structures, job evaluation, improving HR and payroll data, obtaining legal advice, training managers and undertaking audits.

Employers with mature reward systems and reliable workforce data should face significantly lower incremental costs than organisations with fragmented systems. There may also be direct wage costs where an employer identifies and corrects discriminatory pay.

We consider these costs as legitimate consequences of achieving compliance, rather than simply regulatory burdens. The government should nevertheless design the framework proportionately, particularly for smaller employers, and provide accessible practical guidance with manageable implementation timelines.

CIPD's virtual roundtable

For SMEs, the burden was seen as particularly significant because many have no dedicated HR support or reward capability. Members therefore supported funded or subsidised access to expert advice and/or a trusted intermediary, such as ACAS, to help smaller employers comply proportionately.

Question 61: Are there any proposals set out in this chapter that may take employers more than a year to implement?

Yes

Question 62: Please explain your answer, including how long you think any proposal may take to implement

The basic legal changes could be implemented relatively quickly, but the organisational infrastructure needed to comply effectively could take considerably longer. For a large employer with multiple job families, locations and reward arrangements, developing or refreshing job evaluation, improving pay data, reviewing contractual terms and establishing appropriate governance could reasonably take 12–24 months and some cases even longer (for example the Scottish Council workers secure multimillion… | CIPD HR-inform. Organisations with fragmented legacy systems or complex grading structures may need even longer.

CIPD's virtual roundtable

Members said that guidance should be available well before commencement and should include a clear baseline booklet, model templates and step-by-step processes that employers can adapt into equality, reward and recruitment policies. This aligns with CIPD's recommendation for phased implementation supported by practical tools.

We would therefore recommend a phased implementation period, with sufficient lead time between legislation, final regulations, statutory guidance and commencement. For example, a minimum 24-month implementation runway following Phase 1 completion for medium/large employers, with a shorter (12-month) runway acceptable for SME's.

Question 63: Are there other changes that you think the government should consider?

We recommend that government considers the reform as a connected system rather than as a collection of individual legal changes. The package should include accessible pay transparency requirements, clear practical example/scenario-based guidance on the material-factor defence, a proportionate statutory questionnaire, better Tribunal data, improved regulatory enforcement and practical guidance on job evaluation and equal-pay audits.

There should also be a deliberate focus on intersectionality. Race, disability and sex do not operate independently, and government's research highlights the complex and non-uniform nature of pay inequalities.

The government should evaluate the impact of the reforms after implementation. This should include not only the number of claims but whether disabled and ethnic minority workers are obtaining effective redress, whether employers are identifying disparities earlier and whether litigation is becoming simpler and faster.

CIPD's virtual roundtable

Members strongly suggested that they also saw a role for CIPD in building employer capability, including through reward-focused communities of practice, strengthened reward content in professional learning and practical training in job evaluation, benchmarking and audit methodology.

Promoting pay equality in contractual arrangements
Outsourcing
Question 64: Do you agree or disagree with the proposal to introduce a new duty on contracting parties to take all reasonable steps to uphold pay equality in contractual arrangements?

Agree

Question 65: Please explain your answer

Outsourcing should not provide a means of circumventing equality obligations. Research identifies evidence of pay inequality associated with outsourced work, including evidence concerning predominantly ethnic minority workforces. For example, EHRC's Invisible Workforce Report 2014 of the cleaning sector found the workforce is 79% female and 44% from an ethnic minority background, against 47% and 16% respectively across the whole UK labour force. The TUC Insecure work and Ethnicity and Joseph Rowntree Foundation research reinforces this evidence base: ethnic minority workers are disproportionately represented in insecure, zero-hours and agency work, and minority ethnic workers report shift notice periods and cancellations at higher rates than white workers.

This means that outsourcing structures currently exclude precisely the groups most exposed to pay disadvantage from equal pay comparator protection.

A proportionate positive duty requiring contracting parties to take 'all reasonable steps' compared to reasonable steps needs to be fully and clearly defined and articulated. The consultation appropriately proposes a flexible, case-specific approach in which all reasonable steps depend on factors such as size, resources and the contracting party's ability to influence the terms of the other organisation.

We recommend that the government should provide clear regulations and practical guidance identifying what constitutes 'reasonable steps' and distinction with '**all** reasonable steps' in different circumstances. The guidance should:

- Set out 'how to' - identify risk factors, assess likelihood/severity, identify controls, implement necessary change, monitor and review
- Provide a downloadable risk assessment template/tool-kit structured to be adaptable across sectors (a customer-facing retail environment, a professional services firm with client entertaining, a manufacturing site with lone or night-shift working, and a remote/hybrid organisation with digital-only third-party contact, will each need to weigh different factors).

- Highlight that risk assessment is not a one-off compliance exercise: it should be reviewed periodically, after any relevant incident, and whenever working practices, premises or the customer/client base change materially.
- Confirmation of what evidence of a risk assessment (and of decisions taken, including reasoned decisions not to take a particular step) an employer should keep, given this will be directly relevant to demonstrating the 'all reasonable steps' defence.

We do wish to raise a point made by members consulted during the preparation of the CIPD's response to the recent TUPE call for evidence, that many organisations, particularly SMEs are unaware of TUPE and the attendant obligations, with the obligation on transferor employers to provide specified ELI information being a source of concern. Any introduction of additional regulation in this area should recognise that there will need to be significant awareness raising to ensure consistent understanding and compliance.

We cannot overstate the importance of clear, relevant and practical guidance. This will be crucial for encouraging compliance. Many SMEs do not have in-house HR support, or use of systems to easily enable them to access information. The government should commit to developing guidance in partnership with employers, including small and medium businesses, to ensure it is clear what steps employers should be taking.

Proportionality will also need to be assessed realistically – against a framework of increasing obligations and duties on employers, it is possible that the introduction of further regulation will prove too much for small and medium-sized employers (of which there were almost six million in the UK at the start of 2025 compared with 8,335 'large' (250 or more) employers. While equal pay is certainly to be encouraged, if an unintended consequence is the imposition of so much administration that many businesses decide to close, this will reduce opportunities for work, for individuals and for growth of the economy as a whole.

Question 66: Do you agree or disagree that the Equal Pay Regulatory and Enforcement Unit should be able to enforce this duty?
Agree

Question 67: Please explain your answer

The proposed duty is fundamentally preventative and regulatory. Requiring/expecting every individual worker to bring a separate claim would risk recreating the enforcement model the government is seeking to address. Given the multi-party, often opaque nature of subcontracting chains (the consultation's own example involves a principal, a contractor, a labour provider and an umbrella company in a single chain), individual worker litigation against parties with whom they have no direct contractual relationship and limited visibility would replicate the current access-to-justice failures.

The Unit should have meaningful investigative powers, supported by clear procedural safeguards and remitted to provide practical guidance. Individual workers should retain the ability to bring any separate claim available to them under the Equality Act. Additionally, the Unit should be able to build sectoral expertise (e.g. cleaning, catering, security, retail, warehouse, social care) needed to assess 'all reasonable steps' proportionately across different supply chain structures. Expertise an individual tribunal claim is unlikely to develop.

There should be a mechanism for complaints to be made to the enforcement unit, and an obligation on the unit to respond to complaints rather than working entirely to their own agenda. This would reflect, for example, the mechanism by which an individual can raise a complaint to the EHRC that an employer is not complying with the preventative duty to take reasonable (soon to be all reasonable) steps to prevent sexual harassment. This will ensure that individuals will be able to flag when they themselves feel that they are not being paid fairly.

Question 68: Do you agree or disagree that the duty to take all reasonable steps should apply to all parties involved in the outsourcing arrangement? This would mean that the principal(s), outsourced service provider(s) and intermediaries in more complex chains could be liable for a breach.

Agree – subject to clear differentiated responsibility.

Question 69: Please explain your answer

The proposal is sensible in recognising that outsourcing chains can involve several organisations, including labour providers and umbrella companies. The key issue is therefore not whether every party should have exactly the same obligations, but whether each party has taken 'all' the steps that were reasonable given their respective position.

For example, cost-setting power in outsourcing chains typically sits with the principal and not the direct employer, so a duty that affects only the worker's direct employer would allow the party with the greatest practical control over pay outcomes to escape scrutiny entirely, undermining the duty's purpose from the outset.

Regulations should set out the factors relevant to responsibility, including contractual control, bargaining power, access to pay and workforce data, ability to audit, size and resources, duration of the arrangement and the extent to which the party benefits from or controls the outsourced labour.

This is also consistent with the Modern Slavery Act's approach of placing transparency obligations on principals regardless of their direct employment relationship with affected workers. This is a model that UK compliance and procurement functions are already familiar with.

It should be made clear how any duty will extend in subsequent retendering exercises. It is often the case that workers will find themselves transferred on more than one (two, three four or even five times) through their working life while essentially performing the same work for the same principal.

Question 70: What specific steps do you think would be reasonable and proportionate for either a small, medium or large employer to take to fulfil this duty?

The framework and guidance should be risk-based – scaled by size.

For a small employer, reasonable steps might include appropriate due diligence before entering an outsourcing arrangement, contractual clauses and commitments to comply with equality law; ensure documented, bias-free internal pay decisions; request and record available comparator pay data from the principal; confirmation from suppliers of their pay practices and escalation where credible concerns arise.

For a medium (c-100 employees), expectations could reasonably include obtaining relevant pay and demographic information, including equality provisions in contracts, retaining audit rights and periodically reviewing higher-risk arrangements. The consultation suggests requesting pay and demographic information as an example for a medium-sized employer acting as a principal or intermediary.

Large organisations and major principals should be expected to take more systematic steps, including supply-chain equality risk assessments, appropriate contractual warranties, access to relevant data, audit mechanisms, remediation requirements and governance (board-level oversight – as part of wider EDI and ESG reporting), including through procurement and reward functions.

In preparing a response to the recent TUPE Call for Evidence, one-to-one interviews with a number of senior HR professionals highlighted a key issue with the timing of the provision of Employer Liability Information - 'ELI' - within the current TUPE framework. The consistent message we

received was that provision of basic ELI information required is inconsistent, often incomplete or not provided, and provided at very short notice. This late and/or inadequate provision of ELI had knock on impacts on commercial decision-making at a late stage, when a deal We indicated in the CIPD response to the Call for Evidence that measures to expedite the provision of detailed and accurate ELI earlier in the commercial process would be a significant improvement. We recommend that any new requirements to provide information before any initial outsourcing, or further subcontracting or re-tendering exercise to which this new duty would apply should similarly be timetabled for much earlier in the process: information regarding pay and other liabilities can impact on the commercial sense of a deal. It would be preferable for this to be known at an early stage to allow parties to contract with all available information, rather than the information being received at a late stage and a deal then falling through after the investment of considerable time and effort up to that point.

Question 71: Do you agree or disagree that contracting parties should not be required to pay compensation but should be required to take reasonable steps to ensure ongoing pay equality in their contractual arrangements?

Agree with qualification.

Breach of this specific regulatory duty should primarily result in corrective and preventative action; however, it must not prohibit or stop a compensation claim. The distinction is important because workers should not lose existing rights to compensation where the underlying facts amount to unlawful discrimination or an equal-pay breach. The proposed regulatory duty should complement those rights rather than displace them.

If there is no right for an individual, there is a significant risk that this will result in an overly complex, administratively burdensome and costly information providing exercise which will actually stifle productivity and growth with no actual benefit to any one concerned – not least the individuals who suffer most from uncertain and insecure pay structures.

Question 72: What remedies do you believe should be available to a claimant when a contracting party is found to be in breach of this duty? Please provide details on the types of remedies or corrective actions you would like to see implemented.

The primary remedies should be corrective and prospective. These could include a requirement to undertake a pay audit, review contractual arrangements, provide specified information, implement an agreed remediation plan/ take all reasonable steps to prevent recurrence. The Tribunal or regulator should also be able to require monitoring and follow-up reporting where appropriate.

A declaration of breach should be available, together with regulatory enforcement where a contracting party fails to comply. The framework should avoid an unlimited standalone compensation remedy. However, the legislation must expressly preserve any separate right a worker may have to pursue compensation for unlawful discrimination, equal pay or another actionable breach.

We recommend:

- the Unit's primary remedy should be a binding all reasonable-steps order (mirroring the equal pay audit order model)
- the Unit should retain discretion to seek modest, capped compensation in cases of deliberate, repeated non-compliance identified through investigation, to preserve a meaningful deterrent effect beyond forward-looking process orders alone.

Promoting pay equality in contractual arrangements: impacts
Question 77: If the proposals set out in this chapter were implemented, how might employers change how they operate? For example, regarding recruitment practices or pay and conditions.

We expect increased use of standard data-sharing clauses in outsourcing contracts (mirroring Modern Slavery Act statement practice), greater willingness among principals to consolidate their outsourced supply chains to fewer and better-vetted providers to manage the compliance burden.

Employers are likely to strengthen procurement and supplier-governance processes. Equality considerations would become a more explicit part of outsourcing decisions, contract drafting and supplier due diligence.

Large organisations could introduce standard equality clauses, supplier warranties, information rights and audit provisions. They could also require suppliers to provide relevant pay and workforce information where the risk of pay inequality is material.

Procurement, HR, legal and EDI functions would need to work more closely together. Organisations could also reconsider whether some services should be outsourced where they cannot obtain sufficient assurance over pay practices.

It will be important to ensure to avoid creating incentives to abandon legitimate outsourcing simply because the compliance framework is too uncertain or costly. The objective should be responsible outsourcing, not discouraging outsourcing as a business model.

Question 78: If the proposals set out in this chapter were implemented, what costs do you think businesses would face, if any? For example, wage, administrative or legal costs.

Using the scale of the outsourced/cleaning sector as an example (over 450,000 workers per the British Cleaning Council), even modest per-contract administrative costs will aggregate meaningfully at a national level, reinforcing the case for clear model contract clauses and guidance to reduce duplicated legal drafting costs across the sector.

The main costs would arise from supplier due diligence, contract review, legal advice, data collection, audits and ongoing monitoring. For large organisations with extensive supply chains, there could also be costs associated with integrating pay-equality requirements into procurement systems and supplier-management processes. Some suppliers may pass compliance costs through commercial pricing.

There may be additional wage costs where the review identifies actual unlawful pay disparities. Those should be regarded differently from administrative compliance costs: correcting unlawful discrimination is a substantive employment cost, not simply a consequence of regulation.

Recommendation: Government should undertake effective impact assessments across different employer sizes and supply-chain models before implementation.

Question 79: Are there any proposals set out in this chapter that may take businesses more than a year to implement?

Yes

Question 80: Please explain your answer including how long you think any proposal may take to implement?

Implementation time will depend on the complexity of the organisation's supply chain.
A relatively simple outsourcing arrangement could be reviewed within 6–12 months. A large organisation with multiple service providers, subcontractors and labour intermediaries may require 12–24 months to map contractual relationships, introduce standard clauses, establish data requirements, negotiate amendments and build monitoring processes.

The government should therefore provide a substantial implementation period and publish detailed guidance before the duty takes effect. Transitional arrangements should also protect organisations that are already operating under long-term contracts and need time to renegotiate them.

Question 81: Are there other changes aimed at promoting pay equality in contractual arrangements that you think the government should consider?

Our recommendation is for stronger practical infrastructure around the proposed duty. Government should develop model contractual clauses, procurement guidance and a clear framework or tool-kit for supplier due diligence. Publishing/providing standard clauses and templates would materially reduce legal drafting costs and compliance uncertainty relative to leaving each employer to develop its own approach.

It should also clarify how the proposed duty interacts with TUPE, the Equality Act 2010 and the Public Sector Equality Duty. The consultation itself recognises the value of strengthening guidance on TUPE and equality obligations in transfer and outsourcing situations.

There should also be clear rules about access to pay and workforce data across supply chains, particularly where an organisation is expected to take reasonable steps but does not directly employ the workers concerned. The regulatory framework should recognise multi-tier supply chains. A principal should not be able to avoid responsibility simply because a direct supplier has inserted another intermediary between itself and the workers. Equally, responsibility should not become unlimited or disproportionate for organisations that have little practical control over downstream arrangements.

Geographical scope
Question 82: Do you agree or disagree that the proposed measures should retain the same geographical scope as the discrimination and equal pay provisions of the Equality Act 2010 (applying to England, Wales, and Scotland)?

Yes- the consultation proposes retaining the existing geographical scope of the Equality Act 2010 as the relevant equal-pay and discrimination provisions already apply across England, Wales and Scotland.

A common framework is particularly important for employers operating across Great Britain. Different rules on pay transparency, equal-pay claims, contractual modification or outsourcing would increase complexity and potentially create arbitrary differences in protection based on where an employee works.

Respecting the UK's devolved constitutional arrangements we would recommend that government continue to engage with the Scottish and Welsh Governments. We would especially encourage the government to work with the Northern Ireland Executive on parallel reforms to avoid a growing protection gap for workers there, given that Northern Ireland's separate equality law framework already diverges from GB in other respects. This can help maintain a consistent approach and would reduce administrative complexity for employers and provide greater clarity for workers.

Demographic section
Part 1: Information about you or your organisation
Demographic question 1:

Which of the following are you responding as?

An employer or business (Please refer to section A)
An organisation or network which represents employers or employees (Please refer to section B)
Other organisation (for example a charity or research organisation) (Please refer to section C)
An individual (Please refer to section D)
Section A: about your business
Demographic question 2:

Please provide your organisation's name:

Demographic question 3:

Approximately what is the size of your organisation?

Micro (1 to 9 employees)
Small (10 to 49 employees)
Medium (50 to 249 employees)
Large (250+ employees)
Do not know
Demographic question 4:

Where is your organisation mostly located?

Great Britain (England, Scotland and Wales)
Northern Ireland
Outside the UK
Demographic question 5:

Which sector does your organisation best fit into??

Public sector
Private sector
Voluntary sector (for example, a charity or not-for-profit organisation)
Other (please specify):
Demographic question 6:

Does your business provide services or staff that have been outsourced from another business or public body?

Demographic question 7:

Which industrial sector does your organisation best fit into?

Agriculture, forestry and fishing
Mining and quarrying
Manufacturing
Electricity, gas, steam and air conditioning supply
Water supply, sewerage, waste management and remediation activities
Construction
Wholesale and retail trade
Transportation and storage
Accommodation and food service activities
Publishing, broadcasting, and content production and distribution activities

Telecommunication, computer programming, consulting, computing infrastructure and other information service activities
Financial and insurance activities
Real estate activities
Professional, scientific and technical activities
Administrative and support service activities
Public administration and defence, compulsory social security
Education
Human health and social work activities
Arts, sports and recreation
Other service activities
Activities of households as employers and undifferentiated goods – and service-producing activities of households for own use
Activities of extraterritorial organisations and bodies
Section B: about your organisation or network [employee or employer representative organisation or network]
Demographic question 8:

Please provide your organisation or network's name:

Demographic question 9:

What type of organisation or network do you mostly represent?

An employee representative organisation or network
An employer representative organisation or network
Both an employee and employer representative organisation or network
Other (please specify):
Demographic question 10:

Approximately how many members does your organisation or network represent?

1 to 9 members
10 to 49 members
50 to 249 members
250+ members or more
Do not know
Demographic question 11:

Where are most of your members located??

Great Britain (England, Scotland and Wales)
Northern Ireland
Outside the UK
Demographic question 12:

Which sector does your organisation best fit into?

Public sector
Private sector
Voluntary sector (for example, a charity or not-for-profit organisation)
Other (please specify)
Demographic question 13:

What type of organisation are you mainly?

Disabled people's representative organisation or network
Ethnic minority representative organisation or network
Women's representative organisation or network

Other representative organisation or network
Trade union
Other (please specify):
Demographic question 14:

Which industrial sector does your organisation best fit into?

Agriculture, forestry and fishing
Mining and quarrying
Manufacturing
Electricity, gas, steam and air conditioning supply
Water supply, sewerage, waste management and remediation activities
Construction
Wholesale and retail trade
Transportation and storage
Accommodation and food service activities
Publishing, broadcasting, and content production and distribution activities
Telecommunication, computer programming, consulting, computing infrastructure and other information service activities
Financial and insurance activities
Real estate activities
Professional, scientific and technical activities
Administrative and support service activities
Public administration and defence, compulsory social security
Education
Human health and social work activities
Arts, sports and recreation
Other service activities
Activities of households as employers and undifferentiated goods – and service-producing activities of households for own use
Activities of extraterritorial organisations and bodies
Section C: about your organisation (other)
Demographic question 15:

Please provide your organisation's name:

Demographic question 16:

Where is your organisation mostly located?

Great Britain (England, Wales and Scotland)
Northern Ireland
Outside the UK
Demographic question 17:

Which sector does your organisation best fit into?

Public sector
Private sector
Voluntary sector (for example, a charity or not-for-profit organisation)
Other (please specify):
Demographic question 18:

Which industrial sector does your organisation best fit into?

Agriculture, forestry and fishing
Mining and quarrying
Manufacturing
Electricity, gas, steam and air conditioning supply

Water supply, sewerage, waste management and remediation activities
Construction
Wholesale and retail trade
Transportation and storage
Accommodation and food service activities
Publishing, broadcasting, and content production and distribution activities
Telecommunication, computer programming, consulting, computing infrastructure and other information service activities
Financial and insurance activities
Real estate activities
Professional, scientific and technical activities
Administrative and support service activities
Public administration and defence, compulsory social security
Education
Human health and social work activities
Arts, sports and recreation
Other service activities
Activities of households as employers and undifferentiated goods – and service-producing activities of households for own use
Activities of extraterritorial organisations and bodies
Section D: about you (individual)
Demographic question 19:

In what capacity are you responding in:

As an individual – my responses reflect my own views
On behalf of someone else – my responses reflect the views of someone else
Demographic question 19:

What is your sex?

Female
Male
Prefer not to say
Demographic question 20:

What is your age?

0 to 15
16 to 64
65 to 74
75 plus
Prefer not to say
Demographic question 21:

What is your ethnic group? Choose one option that best describes your ethnic group or background.

White

English, Welsh, Scottish, Northern Irish, British
Irish
Gypsy or Irish Traveller
Roma
Any other White background
Mixed or multiple ethnic groups

White and Black Caribbean
White and Black African
White and Asian

Any other Mixed or multiple ethnic background
Asian or Asian British

Bangladeshi
Chinese
Indian
Pakistani
Any other Asian background
Black Black British, Caribbean or African

Caribbean
African
Any other Black, Black British, Caribbean or African background
Other ethnic groups

Arab
Other ethnic group
Prefer not to say

Demographic question 22:

Do you have any physical or mental health conditions or illnesses lasting or expected to last for 12 months or more

Yes
No
Don't know
Prefer not to say
Demographic question 23:

Does your condition or illness/do any of your conditions or illnesses reduce your ability to carry out day-to-day activities?

Yes, alot
Yes, a little
Not at all
Demographic question 24:

Where do you mostly work? If you are currently not in work, please indicate where you live most of the time.

Great Britain (England, Scotland and Wales)
Northern Ireland
Outside the UK
Part 2: updates
If you would like to receive updates on this consultation, please visit [XXX] and select 'Get emails about this page'