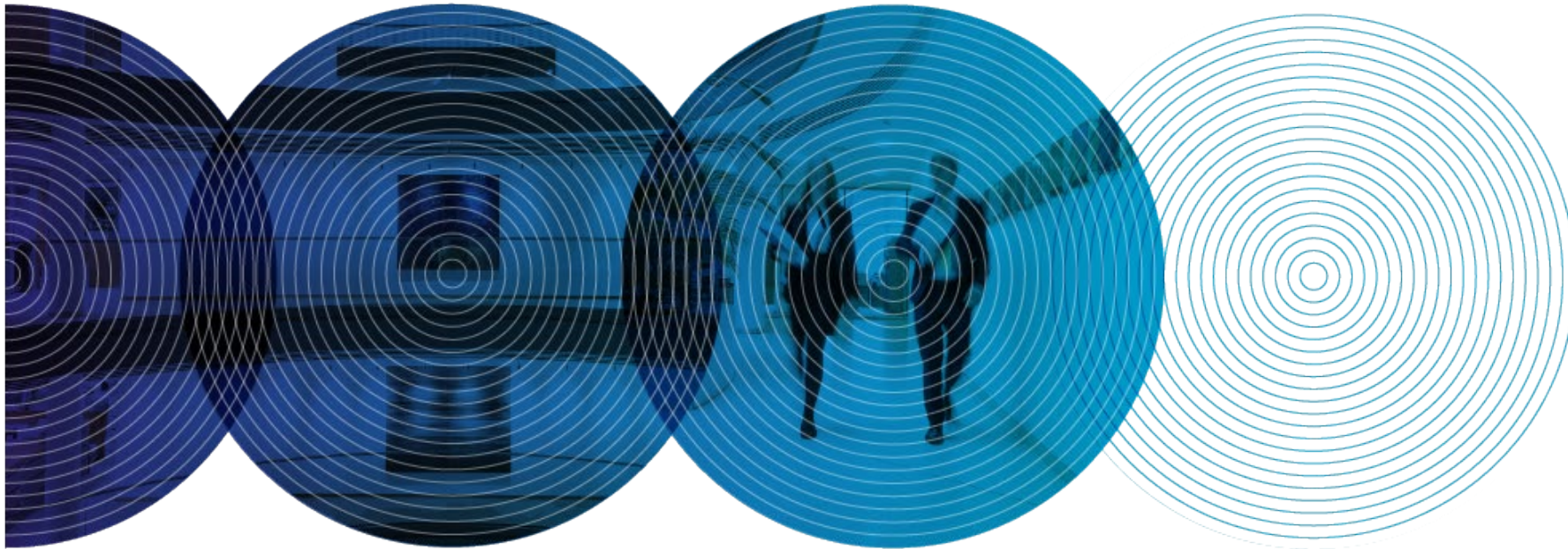


---

# Gender Pay Gap Reporting: Getting it Right

10 November 2022

Mary Brassil, Partner, McCann FitzGerald LLP



---

# Gender Pay Gap Reporting legislation

- Gender Pay Gap Information Act 2021
- Employment Equality Act 1998 (Section 20a) (Gender Pay Gap Information) Regulations 2022
- Additional guidance on calculating the pay gap, and FAQs, is available through [gov.ie/genderpaygap](https://gov.ie/genderpaygap)

# What is the Gender Pay Gap?

- **Gender Pay Gap** - difference in average gross hourly pay of women compared to men, such that it captures whether women are represented evenly across an organisation
- **Equal Pay** – women and men should receive equal pay for equal work



V



---

## Gender Pay Gap Reporting

- Which employers are required to report?
- ‘Snapshot Date’
- ‘Relevant pay period’ means the period of 12 months ending on the ‘Snapshot Date’
- ‘Reporting date’ “not later than 6 months after the ‘Snapshot Date’
- Which employees are included/excluded?
- Can group companies report on a group basis?

---

## What information must be reported ?

- The differences in male and female remuneration as follows:
  - mean and median hourly remuneration for all employees
  - mean and median hourly remuneration for part-time employees
  - mean and median hourly remuneration for temporary employees
  - mean and median bonus remuneration percentage of all employees
  - percentage of male and female employees that received a bonus
  - percentage of male and female employees that received benefits-in-kind
  - percentage of male and female employees in 4 equal quartile pay bands
- Narrative explaining the reasons for the gender pay gap and the measures to be taken by the employer to close the gender pay gap

---

## Key Definitions for the Calculations

- Hourly pay is an average over the 12 month period preceding the Snapshot Date.
  - How to calculate ‘ordinary pay’?
  - How to calculate ‘bonus remuneration’?
  - What is included in ‘benefits in kind’?
- “Working Hours” means the hours when a relevant employee is available, or required to be available, at or near his or her place of employment for the purposes of working...
  - Regulations provide for three methods for calculating the total number of working hours
  - How to treat periods of paid/unpaid leave?
- The total amount paid is divided by the hours worked to provide the hourly pay for that employee

---

# Gender Pay Gap Reporting

- How should the data be reported?
- How long must the report be available?
- What are the sanctions for non-compliance
- Understanding the results
- Narrative
  - to explain reasons for the gender pay gap
  - measures being taken, or planned, to address the gender pay gap

# Gender Pay Gap Action Plan

- Actions to improve the recruitment and promotion of women:
  - Ensuring multiple women are included in shortlists for recruitment and promotions
  - Using skills based assessment task in recruitment
  - Introducing transparency to promotion, pay and reward processes
  - Appointing diversity managers
  - Unconscious bias training
- Actions to support women's participation in the workplace:
  - Introduce flexible work policies for men and women
  - Introduce and encourage shared parental leave
  - Develop mentoring and sponsorship programmes





# Gender Pay Gap Reporting

Patrick Gallen,

Partner People and Change

10<sup>th</sup> November 2022



# Introduction



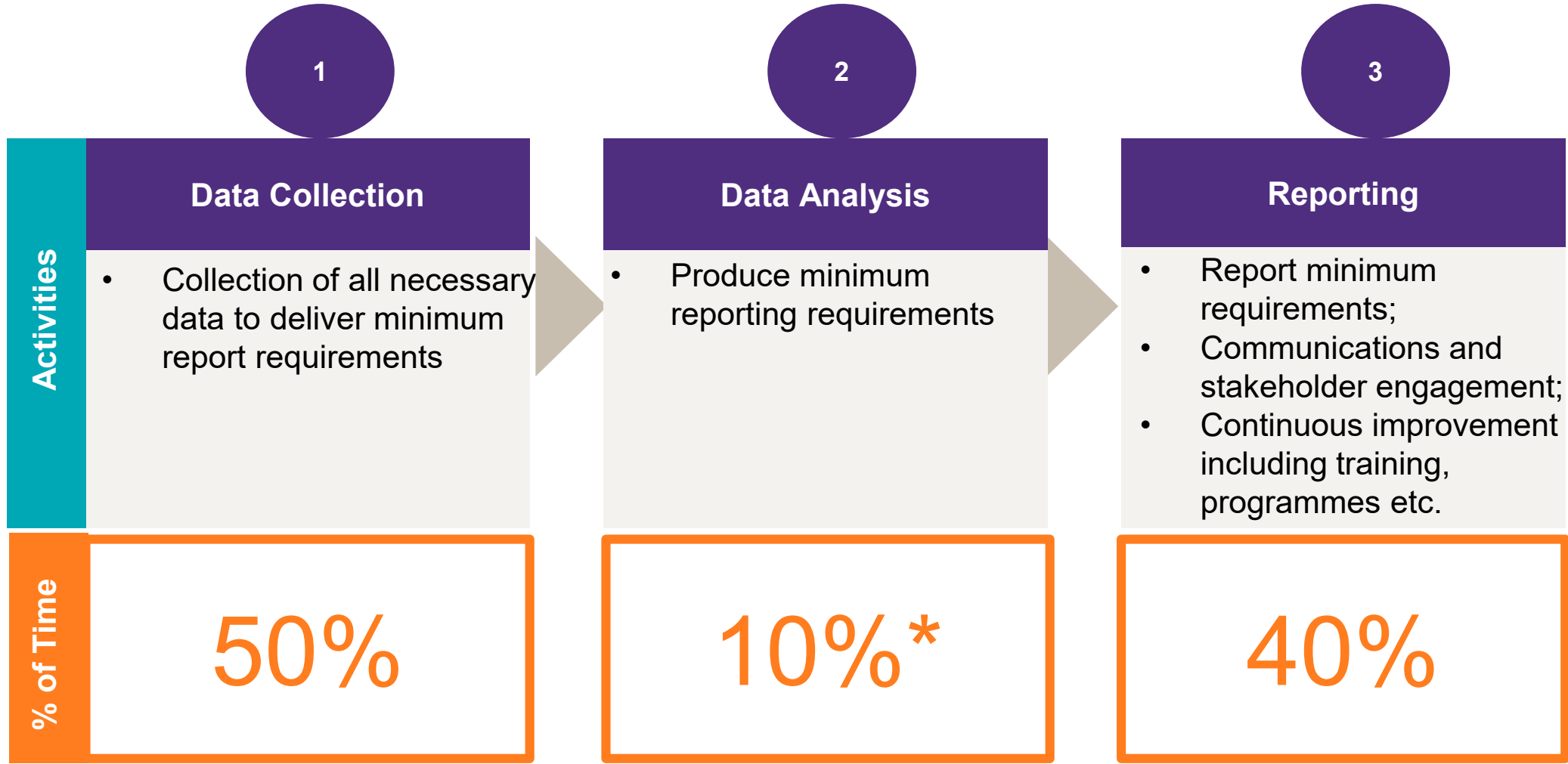
**Patrick Gallen**

**Partner, People and Change Consulting**

**T +353 1 680 5942**

**E [Patrick.gallen@ie.gt.com](mailto:Patrick.gallen@ie.gt.com)**

# The Gender Pay Gap Process



\*if you have an analysis process or tool in place

# Sample Action Plan

1. Engage senior stakeholders to set out the vision for the process – ask what is important here;
2. Create a cross functional gender pay gap team including HR, Finance, IT and Communications to get started and delegate roles and responsibilities;
3. Collect your data from HRM and Payroll;
4. Qualify your data – do I have all the information I need to report mandatory data?
5. Analyse data via a spreadsheet or Power BI tools;

Sample Spreadsheet

PAYROLL DATA																	
Employee ID	First Name	Surname	Full Name	All the elements that make up ordinary pay (actual salary, bonus allowances, overtime etc)													TOTAL Ordinary Pay
																	0.00
																	0.00
																	0.00
																	0.00
																	0.00
																	0.00
																	0.00

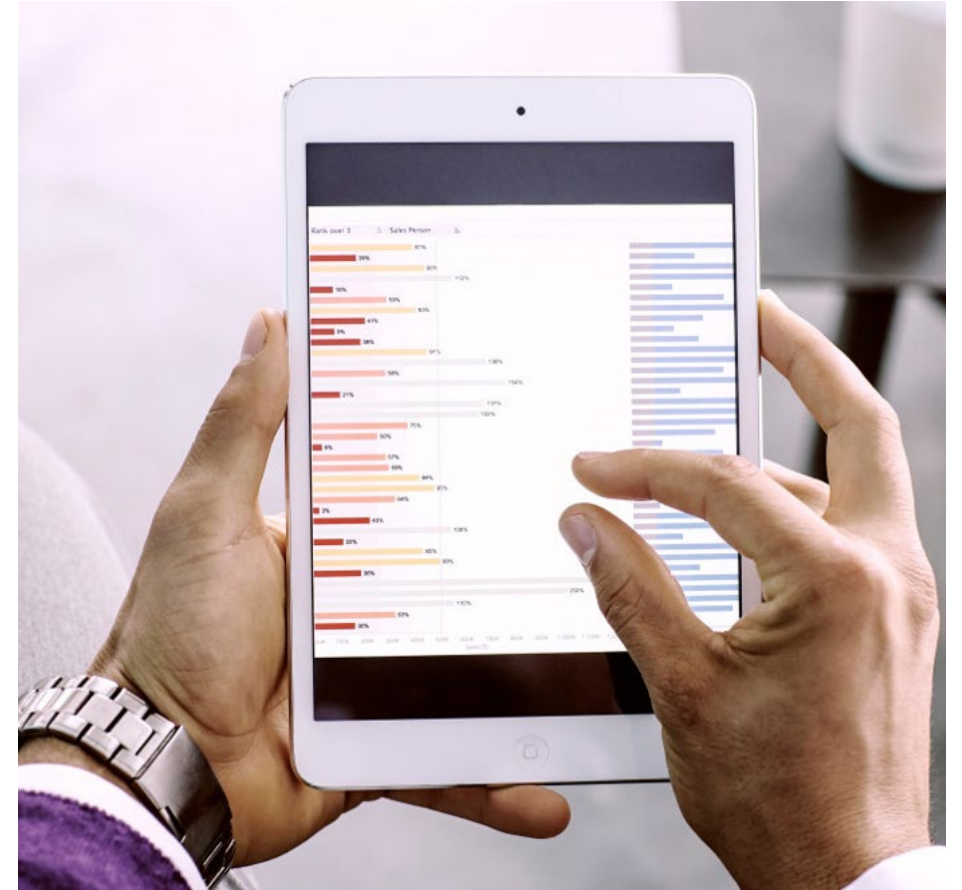
# Sample Action Plan (continued)

6. Anticipate your findings and socialise with key internal stakeholders, devise potential impact assessment (if any);
7. Create the Report;
8. Create Communications and Engagement Plan; and
9. Publish.



# Data Collection Challenges

- GPG Reporting relies on accurate HR/Headcount data and Payroll data correlating;
- Resources and time is required to create accurate data sets from multiple systems;
- Does not account for LGBTQIA+ identities; and
- Employees are required to self identify for accurate reporting which is not required by all organisations.





# Data Analysis Challenges

- Skewed data in the upper quartile as 70% of Senior Executives in Ireland are male (CSO, Gender Balance in Business Survey 2021);
- Bonus or commission based industries may experience a widened pay gap in comparison to standardised salary industries; and
- Public vs Private sector findings may be exaggerated due to fixed vs fluid pay scales.



# Reporting Challenges

- GPG reporting may influence candidate's assessment of your commitment to diversity and inclusion impacting your hiring power;
- Raises other Diversity, Inclusion and Belonging questions which your organisation may not be ready to consider; and
- Internal policies may need to be reviewed and updated in line with findings.






# Report Content

- GPG Report must contain the mandatory reporting information; and
- Published on your website or, if no website exists, printed versions must be available in your offices when requested.



# Sample Reports



## Gender Pay Gap Report – 2022

Relating to the snapshot date of 5 April 2021

The WRU Group remains committed to equality, inclusion and diversity in everything we do. We continue to consider how we can improve and we remain committed to giving, promoting and providing opportunities for all of our employees. We continue to provide additional levels of investment into women's and girl's rugby in order to grow participation – improving the rugby pathway for women's and girl's rugby remains a strategic priority.

The gender pay gaps that exist remain because of payments made to international players and elite coaches, all of whom are men. These individuals are on higher salaries given their roles and this impacts our gender pay position. The analysis contained in this report is not a calculation of equal pay, which is the difference in pay between men and women who carry out the same or comparable jobs.

The WRU does not operate a company-wide bonus scheme for employees. Our bonus pay gap remains 100%. The vast majority of employees who received a bonus are involved in the international game, receiving performance related payments. All of the roles in respect of which a bonus was paid are roles that are filled by men.

### THE WELSH RUGBY UNION LIMITED

Gender Pay Gap	
Mean	Median
34.8%	9.6%

Gender Bonus Gap	
Mean	Median
100%	100%

### Proportion of Relevant Employees Receiving a Bonus

Did receive a bonus	Did not receive a bonus
80.2%	19.8%

The WRU has 130 'relevant employees' as at the snapshot date which is significantly lower than usual as a result of the Covid-19 pandemic and employees on furlough.

### Pay Quartiles

The proportion of men and women in each pay quartile is as follows:

Quartile	Male	Female
Lower Quartile	90.9%	9.1%
Lower Middle Quartile	69.7%	30.3%
Upper Middle Quartile	78.1%	21.9%
Upper Quartile	87.5%	12.5%

We analysed our figures and excluded payments made to a total of 10 players and team management from the Senior Men's National Squad (including National Dual Contract Players). This reduced our mean and median pay gaps to the following:

Gender Pay Gap (Without Senior Men's National Squad)	
Mean	Median
6.9%	3.8%

The comparison of our gender pay and bonus gaps for The Welsh Rugby Union Limited in the past three years, as published is:

Report year	2019	2020	2021	2022
Mean gender pay gap	50%	46.1%	42.3%	34.8%
Median gender pay gap	17.6%	14.4%	7.4%	9.6%
Mean gender bonus gap	100%	100%	100%	100%
Median gender bonus gap	100%	100%	100%	100%



## GENDER PAY REPORT 2021

Published in 2022

At the RFU, increasing engagement in Women's rugby and providing a clear and equal pathway to progress through the organisation remains a key strategic driver. Our aim is to increase the number of women in senior and elite roles (across a number of capacities) in future years and, in turn, positively influence our Gender Pay data.

In 2021, the RFU launched its new strategy to create a successful and thriving game across England. Within this, the acceleration and long-term value of the Women's game remains a key objective, as is improving the accessibility for women and girls across the game.

Through our Diversity and inclusion initiatives, we aim to reflect the diversity of society within English Rugby, as well as our own workforce. Increasing the number of women in roles across our organisation forms part of our diversity and inclusion plan and we have established a number of goals to achieve this.

Coupled with the effectiveness and development of our culture and our internal People policies, our objectives are designed to facilitate professional growth and provide equal opportunities throughout the organisation.

Over recent years, Women's and Girl's Rugby has experienced significant growth at both a professional and grassroots level.

### GROWTH

- In 2021, the RFU launched its 'Every Rose' strategy to accelerate the growth of the game for women and girls, focusing on increasing visibility - and access, creating successful England teams and driving commercial viability.
- RFU is a strong candidate to host the Rugby World Cup 2025; a bid that has received government backing and will deliver significant legacy returns for Women's rugby.

### PARTICIPATION

- 40,000 women and girls are registered to rugby clubs (compared to 25,000 in 2017 and 13,000 in 2012).
- 430 community clubs actively offer rugby programmes to women and girls (300 in 2017).
- 25,000 women have attended Allianz Inner Warrior Camps (introduction to rugby) at community rugby clubs since Jan 2017, with many going on to join women's touch or contact rugby teams.

### WINNING ENGLAND

- England Women are ranked number one in the world and head of the delayed 2021 Rugby World Cup in New Zealand on the back of winning all four games in the Autumn Nations Series.
- The Red Roses were 2021 Six Nations Champions for the third year running.
- Broadcasting of the Women's game has significantly increased allowing many more to experience the game.
  - England Women's TikTok Six Nations Championship, now in a stand-alone window, is broadcast live on BBC.
  - BBC coverage of the 2021 Red Roses Autumn Nations Series games peaked at 1 million views.
  - This season has seen the biggest commitment from the RFU in broadcasting Allianz Premier 15s league matches, with two live streamed each round. The BBC has broadcast some games on the BBC Sport website, app and iPlayer as well as taking selected matches on the BBC Red Button.



## THE NUMBERS

Please note that the following is not a calculation of equal pay i.e. the difference in pay between men and women who carry out the same or comparable jobs.

In addition to our permanent employees, the following analysis includes casual referees, coaches and event day workers.

### PAY AND BONUS GAP

	MEAN		MEDIAN	
	MALE	FEMALE	MALE	FEMALE
HOURLY PAY	81.7%	21.1%	1.5%	10%
BONUS	86.6%	76%		

Percentage distribution (Hourly pay range)

Pay Range	Male	Female
Lower	56%	44%
Lower Middle	61.2%	38.8%
Middle Upper	68.5%	31.5%
Upper	84.2%	15.8%
All	67.5%	32.5%


\*The only bonuses paid during the reporting period were contractual with the majority based on the on match performance.

It remains that our pay gap is due to having a higher concentration of men in our senior roles – and in particular in our senior elite Rugby coaching and management roles. These individuals are also more likely to be incentivised by performance bonuses, contributing significantly to the average bonus gap.

c. 16% of the population are casual match officials and coaches who are also predominantly male and are typically paid a higher hourly rate than the average employee. Over the past few years, we have seen a significant increase in the number of female coaches completing the England Rugby Coaching Award and England Rugby Referee Award. We expect that over time, the progress made in growing the Women's game will help increase the number of female coaches and match officials.

We confirm that the RFU's gender pay report is accurate and has been calculated in accordance with the requirements of The Equality Gap (Gender Pay Gap Information) Regulations 2017.

We confirm that the RFU's gender pay report is accurate and has been calculated in accordance with the requirements of The Equality Gap (Gender Pay Gap Information) Regulations 2017.

  
 Bill Sweeney  
 Chief Executive Officer,  
 RFU

# Sample Reports (continued)

ASK SCOTTISH RUGBY ABOUT SCOTTISH RUGBY RULES & REGULATIONS SAFEGUARDING

SCOTTISH RUGBY

NEWS TEAMS FIXTURES AND RESULTS CLUBS & SCHOOLS TICKETS & EVENTS SHOP

BUY TICKETS MENU

## ***GENDER PAY GAP REPORTING***

The information below relates to all our employees (i.e., includes all players and coaches).

*Mean and Median gaps for Pay and Bonus*

	20/21	19/20	18/19	17/18
Mean Pay Gap	46%	44%	53%	50%
Median Pay Gap	31%	34%	34%	34%
Mean Bonus Gap	49%	81%	85%	83%
Median Bonus Gap	-10%	63%	50%	64%

**Percentage of employees receiving bonus payments**

	2020/21	19/20	18/19	17/18
Male	25%	50%	51%	44%
Female	2%	47%	51%	41%

# Reporting Considerations


- Your deadline is the snapshot date e.g. June 9<sup>th</sup> for Snapshot, December 9<sup>th</sup> deadline;
- What level of visibility do you want your report to have?
- What level of publicity should you expect from publication?
- How do you compare with others in your industry?
- Do you have Diversity, Inclusion and Belonging strategies and policies in place that you would like to highlight?

# Gender Pay Gap: An Opportunity to Grow


GPG represents an opportunity for your organisation to grow in a more diverse and sustainable way including:




Considering where your organisation is and where it needs to go to be more diverse and inclusive



Starting conversations internally about important challenges in crucial operational matters including performance management, succession planning and learning and development



Creating a Diversity and Inclusion specific strategy and reviewing relevant policies and procedures to make them more functional, effective and inclusive



Creating transparency around salary, increasing trust and improving overall communication.

# Your Gender Pay Gap Goals

