The Agenda podcast by Lewis Silkin: Pay Attention

Pay Attention Episode 7: Does Pay Transparency really work?

Tom Heys: Hello and welcome to another episode Pay Attention, a regular podcast coming to you from the Lewis Silkin offices in London and in Dublin. I'm Tom Heys.

David Lorimer: I'm David Lorimer.

Hannah Grayson: I'm Hannah Grayson.

Síobhra Rush: And I'm Síobhra Rush.

Tom Heys: And as usual, we'll be deep diving into the ins and outs of the Pay Transparency Directive, gender pay gap reporting and everything in between. But today we've actually got a very special episode lined up for you. Today we're taking a step back from discussing the nitty gritty of the Pay Transparency Directive and looking at the bigger picture. Does pay transparency actually work?

In today's chat, we'll be looking at the historical journey through the evolution of pay transparency and gender pay gap reporting, before delving into why pay equity is such a crucial issue today. Then we'll explore the research. We'll see what outcomes might be expected from greater pay transparency and, spoiler alert, it's not all positive. We'll discuss the unintended consequences and challenges that come with implementing pay transparency rules, drawing on research and real-world examples. And finally, we'll examine the experiences of the UK and Ireland with gender pay gap reporting, from the initial introduction of the UK's regime in 2017 to the recent developments in Ireland. We'll discuss the successes, the setbacks and what the future might hold. So, grab a coffee, strap in and let's pay attention to the important issues of pay transparency and gender pay reporting. So with that, over to you, Hannah.

Hannah Grayson: So, as an initial look at the issues, I've looked at the history of equal pay and generally the workplace, looking at how it stretches back many, many hundreds, if not thousands of years. And in the last 100, 150 years, we've seen the introduction of women's rights and women into the workplace and changes. So in a sense, progress has been over a very short space of time in the sense of history, but actually looking at it into the modern day, progress has been also relatively slow. For example, it wasn't until 1970 that the Equal Pay Act actually placed a legal prohibition on women being paid less than men for doing the same work. But in recent years, through the 1990s into the 2000s, the issue of equal pay specifically has become a lot bigger.

Some other interesting non equal pay examples that I've been looking at doing a bit of research. It wasn't until 1919 that a woman could become a lawyer or accountant, so looking at the sort of higher echelons of professional working life. In Canada, it wasn't until 1929 that women were viewed as a person in their own right.

David Lorimer: Good god.

Hannah Grayson: Right? That's an interesting titbit.

David Lorimer: You don't expect that from Canada, right?

Hannah Grayson: No! And the mid -1920s in the UK, again, women couldn't hold and dispose of property in the same way as men. Women couldn't open their own bank account until 1975. And it wasn't until 1987 that statutory maternity pay became available. So, we've sort of seen a big explosion into sort of equal rights and working and changes, but you know, a lot of limitations have had to be lifted off women in terms of their whole, you know, life and their working life. So there's a lot of factors in play here. Looking at the modern day, societal norms are changing. There's significantly more women in the workplace. There's pressure on families for both parents to be working due to the high cost of living. And women and men are now trying to

find their place in this modern society. I think the sort of issues for men as well as women, I think it's important to look at both sides of it in terms of making gender pay and equal working rights correct.

In terms of the gender pay regime, our UK regime was introduced relatively early in 2017, but we certainly weren't the first to introduce these types of rules. So since 1991, Italy has had reporting obligation in place for large companies concerning male and female employees working conditions and salaries. In 2012, the Australian Gender Equality Act created the Gender Equality Agency and there's been updates to the laws up to 2023 to include further gender pay reporting requirements. In 2013, Denmark introduced mandatory reporting on gender pay disparities for large companies. So that's all before there's 2017 UK gender pay reporting coming into effect.

2018 to 2024, we see various US states and individual cities introducing pay transparency laws, largely focused on requirements for employers to provide information about wages and salaries and prohibitions on employers asking about pay histories. There's some interesting developments there. And then sort of into 2019, France introduces a decree requiring companies with at least 50 employees to calculate and publish once a year indicators relating to the gender pay gap between women and men based on average pay. And then 2022, we've got Ireland introducing gender pay gap reporting. Síobhra will come on to that later in a bit more detail. And Japan also introducing gender pay gap reporting.

Leading up to 2023 with the EU Pay Transparency Directive being adopted, which was what we're all here to discuss today, introducing requirements for employers to report on gender pay gap and also introducing a number of individual rights and various prohibitions on asking job applicants about their current and past pay. The first report in relation to the Pay Transparency Directive will be published in 2027 and will relate to the 2026 calendar year. So that's a bit of a look into the history.

Tom Heys: What I find particularly interesting is that there seems to be a global consensus emerging that a country needs to do something about gender diversity, gender representation in the workplace, and the countries that you've mentioned, we've got Europe, we've got America, you mentioned Japan, Australia, Brazil as well, very diverse countries all across the world. And all approaching the issue of pay transparency and gender diversity in the workplace in slightly different ways, but all agreeing that something needs to be done.

And I also think that all of these countries are doing that in broadly the same sort of time period that we're looking at. You said about the past 10 years, but really sort of the past five years. So I think a lot of countries are looking at this now. And I think that's surely going to increase. There'll be more countries that haven't done things about this yet that will start to do things.

David Lorimer: Yeah, there is a real sense of momentum, isn't there? And I think that maybe segue nicely onto why pay equity is an important issue, kind of globally, but also down to the kind of organization level. And I'm going to try and cover some of this off. Of course, some of this should be obvious, but actually we think it's part of the story that's missing here amongst the kind of haze of quite long to do lists and getting ready and complying with legislation is the, well - why is it important to our audience, to our employees, to our would-be employees or applicants?

So I guess it's worth saying that the average gender pay gaps, the kinds of reporting that we've done in the UK and Ireland for a while now, that doesn't give the full pay equity picture, but it does demonstrate that there remains a very stubborn issue around pay inequality. In many cases, partly because of the kind of legislative drive that Hannah's talked about, that gap is coming down, but it's slowly and substantial and stubborn gaps remain. And just to take an example of that across the whole EU, the average gender pay gap went from 16.2 % in 2011 to 12.7 % in 2020. And that's right in the middle of that kind of rush to legislate on this.

Understandably with that kind of stubborn gap, there's pressure on both government and businesses to resolve that unfairness. For employers, we find that pressure often comes directly from employees and from

job applicants. And they're increasingly aware of issues relating to pay equity and actually more broadly, increasingly prepared to kind of raise and base employment decisions that they make on the social positions of their would-be employers.

Hannah Grayson: Yeah, I think just to chip in on that, it's certainly a generational thing in terms of the younger generations coming into the workplace, wanting that sort of transparency and certainty in relation to their pay and wanting to feel like, particularly women, are treated equally and they have those equal opportunities and being aware of those rights, perhaps more so than ever in history, I think is really lending to that pressure that you mentioned.

David Lorimer: Absolutely, and our Future of Work Hub have covered this a lot in terms of the way in which Gen Z in particular are probably gonna change the workplace entirely.

Síobhra Rush: Just to highlight the fact that from a PR perspective, employers will come under pressure. You'll all have seen that bot on Twitter (X) that on International Women's Day follows particular, or looks for employers' announcements about what initiatives they're doing for International Women's Day and will then look for their gender pay gap report and retweet what they've, or repost what they've said about what they're doing for International Women's Day while also highlighting what their gender pay gap is, and that has been I think quite effective.

David Lorimer: Yeah absolutely. The gender pay bot on X is a really good example. And actually, I guess anecdotally, what we've noticed is that the more an organization does in terms of being radically transparent, often the more challenges they get. So the gender pay bot is a really good example of the kind of UK, Ireland based broad brush reporting where there can be reputational damage, even though those reports don't really say anything about equal pay claims, for example. But actually, when you get into more detail, so for example, the BBC took a perfectly admirable decision to go above and beyond its obligations and to publish the pay of its top on-screen talent, but that resulted in a successful equal pay claim, which was pretty high profile, brought by one of their news presenters, Samira Ahmed.

And then, of course, there are really well-publicised claims against Birmingham City Council, which have contributed strongly to its insolvency. And those, again, were informed by more radical pay transparency or more information obtained through disclosures and response to freedom of information requests and pay bargaining processes.

So really, there are literal and metaphorical costs of pay inequality, particularly in the era of radical transparency, which the pay transparency director is going to usher in.

That's the risk, but there is a positive side here! And a good example of that is that there's a really well put together Kelly School of Business report, and that found that where transparency revealed to employees that their company has been equitable and has been consistent in how it allocates pay to performance, well, that has a really positive impact on productivity. In other words, if you get it right, there's a productivity upside here.

And then looking more globally, we know from published research by the IMF, the International Monetary Fund, that actually improving pay equity can also increase a country's economic output by up to 35%. So resolving gender pay issues can ultimately have a huge impact, not just on microeconomics of businesses, but the global economy.

Tom Heys: Not to be the overly negative one in the room, but that 35%, that is a study of developing countries that don't really have any women at all in the workplace. So it's going from very little to more than that. Whereas I think if you were to try and say in a developed, large economy like the UK or I suppose any Western European country, could they expect to see a 35% increase in economic output? Probably not. It would be a lot less.

David Lorimer: Yeah I mean that's a good, that's a really good counterpoint. But of course, we still, you know, anecdotally, we still know that there isn't good enough representation of women at senior levels, and that could unlock a reasonable amount for sure.

Tom Heys: Yeah, I mean, it doesn't make sense for any country to be excluding a significant part of its talent.

Hannah Grayson: I mean, also, we're looking at companies that are operating on a global basis and potentially are looking at reaching into developing countries as places to build their business. That is a significant amount of their workforce that are potentially missing out on, you know, income and profit as well.

David Lorimer: Absolutely. So all that in mind, I guess the bigger question for organizations becomes how can we get to pay equity, genuine pay equity faster?

And that can actually be helpful for those listening when you're briefing senior leadership, when you're bringing them along on this journey towards compliance with the directive, starting with - how can we get closer to pay equity and potentially access a bigger and more talented applicant pool and have a more valued and productive workforce? – is probably a preferable way of positioning things than, well, this is what we have to do because the EU says so.

An immediate subset of that kind of line of questioning would be then - is pay reporting and pay transparency going to be enough to get us there to genuine pay equity? Is it going to work and is it going to work fast enough? Hannah's done the research, over to you.

Hannah Grayson: Thanks. Yeah so I mean, as we sort of touched on earlier, it seems there's been a natural reduction in the EU's gender pay gap between 2011 and 2020 without these overarching rules in place. And what might have caused this reduction might be sort of existing pay transparency regimes in those individual countries, as we discussed, there's been this real build up, this pressure of bringing these regimes into place and trying to balance the gender pay gap and the general trend as well towards equal pay, equal treatment of employees, ways of working, becoming more modern, more flexible, you know, homeworking, things like that allow families to have both parents potentially working and in the workforce.

Also just generally a more equal split of genders in the workforce in terms of you know, over that past 150 years, more women are entering the workforce more than ever before and that's you know naturally going to bring that split down as people progress through their careers and become more senior.

The European Council published some thoughts on how the Pay Transparency Directive will improve things and they felt that it will help detect and tackle unjustified pay differences between men and women doing the same work. And their sort of more specific views on this are that job candidates will be able to assess salary offers and will be better informed as to whether their pay is equal to colleagues of the other sex who are doing the same work. Society will be better informed about pay systems and job grading – I'm not really sure how much that will actually be the case. Big employers have quite complex systems for job grading and pay, and I'm not sure whether that's a bit of an oversimplification and quite a high expectation.

Tom Heys: I agree. I think it's one thing to tell people about the pay systems and the job grading, but it's another that people would actually understand what that means. It's a bit like this idea in the GDPR that everyone would suddenly be aware of what exactly was being done with their personal data and the reality perhaps becoming that privacy notices aren't read.

Hannah Grayson: Precisely. In addition to that, society will have increased awareness about gender-based pay discrimination. Employees will feel empowered to enforce their right to equal pay. And also, I think this is quite a bold statement, gender bias in pay will be eliminated.

Tom Heys: I think all those things that you've mentioned from the European Council, they're all bold, lofty statements. They're not really borne by evidence or research or them being able to say, we know that we've done this study, and we know that the impact will be X or the impact will be Y.

These seem more like aims rather than proof of concept.

Hannah Grayson: Yeah, exactly. And I think, put against the backdrop of, you know, this sort of natural reduction in the gender pay gap, I think we're still yet to see the evidence that these regimes are having a true impact and what that is. And I don't know how measurable that even is, it's quite a complex topic.

David Lorimer: The kind of idea that employees and worker reps will have in their hands, this directly comparable set of statistics, which show in theory that there is an equal pay issue, i.e. there is a gender pay gap of more than 5 % or more in any category, probably will in reality lead to more enforcement of the equal pay principles through claims.

Tom Heys: I agree, I think that definitely will happen. But will it address some of the wider courses of women in the labour market? So, how can more women both access the labour market access good jobs, stay in them, get promoted? I think those are all challenges that women face in the workplace, but which are not addressed by the Pay Transparency Directive or really any of these pay transparency regimes across the world?

Síobhra Rush: I also think there's a massive education piece here because certainly when we brought in the gender pay gap regulations, there was massive misunderstanding about the gender pay gap being a representative statistic and not necessarily forming the basis of equal pay. And I think governments, interested bodies, employers, etc. need to be really careful that what they're communicating is very clear and questions or queries or mistaken claims around these reports don't become a sideshow of the aims of the Pay Transparency Directive and the gender pay reporting regulations as Tom has said, about keeping women in the workforce, getting them into the workforce, getting them into senior positions, getting that pay equity. I think it could be very easy for these kinds of other issues, where there's a genuine misunderstanding about what the report says or does, they could become a sideshow that kind of stops the slow progress that is happening**.**

Hannah Grayson: Yeah, I agree, I think there is a risk that those things could become a bit of a distraction from the sort of true line of progress towards true equality in terms of not just pay, but other things. And you know, most analyses on gender pay gap reporting are suggesting that there are similar benefits to what the European Council has said, but I suppose effectively overall we're saying that it's shining a light on the issue of unequal pay and hopefully is a positive step towards addressing some of these issues, but you know there are a lot of other things to be done.

I think this possibly moves us on quite nicely to the next section and talking about whether there are any downsides to implementing these rules and you know, there are other studies that have been undertaken, which suggests that there potentially are some downsides.

There was a recent Harvard Business Review article that suggests that although pay transparency does increase pay for the inequitably underpaid overall, it will generally lower or flatten the overall wages of the broader population of the employees. I mean, I don't know whether that's necessarily a bad thing. Ultimately, you know, a business has to look at its finances and it has to find that, you know, money somewhere to be able to make these changes and push things into the right direction, and maybe that will mean that those who are higher paid become a little bit lower paid in order to bring everybody up to a line. There's got to be some give or take.

Tom Heys: I think I agree with that as well, because I mean, a business has a finite amount of money to go around. So if it has to increase the pay of those who are unfairly underpaid then it means there can't be more money to go around elsewhere.

Síobhra Rush: Yeah, but in the short to medium term, you will see those who are traditionally higher paid and well rewarded not tolerating that and moving around between employers to go to places where, you know, historically they've been better paid. So again, it could be something that could halt that progress a little bit.

Hannah Grayson: Yeah, exactly, and that's what another one of the points that this report discovered was that, you know, one of the unintended consequences was that those top performers might look elsewhere and look for that pay somewhere else, and, you know, essentially kind of move the problem to another place.

Other potentially negative effects have been looked at by other studies. So there's a UCL paper on mandatory pay gap reporting in the UK financial services sector and has suggested that the sort of response to mandatory pay gap reporting has resulted in a reduction of male wages. So, you know, again, finding the money from somewhere else and it's not exactly having a downside to, you know, the other gender is not necessarily solving the problem. It's, you know, moving the problem around. And a similar research in Denmark found that the gaps are reduced due to decreasing male pay rather than increased pay for women.

So there are also some general concerns from employers that employees may attempt to push for higher pay at the top of a salary band or that there might be a sense of envy or dissatisfaction within the workforce if people are a bit more aware of what other people are being paid for different roles. I mean, my question is whether those are legitimate concerns. I think having entered the workforce relatively recently my real, like what I like to see is transparency. And I think it is something that is attractive to me from an employer. So I don't know whether some of these concerns aren't necessarily truly representative of what the current generations are looking for in an employer anyway, and whether that it would actually lead to those issues.

David Lorimer: Honestly, I think two things can be true at once. One is that we're moving towards, in moving towards greater and more radical transparency and proper pay equity, that can be a good aim. But in the short term, there can be some pain points along the way. And Síobhra's one is a really good observation that there may be some moving around of talent who feel annoyed, frankly, about their pay being red-circled.

Síobhra Rush: I feel like the downer in the group! I keep pointing out like, this is a bit negative about it, isn't it? But actually,we do have experience of us in some respects. I suppose it is definitely worth highlighting kind of, you know, downsides and things that can happen. But I suspect they're probably a smaller proportion than might be presented. But we have experience of organizations where a particular cohort of male employees aren't happy with the perceived less favourable treatment on them now because of some initiatives around pay transparency and pay gap reporting. But I suspect it's short term. I would hope it's short term, I should say.

Tom Heys: I agree, I think, when any pay transparency regime is implemented, there will be short term problems that are revealed, but they'll get solved, people will start getting paid more fairly and you know, life goes on.

Síobhra Rush: That’s very philosophical, Tom.

Tom Heys: Welcome to my new philosophical podcast.

Something I thought I did want to mention though. So there's a case from the UK where, an advertising agency had a very overzealous approach to how it wanted to reduce its gender pay gaps. It did this town hall style meeting where it told all of its workforce, oh yeah, we've got a very high gender pay gap and it's all because of straight white men in all of the best paid jobs. This advertising agency then faced some difficulties and had to make some redundancies. Who did it make redundant? All of their senior men who they were all straight white men. And these straight white men brought discrimination claims saying, well, it looks like you have a bias against straight white men. Look at what you said at this town hall meeting, and then they all won their discrimination claims.

David Lorimer: Yeah a really prescient example, Tom, and that brings us nicely back into interpreting what's gone on more locally in the UK and Ireland. So let's have a look first at what's gone on in the UK and how we're going to align.

Tom Heys: So in 2017, when gender pay gap reporting came in, the gender pay gap in the UK was 18.4 % across all employees, and today, that's decreased to 14.3%. Is that because of gender pay gap reporting? I

don't know - maybe. The trend before then was that it was going down. The trend since then is that it was going down. It's hard to be able to see what impact gender pay gap reporting has had across the whole economy. I mean, anecdotally, there's plenty of examples of organizations who have identified that they've had large gender pay gaps and taken big measures to try and reduce them. Companies that, for example, found they had a large gap because they had very male dominated sales roles or technical engineering roles and over that time have made great efforts to attract women into the entry level roles in those areas, supported them, they've progressed and their gaps have reduced. So there are plenty of, as I say, anecdotal examples of where gender pay gap reporting has had a positive impact because it's forced companies to actually think about gender diversity regularly each year.

David Lorimer: Yeah and actually it's an interesting point Tom, there were lots of conversations around the time around what's a good short-term measure that might not be good for pay equity more generally but might get our gaps down but also there was an emphasis, and we work with clients to have an emphasis, on the longer term goal and with these kind of more radical transparency obligations coming down the line those are starting to pay off which is great news.

Tom Heys: And looking to the future, how is gender pay gap reporting in the UK going to change? We've had a new government and that said a lot before about wanting to eliminate the gender pay gap completely. So far what they've promised has been not very much. They have said before that they wanted companies to develop and publish action plans for how they would reduce gaps. I think that would certainly affect a lot of companies, but there are plenty who are already doing that. They are already working out what's causing their gaps, taking measures to reduce them. So those sorts of new requirements might not have such a big impact on those. It would really affect those companies who are just doing the legal minimum that they have to calculate and report their gaps.

Perhaps a bigger thing that the new government has said it will introduce will be ethnicity and disability pay gap reporting. Those are probably subjects for a whole other podcast episode.

David Lorimer: Yeah, absolutely. And it’s worth bearing in mind, actually, the kind of Northern Ireland's typically unique position in that, there's a fairly good argument that the institutions in Northern Ireland are required to implement the Pay Transparency Directive, even though it still exists within the UK. And that's because they risk being in breach of some fundamental principles under the Good Friday agreement, St Andrews agreement and the Windsor framework if they don't. So do watch this space because you might see a much closer alignment in NI for those who have lots of people there.

Tom Heys: And it'll be interesting to see whether Northern Ireland copies what's going on in Ireland or what's happening in Great Britain with gender pay gap reporting or does something else entirely different?

David Lorimer: Absolutely or even sets the agenda for the rest of Great Britain by treading both paths. Speaking of Irish conundrum, Síobhra you're going to talk about your experience in Ireland and what might change there, aren't you?

Síobhra Rush: Yeah, so as you know, we introduced gender pay gap reporting in 2022 and that applied to the larger employers with 250 or more employees. It's been hard to track progress because the portal, the central reporting portal that employers were supposed to use to upload their reports didn't materialize.

So at the moment, employers just have to make their reports available either in hard copy at their registered offices or online on their website. Some have been more difficult to find than others. So I mean, I've heard tales of woe of journalists and, you know, kind of corporate bodies trying to, you know, gather all these reports together to do some kind of analysis. It should also be borne in mind that we report more broadly than in the UK. we look at the mean and median pay gap, the mean and median bonus gap, the proportion of men and women who receive a bonus. And actually, we've seen a really big gap in terms of the bonus gap in the reports, and then the proportion of men and women according to quartile pay bands. We also require

BIK to be reported on, just the receipt of BIK and not the amount. Now, the amount will be required under the Pay Transparency Directive when those regulations come in, but that will remain to be seen.

Tom Heys: And BIK is benefits in kind?

Síobhra Rush: Benefits in kind, yes. So I suppose it's important to remember that so far our reporting has been for the larger employers who have more than 250 employees. This year, so 2024 is the first year where employers who have more than 150 will be required to report.

Also important to bear in mind, I suppose, that some reports have been better than others. So some employers have concentrated their minds a little bit more on this than others. And I think the part of that is because our regulations don't have real teeth in terms of fines or awards of compensation for employees who bring complaints about employers who haven't reported the most at the workplace.

Hannah Grayson: Can I just jump in with a question? I was just, for everybody, don't know whether it might be just Síobhra, or everyone has an opinion on this. Whether, you know, given that there is a slightly different approach in Ireland to Great Britain, whether there are specific benefits in that approach and the information is potentially better or worse, or whether we can even say that, is it too early to say?

Síobhra Rush: Tom is probably best placed to answer this because he has helped so many clients who have both Irish and UK operations, so has been helping them with the differences in their reports and whether having to report on more statistics has been of benefit. I don't know, Tom, what do you think?

Tom Heys: So I think the Irish regime has a few extra statistics. There's the pay gaps for temporary employees and the pay gaps for part-time employees, and there's the benefit in kind proportions as well. My view is I don't feel like those statistics really get very much attention. They can also not mean very much because, well, it doesn't help that there's no real definition of what a benefit in kind is. And also, we've seen plenty of employers have so few part-time or temporary employees that those statistics are calculated from literally one or two people, so they become pretty meaningless.

I think a bigger difference that the Irish regime has compared to the UK is that there's this requirement to identify the causes of the gaps and to report upon what measures you're taking to reduce those gaps. Because you've got to do those two extra things, it forces employers to think about their gender diversity issues properly. Whereas in the UK, companies can get away with just reporting their statistics, dumping it on their website, repeating the process again next year. If no one's asking them about it, it's not a big deal for them. They can just carry on. In Ireland, because you have to take those extra steps, it forces you to do more.

What I think, though, so you mentioned the portal hasn't been created yet. I think that's a real flaw in the Irish system because all of this relies upon there being transparency. And for there to be transparency, you've got to be able to see what the numbers are. If it's not easy for the media, employees, job applicants to compare statistics between different companies, the whole purpose behind the system, behind pay transparency, it falls away.

Síobhra Rush: Yeah, but I do think like for some of our larger corporations, certainly they are getting questions from employees about their reports and they are also getting questions about, you know, hey, in 2022, you said you'd do this and by the time you were doing the 2023 report, you haven't addressed that properly or you haven't done anything about it.

Now again, there's no, you know, employees can bring a claim to the WRC if their employers haven't reported or have reported incorrectly. So, you know, it is more the PR impact and the kind of employee relations impact. I think that that's a risk for them. I think also that probably the biggest impact that gender pay gap reporting has had in Ireland is around sectors and a focus on what sectors have the biggest pay gaps. Now, unfortunately, it's the law firms that have come a crapper when every December when they publish, when everybody is supposed to have published their reports, they on the whole, in an effort to be

more transparent, have included the pay of equity partners, but that has meant that because their equity partners are more male dominated, that they have a bigger gender pay gap. So, I think, you know, you've kind of seen industries such as financial services. So there's been a comparison between sectors as to who has a bigger pay gap. That's probably the bulk of the analysis, and then, as I said before, the bonus payments showed a large gap as well.

Overall, I think it's a good thing, you know, people both within business and at managerial level and people who are looking for jobs or recently into the workforce, like our youngster, Hannah, are definitely keeping an eye out for this kind of thing. And, you know, they're going to have to address these issues. The portal, I think, is likely to come this year or next year, in which case it will become much easier for people to do an analysis and to rightly discover what's going on in their particular industry or with their employer, and are people actually just reporting or are they reporting and addressing the points that are contributing to an increase in their gender pay gap?

David Lorimer: Thanks very much, Síobhra. That's been a really fascinating discussion. We've had a quick trot through the history, how we got to where we've got to. We've learned that, or we already knew, but we've doubled down on pay equity more generally being really important for a whole range of reasons, not least curating a productive, satisfied workforce and improving economic outcomes.

We trotted through what pay transparency measures exist and whether they've had an impact. And I think where we've landed is perhaps some, but not a transformative impact on moving towards genuine pay equity.

So looking through that lens, looking towards how can we achieve genuine pay equity can be a good starting point for Pay Transparency Directive readiness projects, because ultimately we are where we are and there's a need to get on with this. But do bear in mind that pay transparency is a necessary but not sufficient answer to the broader pay equity picture.

With that, all that remains for me to say is thank you so much for joining us today. Please do keep an eye out on your usual channels for more podcasts that are coming down the line and on our website for more insights on pay reporting and pay transparency and diversity equity and inclusion more generally. Do leave us a review, especially if you enjoyed the podcast and we'll be back again soon!