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Equality Framework Team
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Submitted online and via email – equalpayconsultation@cabinetoffice.gov.uk

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Dear Sir/Madam/+

Consultation – Equal Pay and Pay Discrimination

The Chartered Governance Institute is the professional body for governance and the qualifying and membership body for governance professionals across all sectors. Its purpose under Royal Charter is to lead effective governance and efficient administration of commerce, industry, and public affairs working with regulators and policymakers to champion high standards of governance and providing qualifications, training, and guidance. As a lifelong learning partner, the Chartered Governance Institute helps governance professionals achieve their professional goals, providing recognition, community, and the voice of its membership.

One of nine divisions of the global Chartered Governance Institute, which was established 135 years ago, The Chartered Governance Institute UK & Ireland (the Institute) represents members working and studying in the UK and Ireland and many other countries and regions including the Caribbean, parts of Africa and the Middle East.

As the leading professional body that qualifies Chartered Secretaries and Chartered Governance Professionals, our members occupy senior governance, company secretarial, risk, compliance and leadership positions across the public, private and not-for-profit sectors. They advise boards and governing bodies on matters including workforce governance, organisational culture, remuneration, risk management, regulatory compliance, stakeholder engagement and corporate reporting. Many are directly involved in the development, implementation and monitoring of policies relating to equality, diversity and inclusion, pay governance, workforce reporting and organisational accountability. They are therefore well placed to understand both the practical and governance implications of the proposals contained within this consultation.

In preparing our response, we have consulted (amongst others) with our members and industry leaders operating in these spaces. We have also sought to draw upon external expertise and lived experience from organisations working in the areas of race equality, disability inclusion and neurodiversity. However, the views expressed are

not necessarily those of any individual members, nor of the organisations they represent. Our views on the questions raised in this consultation are set out below, together with some general comments on the issues raised.

General comments

The Chartered Governance Institute UK & Ireland welcomes the Government's commitment to strengthening protections against pay discrimination and improving the effectiveness of the UK's equal pay framework. We support the overall objective of moving from a predominantly reactive, litigation-driven model towards one that promotes transparency, proactive prevention, organisational accountability and effective enforcement. Good governance seeks to identify and address risks before harm occurs. In this regard, the consultation's emphasis on transparency, early intervention and organisational learning is welcome.

From a governance perspective, pay discrimination should not be viewed solely as an employment law issue. It is also a matter of social and organisational culture, board oversight, risk management, workforce governance and accountability. Boards and governing bodies have a legitimate interest in ensuring that remuneration arrangements are fair, transparent and capable of withstanding internal and external scrutiny.

The Institute especially welcomes the consultation's focus on addressing structural barriers and improving protections for individuals who experience discrimination based on race or disability. We support the principle that effective protections should be available irrespective of the protected characteristic concerned. However, successful implementation will depend upon ensuring that new obligations are proportionate, clearly understood and supported by practical guidance. The Institute would encourage Government to recognise the important role played by governance professionals, company secretaries, board administrators and other governance practitioners in supporting organisations to implement these changes effectively.

While the consultation frequently discusses race and disability together, the Institute cautions against assuming the two issues present identical governance challenges. The drivers of race pay disparities and disability pay disparities are often different, as are the barriers faced by affected individuals. Not all disabilities are immediately apparent, especially non-physical ones. Government guidance, regulatory activity and employer support should recognise these differences while maintaining equivalent legal protections. The Institute also recognises that behind every pay gap statistic is an individual experience of opportunity, progression, reward and inclusion, and that effective governance requires organisations not only to monitor data but also to understand the lived experiences that may contribute to unequal outcomes.

Throughout the consultation, we encourage Government to prioritise clarity and consistency of guidance, proportionate implementation, strong governance and accountability mechanisms, avoidance of unnecessary regulatory complexity, sufficient implementation periods, and practical support for employers, boards and governance professionals. Rather than responding to all 82 questions, the Institute has focused on those areas where it can provide a distinct governance perspective, particularly in relation to boards, remuneration committees, governing bodies, governance professionals and company secretaries.

Ultimately, the Institute encourages recognition that transparency and reporting are important enablers of change, but that sustainable progress is only meaningfully driven by social and organisational culture, leadership accountability, workforce practices and governance oversight.



Response to the questions

Questions 1 and 2: 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)? Please explain your answer.

The Institute agrees with the proposal. Pay transparency can act as an effective preventative mechanism by reducing information asymmetries and encouraging organisations to adopt more consistent and transparent approaches to remuneration. Transparency also supports accountability and better governance of pay decisions.

From a governance perspective, transparency helps boards and management demonstrate that pay decisions are based on objective criteria rather than informal practices or individual negotiation outcomes. The publication of pay information at the recruitment stage may also encourage organisations to review remuneration frameworks and establish clearer internal controls. Further, boards and remuneration committees should be required to periodically review recruitment pay ranges and hiring outcomes to identify whether certain groups are disproportionately clustered at the lower end of salary bands.

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.

The requirement should remain focused and proportionate. The Institute believes employers should ordinarily publish metrics such as salary or salary range, pension arrangements, bonus eligibility (where applicable), key contractual benefits, and relevant collective bargaining arrangements where these materially affect remuneration. Overly detailed or prescriptive disclosure requirements should be avoided.

Question 4: What level of pay information should employers be required to publish in job adverts or disclose before an interview?

The Institute supports the publication of salary ranges rather than fixed salaries. Salary ranges provide transparency while recognising legitimate factors such as experience, qualifications, geographic location and labour market conditions.

Questions 5 and 6: 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?

The Institute agrees with the proposal to reduce the existing exceptions. Where a tribunal has found an equal pay breach, there should be a strong presumption that the organisation undertakes a structured review to identify whether wider issues exist. Equal pay audits can support organisational learning and strengthen governance arrangements by identifying systemic weaknesses in pay structures and decision-making processes.

Questions 7 and 8: 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? Please explain your answer.

The Institute supports the proposal. Where discrimination has been identified, the implementation of a non-discriminatory job evaluation framework may help prevent recurrence and improve organisational confidence in

pay-setting arrangements. Organisations undertaking equal pay audits should ensure findings are reviewed by the appropriate governing body, board committee or senior leadership structure and that responsibility for implementation is clearly allocated. Effective job evaluation frameworks support consistent decision-making and strengthen confidence in organisational remuneration systems.

Questions 9 and 10: Do you agree or disagree with introducing a new statutory questionnaire for pay discrimination claims only?

The Institute supports the introduction of a statutory questionnaire process limited to pay discrimination claims. Resolving information gaps early may reduce unnecessary litigation and support more efficient dispute resolution. An effective questionnaire procedure may benefit employers and claimants alike by clarifying matters at an earlier stage and encouraging informal resolution where appropriate. However, the purpose of the questionnaire should not simply be administrative efficiency but enabling claimants to access information that would otherwise be unavailable.

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

The questionnaire should focus on matters directly relevant to pay discrimination, including pay comparators, grading arrangements, job evaluation results, bonus and allowance structures, and promotion and progression criteria.

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

To maximise effectiveness, the questionnaire should use standardised (and accessible) formats, avoid unnecessary complexity, be supported by clear guidance, and include reasonable limits on requests that are disproportionate or irrelevant.

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.

Employers are likely to undertake more structured reviews of remuneration and recruitment practices. Many organisations are likely to place greater emphasis on workforce reporting dashboards, pay governance metrics and regular board-level monitoring of equality risks. Boards and remuneration committees should also seek greater oversight of pay governance.

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.

Costs are likely to arise from policy reviews, remuneration benchmarking, updating recruitment processes, staff training, and governance and compliance activities. Many organisations are already undertaking much of this activity voluntary.

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

Yes. Some organisations, especially larger and more complex employers, may require more than a year to review and redesign pay structures. Smaller organisations or organisations who have recently surpassed the size threshold may also need a grace period to catch up.

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

Implementation periods should recognise differences in organisational size, complexity and sector. Larger employers are likely to require longer implementation periods.

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

Government should consider promoting stronger governance oversight of remuneration practices through guidance directed at boards, governing bodies and remuneration committees. The experience of gender pay gap reporting suggests that reporting requirements are most effective when accompanied by senior accountability, clear ownership of action plans and regular review by boards and governing bodies.

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?

Government should publish clear guidance on the application of the material factor defence. One of the principal concerns raised by employers is uncertainty regarding what constitutes a legitimate justification for differential pay.

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

Guidance should include practical examples, illustrative case studies, sector-specific scenarios where appropriate, and examples of lawful and unlawful justifications. This would improve consistency and support compliance.

Questions 20 and 21: Where do you think the Equal Pay Regulatory and Enforcement Unit should be based? Please explain your answer.

The Institute believes the Equal Pay Regulatory and Enforcement Unit should be housed within the Equality and Human Rights Commission, contingent upon sufficient funding, specialist expertise, and operational capacity being provided (acknowledging the EHRC's limited enforcement history). The Equality and Human Rights Commission already possesses significant expertise in discrimination law and enforcement. Locating the Unit within an established institution would promote consistency, reduce duplication and avoid the costs associated with creating a new organisation.

Questions 22 and 23: 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. Please explain your answer.

The Institute supports this proposal, subject to appropriate procedural safeguards. Early access to information may enable issues to be resolved before lengthy formal investigations become necessary. Any powers should be exercised proportionately and subject to appropriate oversight. Organisations should have opportunities to respond and make representations before formal enforcement action is taken.

Questions 24 and 25: 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? Please explain your answer.

The Institute agrees. Where there is reasonable evidence suggesting potential pay discrimination, job evaluation schemes and pay audits may represent an appropriate investigative tool. Appropriate guidance and minimum standards should be established to ensure consistency and quality.

Questions 26 and 27: 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? Please explain your answer.

The Institute agrees. Organisations should be expected to respond formally to recommendations affecting pay equality and provide updates on implementation. Public accountability mechanisms are generally stronger where organisations are required to explain how recommendations have been considered and implemented.

Questions 28 and 29: Do you think the Unit should have additional new powers or capabilities to help secure remedies for workers beyond our proposal? Please explain your answer.

Additional powers should be considered cautiously. The Institute would be more supportive of powers that encourage corrective action, governance improvements and cultural change than punitive measures, especially for powers enabling regulators to require organisations to produce corrective action plans, assign executive accountability and report progress against agreed milestones. Organisations should consider assigning named executive responsibility for workforce equality and pay equality outcomes, with regular reporting to the board or relevant committee. The Unit should focus on guidance, prevention, good practice dissemination, organisational learning, and proportionate enforcement.

Question 30: If the proposals set out in this chapter were implemented, how might employers change how they operate?

Similar to other responses, employers are likely to strengthen internal governance arrangements relating to remuneration and workforce equality.

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.

Costs are likely to arise through governance reviews, audits, training, compliance activity, and professional advice.



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

Yes. Some organisations may require substantial time to implement revised governance and reporting systems.

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

Implementation periods exceeding one year may be appropriate for larger organisations and those with complex workforce structures.

Question 34: Are there other changes to improve the enforcement of pay discrimination that the government should consider?

Government should strengthen guidance aimed specifically at boards, remuneration committees and governance professionals.

Questions 35 and 36: 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? Please explain your answer.

The Institute agrees. Equivalent forms of pay discrimination should attract broadly equivalent protections and remedies. The current framework creates inconsistencies which may be difficult to justify in principle and difficult for organisations to understand in practice – equivalent legal protections do not eliminate the need for different implementation approaches. Government guidance should recognise that race and disability discrimination may manifest differently and may require different forms of organisational analysis, workforce data collection and intervention.

Questions 37 and 38: 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? Please explain your answer.

The Institute agrees. Tribunals should have effective powers to remedy discriminatory contractual arrangements. Enabling tribunals to modify discriminatory contractual terms may provide a more direct and effective remedy than compensation alone.

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

Similar to prior answers, safeguards should include proportionality, clear evidential thresholds, rights of appeal, and practical implementation periods where necessary.

Questions 40 and 41: 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? Please explain your answer.

The Institute agrees. Where race or disability-related pay discrimination is established, equal pay audits and job evaluation exercises may assist organisations in identifying wider systemic issues. This approach would create

greater consistency across the framework and encourage proactive remediation. Pay audits relating to disability may be more complex than those relating to race because disability status is often undisclosed, may fluctuate over time and may involve a wide range of conditions and support requirements. Guidance should address the practical challenges associated with disability declaration rates and workforce data quality.

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

An ongoing problem with gender pay gap reporting is that numbers alone are easy to misinterpret, because aggregate data can conceal important variations in experience, especially pertaining to intersectionality. Organisations should be encouraged to accompany workforce and pay data with narrative explanations and action plans, helping boards, employees and stakeholders understand the drivers of any disparities and the actions being taken in response. The Institute acknowledges that identifying a disparity and understanding its underlying causes are often different exercises. Some disparities may be addressed through relatively straightforward policy or process changes, while others may reflect longer-term issues relating to progression, representation, workforce composition or accessibility. Guidance should focus not only on measurement, but also on helping organisations understand the drivers of disparities and develop proportionate action plans in response. Accordingly, government should also consider how employers can understand intersectional impacts without creating disproportionate reporting burdens. Guidance should address dimensions such as disability-related considerations, neurodiversity, intersectionality, data collection and disclosure, governance and oversight arrangements, and implementation of corrective actions.

Questions 43 and 44: 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? Please explain your answer for employers and businesses.

The Institute agrees in principle but recognises that “equal value” assessments can be resource-intensive and technically complex and, moreover, “equal value” is a very subjective judgement. Where there is evidence that work is of equal value, individuals should have access to effective remedies irrespective of the protected characteristic involved. Government should provide clear methodologies and practical guidance to reduce uncertainty for employers and claimants alike – guidance should therefore focus on promoting robust job evaluation methodologies and reducing unnecessary disputes over methodology.

Questions 53 and 54: 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)? Please explain your answer.

The Institute supports the carefully limited use of hypothetical comparators as proposed. The proposal may improve access to justice while maintaining reasonable safeguards against speculative claims.

Questions 55 and 56: Are there any other scenarios where the use of a hypothetical comparator should be considered? If yes, what are those scenarios?

No additional scenarios are proposed at this stage. Government should assess the impact of the proposed changes before considering further expansion. The Institute would wish to avoid unnecessary complexity or uncertainty arising from wider use of hypothetical comparators.

Questions 57 and 58: 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'? Please explain your answer.

The Institute agrees. Providing judicial discretion would improve consistency across discrimination regimes and reduce the risk of claimants losing access to justice due to procedural barriers.

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.

For the changes to be meaningful and provide value, the proposals should drive a more proactive approach to workforce governance and pay equality. In addition to reviewing remuneration frameworks, employers should place greater focus on recruitment outcomes, progression pathways, promotion decisions, talent management and workforce data. From a governance perspective, boards and governing bodies may seek greater assurance that pay systems are operating fairly in practice and that organisations are identifying and addressing structural barriers before they result in formal disputes – all of which are likely to increase the use of workforce reporting, pay audits, equality metrics and board-level monitoring.

The Institute also notes that race and disability pay disparities do not necessarily arise from the same underlying causes, and so employers will need to adopt different approaches to understanding and addressing barriers experienced by different groups. Disability-related disadvantage may arise in relation to workplace adjustments, career progression, performance assessment, recruitment processes, disclosure decisions, fluctuating conditions, non-visible disabilities and inaccessible working practices. Race-related disadvantage may arise through different mechanisms, including underrepresentation in senior roles, recruitment outcomes, sponsorship opportunities, progression pathways and systemic bias. Accordingly, organisations will need to move beyond broad equality strategies and adopt more targeted interventions informed by workforce data, employee voice and engagement with affected groups.

Experience from gender pay gap reporting and board diversity initiatives demonstrates that transparency alone is insufficient to address structural barriers. While the 2026 FTSE Women Leaders Review reports that women now hold 43% of FTSE 350 board roles, only 8% of CEO positions are held by women. This suggests that reporting can be an important catalyst for change, but organisations must also address leadership pipelines, succession planning, progression pathways and organisational culture – transparency alone rarely changes outcomes unless it is accompanied by sustained organisational action, leadership accountability and ongoing review. These underlying factors require sustained organisational attention and accountability over time if meaningful and lasting change is to be achieved. Similar lessons should inform any future approach to race and disability pay inequality, where transparency should be viewed as the beginning of organisational action rather than the end point.

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.

Similar to other responses, potential costs include policy reviews, job evaluation exercises, internal and external audits, legal advice, and governance and assurance activities. Some organisations may also incur costs associated with improving accessibility, strengthening reasonable adjustment processes, reviewing progression frameworks or enhancing workforce monitoring capabilities. However, these costs should be viewed alongside the potential benefits of improved workforce retention, reduced litigation risk, increased employee trust, stronger organisational culture and more effective utilisation of talent. From a governance perspective, there may also be

value in organisations investing in preventative measures rather than relying solely on dispute resolution mechanisms after issues have emerged.

Questions 61 and 62: Are there any proposals set out in this chapter that may take employers more than a year to implement? Please explain your answer.

Yes. Many organisations may require more than one year to implement structural changes, especially where they need to review remuneration frameworks, workforce data systems and governance processes. Some of the greatest implementation challenges may arise not from pay structures themselves, but from the infrastructure needed to identify and address potential inequalities. For example, organisations may need to improve the quality of disability and ethnicity workforce data, strengthen mechanisms for voluntary disclosure, review job evaluation methodologies and establish new reporting arrangements for boards and governing bodies.

In relation to disability, implementation may be particularly complex where employers have low disclosure rates or limited understanding of how disability and long-term health conditions are represented across the workforce. Neurodivergent employees and employees with non-visible disabilities may not currently be reflected accurately in workforce data and may be reluctant to declare these, making it more difficult for organisations to assess potential inequalities without first addressing workplace psychosocial safety.

The Institute therefore encourages the adoption of realistic implementation timelines supported by practical guidance and phased introduction, where appropriate.

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

The Institute encourages the consideration of the role of governance and accountability in supporting long-term change. Boards, governing bodies and remuneration committees can play an important role in ensuring that pay equality is considered alongside wider workforce issues such as recruitment, progression, retention, leadership development and succession planning – but they cannot be expected to manage pay equality directly. Effective governance requires clear executive accountability, supported by appropriate reporting, assurance, and oversight mechanisms – to this extent, clear guidance for boards and governance professionals on the oversight of pay equality risks may assist implementation.

The Institute reiterates that race and disability are distinct areas of policy and practice. While equivalent legal protections are appropriate, organisations will require different forms of guidance, data collection methodologies and intervention strategies to address the different barriers experienced by ethnic minority employees, disabled employees and neurodivergent employees.

Finally, consideration should be given to the role of employee voice and lived experience in identifying pay inequalities that may not be visible through workforce data alone. Effective governance depends not only on metrics and reporting, but also on meaningful engagement with the individuals affected by organisational policies and practices.

Questions 64 and 65: 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? Please explain your answer.

The Institute agrees in principle, but an additional clause in all legal agreements, whether or not actually relevant to the contract, will add little value in and of itself. Governing bodies should ensure equality considerations form part of procurement, supplier oversight and contract management processes, and organisations should not be able to avoid equality obligations through outsourcing arrangements. The effectiveness of the proposal will depend upon clear guidance regarding what constitutes "reasonable steps" in differing circumstances.

Questions 66 and 67: Do you agree or disagree that the Equal Pay Regulatory and Enforcement Unit should be able to enforce this duty? Please explain your answer.

The Institute agrees. The proposed Unit should be responsible for enforcement. Centralised enforcement should promote consistency and prevent excessive reliance on individual claimants.

Questions 68 and 69: 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. Please explain your answer.

The Institute agrees in principle, provided obligations remain proportionate and reflect the degree of influence and control exercised by each party. Liability should be linked to practical ability to influence contractual arrangements and employment conditions.

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?

Examples of reasonable steps may include contractual provisions relating to equality, supplier due diligence, pay transparency requirements, periodic corporate reporting, and escalation procedures where concerns arise.

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?

The Institute broadly agrees. The primary focus should be preventing and correcting inequalities rather than creating additional compensation regimes.

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.

Appropriate remedies could include corrective action plans, contractual revisions, reporting requirements, monitoring arrangements, and compliance undertakings.

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.

Organisations are likely to strengthen supplier oversight, procurement governance and contractual monitoring arrangements.

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.

Businesses may incur contract review costs, supplier assurance costs, governance and compliance costs, and legal advisory costs.

Questions 79 and 80: Are there any proposals set out in this chapter that may take businesses more than a year to implement? Please explain your answer.

Yes. Complex supply chains and outsourcing arrangements may require substantial implementation periods. Large organisations may require more than one year to review existing contractual arrangements and establish monitoring processes.

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

Government should consider producing practical sector-specific guidance demonstrating what constitutes reasonable steps in common outsourcing scenarios.

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)?

The Institute agrees that the geographical scope should remain aligned with the existing framework under the Equality Act 2010. Maintaining consistency across England, Wales and Scotland will assist implementation, reduce complexity and support legal certainty for employers operating across multiple jurisdictions.

Should you wish to discuss any of the above comments in further detail, we welcome you to contact our Policy Department at policy@cgi.org.uk.

Yours faithfully,

Kayla Schembri

Head of Policy
The Chartered Governance Institute UK and Ireland