

DON'T FEAR GENDER PAY GAP REPORTING

ADVICE FOR EMPLOYERS

1. WHEN SHOULD I BEGIN REPORTING ON MY COMPANY'S GENDER PAY GAP?

Gender pay-gap reporting for employers of 100+ employees will be mandatory across the EU from June 2026. The [EU Pay Transparency Directive](#) came into force in June 2023, and national governments need to transpose the Directive into national law by June 2026. Reporting is already a legal requirement in several EU Member States. Check your national government website for guidance.

The Pay Transparency Directive requires gender pay-gap reporting for companies of 100+ employees. If your company has < 100 employees, check your national government website, as the threshold is lower in several countries. In Belgium, France, Italy and Ireland, for example, gender pay-gap reporting is currently mandatory for employers with 50+ employees; in Denmark the threshold is 35+, and in Sweden there is currently no minimum threshold. You will need to comply with your obligations under the laws of the country in which you are based.

If you run a smaller company, you are not obliged to monitor your gender pay gap, but you may still want to do so, to send the right message to your employees, contribute to the advancement of gender equality, and to gain a competitive edge in the rapidly segmenting media sector, where female consumers are a key target market.

2. WHAT ABOUT THE GDPR?

The GDPR allows you to hold data for justifiable reasons. The data you collect must be proportionate (don't collect more data than you need), anonymised (de-linked from personal identifiable data such as name, date of birth, and in a very small company – job title) and fully disaggregated.

As with all personal data, don't hold data for longer than you need to. Payroll data is 'personal data', so be fully transparent with employees about how this data will be used.

As with all personal data that you collect and hold, comply with the letter and the spirit of the GDPR: for more guidance, refer to [Recital 39 and 51 of the GDPR](#).

3. WHAT DATA SHOULD I COLLECT?

For each employee:

- Basic pay
- Additional financial benefits
(pension, holiday pay, sick pay, bonus, benefits in kind)
- Gender
- Broad definition of role. Avoid using specific job titles, instead, group roles by function (e.g. technical/ production/post-production) or by seniority.

FOR EXAMPLE:

- Trainee/ intern/ apprentice
- Junior/ entry level
- Mid-level employee – non managerial
- Mid-level manager
- Senior manager
- Director/ head of department

4. WHAT ABOUT EMPLOYEE ON SHORT TERM CONTRACTS?

Include all employees on your pay roll in your report, even those on short term contracts.

5. WHAT ABOUT SELF-EMPLOYED/FREELANCE WORKERS?

You are not required to include self-employed/freelance workers in your report.

However, you are not obliged to omit them either.

You could include them under a 'self-employed/freelancers' - heading with subheadings:

- Self-employed/Freelancers – junior
- Self-employed/Freelancers – mid-level
- Self-employed/Freelancers – head of department/ senior

You may find that including self-employed/freelancers in your report will help to build a sense of trust with freelance talent, which is in high demand. This may give you an edge over your competitors when you are crewing up for your next production.

6. WHAT ABOUT TRANS EMPLOYEES, OR EMPLOYEES WHO IDENTIFY AS NEITHER MALE NOR FEMALE?

While this is an evolving topic, the EU Pay Transparency Directive makes no explicit reference to collecting data beyond the binary genders (male/female). You could, with employee consent, collect data on a wider spectrum of gender identities and, if your national data privacy laws permit, consider calculating pay gaps for different gender identity groups (if you have enough data) alongside the binary male/female gap.

7. WHAT IS THE 'SNAPSHOT DATE'?

The data in your report creates a picture, or 'snapshot' of remuneration in your company for the 12-month period ending on your 'snapshot' day. Check with your national government for the rules on snapshot dates in your country – some specify a date range (for example, the month of March), while others set specific dates. You must use the same 'snapshot' date each year.

8. HOW DO I COLLECT THE DATA? I ALREADY HAVE SO MANY FORMS TO COMPLETE...

You already have all the data you need: in your payroll reports, your annual budget, budgets for productions, funding applications etc. All you need to add is a Female/Male field next to the name of each employee you are tracking. When you compile your gender pay gap report, delete all names, dates of birth and job descriptions, but keep pay rates and the gender description.

On a practical note, many payroll software packages already include gender pay reporting functionality. You can find a range of user-friendly templates for gender pay gap reports online.

9. HOW DO I CALCULATE MY GENDER PAY GAP?

The base calculation is simple. Use this formula to calculate your Mean Pay Gap (%)

$$= \frac{(\text{Average Male Hourly Wage} - \text{Average Female Hourly Wage})}{\text{Average Female Hourly Wage}} * 100.$$

Your reporting requirements will vary, depending on your country's national legislation. Remember to include holiday and sick pay, bonuses, payments in kind, etc.

You will probably want to measure both your mean and median pay gaps. The median pay gap compares the earnings of the middle earner in one group (e.g., men) to the middle earner in another group (e.g., women). The median is a typically more representative figure as the mean can be skewed by a handful of highly paid people.

10. DO I NEED TO PUBLISH MY GENDER PAY GAP REPORT?

To be useful for your company, your colleagues and the sector at large, your report must be made publicly available. Some countries already require companies to publish the report on their company website, so it is easy to find. Some countries may opt for a centralised government portal instead – but you can still publish a summary on your company website as well.

11. WHAT IF MY REPORT MAKES MY COMPANY LOOK BAD?

Don't worry. By being open and honest you are already heading in the right direction. Your pay gap report will show you where you are doing well (which departments, which roles, which levels of seniority) and where you could do better. Include a clear statement about how you plan close the gap in your report. By outlining the concrete actions that you will take, you can keep control of the narrative – and ensure that your next report will show a narrower pay gap.

12. WHAT IF MY GENDER PAY GAP REPORT SHOWS THAT MY COMPANY'S PAY GAP IS NARROWER THAN AVERAGE/ NON-EXISTENT?

Congratulations – you are already a gender-pay champion. Share your success story on your website and on social media. Mention it in job advertisements and funding applications. And keep up the good work!

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WHAT CAN YOU DO ABOUT THE **GENDER PAY GAP** TODAY?



PROMOTE PAY TRANSPARENCY

- Say what you're paid! Break the taboo on talking about money!
- Announce the starting pay range in advertised positions
- Don't ask candidates about their pay history
- Refuse pay-secrecy clauses



FIGHT DISCRIMINATION

- Formalise recruitment processes
- Publish gender-neutral job notices
- Establish objective criteria for pay and career progression



TAKE ACTION FOR GENDER EQUALITY

- Ensure safe workplaces and fight violence and harassment
- Proactively support women's careers and women in leadership
- Combat discrimination against workers with caring duties



ADVOCATE FOR FAIR PAY

- Acknowledge 'gendered occupations' undervalued in terms of pay
- Promote equal pay for work of equal value across all jobs
- Stop working for free!



MONITOR THE GENDER PAY GAP

- Demand/publish regular gender pay reports
- Include freelancers in your reports
- Adopt action plans and monitor progress