

Review of compliance with the Code of
Practice for Statistics

Gender Pay Gap in the UK

Statistics producer: Office for National Statistics
Report by: Office for Statistics Regulation

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The Office for Statistics Regulation

Statistics should serve everyone, helping enhance knowledge about every section of society and the economy, and people's place within them.

The Office for Statistics Regulation (OSR) provides independent regulation of official statistics produced in the UK. Official statistics are statistics produced by Crown bodies and other organisations listed within an [Official Statistics Order](#), on behalf of the UK Government or the devolved governments.

We aim to enhance public confidence in statistics produced by government by setting the standards that they must meet in [the Code of Practice for Statistics](#). We ensure that producers uphold these standards by conducting reviews of statistics against the Code. We also report publicly on system-wide issues and on the way statistics are being used, celebrating when the standards are upheld and challenging publicly when they are not.

Compliance review

A compliance review is a review of any official statistics (or [accredited official statistics](#)) to establish the extent to which they meet the standards of Trustworthiness, Quality and Value in the Code of Practice for Statistics. We might undertake a review with a view to accrediting a set of statistics (this type of compliance review is called an assessment), focus on a specific issue or involve a high-level check of ongoing compliance.

A range of factors determine the scope of and approach to a compliance review, including the type of statistics, their accreditation status, the producer history, the profile of the statistics and the reasons for initiating the review.

Contents

The Office for Statistics Regulation 2

Compliance review 2

Overview 4

Why we did this review 4

Findings 4

Our judgement.....5

Next steps.....6

Overview

At the time of this report, the Office for National Statistics (ONS) Gender Pay Gap in the UK statistics are published as accredited official statistics.

The [gender pay gap](#) statistics are a sample of the Annual Survey of Hours and Earnings (ASHE) and measures the difference in median hourly earnings between men and women across all jobs in the UK, expressed as a percentage of men's earnings. The statistics show the difference in average pay levels between men and women employees overall, rather than comparing the pay of men and women doing the same job.

This review assesses whether the ONS Gender Pay Gap statistics continue to meet the standards of the [Code of Practice for Statistics 3.0](#).

Why we did this review

The ONS Gender Pay Gap statistics are important because they provide an authoritative measure of trends in the difference in earnings between men and women across the UK. They inform public debate, policymaking and organisational action on labour market inequality.

A concern was raised with us about the [gender pay gap reporting](#) that employers submit to government. While these submissions are not official statistics, due to the prominence of the topic we decided to review whether the ONS Gender Pay Gap statistics, which are the accredited official statistics on this topic, are clearly communicated.

The review considered whether ONS's reporting and messaging provide enough context and supporting information to enable appropriate interpretation and use, particularly given the risk that users may conflate ONS's ASHE-based statistics with mandatory employer-level gender pay gap reporting.

Findings

- The statistics provide valuable information to users on an important topic. ONS clearly explains in the statistical bulletin that the gender pay gap is a measure of difference in earnings between men and women and is not a measure of equal pay. The bulletin also explains how ONS's ASHE-based analysis is entirely separate from the UK's mandatory company-level reporting and that statutory filings are not included in the statistics.
- ONS uses the term 'gender pay gap' because, in this context, it is long-standing and internationally recognised terminology. However, the statistics report differences in earnings between 'men' and 'women', while the bulletin also uses the term 'sex'. ONS does not clearly explain the data used to classify employees as men or women in these breakdowns, including the data sources, definitions,

strengths and limitations. This may create uncertainty for users about what is being measured.

- ONS is monitoring developments relating to sex and gender identity, including the implications of the 2025 UK Supreme Court ruling on the meaning of sex in the Equality Act and the new [Government Statistical Service guidance and standards for collecting data on sex](#). As guidance and policy develop, ONS should review and update its explanation of the data used to produce the breakdowns between men and women and keep under review its use of the term gender pay gap.
- ONS has published detailed quality information to help with the context, limitations and use of these statistics. However, some of the materials, including its Quality and Methodology Information, analytical articles and a [blog](#), are out of date and spread out across several outputs. Key explanations about limitations and coherence are not always clearly signposted from the bulletin itself, which may reduce accessibility for users.
- ONS uses several ways to engage with users, including through established statistical networks and feedback routes. This provides a foundation for understanding user needs. However, there is limited recent evidence of active testing with key user groups about how they interpret the gender pay gap statistics and what contextual information they need to avoid misuse.

Our judgement

We judge that the ONS Gender Pay Gap statistics meet the standards of the Code of Practice for Statistics and can remain as accredited official statistics. The statistics are well presented and provide valuable information to users on an important topic. ONS has made good progress in updating and implementing the policies, guidance and supporting documentation required by the refreshed Code of Practice for Statistics. The majority are now in place, with arrangements established to complete the remaining actions by December 2026. We have identified three areas where improvement is required to strengthen interpretation, accessibility and monitoring of public use of the statistics.

Recommendation 1: To support appropriate interpretation of the statistics, ONS should:

- Clearly explain the sources of data about sex or gender identity that are being used and how these data are collected. This should include the strengths and limitations of these data sources and why the term ‘gender pay gap’ is used in this context.
- Keep the data sources, definitions and terminology it uses in the bulletin under review, as guidance, policy and statistical developments emerge.
- Review the bulletin commentary and update it to ensure that the most important quality information is presented where users need it, including information on discontinuities, sampling variability, comparability and coherence with other pay gap statistics.

Recommendation 2: To improve accessibility, ONS should review and update the explanatory material on the context, limitations and appropriate uses of the statistics and link to this material from the bulletin. The updated material should clearly distinguish the ASHE-based statistics from mandatory company-level gender pay gap reporting.

Recommendation 3: To improve its understanding of how the statistics are used, ONS should develop and implement a plan for engaging with key user groups and monitoring the public use of the gender pay gap statistics. The plan should set out how ONS will test user understanding and respond to evidence of misinterpretation or misuse.

Next steps

ONS intends to publish the next release on 22 October 2026 and plans to implement some of the recommendations in this report in time for that release. This should include clearly explaining the sources of data about sex or gender identity that they are using, how these data are collected and why the term 'gender pay gap' is used in this context. We expect ONS to provide a public update on progress meeting the remaining recommendations by January 2027. We will remain available to discuss plans with the team and will follow up on these recommendations to offer support and guidance as needed.

