Brightmine® is part of LexisNexis® Risk Solutions.

SELF-DIAGNOSTIC

Check your pay transparency blind spot

Most organizations don't struggle everywhere.

They struggle somewhere.

If you were challenged today, could you clearly explain the range you published, the pay decision you made and the evidence behind both?

Often, the issue is not that pay decisions are wrong. It is that the rationale, range-setting logic and supporting evidence are not consistently documented, applied or easy to explain when challenged.

This diagnostic helps you identify:

- Your biggest pay transparency blind spot
- Your strongest area
- Your overall readiness level
- Where to focus next

Who this diagnostic is for

This diagnostic is for HR, total rewards and talent acquisition leaders responsible for governance, employee relations risk, compliant disclosures and the credibility of pay decisions.

It focuses on whether your decisions, posted ranges and range-setting logic can be explained, evidenced and defended — consistently, and under pressure.

Instructions

For each statement, select the score that best reflects your current reality.

Score	Level	What it means
1	Exposed	Practice is reactive, inconsistent, informal or largely undocumented.
2	Emerging	Some structure exists, but practice is uneven or dependent on individuals.
3	Structured	Processes are defined and used in most cases, but gaps remain under pressure.
4	Defensible	Decisions are clear, current, documented, governed and consistently explainable.

Calculate a score for each section, then identify your lowest-scoring section (your blind spot), your highest-scoring section (your strength) and your overall readiness score.

Section 1: Job architecture & internal equity

This is where blind spots often begin. This section tests whether you can clearly explain why comparable work may be paid differently.

A. How clearly can you show why comparable roles sit where they do in your grade or band structure?

- ◯ 1 — **Mostly informal or precedent-based:** Role placement is shaped by historical data, negotiation or local practice with no clear rationale.
- ◯ 2 — **Partially defined, but inconsistently applied:** Criteria exist, but are difficult to apply or explain under challenge.
- ◯ 3 — **Defined for most roles, with some gaps:** Most roles follow clear criteria, but exceptions remain hard to evidence.
- ◯ 4 — **Clear, consistent and evidence-based:** Roles are placed using defined criteria, applied consistently and supported by evidence.

B. How consistently are roles leveled against defined criteria rather than precedent or negotiation?

- ◯ 1 — **Mostly precedent-led:** Decisions rely heavily on historical data or individual judgment.
- ◯ 2 — **Criteria exist, but practice varies:** Application differs across teams, locations or decision-makers.
- ◯ 3 — **Mostly consistent, with exceptions:** Most roles follow criteria, but gaps are not always documented.
- ◯ 4 — **Consistent and explainable:** Role leveling is criteria-led, evidence-based and easy to justify.

Section score = (Question A + Question B) ÷ 2

Your score: ________

1-Exposed	2-Emerging	3-Structured	4-Defensible
Roles and pay sit largely on precedent, negotiation, or local practice. Comparable work may land in different grades or pay logic.	Some grades or bands exist, but mapping is inconsistent and boundaries blur under pressure.	Roles are leveled against defined criteria and most decisions sit inside structured ranges.	Job architecture, grade allocation, meaningful ranges, progression rules, and re-evaluation triggers are explicit, objective, and consistently applied.

Section 2: Data integrity & market evidence

Blind spots here weaken credibility fast. This section tests whether decisions are supported by evidence that stands up to scrutiny.

A. How consistently do you use current market data and internal comparators when setting or posting pay ranges?

- ◯ **1 — Outdated or selective:** Decisions rely on old, incomplete or inconsistent evidence.
- ◯ **2 — Used inconsistently:** Up-to-date data and evidence are applied in some cases, but not reliably.
- ◯ **3 — Used in most decisions:** Evidence supports most decisions, with some gaps.
- ◯ **4 — Consistent and explainable:** Decisions are backed by current, relevant and consistently applied evidence.

B. How clearly can you explain the factors and sources used to determine a posted or shared pay range?

- ◯ **1 — Difficult to explain:** Rationale is inconsistent or unclear.
- ◯ **2 — Partially explainable:** Logic varies across decisions.
- ◯ **3 — Mostly explainable:** Defined logic exists, but exceptions are not always documented.
- ◯ **4 — Clear and documented:** Reference points are selected through a consistent, explainable approach.

Section score = (Question A + Question B) ÷ 2

Your score: ________

1-Exposed	2-Emerging	3-Structured	4-Defensible
Data is fragmented, stale, or hard to defend. Comparator choices vary by case.	Market checks happen selectively, usually for hard-to-fill roles or urgent cases.	Current market data and internal comparators inform most decisions; refresh discipline exists.	Current, role-relevant market evidence plus internal equity checks underpin ranges, exceptions, and remediation decisions.

Section 3: Decision rules & governance

This is where inconsistency becomes risk. This section tests whether decisions follow clear standards or depend on judgment.

A. How clear is your standard for what counts as a justifiable pay difference?

- ◯ **1 — No shared standard:** Pay differences are judged case by case, with no clear or consistently applied standard for what is justifiable.
- ◯ **2 — Some principles, but limited consistency:** Broad principles exist, but teams may interpret them differently or apply them unevenly.
- ◯ **3 — Defined standard, with some gray areas:** A standard exists and is used in most cases, but exceptions or borderline decisions may still create uncertainty.
- ◯ **4 — Clear, governed and consistently applied:** Justifiable pay differences are defined, governed and supported by evidence that can be explained consistently.

B. How consistently are starting pay, progression and exceptions governed by defined criteria?

- ◯ **1 — Mostly discretionary:** Decisions depend heavily on manager judgment, negotiation, urgency or local practice.
- ◯ **2 — Partially governed, but uneven:** Criteria exist for some decisions, but application varies by team, role type or approver.
- ◯ **3 — Mostly governed, with exception gaps**: Defined criteria guide most decisions, but exceptions are not always controlled or documented consistently.
- ◯ **4 — Consistently governed and evidence-led:** Starting pay, progression, and exceptions follow defined criteria, approval routes and evidence standards.

Section score = (Question A + Question B) ÷ 2

Your score: ________

1-Exposed	2-Emerging	3-Structured	4-Defensible
No shared standard for what counts as a justifiable pay difference. Exceptions are common and loosely controlled.	Some rules exist, but exception handling depends on who asks and who approves.	Starting pay, progression, and exception rules are defined and usually followed.	Objective criteria, approval thresholds, exception rules, calibration, and ownership are clear enough to evidence why differences exist.

Section 4: Documentation & auditability

If it isn't recorded, it won't stand up to challenge. This section tests whether decision rationale can be retrieved and understood later.

A. If a pay range or decision were challenged six months later, could you produce the factors, sources, approvals and rationale behind it?

- ◯ **1 — Informal or reliant on memory:** The rationale would mainly depend on recollection, informal messages or the people involved at the time.
- ◯ **2 — Partially documented, but inconsistent or hard to find:** Some rationale may exist, but records are incomplete, stored across different places or not consistently linked to the decision.
- ◯ **3 — Documented for most standard decisions, with some gaps:** Most decisions have a recorded rationale, with supporting evidence and approvals available for standard decisions.
- ◯ **4 — Complete, consistent and easy to find:** Decision rationale, evidence, approvals and any exceptions are consistently recorded, easy to retrieve and clear to someone outside the original decision.

B. How consistently do decisions leave a clear, auditable trail that someone else could follow?

- ◯ **1 — Little or no evidence trail:** Decisions are rarely recorded in a way that someone outside the original conversation could follow.
- ◯ **2 — Patchy evidence trail:** Some decisions leave a record, but evidence quality, location and completeness vary.
- ◯ **3 — Evidence trail for most decisions:** Most hiring, progression and exception decisions are recorded, though some gaps remain around complex or unusual cases.
- ◯ **4 — Consistent and audit-ready evidence trail:** Decisions leave a clear, complete and retrievable trail showing rationale, evidence, approvals and exceptions.

Section score = (Question A + Question B) ÷ 2

Your score: ________

1-Exposed	2-Emerging	3-Structured	4-Defensible
Rationale is mostly verbal, dispersed, or irretrievable after the event.	Some cases are documented, but coverage is patchy and evidence quality varies.	Most decisions use templates or records, but exceptions and historic cases may still be hard to reconstruct.	Decision rationale, evidence, and approvals are consistently recorded and retrievable in a form that can withstand audit or challenge.

Section 5: Manager application & communication

This is where weak explainability becomes visible. This section tests whether managers can explain decisions clearly and consistently under pressure.

A. How confident are managers and recruiters in explaining pay decisions without improvising?

- ○ **1 — Managers mostly improvise or avoid detail:** Managers are not equipped to explain pay logic consistently and rely on vague or inconsistent messages.
- ○ **2 — Basic understanding, but limited confidence:** Managers understand the policy at a high level, but struggle with comparators, progression or difficult questions.
- ○ **3 — Supported for most conversations:** Managers have guidance or training for regular pay conversations, but may still need support with more complex cases.
- ○ **4 — Confident, consistent and well supported:** Managers can explain pay logic clearly and consistently, with training, guidance and escalation routes in place.

B. How consistent are pay messages across teams and locations?

- ○ **1 — Messages vary widely:** Employees may hear different explanations depending on their manager, team or location.
- ○ **2 — Some consistency, but local variation remains:** Core messages exist, but interpretation or delivery varies across the organization.
- ○ **3 — Mostly consistent, with some pressure points:** Most pay messages are aligned, though complex cases or local practices may still create inconsistency.
- ○ **4 — Consistent, tested and credible:** Pay messages are aligned across teams, managers and locations, and leaders can explain them clearly under challenge.

Section score = (Question A + Question B) ÷ 2

Your score: ________

1-Exposed	2-Emerging	3-Structured	4-Defensible
Managers improvise, soften, or avoid pay conversations. Messages vary widely.	Managers understand policy at a high level but lack confidence on comparators, progression, or difficult questions.	Managers are trained and supported for most pay conversations, with basic scripts and escalation routes.	Managers can explain pay logic clearly, consistently, and credibly; training, FAQs, and escalation rules are embedded.

Section 6: Disclosure readiness

This is where hidden risks become exposed. This section tests whether you understand where pay disclosure requirements apply, what your ranges reveal and whether your process can support them consistently.

A. Have you identified where weak documentation, inconsistent range-setting or posting practices could be exposed?

- ◯ **1 — No focused disclosure review:** The organization has not assessed where pay disclosure requirements apply or what its posted ranges could expose.
- ◯ **2 — Informal awareness, but no structured review:** Some risks may be known, but there has been no consistent review of posting practices, range-setting logic or documentation.
- ◯ **3 — Review completed, with some gaps:** A disclosure readiness review has identified key risks, but actions, ownership or follow-up are still incomplete.
- ◯ **4 — Structured review with clear actions:** The organization has reviewed disclosure readiness, identified priority risks and agreed actions to strengthen weak points before ranges are shared more widely.

B. Have you defined how pay disclosure requirements will be managed across roles, locations, postings and remote work arrangements?

- ◯ **1 — No agreed direction:** There is no clear view of which roles, postings or jurisdictions trigger pay disclosure requirements.
- ◯ **2 — Requirements discussed, but not defined:** Leaders have discussed disclosure expectations, but decisions, ownership or operating rules remain unclear.
- ◯ **3 — Approach agreed, with some dependencies:** The organization has agreed a likely approach, but some supporting work is still needed before it can be applied consistently across postings and locations.
- ◯ **4 — Clear plan, owned and operationalized:** The organization has agreed what must be disclosed, where, by whom and how range-setting logic will be documented.

Section score = (Question A + Question B) ÷ 2

Your score: ________

1-Exposed	2-Emerging	3-Structured	4-Defensible
The organization has not assessed where pay disclosure requirements apply or what posted ranges could expose.	There is awareness of pressure, but no consistent disclosure standard, posting review or readiness plan.	A defined approach to sharing pay information exists, with some controls for postings, locations and communication planning.	Disclosure requirements, remote-role checks, bounded ranges and documented range-setting logic are clear, owned and consistently applied.

Results

Step 1: Identify your blind spot

Review your six section scores. Your lowest score is your primary blind spot.

Blind spot:

- Job architecture & internal equity
- Data integrity & market evidence
- Decision rules & governance
- Documentation & auditability
- Manager application & communication
- Disclosure readiness

Your pay transparency blind spot

Your lowest-scoring area is the place where pay disclosure, posted ranges or greater transparency are most likely to expose inconsistency, create difficult questions or undermine confidence in pay decisions.

The goal is not to score perfectly across every area.

The goal is to understand where scrutiny is most likely to reveal a weakness before someone else does.

Your blind spot

If your lowest score is job architecture & internal equity

The hidden risk

People can usually accept pay differences when the logic is clear. Problems emerge when similar roles appear to be treated differently and nobody can clearly explain why.

What transparency could expose

- Inconsistent role leveling
- Grade drift over time
- Pay decisions influenced by negotiation rather than objective criteria
- Different treatment of comparable roles

Step 1 (continued)

Questions to ask

- Could we explain why similar jobs sit in different grades?
- Would leaders reach the same grading decision today?
- Are progression rules consistently applied?

Where to focus next

Strengthen job architecture, grading criteria and progression governance, before transparency shines a light on inconsistencies.

If your lowest score is data integrity & market evidence

The hidden risk

Many organizations believe their ranges are competitive, but struggle to evidence the market data, internal comparators and range-setting logic behind them when challenged.

What transparency could expose

- Outdated market benchmarks
- Weak comparator selection
- Inconsistent use of market data
- Decisions made on assumptions rather than evidence

Questions to ask

- How current is our market data?
- Would we be comfortable sharing the evidence behind pay ranges?
- Are we using the same reference points consistently?

Where to focus next

Improve the quality, consistency and defensibility of the data used to set pay ranges and make pay decisions.

If your lowest score is decision rules & governance

The hidden risk

Inconsistent decisions often happen despite good intentions. Without clear rules, similar situations can produce very different outcomes.

Step 1 (continued)

What transparency could expose

- Uncontrolled exceptions
- Manager discretion that varies widely
- Inconsistent starting salaries
- Uneven progression decisions

Questions to ask

- Can we clearly explain why exceptions were approved?
- Would different leaders make the same decision?
- Are approval thresholds understood and followed?

Where to focus next

Clarify decision-making rules and reduce reliance on individual judgment.

If your lowest score is documentation & auditability

The hidden risk

You may know why decisions were made. The challenge is proving the factors, sources, approvals and rationale months or years later.

What transparency could expose

- Missing rationale
- Weak record keeping
- Inconsistent documentation
- Decisions that cannot be reconstructed

Questions to ask

- Could we evidence the factors and sources behind key pay decisions and posted ranges from the last 12 months?
- Is rationale recorded consistently?
- Would records withstand challenge or audit?

Where to focus next

Create a clear and consistent audit trail for all significant pay decisions, posted ranges and exceptions.

If your lowest score is manager application & communication

The hidden risk

Even well-designed policies can fail if managers and recruiters cannot explain pay ranges and decisions confidently.

What transparency could expose

- Mixed messages
- Contradictory explanations
- Reduced trust in pay processes
- Escalations caused by confusion rather than policy

Questions to ask

- Would managers and recruiters explain the same range or decision in the same way?
- Are managers confident answering difficult questions?
- Do managers know when to escalate?

Where to focus next

Equip managers with the knowledge, language and support needed to communicate consistently.

If your lowest score is disclosure readiness

The hidden risk

The issue isn't transparency itself. The issue is discovering gaps only after a posting, remote role or disclosure obligation has already exposed them.

Step 1 (continued)

What transparency could expose

- Unidentified jurisdictional risks
- Weak posting and communication planning
- Inconsistent disclosure practices across roles, locations or remote work arrangements
- Ranges that are difficult to defend because the underlying logic is unclear

Questions to ask

- Do we know which postings, roles and remote work arrangements trigger disclosure requirements?
- Do we know where candidate, employee or compliance challenges are likely to come from?
- Are leaders, managers and recruiters prepared to explain our approach?

Where to focus next

Conduct a structured disclosure readiness review and address potential exposures before postings, remote roles or new requirements make them visible.

Step 2: Identify your strongest area

Review your six section scores. Your highest score represents the area where your organization is currently most prepared.

Strongest area:

- Job architecture & internal equity
- Data integrity & market evidence
- Decision rules & governance
- Documentation & auditability
- Manager application & communication
- Disclosure readiness

This is the area where your organization is currently prepared for greater pay transparency

Strong foundations matter. Your highest-scoring area is evidence of practice that is already more consistent, explainable and defensible than elsewhere in your organization.

Step 2 (continued)

While no area should be considered “finished”, your strongest area is likely to require less immediate attention than your blind spot.

Protect what’s working and focus your energy where risk is greatest.

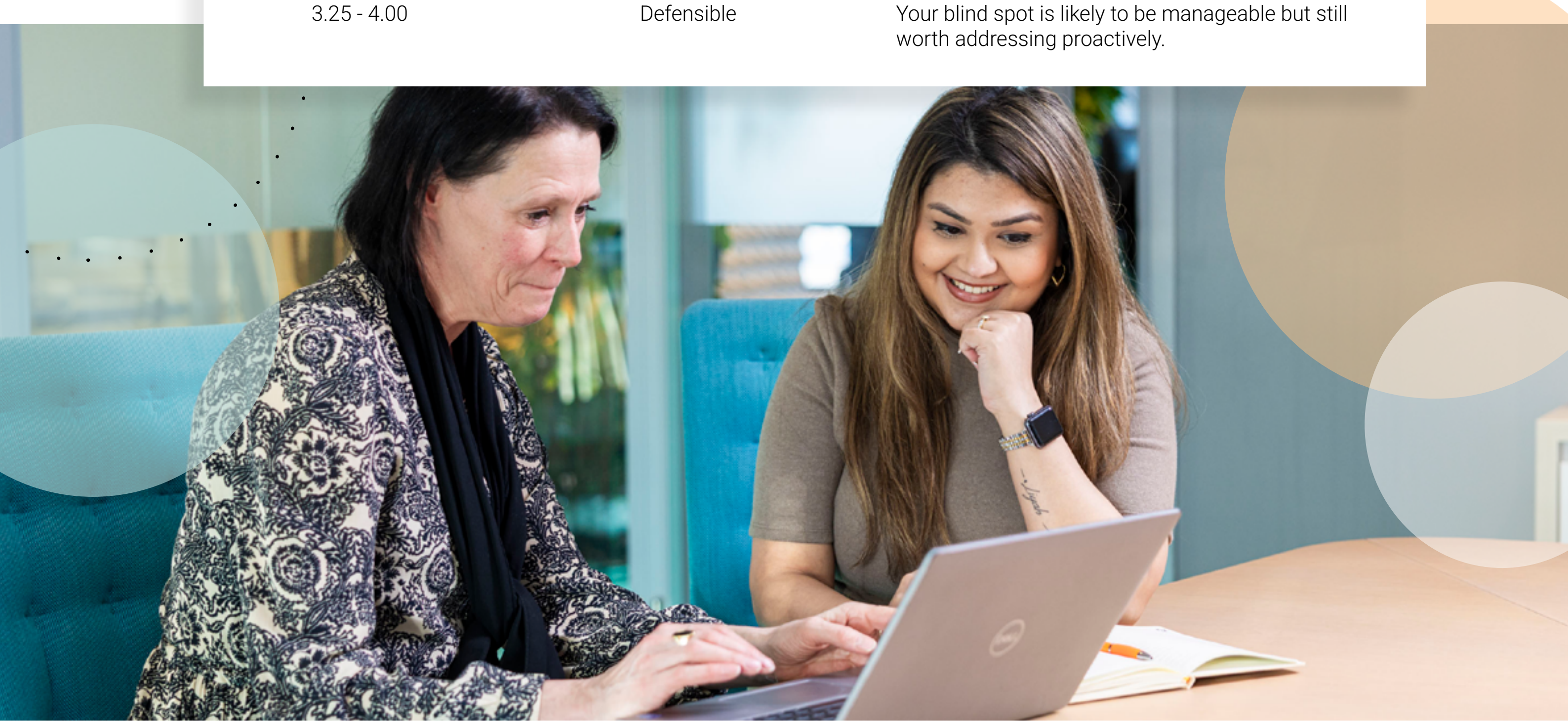
Most organizations have both strengths and blind spots. The goal isn’t to achieve a perfect score across every area. It’s to understand how those strengths and weaknesses combine to determine your overall readiness.

Step 3: Calculate your overall readiness

Add your six section scores and divide by 6.

Overall readiness score: ________

Overall score	Maturity level	What it means
1.00 - 1.74	Exposed	Your blind spot is likely to represent a material disclosure or pay transparency risk.
1.75 - 2.49	Emerging	Your blind spot may undermine otherwise positive progress.
2.50 - 3.24	Structured	Your blind spot is likely to be concentrated rather than organization-wide.
3.25 - 4.00	Defensible	Your blind spot is likely to be manageable but still worth addressing proactively.



Overall readiness

Use your overall score as context, not the headline. Your blind spot tells you where risk is concentrated. Your overall score tells you how prepared you are overall.

An organization with a strong average score can still have a significant blind spot. Likewise, an organization with a modest overall score may be closer to readiness than it appears if weaknesses are already understood and being addressed.

The most important result is not your average score. It's the answer to one question:

"If someone challenged our posted ranges or pay decisions tomorrow, where would we be least confident defending our approach?"

That's your blind spot.

That's where to focus next.

What to do next

Your overall readiness score provides context, but it shouldn't determine your priorities by itself.

Even organizations with a high readiness score can carry significant risk if a blind spot remains unaddressed. Equally, organizations with lower scores often make rapid progress once they understand where their weaknesses lie.

Use your strongest area as a foundation. Use your blind spot as a priority. That's where your next improvement should begin.

About Brightmine

Brightmine® is part of LexisNexis® Risk Solutions, a RELX business. RELX is a global provider of information-based analytics and decision tools and serves customers in over 180 countries with 36,000+ employees. London: RELX; Amsterdam: REN; New York: RELX.

With 20+ years of experience providing HR data, compliance and reward solutions, Brightmine® empowers HR professionals with critical data, innovative tools, and the confidence needed to reduce risk, enhance talent strategies, and increase HR impact.

We support HR professionals as they manage complex legal, social and economic conditions. With over 7,500 customers and strategic partners, we're building a global community of HR leaders who rely on our trusted HR data and insights to shape the future of work.

Our portfolio of products

The award-winning Brightmine product portfolio empowers HR professionals like you with the insights you need to drive better business outcomes. Through our comprehensive product suite, Brightmine gives you the data, tools and confidence to reduce risk, improve talent strategies and increase HR impact across your organization.

Learn more

HR & Compliance Center

Automated Handbook Management

brightmine®

Brightmine® is part of LexisNexis® Risk Solutions.

About Brightmine®

Brightmine is a leading global provider of HR data and insight – helping HR leaders to reduce risk and improve talent strategies. For more than two decades, Brightmine (formerly XpertHR®) has helped HR professionals manage complex legal, social and economic conditions through our unique combination of HR expertise, critical workforce data and AI-enabled technology. Brightmine is part of LexisNexis® Risk Solutions, a RELX business and global provider of information-based analytics and decision tools. RELX serves customers in 180+ countries with 36,000+ employees.

To learn more visit Brightmine.com.

Brightmine and its affiliated products have an Information Security Management System, which is certified to the ISO/IEC 27001:2013 standard.