



**SUMMARY OF
PUBLIC CONSULTATION:**

**Measures to tackle
the gender pay gap**

**Gender Equality Division
Department of Justice and Equality
January 2018**

Tweets by @DeptJusticeIRL
#genderbalance
#womensstrategy
#GenderPayGap

I. INTRODUCTION

Public consultation

The Programme for a Partnership Government contains a commitment to take measures to reduce the gender pay gap. This commitment is reflected in the National Strategy for Women and Girls 2017-2020, and the actions to be undertaken to this end are:

Action 1.21 Undertake a package of measures to tackle the gender pay gap.

Action 1.22 Initiate dialogue between union and employer stakeholders to address the gender pay gap. Develop and promote practical information resources to explain and increase understanding of the multifaceted aspects of the gender pay gap and its causes (i.e. traditional role models, gender-segregated education and labour market, the challenges of balancing work and family life, the difference in participation of men and women in family responsibilities, the availability of quality, affordable childcare facilities and out-of-school hours care, and processes within organisations where imbalance needs to be addressed). Develop practical tools to assist employers to calculate the gender pay gap within their organisations and to consider its aspects and causes, mindful of obligations regarding privacy and data protection.

Action 1.23 Promote wage transparency by requiring companies of 50 or more employees to complete a wage survey periodically and report the results.

On 9 August 2017, the Minister for Justice and Equality, Mr Charles Flanagan TD and the Minister of State with special responsibility for Equality, Immigration and Integration, Mr David Stanton TD, launched a public consultation on tackling the gender pay gap.

The consultation aimed to invite views from interested parties to inform the development of the package of measures to tackle the gender pay gap, and to identify issues to be advanced through further discussion with union and employer stakeholders.

Interested parties were invited to make submissions in writing by 4 October 2017 on the issues set out in the consultation paper, "*Measures to Tackle the Gender Pay Gap*", published on 22 August 2017. In particular, interested parties were invited to comment on the following issues:

- the factors creating the gender pay gap;
- the actions that need to be taken; and
- whether they could contribute to implementing these actions.

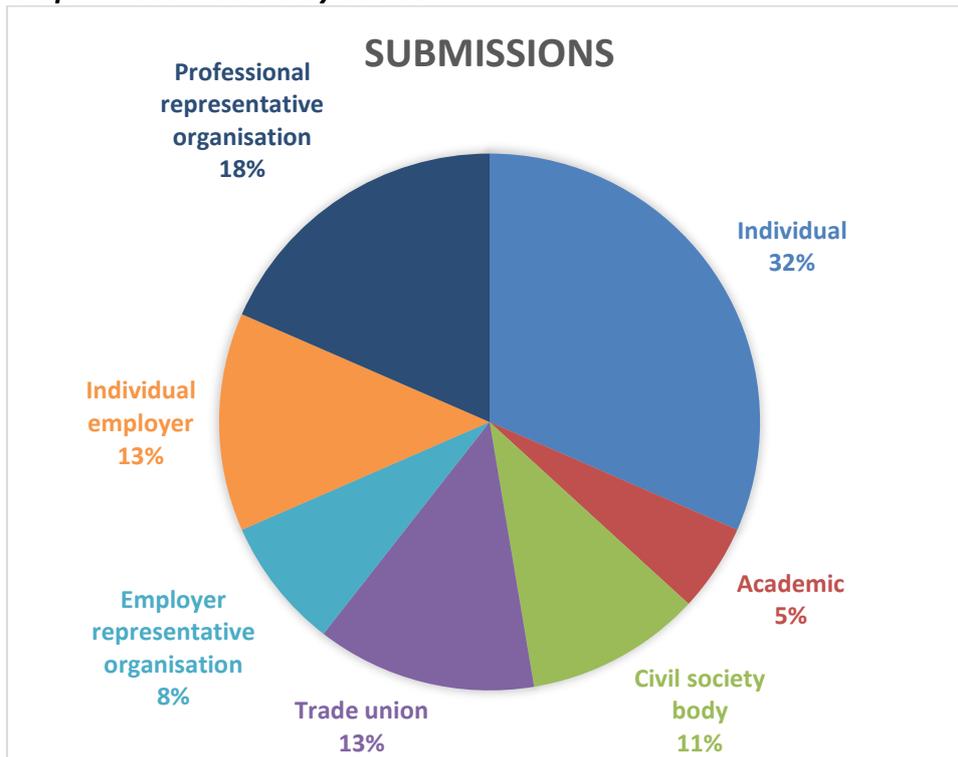
Response to the consultation

In all, 38 written submissions were received, of which 14 were made by individuals and 24 made on behalf of organisations. The list of these contributors is included at the Appendix to this document.

Submissions were made by a wide range of individuals and organisations, as follows:

- 2 submissions were received from academics,
- 4 submissions were received from civil society bodies,
- 5 submissions were received from trade unions,
- 3 submissions were received from employer representative organisations,
- 5 submissions were received from individual employers,
- 7 submissions were received from professional representative organisations, and
- 12 submissions were received from other individuals.

Graph A: Submissions by source



II. RESPONSES TO THE CONSULTATION QUESTIONS - OVERVIEW

Question 1: What factors contribute to creating the gender pay gap?

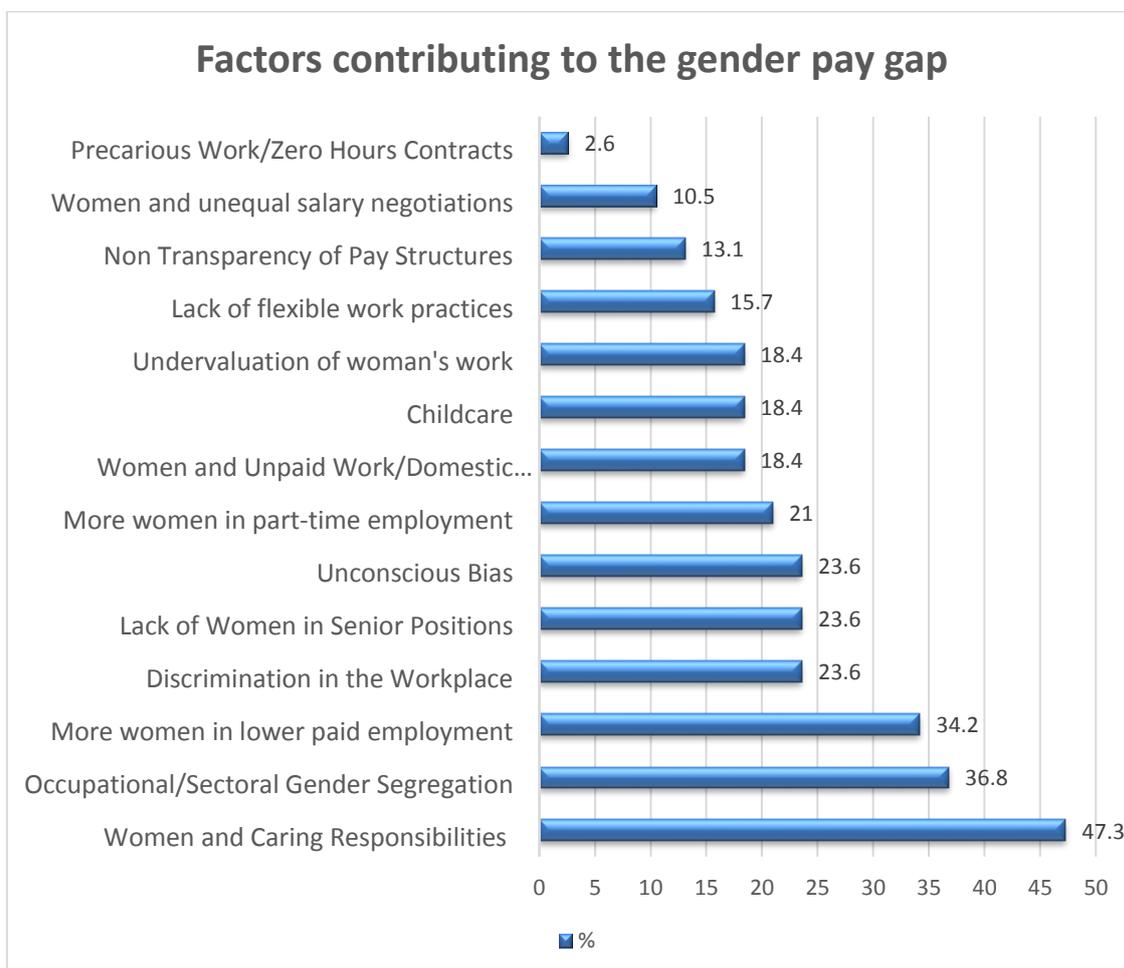
In total, the 38 submissions referred to 14 specific factors, identified as contributing to creating the gender pay gap.

These factors, in order of the number of submissions in which they were cited, are as follows:

Table 1: Contributory factors identified in submissions

| Factors contributing to gender pay gap | Submissions citing this factor | |
|--|--------------------------------|------------|
| | No. | Percentage |
| 1. Women and caring responsibilities | 18 | 47 % |
| 2. Occupational/sectoral gender segregation | 14 | 37 % |
| 3. More women in lower paid employment | 13 | 34 % |
| 4. Discrimination in the workplace | 9 | 24 % |
| 5. Lack of women in senior positions | 9 | 24 % |
| 6. Unconscious bias | 9 | 24 % |
| 7. More women in part-time employment | 8 | 21 % |
| 8. Women and unpaid work/domestic responsibilities | 8 | 21 % |
| 9. Childcare | 7 | 18 % |
| 10. Undervaluation of women's work | 7 | 18 % |
| 11. Lack of flexible work practices | 6 | 16 % |
| 12. Non-transparency of pay structures | 5 | 13 % |
| 13. Women and initial/unequal salary negotiations | 4 | 10 % |
| 14. Precarious work/zero-hour contracts | 1 | 3 % |

Graph B: Contributory factors, in order of the % of submissions citing that factor



Question 2: What actions need to be taken?

2.1 Overview

In all, the 38 submissions included 253 suggestions for action to address the various factors the respondents had identified as contributing to the existence of the gender pay gap.

Many of the suggested actions appeared in more than one submission, with several respondents making similar observations and recommendations.

Table 2 below presents the number of actions suggested overall, and a breakdown of this total showing the number of actions associated with each of the identified contributory factors (see response to Question 1).

Table 2: No. of actions suggested in response to each contributory factors identified in submissions

| Factor contributing to the gender pay gap | No. of actions | % |
|---|----------------|-------------|
| Non-transparency of pay structures | 63 | 25% |
| Women and caring responsibilities | 41 | 16% |
| Childcare | 30 | 12% |
| Unconscious bias | 28 | 11% |
| Occupational/sectoral gender segregation | 24 | 9% |
| Lack of women in senior positions | 16 | 6% |
| Lack of flexible work practices | 15 | 6% |
| Discrimination in the workplace | 11 | 4% |
| More women in lower paid employment | 9 | 4% |
| Women and unequal salary negotiations | 9 | 4% |
| Precarious work/zero-hour contracts | 3 | 1% |
| Undervaluation of women's work | 2 | 1% |
| More women in part-time employment | 1 | 0.5% |
| Women and unpaid work/domestic responsibilities | 1 | 0.5% |
| Total | 253 | 100% |

Although many of the actions appear multiple times, this nevertheless provides an indication of the main areas of focus and concern to respondents.

Five contributory factors attracted more than twice the number of suggested actions made in respect of the remaining nine factors. These factors are as follows:

- Non-transparency of pay structures
- Women and caring responsibilities
- Childcare
- Unconscious bias
- Occupational/sectoral gender segregation

2.2 Unique actions suggested

When the overall number of suggested actions submitted by respondents is analysed to take account of similarities and to remove repetition, the number of unique suggestions for action is reduced to 171. A breakdown of these unique actions, grouped by contributory factor, is set out in Table 3 below.

Of the submissions received, five specific factors contributing to the gender pay gap, as cited by respondents, attracted 69 % of all unique suggested actions. When arranged by unique suggested actions, these top five factors cited are as follows:

- Non-transparency of pay structures
- Women and caring responsibilities
- Unconscious bias
- Occupational/sectoral gender segregation
- Childcare

Table 3: Number of unique actions suggested, by contributory factor

| Factor contributing to gender pay gap | No. of unique actions | % |
|---|-----------------------|---------|
| Non-transparency of pay structures | 45 | 26.3 % |
| Women and caring responsibilities | 24 | 14.04 % |
| Unconscious bias | 16 | 9.36 % |
| Occupational/sectoral gender segregation | 18 | 10.53 % |
| Childcare | 15 | 8.77 % |
| Lack of women in senior positions | 11 | 6.43 % |
| Lack of flexible work practices | 11 | 6.43 % |
| Discrimination in the workplace | 9 | 5.26 % |
| Women and initial/unequal salary negotiations | 9 | 5.26 % |
| More women in lower paid employment | 7 | 4.09 % |
| Undervaluation of woman's work | 2 | 1.17 % |
| Women and unpaid work/domestic responsibilities | 2 | 1.17 % |
| More women in part-time employment | 1 | 0.58 % |
| Precarious work/zero-hour contracts | 1 | 0.58 % |

Section III of this report presents the detailed suggestions for action made in respect of each of the 14 contributory factors identified.

Question 3: Offers to contribute to implementing actions?

Having given their views of the actions that need to be taken, those making submissions were invited to state whether, and how, they themselves might contribute to implementing those actions.

Of the 24 submissions received on behalf of organisations, 8 organisations (33%) included offers of contributions towards the process of reducing the gender pay gap. A number of these referred to furthering the actions contained within the National Strategy for Women and Girls 2017-2020.

The proposals made by each are quoted below, as each of these submissions has been published in full by the relevant organisation:

3.1 30% Club

“The 30% Club strongly supports the aims of the National Strategy for Women and Girls 2017-2020 which includes specific actions aiming for greater gender balance in business and public sector leadership and is happy to engage with Government Departments as considered appropriate.

- Action 4.1: We would welcome the opportunity to support such a review in any way considered appropriate by the Department of Justice and Equality, including sharing insights and experience from the research already conducted by the 30% Club.
- Action 4.2: Through our supporting organisations and working groups we will promote and support the implementation of such measures.
- Action 4.3: The 30% Club Agri-Food Working Group will support such initiatives and will consider the appropriate approach to mentoring in the sector, including potential use of the existing 30% Club/IMI Cross Company Mentoring initiative.
- Action 4.9: We are happy to share insights and experience from the research already conducted by the 30% Club, including research currently underway in the Financial Services sector.
- 4.10-4.13, we would be pleased to share insights and experience from other sectors represented by our supporters.

We work with employers and interested parties to address the challenges within organisations and society that prevent greater gender parity. In the past this has included developing tools and guidelines such as the Maternity and Parenting Toolkit; co-hosting leadership and gender conferences with the Department of Justice and Equality and leading or participating in European funded projects to further the aims of gender balance in employment.

We look forward to engaging with Government and relevant agencies to develop a suitable reporting tool, provide support for their actions as well as providing assistance and guidance for employers on addressing gender gaps and creating cultures supportive of gender balance.”

3.2 Women in Technology and Science (WITS)

“Women in Technology and Science as a membership organisation will work with its members to inform them about these actions and will respond based on their feedback. It will ensure that pay and the gender pay gap is considered by members and will disseminate any tools that help people ask questions about pay, pay scales etc. Working with organisations such as the National Women’s Council of Ireland it will lobby for systemic action to reduce the gender pay gap in STEM.”

3.3 Dress for Success Dublin

“Dress for Success Dublin can contribute to implementing measures to address the gender pay gap in the following ways:

- We would be happy to sit on any advisory/working group established by government to progress the outcomes of this public consultation process.
- We will roll out our Equal Pay campaign again in 2017 (and beyond), with a view to raising awareness of the gender pay gap and its root causes.
- We will use our existing links with corporate entities across Ireland to raise awareness of the gender pay gap amongst employers, and encourage the companies that support our work to demonstrate leadership in addressing gender inequality in their own workplaces and sectors.”

3.4 IMPACT

“IMPACT is also seeking the earliest possible implementation of Gender Pay Gap Reporting in the Public Sector and is willing to facilitate this. IMPACT will continue its work aimed at closing the Gender Pay Gap and will assist in any practicable way with the introduction of Gender Pay Gap Reporting.”

3.5 CIPD Ireland

“We engage with a senior forum of HR directors and HR leaders from Irish and multinational organisations, as well as academics, on the challenges emerging on the future workforce and workplace. We can provide you with the opportunity to engage with this group on a consultation basis, and as a forum to debate the issues and provide a sounding board for draft proposals.

We engage with and communicate regularly with our wide Irish membership. We can work with the Department on distributing key messages and guidance on tackling the GPG. We can generate face to face events with members, carry insights on our website and roll out short polls to build awareness and inform. Our research agenda provides us with the opportunity to ask questions of the HR and L&D profession to further establish facts, attitudes and practices on the GPG. To date we have not included this topic in our research in Ireland, and would propose to address it in our pay survey in Jan 2018. This can further inform our engagement with the Department.

Being part of an international body provides us with access to wider research and thought leadership. We would be pleased to provide direct access to expertise and experience from the UK in relation to practice and policy, for example on gender pay gap reporting or pension auto enrolment or equality and inclusion issues.”

3.6 The Health Service Executive (HSE)

“The HSE, as the largest health services employer in the country, would welcome the opportunity to be part such a decision-making forum. We welcome any further involvement and assistance in progressing this important agenda.”

3.7 National Women’s Council of Ireland

“NWCI, as the national women's membership organisation is committed to working with Government in the implementation of any new actions undertaken. We will work with the Gender Equality Division of the Department of Justice and Equality and all Government departments and state agencies in the implementation of their actions to eliminating the gender pay gap.”

3.8 Council of the Bar of Ireland

“In terms of the contribution The Bar of Ireland can make to the implementation of the action proposed in this consultation document, there is a wealth of legal expertise available at the Bar in areas such as equality and human rights, employment law, and constitutional law. The Women’s Working Group, established by Council of The Bar of Ireland in December 2015 to support women at the Bar, and a number of Specialist Bar Associations who practise and advise on specialist areas of law, such as the Employment Bar Association, are available to consult with the Department and to advise on an in-depth and specialist basis on any legal aspects arising from the pursuit of gender equality in line with the National Strategy for Women and Girls 2017-2020.”

III. RESPONSES TO QUESTION TWO – IN DETAIL

This section sets out the main proposals received in response to question two in the consultation paper, namely the views expressed of actions that need to be taken.

Taking account of duplications, in all 171 unique suggestions for action were made. These are presented below, grouped in respect to the contributory factor the action aims to address, and by theme under each factor.

Factor 1: Women and caring responsibilities

With 47% of submissions citing this factor, women’s traditional roles, their disproportionate share of caring responsibilities, and the associated career gap/’parenting penalty’ was the most-frequently-cited factor contributing to the gender pay gap.

The 24 actions proposed in response to this factor, arranged by theme, are as follows:

Paternity Leave

- Extend paternity leave to 1 month.
- Increase paternity leave available.
- Provide properly paid paternity leave on a ‘use it or lose it’ basis, to be used when the mother’s maternity leave ends.
- Formal review of current Paternity Leave take up rates to establish if equal sharing of parenting leave such as in other jurisdictions should be actively considered.

Family leave

- Flexible family-related leave options and arrangements (parental, paternity and carer’s leave).
- Flexible family friendly options in medical training and consultant posts to include options for part-time work and job-sharing as well as the possibility to take parental breaks.

Supports for women returning to work/education after maternity/care period

- Additional top up payments for females in a non-working family/lone parent returns to education.

- Apprenticeships for older workers re-entering the workforce.
- Recognition of prior learning and acquired experience of women returning to work.

Support/encourage shared Parental Leave

- Introduce and encourage business support and take-up of shared parental leave packages/provisions, particularly by men.
- Introduce Mandatory Shared Parental Leave
- Introduce 6 months paid parental leave and benefit to commence after maternity leave, on a phased basis so that parents can have greater choices in the first year of a child's life.

Augment/increase Maternity Benefit to full pay

- Government could consider incentivising companies that top up the maternity benefit to the woman's original pay level when on maternity leave.

Pensions reform (gender pension gap)

- Introduction of a universal pension, independent of PRSI contributions which would ensure equality in older age.
- Pension reform - legislation to provide for mandatory second tier pension scheme with provision for auto enrolment.
- Decisions on universal pension coverage must take account of the lower pension coverage by women, their lower wages and gaps in employment, and provide additional funding supports during career gaps.
- Bridging pension arrangements for those availing of carer's leave or parental leave.
- Support access to pensions and credits for unpaid work for all women.
- Review is carried out on the effects of the removal to the retirement age.
- Streamline the number of schemes and the associated costs of pension administration.
- Maternity leave considered same as employment, at the employee's rate, for pension purposes.

- Time spent caring should be recognised and PRSI credited both for people currently in the workforce and those who are now of retirement age who have spent a large portion of their lives caring.
- 2012 pension changes be reversed and for the incomes of these pensioners to be restored.
- Future-proof pension provision to ensure that it does not inadvertently effect those who may have be out of the workforce, whether though parenting or illness.

Factor 2: Occupational/sectoral gender segregation

With 37% of submissions citing this factor, occupational and sectoral gender segregation (over and under representation of women in certain areas) was the second most-frequently-cited factor contributing to the gender pay gap.

The 18 actions proposed in response to factor two, arranged by theme, are as follows:

Research/review

- Examine the trend towards the ‘feminisation’ of some sectors of the labour market – and in particular the feminisation of lower-paid roles in those sectors.
- Monitoring take up Springboard courses by gender.
- Examine the barriers to female participation in apprenticeships.
- Collate, analyse and publish gender statistics on an annual basis and as a norm. These statistics to include: participation, pay, quality of employment (full-time, part-time, casual, freelance), leadership, visibility, board membership.
- Fund annual gender equality research across all publicly funded bodies or those that provide public funding to ensure equal progression and disbursement of funds.

Careers/education promotion

- Tackling occupational segregation at early stage - school, career guidance and recruitment.

- Promotion of more scholarships to encourage female continued education.
- Promotion of STEM subjects and apprenticeships - to increase the participation by young women in STEM subjects at second and third level.
- Review the subjects offered by girls' schools and ensure that there is a full offering of STEM subjects including engineering.
- Career guidance programmes use STEPS and Smart Futures to provide STEM industry role-models for career guidance sessions.
- Strategies for promotion and support of female students in higher education - mentoring by students in higher years.

Gender quotas

- Gender quota (30%) for publically funded initiatives, in particular SFI funding/HEA funding.
- Gender equality targets to be established for apprenticeship and trainee programmes.

Individual sectors

- Uncouple link with GP consultation time and incentives/targets of overall patient numbers seen.
- Analysis should be conducted by the HSE of the reasons for underlying the gender disparities within individual medical specialties, both at senior practitioners and trainee levels. This review should encompass an assessment of work-life balance within all medical specialties, and the role it may have in specialty choice.
- Recruitment efforts should be made to encourage equal gender representation within all medical specialties, targeting in particular those specialties in which the underrepresentation of one gender is clearly evident.
- Introduction of a similar equitable briefing policy (NZ/Aus) in Ireland, within the legal profession, particularly where the engagement of barristers' services by the State is concerned.
- Briefing firms required to collect data and to privately report on annual basis, the nature of engagement with counsel and separately the figures for male and female barristers in respect of, inter alia, the monetary value of briefs and the pay rates.

Factor 3: More women in lower paid employment

Referenced in 34% of submissions, a higher number of women engaged in lower paid employment was the third most-frequently-cited factor contributing to the gender pay gap.

The 7 actions proposed in response to factor three, arranged by theme, are as follows:

Research/review

- Monitor women's Return to Work schemes to make sure they are not being used a source of cheap skilled labour.
- Undertake research on how the Gender Pay Gap Impacts on Lower- Income Earners and those with Lower Levels of Educational Attainment.
- Tracking/researching gender trends against economic cycles.

Pay improvements in highly feminised sectors

- Pay improvements in highly feminised sectors of the economy including elder care, early education, care and education of children with special needs, retail, hospitality and clerical and administrative work.
- Continued increase of the National Minimum Wage to align with the living wage in the medium term.
- Ensure minimum wage is paid in all productive work experience placements and extended to core groups traditionally excluded from coverage..

Protections for low paid workers

- Additional regulatory protection needed for low paid workers in precarious employment, but concerned that we do not over-regulate this area.

Factor 4: Discrimination in the workplace

With 24% of submissions citing this factor, discrimination in the workplace (both direct and indirect) was the joint fourth most-frequently-cited factor contributing to the gender pay gap.

The 9 actions proposed in response to this factor, arranged by theme, are as follows:

Gender budgeting

- Sufficient resources should be allocated to gender-proofing all major policy proposals. Assessments of their impact should be made both ex ante and ex post.

Equality reviews

- Employer equality reviews under IHREC auspices with an obligation to publish the findings (as distinct from simply doing a review). This could be in steps e.g. review in year 1 and then publish results from year two on.
- All national cultural institutions, organisations in receipt of public funding, as well as private companies must have a gender equality policy in place - include measurable action plans, sanctions for noncompliance, reporting details (for transparency and measurability) to a government body and/or shareholders.
- The National Quarterly Household Survey should prioritise a special equality module to capture data on perceived gender discrimination in the workplace, further closing the data gaps related to the gender pay gap.

Legal/legislation

- Amend the Equality Act by introducing a new section, to extend the powers of the Workplace Relations Commission to require employers to conduct an equal pay audit, if they find they have discriminated on pay.
- Ensure that hearings before the Workplace Relations Commission are held in public, that cases are not anonymised, and evaluate and revise the stated aim of the WRC to settle cases before they go to hearing.
- Civil Legal Aid Scheme should be expanded and supported to provide free legal representation to women taking claims under employment equality and equal status legislation.
- Investigate whether provision should be made under our equal pay laws for representative legal actions.

Reporting – individual sector

- Concerted efforts should be made to encourage medical practitioners to report all instances of discriminatory behaviours, and these be appropriately handled through use of robust grievance procedures.

Factor 5: Lack of women in senior positions

Referenced in 24% of submissions, the lack of women in senior positions and in leadership roles was the joint fourth most-frequently-cited factor contributing to the gender pay gap.

The 11 actions proposed in response to this factor, arranged by theme, are as follows:

Corporate boards

- Improve gender balance on the boards of companies, initial focus on companies listed on the Irish Stock Exchange.
- Quotas/targets for women on corporate boards.
- Set a goal of 50/50 board representation by 2020.

Promotion/sponsorship

- Campaign: Male champions to promote gender balance.
- Active career sponsorship and mentoring of women.

Research/analysis

- Human Resource and pipeline analysis, for rate of career attrition for women, to judge whether there is a gender dimension to losing people at senior roles.
- Explore talent management strategies and assess if there are barriers stopping women from reaching senior roles.
- Research the actions for greater gender balance in business and public sector leadership.

Women in senior leadership

- Gender targets for senior levels of Government.
- Gender quotas for women in leadership.
- Introduce a quota for local elections in Ireland.

Factor 6: Unconscious bias

With 24% of submissions citing this factor, unconscious bias (in areas such as education, work, recruitment, and promotion) was the joint fourth most-frequently-cited factor contributing to the gender pay gap.

The 16 actions proposed in response to this factor, arranged by theme, are as follows:

Recruitment/promotion

- Gender lens and inclusiveness applied to policies around recruitment, promotion and retention, in order to remove inherent biases
- Gender neutral job evaluation criteria
- Business internal targets for gender balance at various levels in their organisations
- Where job descriptions are similar but with different titles (and pay scales), the female: male ratios are examined to ensure that there is no unconscious gender pay gap or gender bias in the role descriptors.
- Unconscious bias training and introduction of affirmative recruitment systems.

Management training/development

- Continuous unconscious bias training to be promoted at all levels in business and education
- Private sector company training programs for managers on unconscious bias

Gender proofing in the workplace

- Increasing awareness and promoting good practice in gender proofing policies and practices in the workplace
- Add gender equality to Boards' risk register. Ensure accountability for their gender efforts by tracking and reporting progress in their annual reports (including pay rates and gender pay gaps).
- Organisations in receipt of any public funding or supports obliged to provide an annual public review of equality and diversity efforts within their organisation and activities.

Promotion

- Feasibility of an equality & inclusion mark for business.

- Promote the image of gender equity and career opportunities through media campaigns
- A government publicity campaign to increase awareness of the gender pay gap, and why addressing the gender pay gap makes good business sense

Education

- As well as changes in curriculums and subjects' content, it is essential that teachers and education providers also receive gender awareness, unconscious bias, and sociology. training, included in all Professional Development programmes for teachers and trainers
- Ensure the new Leaving Certificate 'Politics and Society' subject includes compulsory modules on gender equality and diversity.

Research/analysis

- Monitor and analyse trends in gender working patterns, career progression and pay

Factor 7: More women in part-time employment

With 21% of submissions citing this factor, a higher number of women in part time employment was the joint seventh most-frequently-cited factor contributing to the gender pay gap.

One action is proposed in response to factor seven, as follows:

Family taxation

- Taxation: review the tax treatment of second earners and the unintended consequences faced typically by women caused by the current Participation Tax Rates (PTR's) and the Marginal Effective Tax Rates (METR's).

Factor 8: Women and unpaid work/domestic responsibilities

Referenced in 21% of submissions, a higher proportion of women undertaking unpaid work associated with domestic responsibilities was the joint seventh most-frequently-cited factor contributing to the gender pay gap.

Two actions are proposed, as follows:

Promotion

- Broader social campaigns to promote gender equality in domestic and caring environments, as well as in the workplace and throughout society.
- Referendum on the removal of Art. 41.2 from the Constitution.

Factor 9: Childcare

With 18% of submissions received referencing this factor, the cost, availability, quality and viability of childcare was the joint ninth most-frequently-cited factor contributing to the gender pay gap.

The 15 actions proposed in response to factor nine, arranged by theme, are as follows:

Pre-school childcare

- Provision of and access to affordable childcare.
- Reduce cost of child care.
- Child care vouchers or tax credits payable to nurseries like in the UK.
- State supported childcare schemes.
- Future model for capping of childcare fees.

Schools

- Require schools to provide after-school care and activities.
- A formal out-of-school hours care system should be implemented to address the needs of working parents and the atypical work day.
- Crèches run similarly to the national primary school system.
- Efforts to maximise the use of schools and community facilities and to formulate guidelines for schools to facilitate the use of school buildings for out-of-school-hours care.

Augment child benefit

- Child benefit payments means tested - remain the same for low income households but taper off gradually for higher income households with the savings redirected into childcare services.

Extending current entitlements

- The Early Childhood Care and Education scheme should be extended to include children from six months to three years and to increase the duration to four hours to facilitate the gap between the end of paid leave and the start of childcare entitlement or school.

Childcare in individual sectors

- HSE should investigate the suitability of on-site crèche or child-minding provisions at its premises to better facilitate ease of access to childcare for doctors who are parents.

Childcare cost and taxation

- More affordable childcare provision via appropriate taxation measures.
- Increase financial support/tax relief towards the cost of childcare.
- A more supportive tax regime to self-employed parents such as an entitlement to claim tax relief on the cost of childcare.

Factor 10: Undervaluation of women's work

Referenced in 18% of submissions, the undervaluation of women's work and human capital was the joint ninth most-frequently-cited factor contributing to the gender pay gap.

Two actions are proposed in response to factor ten. Arranged by theme, these are as follows:

Questioning gender differences

- Where women are being rewarded differently, it's important to question is it fair, or is it just that work that women do is always undervalued because it is being done by women?

Sector-specific wage Increases

- Increase SNA salaries (work mainly carried out by women).

Factor 11: Lack of flexible work practices

Cited in 16% of submissions, a lack of family friendly flexible work practices was the eleventh most-frequently-cited factor contributing to the gender pay gap.

The 11 actions proposed in response to factor eleven, arranged by theme, are as follows:

Promote flexible working

- Encourage employers to facilitate more flexible working arrangements. i.e. job sharing or flexible hours.
- Working from home incentives.
- Breastfeeding/pumping breaks beyond the 6 month limit currently set.
- Career breaks with a guarantee that role will be retained for them to return to work.

Legislate for flexible working

- Legislation compelling companies to provide a flex time option to employees.
- Introduce statutory entitlement to part time working.
- Establish statutory flexible working policies in all types of employment with all employees having an enforceable right to such an option.
- “Flexibility by default” in labour market contracts.

Work-sharing and promotion

- Allow worksharing/part-time staff to retain their worksharing where feasible in the event they receive a promotion.
- Allow movement of staff within public/civil service departments to continue their worksharing arrangements where feasible.
- Allow two staff to job share into a promotional post, if they are both deemed suitable candidates for the post.

Factor 12: Non-transparency of pay structures

Referred to in 13% of submissions, the non-transparent nature of pay structures was the twelfth most-frequently-cited factor contributing to the gender pay gap.

Matters of pay and wage transparency attracted the largest number of suggested actions from respondents - over a quarter of the total actions suggested. These centred on several themes, such as data collection; wage surveys disaggregated by gender; measures to increase wage transparency; promotion of information and awareness of the gender pay gap and sector specific recommendations.

The 45 actions proposed in response to this factor, arranged by theme, are as follows:

Data collection

- Research programme into the ‘explained’ and the unexplained aspects of the GPG in Ireland.
- Collect disaggregated data on disability and gender to examine if there are multiple discriminations at play for women with disabilities regarding the gender pay gap.
- Collecting more timely and robust data on the gender pay gap.
- Use the results of the proposed wage surveys of large firms to establish an evidence base for the nature of earnings and gender divides within these firms. The results should act as a baseline for assessments of progress on this issue over time.
- Much EU and Eurostat analysis does not include information on Ireland. Significant improvement in the data provided to and emerging from the EU should be prioritised to demonstrate Ireland’s weakness / progress in this area.
- Department commission a sectoral evaluation of the GPG in Ireland as it is currently impacting on female labour market participation and pay rates.

Targets

- Adopt clear targets for reducing the gender pay gap - overall target and a series of interim targets which would allow ongoing monitoring.

Gender pay gap wage surveys

- Set a target and produce guidance for companies to voluntarily report on the gender pay gap as part of their annual reporting process, and ensure this is reproduced on a company’s website.
- Introduce pay audits for companies in receipt of state funds or contracts to ensure they are complying with equality legislation.

- Require organisations with over 50 employees to publish their gender pay gap and pay policies; this needs to be backed up by penalties and enforcement under equality legislation.
- Gender pay gap calculation and appropriate narrative disclosure for organisations over certain size criteria - transparency and granularity of data is important.
- The threshold organisational size for mandatory reporting, of organisations with in excess of 50 employee may be too low - a threshold of 200 employees may be desirable in the first instance.
- Reporting processes should allow employers to offer explanations for the results and also expand on plans they have to address the results if necessary.
- Wage Survey Data Reporting (Australian Model) - a public version which excludes salary data; and a confidential version which includes the aggregated salary data - only available to those employees of the reporting organisation with authorised access.
- Essential that employers use a standard method of calculating the gender pay gap and report progress against the same set of variables.
- The Gender Pay Gap should be calculated on an hourly adjusted basis to reflect the truest figure.
- Company wage surveys/gender breakdown of senior roles with WRC oversight of gender pay gap returns.
- Clear regulatory oversight for any wage survey data, eg. WRC and provision of guidance and instruction on how to narrow/close the gap; issue a compliance notice.
- Offending employers named in annual reports eg. WRC.
- Employers should be legally required to act on the data that they publish, and not just required to publish it.
- Reporting Wage Surveys - every 3 years until the gap is less than 10% and every 7 years after that.
- Reporting Wage Surveys – annual basis.
- Phased implementation of Wage Surveys - allow businesses to become accustomed to reporting required.
- Publishing the gender breakdown at differentiated pay brackets. Organisations would find a gender pay gap broken down by salary band / levels to be easier to calculate than by grade or job type.

- Capturing of discretionary pay gap data by level should also take into account individual, team and organisational bonuses or other forms of performance related pay/benefits.
- Pay gap analysis should not be restricted to permanent, full time staff but also take account of temporary and agency staffing arrangements - should encompass workers who meet the definition in the Employment Equality Act, 1988 and not be limited to employees.
- Government departments and state bodies should report on the gender pay gap in respect of all persons who provide personal services, irrespective of whether those persons are employees.
- GPG initiative be introduced into the public sector in the medium term as a pilot.

Transparency

- Implement pay transparency in all organisations, either full transparency or as salary scales or pay grades.
- Transparency on how companies make compensation decisions.
- Publishing a breakdown of pay scales by gender - with particular emphasis on starting point on the ladder by gender.
- Employers could be encouraged to use and publicise salary scales and entry level rates of employments so as to promote greater transparency within the workplace.
- Ensure that organisations have a robust framework to ensure pay levels are reviewed using a fair and consistent process.
- Prohibit employers from inserting terms in a contract that prevent their employees from disclosing their wages.

Promotion/information awareness

- Information: greater awareness of s.76 of the Employment Equality Acts allows an employee to request information from their employer to establish whether or not they are receiving equal pay.
- Develop guidance for affiliates on specific measures to gender-proof pay claims and pay structures.
- A shift away from a focus on the provision of policies/initiatives and take up rates towards instead the release of GPG data outlining the actual results in required.
- Policy Development Forum be established with representation across all public service employers which may have a governance role in: Agreeing models of data collection for Gender Pay Gap; Making representations and proposals to the political system for specific reforms; Developing policy to support reduction of the

Gender Pay Gap; Monitoring progress through an agreed reporting structure; Building capacity across the system to reduce Gender Pay Gap through strategic sharing of organisational learning.

- In the development of any 'Equality, Diversity and Inclusion mark' for business, (Action 1.18), gender pay auditing should be a necessary constituent part, with the mandatory gender pay gap reporting methodology capable of being incorporated directly into that process.
- Employers require clarity over which elements of remuneration should be included when calculating the gender pay gap - any analysis of the gender pay gap which does not take account of variable remuneration (including bonuses) will be incomplete.
- Tools to help analyse and assess pay inequalities need to be made much more accessible and user friendly than currently available. Standardised methodologies and tools need to be developed to provide support to organisations to understand their GPG.
- Develop an online gender pay gap assessment tool based on common definitions and formulae, ensuring all aspects of pay and activity are represented.

Sector-specific actions

- Reform of pay determination models used across the financial services industry - Transparency of roles, competencies, salary ranges, scales and progression mechanisms.
- Introducing salary scales for Early Educators (Mostly women) in the Early Years Education and Care Sector.
- Law firms who provide legal services to the state should in any procurement or tendering competition or process for the provision of such services, report the gender pay gap in their firm, to include counsel fees and partner income.

Factor 13: Women and initial/unequal salary negotiations

Referred to in 4 (10.5 %) submissions, unequal and non-transparent salary negotiations at entry level and above was the thirteenth most-frequently-cited factor contributing to the gender pay gap.

The 9 actions proposed in response to factor thirteen, arranged by theme, are as follows:

Gender proofing entry

- Direct and indirect barriers to equal entry and treatment need to be identified and challenged.
- Salary scales for job categories and entry level rates.
- A ban on individual salary negotiations.

Review

- Review starting salaries, to ensure recruitment processes aren't creating a gender pay problem.
- Investigate past starting salaries for women and men in public sector to ascertain any past gender differences

Sector-specific actions

- Consultant contract for all consultant trained doctors including public health medicine.
- Initiate roll out of an agreed national salary scale for the childcare workforce to recognise qualifications and professionalization.

Legislation

- Employers should be legally required to state the minimum remuneration that they are prepared to offer for an advertised role.
- Prohibit employers from asking about salary history.

Factor 14: Precarious work/zero-hour contracts

Cited in only one submissions, the situation of women in precarious work was the least frequently cited factor mentioned as contributing to the gender pay gap.

One prospective action was proposed in response to factor 14, as follows:

Legislation

- Legislation in response to casualization of work and to strengthen the regulation of precarious work (among men and women).

APPENDIX A: LIST OF SUBMISSIONS RECEIVED

| No. | Contribution received from |
|-----|--|
| 001 | Tadgh Hyland |
| 002 | Mary Davies |
| 003 | Inclusion Ireland |
| 004 | Monica |
| 005 | Mary Finegan |
| 006 | Dr Micheál Collins (UCD) |
| 007 | <i>Anonymous</i> |
| 008 | Peninsula Ireland |
| 009 | Deborah Maguire & Cathy Maguire |
| 010 | County Kildare Chamber |
| 011 | Mary Keogh |
| 012 | 30% Club |
| 013 | Ibec |
| 014 | Women in Technology and Science (WITS) |
| 015 | SSE |
| 016 | Carolyn Acton |
| 017 | Financial Services Union |
| 018 | Chambers Ireland |
| 019 | Dress for Success Dublin |
| 020 | Dr. Ina Kelly |
| 021 | IMPACT (Union) |
| 022 | IMPACT (Education Division) |
| 023 | Dr Caroline Murphy & Dr Christine Cross (UL) |
| 024 | Irish Women Lawyers Association |
| 025 | Amplify Women Collective |
| 026 | Strength Within |
| 027 | SIPTU |
| 028 | ICTU |
| 029 | HSE Human Resources Directorate |
| 030 | Trinity College Dublin |
| 031 | McCann Fitzgerald |
| 032 | Irish Medical Organisation |
| 033 | CIPD Ireland |
| 034 | John Flanagan |
| 035 | <i>Anonymous</i> |
| 036 | National Women's Council of Ireland |
| 037 | Council of The Bar of Ireland |
| 038 | Owen Martin |