



Government Equalities Office

Closing the Gender Pay Gap

Responding to this Government consultation

Before completing this form, please refer to the Government consultation on closing the gender pay gap that provides background detail to all of the questions:

<https://www.gov.uk/government/consultations/closing-the-gender-pay-gap>

Depending on your views and experiences, it is estimated that this survey will take approximately 10-15 minutes to complete.

The closing date for responses is **6 September 2015**. Responses received after this date will not be considered.

Disclosure of responses

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 [FOIA], the Data Protection Act 1998 [DPA] and the Environmental Information Regulations 2004).

The Government may publish responses received from organisations. If you want other information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory code of practice with which public authorities must comply and which deals, among other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department. The Department will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

YOUR DETAILS

Please complete the following:

Name	Brenda Trenowden
Address	ANZ Bank
Address 2	40 Bank Street, Canary Wharf
City	London
Postal Code	E14 5EJ
Country	United Kingdom
Email address	Brenda.trenowden@anz.com
Contact number	+44 20 3229 2150

Are you completing this consultation as an (tick one):

Individual	
Organisation	<input checked="" type="checkbox"/>

If you are responding on behalf of an organisation, please complete the following:

Company name	30% Club
Company address	c/o BNY Mellon
Address 2	160 Queen Victoria Street
City	London
Postcode	EC4V 4LA
Country	United Kingdom
Email	info@30percentclub.org
Contact number	+44 20 7163 8277
Number of staff in company	N/A

Please select what type of company it is (tick one):

Business representative organisation/ trade body	
Charity or Social Enterprise	
Business	
Legal representative	
Local Government	
Professional body	
Public Sector	
Trade Union or Staff Association	
Other, please specify	<input checked="" type="checkbox"/> Campaign (run by volunteers, we have no employees)

YOUR RESPONSES

Q1: Publication of gender pay information will encourage employers to take actions that will help close the pay gap. Do you:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Do you want to provide any further comment in relation to your answer above (Q1)?

The 30% Club is a campaign that launched in the UK in 2010 with the goal of achieving 30% women on FTSE-100 boards by the end of 2015. Since then the campaign's attention has broadened to focus on achieving better gender balance at executive committee level and throughout the wider pipeline (not only because it's the right thing to do but because it also makes good business sense). We believe that businesses and senior business leaders should drive this change and that meaningful and consistent transparency around gender pay information would be a significant step towards focusing the minds of employers on addressing the pay gap issue and ensuring that female employees are fairly represented in senior grades across businesses.

We firmly believe in the adage that "*what gets measured gets managed*", and that measuring the extent of the gap will provide companies with the information they need in order to tackle the issue most effectively. Furthermore, making the information publically available will introduce competitive pressure amongst companies that will serve to drive further action and catalyse progress towards resolving the imbalance. External publication of the information should create a strong sense of accountability that will lead businesses to drive real progress towards levelling the playing field and reducing the barriers faced by women.

We also believe that the positive impact of this initiative will not only benefit women and the companies they work for, but will also result in a net benefit to the UK economy since any broadening of the talent pool will inevitably improve overall output. As well as being a measure of inequality, the gender pay gap is also a measure of lost productivity and we cannot afford to waste the talents of half our population.

Q2: Transparency on gender pay will have an impact on (tick as appropriate):

	Strongly Disagree	Disagree	Neither Agree nor Disagree	Agree	Strongly Agree	Don't know
Encouraging girls and women to consider working in a wider variety of occupations and sectors						✓
Encouraging employers to develop their female talent					✓	
Encouraging employees to take up flexible working or shared parental leave						✓
Encouraging employers to support flexible working or shared parental leave				✓		
Encouraging employers to adopt good practice on how to manage/support a multigenerational workforce				✓		
Helping those who have a stake in the organisation such as investors, shareholders and clients					✓	
Helping employers to address equal pay in their organisation					✓	

Q3: Employees or other interested parties (e.g. shareholders) may want to gauge how an employer's gender pay gap compares with similar organisations. How important do you think comparability is (tick one)?

- Not at all important
- Very unimportant
- Somewhat unimportant
- Somewhat important
- Very important
- Extremely important
- Don't know

Do you want to provide any further comment in relation to your answer above (Q3)?

We believe there should be a minimum reporting requirement and that data needs to be comparable across organisations and sectors in order to maximize its impact, as well as to fully leverage the competitive element mentioned in answer to Q1 above. We do also feel it's important that companies be given the opportunity to provide additional context to their figures in supporting commentary.

It is also our view, and specifically that of the 30% Club's Investor Group(*), that the publication of comparable gender pay information will be a valuable means by which investors can compare companies and establish the extent to which each is maximizing use of the available talent pool, and therefore maximising its productivity. Such information will in effect allow investors to act as better stewards of their investee companies as it will afford clearer visibility of any talent management issues. Comparable data will provide investors with an additional channel through which to engage with companies when discussing the importance of diverse boards and management teams – it will help to promote successful investor engagement with companies which in turn will further focus corporate energies on narrowing the gender pay gap.

We believe that there needs to be one standardised approach and that the data not only needs to be comparable but, as mentioned previously, it needs to be publicly available - any alternative system such as reporting via the existing PAYE system risks being less transparent and thus less effective in reducing the gender pay gap.

*Members of the 30% Club Investor Group are as follows: Aberdeen Asset Management, Allianz Global Investors, Aviva Investors, Axa Investment Management, BlackRock Asset Management, Church Investors Group, EdenTree Investment Management, F&C Asset Management, Hermes Fund Managers, Hermes Investment Management, HSBC Bank Pension Trust UK, J P Morgan Asset Management, Jupiter Asset Management, Legal & General Investment Management, the Local Authority Pension Fund Forum, the London Pensions Fund Authority, Newton Investment Management, Old Mutual Global Investors, PIMCO, Quilter Cheviot Investment Management, Royal London Asset Management (CIS) Limited, RPMI Railpen Investments, State Street Global Advisors, Standard Life Investments

Q4: Do you think the regulations should specify where the employer publishes their gender pay gap information - for example, a prominent place on their public website?

- Yes
- No
- Don't know

Q5: Which of the following measures showing the difference in the pay of male and female employees are you currently able to calculate from existing data and systems?

	Tick all that apply
An overall gender pay gap figure	N/A
Gender pay gap figures broken down by full-time and part-time employees	N/A
Gender pay gap broken down by grade or job type	N/A
None of the above	N/A

Q6: Do you think that any additional narrative information published by employers should be:

	Tick one
Voluntary and not set out within the regulations or non-statutory guidance	<input type="radio"/>
Voluntary, not set out within the regulations, but set out in the non-statutory guidance	<input checked="" type="radio"/>
Set out within the regulations	<input type="radio"/>
Other, please specify	<input type="radio"/>

Q7: How often do you think employers should report gender pay gap information?

	Tick one
Every year	<input checked="" type="radio"/>
Every 2 years	<input type="radio"/>
Every 3 years	<input type="radio"/>
Other	<input type="radio"/>

If you responded 'other' to Q7, please specify how often employers should report gender pay gap information below:

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Q8: What is your assessment of the costs of conducting gender pay analysis and publishing results?

	Actual Costs (£)	Estimated Costs (£)
Infrastructure (e.g. software)	N/A	N/A
Training requirements	N/A	N/A
Publication	N/A	N/A
Other, please specify	N/A	N/A
Total	N/A	N/A

Q9: What is actual / estimated time taken by the lead person assigned to the activity of analysing and publishing a gender pay gap estimate?

	Actual Costs (£)	Estimated Costs (£)
Number of hours	N/A	N/A

Q10: Private and voluntary sector employers in Great Britain with at least 250 employees may fall within the scope of the proposed regulations. Do you think this threshold is appropriate?

- Yes
- No
- Don't know

If you said 'no' to Q10, do you wish to provide any further comment below?

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Q11: The cut off period for any calculation of the gender pay gap will need to be specified in the regulations. Which of the following do you consider preferable (tick one)?

- 1 January
- 6 April
- 1 October
- The year-end date for each organisation
- No preference
- Other

If you said 'other' to Q11, please specify which date you would prefer and why below:

Q12: The Government is considering a number of actions to help support employers implement the proposed regulations. How helpful do you think the following measures would be?

	Very unhelpful	Not very helpful	Neither helpful or unhelpful	Somewhat helpful	Very helpful	Don't know
Helping employers to understand the new regulations e.g. through workshops and seminars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Helping employers to calculate their organisation's gender pay gap e.g. through access to software	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Helping employers with other types of supporting analysis e.g. analysis of representation of women at different levels within the workforce	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Helping employers to address the issues identified by a pay gap analysis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q13: Do you think there are alternative ways to increase transparency on gender pay that would limit the cost for employers, for example reporting to the Government via the existing PAYE system?

- Yes
- No
- Don't know

We are satisfied that any potential risks or unintended consequences are far outweighed by the benefits to business and society.

If you said 'yes' to Q13, what alternative(s) would you suggest?

Q14: Do you think that introducing civil enforcement procedures would help ensure compliance with the proposed regulations?

- Yes
- No
- Don't know

Q15: What, if any, do you consider to be the risks or unintended consequences of implementing section 78?

Whilst we strongly agree that publication of gender pay information will encourage employers to take positive actions, there is also a risk is that we just end up dealing with crude averages.

We believe the success of this initiative hinges on how companies are required to report the data – and on the detail around the “what”, the “where” and the “how often”. If the information requirement is too general or vague (such as average pay data for male and female staff employed by the business as a whole) this may not actually progress matters much further. The more detailed information companies can publish, including differences at a grade level, the better. We know that the pay gap increases with age and seniority, and we also know that the gap is far greater in some industries than others so unless more detailed figures are published, comparing the pay of people in specific jobs, it will be impossible to determine whether a gender pay gap is due to the employer-specific factors or industry-specific factors.

We also think that there is a chance that publication of gender pay disparities may potentially and inadvertently exacerbate the issue of women avoiding certain traditionally male-gendered sectors by shining a spotlight on their poor record in this area. It's for this reason, amongst others, that we feel it's very important that companies be given the opportunity to provide narrative context to their gender pay data, and that they also be given the chance to

communicate what steps they are taking to redress imbalances and to explain how they are reducing barriers to women etc.

Q16: Do you consider there are any risks or unintended consequences that warrant dropping or modifying the implementation of section 78?

- Yes
 No

If you said 'yes' to Q16, please explain why you think this is:

Q17: How do you think the Government can most effectively encourage young girls to consider the broadest range of careers?

Given that STEM-related industries are integral to the UK economy, we need to elevate and energise young girls to get involved in these subjects at school in order to allow them to progress through education and training toward the widest range of job opportunities possible.

The Government needs to work with both industry and schools to increase focus on getting more girls into science, technology, engineering and maths. It needs to run more campaigns like its "Your Life" campaign, as well as funding more initiatives that encourage girls to consider employment in fields that are traditionally seen as male-gendered.

The Government should also seek to celebrate positive female role models in enterprise and should encourage such women to share their real life experiences and success stories. It should also consider reaching out to parents directly in order to influence them in trying to get their children to make better career-related choices.

Q18: How do you think the Government can work with business to support women to return to work and progress in their career after having children?

The Government needs to collaborate with business to create a work and social environment which ensures women return to work and fully contribute their economic potential by:

1. ensuring effective talent management and promotion processes
2. facilitating access to affordable, accessible and quality childcare – it should consider expanding current tax breaks to allow more women (and men) to remain attached to the labour market
3. supporting culture change in business through the promotion and adoption of flexible working – use male and female role models to demonstrate that flexible working doesn't

need to be a bar to a career in senior management. One suggestion is to encourage companies to re-think their approach to part-time and flexible working. Here in the UK Unilever has implemented an agile working programme that allows all their employees maximum flexibility – working any place, any time – and it looks to provide its staff with the tools, the technology and the environments to support any such flexible choices. In Australia, Pricewaterhouse Coopers has just announced that all roles are flexible, so its 6,000 employees can chose their own hours. The firm has made this change to help it attract the best staff at all pay levels. Similarly ANZ Bank has made every one of its roles within Australia available on a flexible basis.

4. asking recruitment companies to fully acknowledge and understand the concept of flexible working, so that candidates who want to work flexibly can have a positive conversation during job interviews. In the UK, women are twice as likely to work flexibly than their male colleagues. A recent Timewise study showing that only 6% of “quality” jobs are advertised as open to flexible working provides a clue as to how women in particular can get trapped in jobs that limit their earning power. Companies will agree to requests for flexible working from existing employees, but typically don’t offer this to prospective hires. By adding the strap line “happy to talk flexible working” to job advertisements, companies could break this logjam.

5. supporting return-to-work initiatives designed to support women back in to employment

6. running fatherhood campaigns that advocate for men becoming more engaged in parenting responsibilities

7. extending paid paternity leave and pay

Q19: How do you think the Government can make sure that older women are able to fulfill their career potential?

As suggested by the Women Business’ Council, we believe that the Government should look to:

1. appoint a business champion for older workers to promote the business benefits of recruiting and retaining older workers.

2. build on Age Positive campaign and increase its impact. Raise awareness of the benefits that older workers with the right skills can bring to the workforce.

3. publish a range of ‘how-to’ guides and toolkits for employers, alongside practical solutions to help business adapt their recruitment and retention practices.

4. publicise the availability of existing resources such as the ACAS guidance and Age Audit Toolkit.

5. encourage businesses to invest in in return-to-work schemes and training

Thank you for your time in completing this consultation.

You may email or post your completed response as follows:

By email: GenderPayGapConsultation@geo.gov.uk

By post:

Gender Pay Gap Consultation
Government Equalities Office
4th Floor
100 Parliament Street
London
SW1A 2BQ