1. How adequate are the Government’s proposals for tackling the pay gap faced by women over 40? What additional measures would be most effective in reducing the pay differentials faced by this group?

The government’s steps to ensure that companies publish gender pay gap information is a good first step for tackling the pay gap faced by women over 40. Data gathered should include gender pay gap information on starting salaries offered, salary increases offered whether performance based or otherwise, any gap in total reward packages offered to include all benefits and any gap in performance bonuses.

It is important to recognise, however, that no single action will address the gender pay gap and it is important for joint business-government activity to identify and share best practice between companies of all sectors and sizes.

Other measures could include:

- Guidance on how to ensure performance management processes place equal value on both male and female contributions to the workplace and don’t inadvertently reward typically male traits.
- Encouraging businesses to train their staff to recognise unconscious biases and the impact this has on decision-making
- Profiling positive action taken by employers and its impact on company culture and performance (incentives to action approach)

2. What actions would be most effective in improving recruitment, retention and re-training for women aged over 40?

Actions could include:

- Increasing accessibility to affordable childcare
- Encouraging organisations to increase the number of part-time and flexible working opportunities to help those with childcare responsibilities to balance work and home life. In particular, encourage opportunities to be offered at all levels in the organisation, including senior management, as many highly qualified women end up in jobs for which they are over-qualified because they cannot find an appropriately senior opportunity.
- Encourage and provide funding for programmes designed to support women to return to work following a break from the workforce. Examples could include support for ‘Back to Work’ or ‘Returnship’ programmes or bonuses for women returning to work following maternity leave.
- Partner with employers to offer training in new technologies to women who want to return to work. This would also address the chronic skills shortage and would benefit the whole country.
- Government sponsorship of mainstream awards that have a category profiling employers who take action to positively change their culture and performance through greater diversity.

3. Is there any evidence that women aged over 40 face particular barriers to promotion? If so, what could be done to address this problem?

Actions could include:

- Encouraging unconscious bias training (see point 1 above)
- Support for line management training in dealing with an aging workforce.
- Guidance on how to ensure performance management processes are evidence-based and focus on demonstrated achievements.
- Where panels are used to assess promotion readiness, encourage employers to use mixed gender panels.
- Policies for recruitment and promotion can be too male-centric. These should be designed to be fair to both men and women.
- Run a campaign to profile older women who are highly regarded in senior roles mixing private and public sector roles.

4. Are there particular difficulties in narrowing the gender pay gap for women working in predominantly female sectors and non-professional roles? Are there any evidence-based measures which could effectively address these issues?

The answer to this lies partly in understanding why certain sectors are perceived as predominantly female and others as predominantly male and tackling these perceptions. There are many examples of sectors which are perceived as predominantly female being paid less than those which are perceived as predominantly male such as administrative roles or nursing. For there to be true equality, stigma around certain industries must be abolished as “male only” or “female only”.
Measures to reduce the propensity for certain sectors to be viewed as predominantly female or male sectors include:

- Make unconscious bias training a mandatory module in teacher training courses
- Raise teacher awareness of the importance of the language used both orally and in written materials when reviewing career options with pupils as studies have shown that language can have a big impact on whether girls choose certain subjects at school or careers later in life
- Celebrating female and male technology role models at schools to inspire the next generation eg Ada Lovelace
- Partner with business to offer re-training for those who want to explore a different career later in life
- Increase the number of women on conference panels and Boards

5. Should the regulations on gender pay reporting be extended to organisations with fewer than 250 employees?

Organisations with under 250 employees should be strongly encouraged to provide this information voluntarily and organisations who are positive role models should be profiled to encourage more organisations to disclose their information. This way, it will be seen as best practice as the first system rolls out and as the successes and failures of the reporting come to light, a view can then be taken on whether it is appropriate to extend mandatory reporting to companies with fewer than 250 employees.

6. Would voluntary measures regarding what employers do with gender pay gap information be sufficient to create change within organisations? What could be done to ensure that information about an organisation’s pay gap is translated into action?

In the current climate, voluntary measures would not be sufficient to create change within organisations. Although it would be a good first step, organisations need encouraging by government to take firm action.

Organisations who perform well in information about their gender equality should be commended, encouraged and rewarded by government as best practice. That information should be shared and disseminated.

Where organisations’ gender pay gap statistics are poor, Government should require those organisations to put in place a clear action plan to
address the issue and require them to report on the steps they are taking on a regular basis, say every 6 months.

7. Which mechanisms would most effectively ensure that policies designed to narrow the gender pay gap are fully complied with? Is there evidence from other countries or policy areas of what might work best?

A system of regular reporting and review as well as financial incentives, would be preferable to any monetary consequences which would be seen as an additional taxable burden.

Measures to increase transparency such as those listed in point 6 above, would drive greater awareness of the gender pay gap and encourage women who might otherwise accept the situation as a fait accompli, to question the status quo. This is likely to drive further positive change.

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