

# Public consultation on a legislative initiative on strengthening the principle of equal pay between men and women through pay transparency

Fields marked with \* are mandatory.

## Introduction

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Gender equality is one of the fundamental values of the European Union. Yet, the effective implementation and enforcement of the equal pay principle, stipulated in the European Treaties since 1957 as well as in Article 4 of the [2006 Gender Equality Recast Directive \(2006/54/EC\)](#), remains a major challenge. It is partially reflected in the continuing evidence of non-compliance with the law and in the persistence and magnitude of the gender pay gap, which was still 16% in the EU 28 in 2017. The gender pay gap is the difference between the average gross hourly earnings of men and women expressed as a percentage of the average gross hourly earnings of men. It ranges from 3.5% in Romania to 25.6% in Estonia.

The persistence of the gender pay gap at around 16% and its slow rate of decrease points to structural inequalities. The explanatory factors behind the gender pay gap are complex and mutually reinforcing. They include horizontal and vertical labour market segregation, continued unequal sharing of caring responsibilities and its consequences for participation of women in the labour market, etc. Part of the difference can however be attributed to gender-based pay discrimination.

In order to raise awareness about the persistence of gender bias in pay and to incentivize companies to take initiatives to analyse and possibly revise their pay structures, [the 2014 Pay Transparency Recommendation \(2014/124/EU\)](#) provided four core measures to improve pay transparency and encouraged Member States to implement at least one. However, the 2017 Implementation Report of the Recommendation revealed an uneven follow-up to the Recommendation: in a significant number of Member States, transparency-enhancing measures are still entirely absent (even looking beyond the ones suggested by the Recommendation).

As part of the [2017-2019 Action Plan on tackling the gender pay gap](#), with a view to ensuring a better enforcement of the principle of equal pay for the same work or work of equal value in practice, the Commission committed to assess possible targeted amendments to the 2006 Gender Equality Recast Directive. For that purpose, the Commission conducted an in-depth evaluation of the existing EU legal provisions of the 2006 Gender Equality Recast Directive and of the 2014 Pay Transparency Recommendation implementing the Treaty principle on “equal pay for equal work or work of equal value” for women and men (“the Commission’s Evaluation”).

In her political guidelines, the President of the European Commission announced that she will ‘[...] table measures to introduce binding pay transparency measures’ (for further information, see the [Inception Impact Assessment](#) published in January 2020).

The forthcoming initiative will follow the Commission's Evaluation, as well as other work by the Commission that highlighted problems with enforcing this principle across the EU. It will complement other Commission initiatives focused on tackling the root causes of the gender pay gap, such as the adoption and implementation of the [Work-Life Balance Directive 2019/1158/EU](#); sectoral initiatives fighting stereotypes and ensuring better gender balance; and [the proposed Directive on improving gender balance on company boards](#).

#### IMPORTANT NOTICE ON THE PUBLICATION OF CONTRIBUTIONS

The questionnaire is available in all official EU languages. You can submit your responses in any official EU language. Contributions received from this survey will be published on the European Commission's website. Please choose the option concerning the publication of your contribution (for further information, please consult the privacy statement attached).

## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

### \* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
-

- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

\* First name

Pinella

\* Surname

Bombaci

\* Email (this won't be published)

bpw@christakirchmair.com

In which main sector?

- Agriculture, forestry and fishing
- Mining and quarrying
- Manufacturing
- Electricity, gas, steam and air conditioning supply
- Water supply; sewerage, waste management and remediation activities
- Construction
- Wholesale and retail trade; repair of motor vehicles and motorcycles
- Transportation and storage
- Accommodation and food service activities
- Information and communication
- Financial and insurance activities
- Real estate activities
- Specialized professional, scientific and technical activities
- Administrative and support service activities
- Public administration and defence; compulsory social security
- Education
- Human health and social work activities
- Arts, entertainment and recreation
- Other service activities
- Activities of households as employers (such as domestic employees); undifferentiated goods- and services-producing activities of households for own use
- Activities of extraterritorial organisations and bodies

\* Organisation name

*255 character(s) maximum*

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

836392015840-91

\* Country of origin

Please add your country of origin, or that of your organisation.

- |   |   |  |  |
|---|---|--|--|
| <input type="radio"/> Afghanistan         | <input type="radio"/> Djibouti                            | <input type="radio"/> Libya            | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands       | <input type="radio"/> Dominica                            | <input type="radio"/> Liechtenstein    | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania             | <input type="radio"/> Dominican Republic                  | <input type="radio"/> Lithuania        | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria             | <input type="radio"/> Ecuador                             | <input type="radio"/> Luxembourg       | <input type="radio"/> Samoa                            |
| <input type="radio"/> American Samoa      | <input type="radio"/> Egypt                               | <input type="radio"/> Macau            | <input type="radio"/> San Marino                       |
| <input type="radio"/> Andorra             | <input type="radio"/> El Salvador                         | <input type="radio"/> Madagascar       | <input type="radio"/> São Tomé and Príncipe            |
| <input type="radio"/> Angola              | <input type="radio"/> Equatorial Guinea                   | <input type="radio"/> Malawi           | <input type="radio"/> Saudi Arabia                     |
| <input type="radio"/> Anguilla            | <input type="radio"/> Eritrea                             | <input type="radio"/> Malaysia         | <input type="radio"/> Senegal                          |
| <input type="radio"/> Antarctica          | <input type="radio"/> Estonia                             | <input type="radio"/> Maldives         | <input type="radio"/> Serbia                           |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini                            | <input type="radio"/> Mali             | <input type="radio"/> Seychelles                       |
| <input type="radio"/> Argentina           | <input type="radio"/> Ethiopia                            | <input type="radio"/> Malta            | <input type="radio"/> Sierra Leone                     |
| <input type="radio"/> Armenia             | <input type="radio"/> Falkland Islands                    | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore                        |
| <input type="radio"/> Aruba               | <input type="radio"/> Faroe Islands                       | <input type="radio"/> Martinique       | <input type="radio"/> Sint Maarten                     |
| <input type="radio"/> Australia           | <input type="radio"/> Fiji                                | <input type="radio"/> Mauritania       | <input type="radio"/> Slovakia                         |
| <input type="radio"/> Austria             | <input type="radio"/> Finland                             | <input type="radio"/> Mauritius        | <input type="radio"/> Slovenia                         |
| <input type="radio"/> Azerbaijan          | <input type="radio"/> France                              | <input type="radio"/> Mayotte          | <input type="radio"/> Solomon Islands                  |
| <input type="radio"/> Bahamas             | <input type="radio"/> French Guiana                       | <input type="radio"/> Mexico           | <input type="radio"/> Somalia                          |
| <input type="radio"/> Bahrain             | <input type="radio"/> French Polynesia                    | <input type="radio"/> Micronesia       | <input type="radio"/> South Africa                     |
| <input type="radio"/> Bangladesh          | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova          | <input type="radio"/>                                  |

- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
  
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
  
- Burkina Faso
- Burundi
  
- Cambodia
  
- Cameroon
  
- Canada
- Cape Verde
- Cayman Islands
  
- Central African Republic
- Chad
- Chile
- China
  
- Christmas Island
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
  
- Grenada
- Guadeloupe
  
- Guam
  
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
  
- Guyana
  
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
  
- Hungary
  
- Iceland
  
- India
- Indonesia
- Iran
  
- Iraq
  
- Ireland
- Isle of Man
- Israel
  
- Italy
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
  
- Nepal
  
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
  
- Niger
  
- Nigeria
- Niue
  
- Norfolk Island
- Northern Mariana Islands
- North Korea
  
- North Macedonia
- Norway
- Oman
- Pakistan
  
- Palau
  
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
  
- Syria
  
- Taiwan
- Tajikistan
- Tanzania
- Thailand
  
- The Gambia
  
- Timor-Leste
- Togo
  
- Tokelau
- Tonga
  
- Trinidad and Tobago
- Tunisia
  
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
  
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom

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|--|----------------------------------|---|--|
| <input type="radio"/> Clipperton                       | <input type="radio"/> Jamaica    | <input type="radio"/> Peru  | <input type="radio"/> United States                        |
| <input type="radio"/> Cocos (Keeling) Islands          | <input type="radio"/> Japan      | <input type="radio"/> Philippines                                 | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia                         | <input type="radio"/> Jersey     | <input type="radio"/> Pitcairn Islands                            | <input type="radio"/> Uruguay                              |
| <input type="radio"/> Comoros                          | <input type="radio"/> Jordan     | <input type="radio"/> Poland                                      | <input type="radio"/> US Virgin Islands                    |
| <input type="radio"/> Congo                            | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal                                    | <input type="radio"/> Uzbekistan                           |
| <input type="radio"/> Cook Islands                     | <input type="radio"/> Kenya      | <input type="radio"/> Puerto Rico                                 | <input type="radio"/> Vanuatu                              |
| <input type="radio"/> Costa Rica                       | <input type="radio"/> Kiribati   | <input type="radio"/> Qatar                                       | <input type="radio"/> Vatican City                         |
| <input type="radio"/> Côte d'Ivoire                    | <input type="radio"/> Kosovo     | <input type="radio"/> Réunion                                     | <input type="radio"/> Venezuela                            |
| <input type="radio"/> Croatia                          | <input type="radio"/> Kuwait     | <input type="radio"/> Romania                                     | <input type="radio"/> Vietnam                              |
| <input type="radio"/> Cuba                             | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia                                      | <input type="radio"/> Wallis and Futuna                    |
| <input type="radio"/> Curaçao                          | <input type="radio"/> Laos       | <input type="radio"/> Rwanda                                      | <input type="radio"/> Western Sahara                       |
| <input type="radio"/> Cyprus                           | <input type="radio"/> Latvia     | <input type="radio"/> Saint Barthélemy                            | <input type="radio"/> Yemen                                |
| <input type="radio"/> Czechia                          | <input type="radio"/> Lebanon    | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Zambia                               |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho    | <input type="radio"/> Saint Kitts and Nevis                       | <input type="radio"/> Zimbabwe                             |
| <input type="radio"/> Denmark                          | <input type="radio"/> Liberia    | <input type="radio"/> Saint Lucia                                 |  |

#### \* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

**Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

## Experiences and attitudes on pay discrimination

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Pay: the ordinary wage or salary and any other supplementary components received directly or indirectly from the employer, whether in cash or in kind, such as bonuses or a company car.

Pay discrimination: being paid less than another colleague doing the same work or work of equal value without objective justification.

Work of equal value: the value of work can be assessed and compared based on objective criteria, such as

educational, professional and training requirements, skills, level of effort required and responsibility, work undertaken and the nature of tasks involved.

**Do you think that men and women are paid equally for the same work or work of equal value in your country of residence, as regards the following sectors?**

	Yes	No	Do not know
In the public sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
In large private organisations (from 250 employees)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
In medium sized private organisations (50 to 249 employees)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
In small private organisations (from 10 to 49 employees)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
In micro private organisations (less than 10 employees)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**Do you think that men and women are paid equally for the same work or work of equal value in your organisation?**

- Yes
- No
- Do not know

**Have you, or, if not you, someone you know, ever experienced pay discrimination?**

**(If replying on behalf of an organisation the question must be interpreted as having received complaints for pay discrimination on any grounds)**

- Yes
- No
- Do not know

**If Yes, what do you think the reason(s) was/were?**

**(if replying on behalf of an organisation the questions must be interpreted as the alleged reason of the complaint)**

*[multiple choice possible]*

- Sex
- Race and ethnic origin
- Religion or belief
- Disability
- Age
- Sexual orientation
- Other
- Do not know

**If Other, please specify**

Gender, race and ethnic origin, disability and age

If **Yes**, what kind of action did you or the person you know take? (if replying on behalf of an organisation the questions must be interpreted as the action taken by the complainant to the best of your knowledge)

[multiple choice possible]

- None
- Addressed the issue with the employer
- Contacted trade union
- Contacted equality body
- Contacted labour inspectorate
- Took legal action (before a Court)
- Other
- Do not know

If **Other**, please specify

Importance of training on salary bargaining

**What was the result?**

- No follow-up
- Follow-up

**Please explain**

This depends on the situation, as BPW Europe represents 18000 members

**If you or the person you know took legal action (before a Court) what was the result?**

- Positive result for the employee (e.g. the case was won or agreement with an out-of-court settlement)
- Negative result for the employee (e.g. the case was lost or the action was abandoned)
- Action is still ongoing

**Do you have additional comments?**

**Enforcement issues**

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**What do you think about the following types of support to help employees take action in case of gender-based pay discrimination?**

	Very important	Important	Not that important	Not important at all	Do not know



Easily accessible information on how to lodge a complaint or about other legal procedures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Low litigation costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Certainty of no professional consequences or adverse treatment in case of lodging a complaint or taking other legal action	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free legal support and representation in legal action	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour inspectorate's intervention in case of alleged discrimination	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equality body's intervention in case of alleged discrimination	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Decent monetary compensation or other remedy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and proportionate fine to the company	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of 'naming and shaming' of companies not complying with equal pay principle	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility of collective action – taken by a group of employees in the same situation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In case of potential discrimination, the employer has to prove the absence of discrimination (reversal of the burden of proof)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Relevance and possible features of the forthcoming initiative

Pay: the ordinary wage or salary and any other supplementary components received directly or indirectly from the employer, whether in cash or in kind, such as bonuses or a company car.

Pay levels: information on average pay level of employees per category or position doing the same work or work of equal value, by gender.

Gender pay gaps: the difference between the average pay of men and women per category or position of employees doing the same work or work of equal value.

## What do you think of the following measures on pay transparency and better enforcement of the principle of equal pay?

	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	Do not know
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Employees have the right to access information on pay levels and gender pay gaps of categories of individuals performing the same work or work of equal value	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Employer reports regularly on pay levels and gender pay gaps per employees' category	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Employers and employees representatives analysing information about pay levels and gender pay gaps per employees' category in regular pay audits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender-neutrality of job evaluation and classification systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation to include equal pay matters in collective bargaining	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and proportionate penalties for companies and compensation for victims of discrimination	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strong mandate of national equality bodies to intervene in support of victims	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforced mandate of labour inspectorates to intervene in support of victims	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Do you agree/disagree with the following statements about the possible impacts of pay transparency measures?**

	Strongly agree	Somehow agree	Somehow disagree	Strongly disagree	Do not know
Pay transparency helps enforce the right to equal pay	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency reduces pay discrimination	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency contributes to raising awareness on equal pay issues	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency is a powerful tool for equality bodies/labour inspectorates /social partners to support employees in defending their right to equal pay	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Pay transparency would encourage employers to take action to better implement the principle of equal pay for the same work or work of equal value	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency helps improve work climate	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency has a positive impact on employees' motivation and productivity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency can result in salaries flattening or decreasing and greater wage moderation by organisations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency might make it difficult to reward high-performing employees	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency limits employers' discretion	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency creates significant additional administrative burden for organisations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency must be part of wider equal pay policies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effectiveness of pay transparency depends on the size of the organisation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay transparency measures should be tailored to the size of the organisation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**How do you rate the following possible modalities of the right to access pay information?**

Right to access pay information: right for employees to access information on pay levels and gender pay gaps, for categories of employees doing the same work or work of equal value.

	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	Do not know
Information received upon employee's request to the employer	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information received as a personal regular communication e.g. in the payslip	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information is available to the trade union or equality body	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Information is publicly available and easily accessible	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information should include average pay levels	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information should include gender pay gaps	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information should specify average bonus or benefits (any payments in cash or in kind paid in addition to the ordinary salary) and gender gaps related to them	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information about pay provided at hiring point (in the position vacancy or during the interview)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**In your opinion, what kind of organisation should apply the employees' right to access pay information?**

	Should be applicable	Should not be applicable	Do not know
Micro organisations (less than 10 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Small organisations (10 to 49 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Medium-sized organisations (50 to 249 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Large organisations (at least 250 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**How do you rate the following possible modalities of pay reporting by organisations on pay levels?**

Pay reporting: employers' regular reporting of pay levels by category of employee or position, broken down by gender.

Pay levels: information on average pay level of employees per category or position doing the same work or work of equal value, by gender.

	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	Do not know
Pay report is provided to employees only upon their request	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay report is accessible to employees or employees' representatives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Pay report is available to the equality body or labour inspectorate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay report is available to the public at large	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information is presented in a standard format or with clear explanation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility of a follow up action by labour inspectorate/equality body if significant unjustified gender-based pay differences are detected	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay reports of the last 4 years remain available	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**How do you rate the following possible modalities of pay reporting by organisations on gender pay gaps?**

Pay reporting: employers' regular reporting of gender pay gaps by category of employee or position.

Gender pay gaps: the difference between the average pay of men and women per category or position of employees doing the same work or work of equal value.

	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	Do not know
Pay report is provided to employees only upon their request	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay report is accessible to employees or employees' representatives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay report is available to the equality body or labour inspectorate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay report is available to the public at large	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information is presented in a standard format or with clear explanation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility of a follow up action by labour inspectorate/equality body if significant unjustified gender pay gaps are detected	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pay reports of the last 4 years remain available	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**In your opinion, what kind of organisation should implement pay reporting?**  
(in relation to the previous two questions)

	Should be applicable	Should not be applicable	Do not know
* Micro organisations (less than 10 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Small organisations (10 to 49 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Medium-sized organisations (50 to 249 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Large organisations (at least 250 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

### How do you rate the following possible modalities of pay audit?

Pay audit: employer and employees' representatives regularly analysing information about pay levels and gender pay gaps per employees' category, and further related information.

	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	Do not know
Results of the audit are provided to employees only upon their request	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Results of the audit are accessible to employees or employees' representatives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Results of the audit are available to the equality body or labour inspectorate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Results of the audit are available to the public at large	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The audit includes information on pay levels and gender pay gaps	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The audit includes an analysis of the criteria used to establish pay and reasons explaining differences in pay	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The audit includes an analysis of gender neutrality of job evaluation and classification system	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The audit includes corrective measures if pay differences between men and women are not justified	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The audit includes a follow-up of measures set in previous audits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Possibility of a follow up action by labour inspectorate/equality body if significant unjustified gender-based pay differences or gender pay gaps are detected	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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**In your opinion, what kind of organisation should implement pay audit?**

	Should be applicable	Should not be applicable	Do not know
Micro organisations (less than 10 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Small organisations (10 to 49 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Medium-sized organisations (50 to 249 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Large organisations (at least 250 employees)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**How do you rate the following possible specific modalities of gender-neutral job evaluation and classification systems?**

Gender-neutral job evaluation and classification systems: systematic way of determining the value/worth of a job in relation to other jobs in an organisation with the aim to compare their relative worth and ultimately establishing a rational pay structure.

	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	Do not know
Guidelines for organisations on how to develop and apply gender-neutral job evaluation and classification systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
IT tools for organisations to support the development of gender neutral evaluation and classification systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Training on job evaluation and classification in general and on how to apply gender neutrality in such systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality labeling system for organisations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inclusion of matters related to gender-neutrality of job evaluation and classification systems in collective bargaining	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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## In your opinion, what measures would you like to see included in a forthcoming European Commission initiative?

[multiple choice possible]

- Employees' right to access pay information
- Employers' obligation to report on pay levels
- Employers' obligation to carry out pay audits
- Gender-neutrality of job evaluation and classification systems
- Obligation to include equal pay matters in collective bargaining
- Enforcement measures (e.g. legal support, adequate penalties for companies, compensation for victims and easier shift of burden of proof to employer)
- Stronger mandate of national equality bodies to intervene in support of victims
- More active role of labour inspectorates as regards gender equality issues in employment matters
- Better cooperation between equality bodies and labour inspectorates
- Other

### If Other, please explain

Measures have to be proportionate and feasible according to the size of the organization, the administrative burden, costs and human resources capacity. Public authorities, Employers' Organizations and others such as Chamber of Commerce and Unions should be tasked with providing practical and technical support to companies. There should also be immediate action and planning for training of employers, employees and human resources to be aware of existing legal obligations and recognizes tools to overcome the Gender Pay Gap.

### Please upload any additional reference document or comment that you deem useful

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

[d30d0b46-ef9b-4657-bc60-83a45192c761/BPW\\_Europe\\_Position\\_-\\_EC\\_Pay\\_Transparency\\_Consultation\\_-\\_2020-05-28.pdf](#)

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