



Section 1 – Your details

	Contact details
Title	Mr
First name	Phil
Last name	Hall
Address	Association of Accounting Technicians 140 Aldersgate Street London
Postcode	EC1A 4HY
Email address	Phil.hall@aat.org.uk
Your organisation	Association of Accounting Technicians (AAT)

Do you want is your response to be treated as confidential?

- Yes
 No

If yes, please explain why (please refer to notes below on confidentiality)

Confidentiality

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes. These are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 and the Environmental Information Regulations 2004.

If you want the information you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice which public authorities must comply with. This deals with, amongst other things, obligations of confidence. It would therefore be helpful if you could explain to us why you regard the information you provide as confidential. If we receive a request to disclose the information we will take full account of your explanation, but we cannot assure that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not alone be regarded as binding.

The Government Equalities Office will process your personal data in accordance with the Data Protection Act 1998 and in the majority of circumstances this means your personal data will not be disclosed to third parties.

Section 2 – List of consultation questions

Please refer to the consultation document before completing the online survey, as it provides further background to all of the questions.

Q.1 Do you agree that the new GPG requirements should apply to the same public bodies, with 250 or more employees, which are currently listed at schedules 1 and 2 to the Specific Duties Regulations?

- Yes
- No

If no, please explain why.

Q.2 Are there any other public bodies that should be included at Schedules 1 and 2 to the Specific Duties Regulations?

- Yes
- No

If yes, please provide further details.

The list provided is comprehensive but there appear to be some omissions for example, if we look at a single Government Department (BEIS) and their 47 agencies and public bodies, many are not listed in Schedule 1 e.g. the Medical Research Council. It is likely such omissions are replicated across Government Departments. AAT believes that all public agencies and bodies should be included.

Furthermore, there are others such as the Nuclear Decommissioning Authority which employ very close to 250 members of staff but not quite the requisite 250 for reporting purposes. AAT assumes these organisations will be brought into scope if/when they employ the requisite number of employees rather than simply relying on the prescribed list.

Q.3 Is it appropriate to rely on the definition of ‘employment’ in section 83 of the Equality Act 2010 for public sector employers?

- Yes
- No

If no, please explain why.

It is important to note the significant increase in off-payroll working in the public sector and excluding this group, especially when it is primarily undertaken at senior levels, is likely to skew the results of gender pay gap reporting. As a result the "self-employed" who are working in the public sector should not be excluded as proposed.

Q.4 Do the proposed elements of pay raise any particular issues for the public sector?

- Yes
- No

If yes, please provide further details.

Q.5 Do you agree that the same deadline should be introduced for all reporting requirements under the amended Specific Duties Regulations?

Yes

No

If no, please explain why.

Q.6 Do these reporting requirements pose any particular issues for public sector employers?

Yes

No

If yes, please provide further details.

Q.7 Do you have any other comments on these measures and/or our proposed approach?

Whilst recent HM Treasury analysis suggests the National Living Wage will eradicate the gender pay gap for the lowest paid by 2020, it will remain a significant problem for many others.

With this in mind, shining a light on the performance of public as well as private sector organisations is essential. We therefore welcome the decision to extend gender pay gap reporting to the public sector as there is no valid reason for distinguishing between public and private sector employment.

However, it is important to recognise that whilst important, gender pay gap reporting alone is far from sufficient to tackle the gap.

Action from subsidised childcare, enforced paternity leave and greater workplace flexibility e.g. encouraging working from home are all measures that can be taken to help address the problem but are outside the remit of this consultation. There is one key area that could be addressed by reporting requirements and that relates to the commonly held view that women are less likely to ask for a pay rise than men.

Contrary to much of what has been published in this arena, recent research from Cass Business School and Warwick and Wisconsin Universities confirms that women do ask for pay rises just as frequently as men but often do not get them - although men and women under 40 both ask for and receive pay rises at the same rate, which is encouraging.

This research is based on data from the Australian workplace relations survey. Australia appears to be the only country to record whether employees had asked for a pay rise. Given the importance of this issue, this might be something that the British Government considers including in gender pay gap reporting in the future.