

Labour's Commitments to Working People – Briefing Notes

Give all workers equal rights from day one, whether part-time or full-time, temporary or permanent – so that all workers have the same rights and protections whatever kind of job they have

- All types of workers have the right to the following on day one of their employment:
 - o the National Minimum Wage;
 - o working time rights (including breaks, paid holidays and a limit on the working week);
 - o health and safety protection;
 - o the right to join a union; and
 - o protection from unlawful discrimination.
- Workers classified as “employees” have additional rights, including:
 - o Sick pay
 - o Not to be unfairly dismissed
 - o Maternity/paternity/adoption leave and pay
- Some of these rights currently have a qualifying period, and this qualifying period varies across different types of workers. For example, agency workers gain the right to equal treatment on pay, holidays and working time, and to improved pregnancy rights only after 12 weeks in post.
- Such differential treatment encourages employers to use more precarious contracts. Labour will reverse this incentive by getting rid of qualifying periods and giving all kind of workers equal rights on day one of their employment. Stronger rights, e.g. to a longer holiday allowance, may still be accumulated through long service.

Ban zero hours contracts – so that every worker gets a guaranteed number of hours each week

- ‘Zero hours’ contracts are formal contracts without a minimum number of guaranteed hours each week.
- The Office for National Statistics now collects figures on ‘contracts that do not guarantee a minimum number of hours’ of work. The latest estimate is that there are 905,000 people on ‘zero hours contracts’ and the ONS reports they are more likely to be:

“young, part-time, women, or in full-time education when compared with other people in employment. On average, someone on a “zero-hours contract” usually works 25 hours a week. Around 1 in 3 people (32%) on a “zero-hours contract” want more hours, with most wanting them in their current job, as opposed to a different job that offers more hours. In comparison, 9% of other people in employment wanted more hours.”¹

¹ People in Employment on a Zero Hours contract, ONS, March 2017
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/articles/contracts that do not guarantee a minimum number of hours/mar2017>

- Zero hours contracts are a one-way street demanding total flexibility and commitment from individuals with employees having to agree to make themselves available for work but no guarantee of work is reciprocated from the employer. People can find themselves being called into work or having their shifts cancelled at very short notice. This is a return to the nineteenth century dock-worker waiting 'on the stones' outside the dock gate hoping to be picked for a shift's work.
- For a small number of people the flexibility of zero hours contract might be advantageous, what the vast majority of people want and need is secure and decent work.
- Labour would introduce legislation based on the New Zealand model, which ends zero hours contracts by requiring that:
 - o An employee is given guaranteed hours. These must be specified and written in the contract.
 - o If an employer wants workers to be available in addition to the guaranteed hours then these must be specified in number, with the reason as to why they cannot be part of the regular guaranteed hours and 'reasonable compensation' for availability on the part of the employee – whether required to work or not. This is effectively an 'on-call' payment.
 - o The employer must state the notice period for cancelling shifts – if a shift is cancelled by the employer after this notice period the employee should receive 'reasonable compensation'.
- The implementation of the New Zealand legislation meant that large chains such as Burger King, KFC, Pizza Hut and Starbucks that had been operating zero hour contracts moved to fixed shifts and hours with no loss of competitive advantage since all employers were regulated.

Ensure that any employer wishing to recruit labour from abroad does not undercut workers at home - because it causes divisions when one workforce is used against another

- A Labour government would ensure that any employer wishing to recruit labour abroad can only do so where pay and terms are set by collective agreement, either at the workplace or across the industry.
- This would stop unscrupulous employers recruiting abroad specifically exploit migrant workers from low wage economies to try to undercut the pay, terms and conditions of others in the UK, since employers would have to pay 'the rate for the job'.
- The 1996 Posted Workers Directive in the EU, and the subsequent restrictive interpretations from the European Court of Justice, has meant that 'posted workers' - workers sent by their employer to another EU country on a short-term project - are, in the UK, entitled only to national minimum rates of pay. This effectively means the National Minimum Wage – rather than the going rate for the job, which, where

set by collective agreement, is often significantly higher than the statutory minimum.

- The TUC have previously argued that “in recent years, there has been growing evidence of companies developing ‘sham’ arrangements to restrict the rights of posted workers, as a means of reducing costs. These include the use of ‘letter box companies’ in low paying economies and the use of bogus self-employment arrangements.”² This undermines good employers and can lead to the gross exploitation of migrant workers who are not being paid properly for their work and does not help social cohesion.³
- By strengthening the employment and trade union rights of all workers, and improving the ability to enforce those rights, a Labour government will tackle the exploitation of migrant workers and improve the pay, terms and conditions of all workers.

Repeal the Trade Union Act and roll out sectoral collective bargaining – because the most effective way to maintain good rights at work is through a trade union

- Trade unions are essential to protecting people’s interests at work – when people are organised in trade unions they achieve better pay at work, fairer working conditions, have safer workplaces and a voice at work. In contrast, the undermining of trade unions and collective bargaining in this country is associated with growing inequality and increasing numbers in insecure work.
- Rights at work are important but the best solution is negotiation and agreement between employers and trade unions. We will take steps to promote collective bargaining between the two sides in each industry to fix the going rate and set fair conditions (Sectoral Collective Agreements). This is the model of the most efficient (and strike-free) economies in Europe.
- The Trade Union Act became law on 4th May 2016 and the TUC have called it the “most serious attack on the rights of trade unions and their members in a generation.” It imposes the serious and unnecessary restrictions on unions including: arbitrary thresholds in industrial action ballots; complicated new balloting and notice rules designed to make industrial action more difficult for unions to organise; new restrictions on pickets; new restrictions on union campaigning; and wide-ranging powers for the Certification Officer, who regulates unions.
- Labour will repeal the Trade Union Act when in government as part of its commitment to fighting inequality and securing decent work for people.
- Coverage of collective bargaining has fallen from 82% in 1980 to 20% today. Labour would seek to increase coverage by rolling out sectoral collective bargaining.

² TUC, Posted Workers Directive: proposals for reform in the EU and UK, March 2014 <https://www.tuc.org.uk/pwedmarch2014>

³ More background information can be found on the TUC Touchstone blog <http://touchstoneblog.org.uk/2016/03/guten-tag-pet-reforming-the-posted-workers-directive/>

Guarantee trade unions a right to access workplaces – so that unions can speak to members and potential members

- The “right of access” to the workplace for unions is currently solely restricted to being invited to accompany, not represent, individual members.
- A Labour Government would extend this statutory right so that all workers have a right to be represented by their trade union on all matters affecting their employment on either an individual or collective basis.
- We would also grant officials of independent trade unions the right to access workplaces and to speak/communicate with workforces before any voluntary or statutory recognition application or procedure. This is necessary:
 - o To allow the union to build to the level of support required by any statutory threshold
 - o So that workers may make an informed choice about workplace representation.
- Access rights might be exercised through physically visiting a workplace, or by communication with workers by phone or electronically. It includes talking to them while they work and must be without loss of pay.
- The right imposes an obligation on the employer to facilitate access. The right to access has precedence over trespass and other common law rights that are used to decline access to private property, in this case the employers’ premises. Of course, it may only be used for the proper purposes above, and reasonably.

Four new Bank Holidays – we’ll bring our country together with new holidays to mark our four patron saints, so that workers in Britain get the same proper breaks as in other countries.

- With just 8 bank holidays a year, the UK has one of the lowest numbers of bank holidays of any major economy – and well below the European average. Japan has 16, India has 18, and Spain has 14
- The next Labour government would make all four UK saints days public holidays in every part of the UK – giving all workers an extra four days and bringing the UK in line with the G20 average of 12.
- Some argue that bank holidays cost the economy, but it is extremely difficult to isolate their economic impact. For example, DCMS estimated that the impact of the Diamond Jubilee on GDP would be between £1.1bn gain and a £3.6bn loss. This estimates do not factor in productivity gains from a rested workforce, or the intangible benefits to people’s well-being. Furthermore, the Bank of England estimate that economic activity is delayed rather than lost, and that most of the loss to GDP is subsequently made up. Certain sectors, such as hospitality, retail, leisure and tourism will unequivocally benefit.

Raise the minimum wage to the level of the living wage (expected to be at least £10 per hour by 2020) – so that no one in work gets poverty pay

- Labour believes in a full & proper wage for a working day. That's why we are committing to introducing a statutory Real Living Wage, expected to be £10 per hour by 2020.
- This would give a pay rise to the 5.6 million workers who are currently paid less than the voluntary living wage
- Full-time employees currently earning the Government's National Living Wage will be better off by over £2,500 in 2020
- Labour will abolish the lower youth rate, making everyone over 18 entitled to the Real Living Wage. This means that 21-24 year olds currently earning the National Minimum Wage (NMW) will be better off by over £4,500 in 2020
- Labour's Real Living Wage (RLW) will most benefit people outside of London and the South-East, with Northern Ireland having the highest proportion of employees effected, followed by the East Midlands and Yorkshire and Humber
- Labour's RLW would be set by an independent Living Wage Review Body using the same methodology as the current voluntary living wage
- The new, independent Living Wage Review Body will produce an analysis of the labour market & report on areas where government should mitigate the effects on employers based on economic conditions, e.g. SMEs, particular sectors or regions.
- We will consider measures to support employers where necessary to avoid cuts in employment of hours, which could include, for example, a reformed & expanded Employment Allowance, specifically targeting areas where there is danger of increased unemployment arising from a higher living wage.

End the public sector pay cap – because public sector wages have fallen and our public sector workers deserve a pay rise

- Labour will end the unfair and politically motivated public sector pay caps, and ensure that Britain has the workforce it needs to deliver world-leading public services.
- We will hand power back to the independent Pay Review Bodies where applicable and otherwise ensure public sector pay awards are agreed through collective bargaining.
- The precise cost will depend on the evidence-based work done by independent Pay Review Bodies and on the outcome of collective bargaining. But the Government's 1% pay cap for the public sector announced at the 2015 Summer Budget was expected to save £5 billion over four years, which provides good

guidance as to cost to the government of restoring it (and loss to the workers in not restoring it). This will be paid for out of the return of the 50p additional rate of income tax reversing cuts to corporation tax, as well as the savings to in-work benefits and increased taxes on earnings resulting from higher earnings.

- The government's failed pay policies have also led to huge costs elsewhere in the system by creating staff shortages in key areas, like nursing. This has led to massive increases in spending on agency staff, recruitment of overseas staff (to the loss of the countries from which they come) and a loss of skills and experience which will cost huge amounts to regain.
- It is sometimes claimed that average pay in the public sector is higher than in the private sector, but this is completely misleading – the composition of the public sector workforce is much more weighted towards graduate and professional employment. Moreover the shrinking of the public sector over the past six years has partly taken place by transferring many lower-paid roles to the private sector, which over time, tends to raise the average in the public sector and lower the average in the private sector.

Amend the takeover code to ensure every takeover proposal has a clear plan in place to protect workers and pensioners – because workers shouldn't suffer when a company is sold

- Philip Green bought a company with £500 million in assets and ran it into insolvency, extracting a one-off dividend of £1.3 billion from the Arcadia group (described as the 'largest corporate payout in history') and a total of £1.2 billion from BHS alone, whilst allowing the pension fund to fall to £571 million deficit from a healthy surplus. Other industrial jewels are vulnerable with a weak pound.
- We will amend the takeover regime to ensure that businesses which are identified as being 'systemically important' are protected from hostile takeovers.
- More specifically, when a 'systematically important' business⁴ is the subject of a takeover bid then we will require:
 - o A 'cooling-off' period will be imposed of six months. This would make it possible to resist the takeover as happened in relation to Unilever, for management to have time to examine the alternatives, and for the Stakeholder Board we will create to consider the offer. Importantly, it gives everyone time to fend the offer off;⁵
 - o The offeror company must: (i) clarify how they will pay for the shares; (ii) publish a clear strategy for the takeover for approval by the Takeover Panel which will demonstrate how they will ensure the success of the company,

⁴ The concept of 'systemically important' business already exists in context of banking, under the international Financial Stability Board principles

⁵ Note: The concept of a 'cooling-off' period already exists, we are extending it (regulation 2.8 of the UK Takeover Code 2016 provides that there is a cooling-off period of six months if someone begins the process of making a formal offer but then announces that they will not be proceeding with their offer). Unilever is an example of the importance of the passage of time.

taking into account the interests of employees; (iii) demonstrate how the pension fund will be maintained and be approved by the Pensions Regulator

- o ‘Systemically important’ businesses can be identified in two ways:

- (i) Empower a regulatory body to list any company from the Official List maintained by the FCA or any FTSE-100 trading in the UK as ‘systemically important’ on the basis of its impact on the UK economy;
- (ii) The alternative is to draw up a list of criteria: (i) the shares of the company have been admitted to the Official List maintained by the FCA (i.e. the country’s largest companies); (ii) employee numbers; turnover; (iv) significance in the supply chain of the company, i.e. its inter-connectedness; (v) other strategic importance (e.g. ARM); (vi) National security

Roll out maximum pay ratios – because it cannot be right that wages at the top keep rising while everyone else’s stagnates

- It cannot be right that we live in a society in which Britain’s top bosses are awarding themselves massive and growing pay packets at the same time that ordinary people in Britain are facing the biggest squeeze on incomes in seventy years. Executives today earn up to 50 times more than their equivalents in the past, but there has been no commensurate improvement in performance.
- The fact that pay inequality is rising shows that indicative votes are not enough, and naming and shaming hasn’t worked. Even companies that want to pay more moderate rates face a collective action problem, as no company wants to be seen paying less than the going rate. If we want to see fairer pay, we need Government action.
- Labour would therefore seek to introduce a maximum ratio between the pay of a company’s lowest and highest employees.
- At the top end, “pay” would be defined to include total reward bundles, that is, bonuses and shares as well as salary. At the bottom end, either “company worker” would be defined to include outsourced staff or regulations would adjust to ensure that companies could not manipulate the ratio by outsourcing lower paid staff.
- A Labour Government will enforce maximum pay ratios of 20:1 in the public sector and across companies bidding for public sector contracts.
- We are considering a range of options for reducing pay ratios in the private sector.

Ban unpaid internships – because it’s not fair for some to get a leg up when others can’t afford to

- An internship is a short period of work experience or training and there is no legal definition of an ‘intern’ in law. Without payment an intern cannot become a ‘worker’ or ‘employee.’ They are simply a ‘volunteer’.

- In 2014 the Sutton Trust⁶ estimated that 31% of university graduates who were working as interns were doing so without being paid, and estimated that there were at least 21,000 unpaid interns working in the UK at any one time.
- But unpaid internships do not come for free – the Sutton Trust also estimated that a six month unpaid internship would cost a single person living in London a minimum of £5,556 (£926 a month), and £4,728 (£788 a month) in Manchester, excluding transport costs.
- Many people are not able to support themselves without being paid. This means that there are large numbers of people whose talents and creativity are being wasted because they cannot afford to take unpaid internships. No matter how badly they desire the experience of working in a particular occupation or for a particular employer, those who cannot afford it are being excluded on the basis of their economic background.
- There is no doubt that unscrupulous employers use internships to get the benefit of the very cheapest labour and to circumvent basic employment rights for workers, such as paying the statutory minimum wage.
- Whilst banning unpaid internships we will ensure that apprentices and trainees have sufficient places and are paid at appropriate rates with proper workplace rights. But we will retain unpaid but genuine limited-duration work-experience schemes for pupils and students (usually no more than a week) to experience the world of work and enjoy non-exploitative learning opportunities.

Enforce all workers' rights to trade union representation at work – so that all workers can be supported when negotiating with their employer

- The last Labour Government gave all union members the right to be accompanied by a trade union representative, either full time or lay, at disciplinary or grievance hearings, including those workers who work for employers that do not recognise trade unions. This includes meetings from which redundancy may follow.
- The next Labour Government will extend this statutory right so that all workers have a right to be represented by their trade union on all matters affecting their employment individually and collectively.
- Strong unions deliver benefits to both employees and employers alike and the evidence indicates that the “voice” function provided by strong workplace organisation promotes higher productivity and employment relationships which are both more stable and more constructive in the longer term.
- The evidence shows that productivity is higher and efficiency greater in workplaces with collective agreements and in countries with high levels of collective bargaining coverage. We will promote such bargaining at the workplace and between the two sides of each industry.

⁶ <http://www.suttontrust.com/researcharchive/internships/>

- Trade union workplaces are safer workplaces – all the evidence shows that where there are recognised trade unions there are fewer accidents in the workplace and that everyone benefits from safer systems of work.
- Trade union workplaces are more equal workplaces – all the evidence shows that where there are recognised trade unions there are also procedures that ensure equal treatment at work and that women and ethnic minority employees are less likely to suffer discrimination at work.

Abolish employment tribunal fees – so that people have access to justice

- Employment tribunal fees were introduced by the Coalition Government in July 2013
- The introduction of fees coincided with a steep decline in the number of cases received by the tribunal. The fall has been in the region of 67%. The average number of multiple cases (brought by two or more people) received per quarter was just under 1,500 in the year to June 2013 but has averaged around 400 since October 2013, a 73% decrease.
- The fees have brought in less than £9m a year, showing that they could be easily abolished at little cost. This cost is probably significantly outweighed by the loss of compensation suffered by workers who could not afford the fees to pursue justified claims. Even accounting for behavioural change – that is, the expectation that more people would access the justice they deserve if tribunal fees were abolished – this would cost approximately £30m, which is a fraction of the revenue from reversing cuts to the Bank Levy
- A Justice Committee inquiry resulted in a report in June 2016 recommending that fees should be reduced, restricted and subject to a more generous remissions system.

Double paid paternity leave to four weeks and increase paternity pay – because fathers are parents too and deserve to spend more time with their new babies

- Labour will help families spend more time together with a new baby, doubling the length of paid paternity leave, and increasing the level of paternity pay to the level of a full week's work at our Real Living Wage.
- More than half of dads say they want to take more than two weeks leave when a baby is born, but at present they have no independent right to do so, and the low level of paternity pay prevents many men from taking up their existing rights.
- Paying four weeks paternity leave at the level of Labour's Real Living Wage would cost approximately £280m a year. This could be paid for by redirecting money from other pro-family funding streams – for example, it is a third of the value of the married person's tax allowance.

Strengthen protections for women against unfair redundancy – because no one should be penalised for having children

- Research by the Equality and Human Rights Commission research found that 54,000 women are forced out of their jobs per year due to pregnancy discrimination⁷ and three in four working women with children say they have experienced pregnancy and maternity discrimination.⁸ Yet, less than 1% of women will take a tribunal claim against their employer for pregnancy discrimination.
- The Maternity and Paternity Leave Regulations (Regulation 10) protect women from discrimination by giving them the right to be moved to be offered an alternative suitable role if they are made redundant while on maternity leave. Labour would extend the period over which these rights apply to include the period from notification of a pregnancy through to six months after return to work, which would help to put an end to pregnancy discrimination in the workplace.

Hold a public enquiry against blacklisting – to ensure blacklisting remains a thing of the past

- From the end of the Second World War international legislative assemblies - United Nations, International Labour Organisation, Council of Europe - have guaranteed workers the right to form and join trade unions, to be active in that union and for that union to be able to collectively bargain with employers.
- In the construction industry in the UK a secret blacklist of some 3,000 trade union activists was maintained for over 40 years by a consortium of major construction companies in flagrant breach of those internationally guaranteed rights. Workers seeking a job on a large building site would have their name and details relayed to an office established by the construction companies and called 'the Consulting Association'. If you'd been active in your union and the Consulting Association had your name on file then most likely you would be denied work at that site and any other large site for the rest of your working life.
- In 2009 the Information Commissioner raided the Consulting Association which led to the person who maintained the blacklist, Ian Kerr, being prosecuted under the Data Protection Act 1998. But not a single construction company or manager who had set up, funded, supplied information to and took information from the blacklist has faced prosecution for any offence.
- In response, the Government legislated in an attempt to make blacklisting unlawful

⁷ Pregnancy and maternity discrimination forces thousands of new mothers out of their jobs, July 2015, <https://www.equalityhumanrights.com/en/our-work/news/pregnancy-and-maternity-discrimination-forces-thousands-new-mothers-out-their-jobs>

⁸ Three in four working mothers say they've experienced pregnancy and maternity discrimination, April 2016, <https://www.equalityhumanrights.com/en/our-work/news/three-four-working-mothers-say-they%E2%80%99ve-experienced-pregnancy-and-maternity>

with the Employment Relations Act 1999, (Blacklists) Regulations 2010.

- In 2013, the unions representing construction workers issued proceedings against many construction employers. Before full disclosure of the documents held by the companies and before cross-examination of any manager, the claims for damages for blacklisted workers were settled out of court last year. The trade press reported: “In May 2016, several out of court settlements were reached by construction companies, who were estimated to have paid out £50m in compensation to 771 workers ... the companies involved in the practice not only suffered large settlement bills, but were publicly censured and suffered a blow to their reputation.”
- However, in the absence of full disclosure (Mr Kerr managed to destroy most of those held in his office) and without cross-examination of the organisers, the court case barely scratched the surface of this scandal. That’s why Labour promises a full judicial enquiry into blacklisting in the construction industry.

Give equalities reps statutory rights – so they have time to protect workers from discrimination

- Union equality reps are elected by workers to ensure that equality, diversity and inclusion become a reality within workplaces.
- There are 6.5million trade union members and around 200,000 carry out representative duties at a workplace level. They carry out a wide range of often complex and demanding activities including; providing informal advice to their colleagues; formally representing members in grievance and disciplinary hearings; negotiating with managers. Many also carry out specialist roles in improving health and safety at work, increasing access to learning and skills, improving equality and diversity in the workplace and making workplaces more environmentally friendly.
- The ACAS Code of Practice on *Time off for trade union duties and activities* says “*Trade union representatives have had a statutory right to reasonable paid time off from employment to carry out trade union duties and to undertake trade union training since the Employment Protection Act 1975... Union duties must relate to matters covered by collective bargaining agreements between employers and trade unions and relate to the union representative's own employer, unless agreed otherwise in circumstances of multi-employer bargaining...*”. These statutory rights cover shop stewards, health and safety reps and union learning reps.
- However, trade union equality reps – whose role is to promote equality in the workplace – currently have no legal rights to time off, training or facilities.
- Many good employers do negotiate agreements to give trade union equality representatives reasonable time off in order to perform their role.

- A Labour government would extend the statutory rights to reasonable paid time off, facilities and training to perform their role that currently exist for trade union representatives to include trade union equality representatives. Doing so would promote and achieve greater equality in the workplace.

Reinstate protection against third party harassment – because everyone deserves to be safe at work

- The Equality Act 2010 gave workers protection against harassment at work by third parties, eg. customers, clients or visitors.
- Against overwhelming opposition, including from Labour, the Coalition Government repealed the third party harassment provision under the Enterprise and Regulatory Reform Bill from April 2014.
- The harassment of people at work by a third party can be deeply distressing, harmful and dangerous. Labour is of the view that all parties should welcome such provision to ensure that it is both unlawful and can be addressed.
- These measures assist in this process, ensuring employers take positive steps to provide a safe environment for their employees as well as their customers or clients.

Use public spending power to drive up standards, including only awarding public contracts to companies which recognise trade unions.

- The next Labour government will use the enormous £200 billion national and local government spends in the private sector to upgrade our economy, create good local jobs and reduce inequality.
- In UK law, the Public Services (Social Value) Act 2012 requires authorities that are engaging in certain procurement exercises for services, to consider first how the proposed procurement might improve the economic, social and environmental well-being of their area, and how these improvements might be secured. The Act applies to England, and to Wales to a limited extent.
- For government contracts that fall outside the WTO General Procurement Agreement (GPA), we would introduce local jobs and content requirements to allow public bodies to use local pounds on local jobs and businesses.

Introduce a civil enforcement system to ensure compliance with gender pay auditing– so that all workers have fair access to employment and promotion opportunities and are treated fairly at work

- As part of Labour's Equality Act 2010, legislation was passed to introduce mandatory pay audits, under which companies that employ more than 250 people have to publish details of their male and female staff's pay. Instead of bringing this legislation into force, the coalition government decided to introduce gender pay reporting on a voluntary basis, in the Think, Act, Report scheme.
- Section 147 of the Small Business, Enterprise and Employment Act 2015, which resulted from a Labour amendment, required the Government to make regulations

under the Equality Act 2010.

- On 25 January 2017, parliament finally passed the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 (<http://www.legislation.gov.uk/ukdsi/2017/9780111152010>)
- In the ‘Closing the Gender Pay Gap’ consultation paper, the Government sought views on whether a civil enforcement system would help ensure compliance with the regulations. Despite around two thirds of respondents agreeing that such a system would help ensure compliance, the government decided not to introduce one.
- The Government is relying on the Equality and Human Right's Commission to enforce the rules, whilst simultaneously cutting the EHRC's budget by almost 75%.

Equality and Human Rights Commission: Response to the Government Equalities Office Consultation: Closing the Gender Pay Gap, March 2016

[<https://www.equalityhumanrights.com/en/legal-responses/consultation-response-mandatory-gender-pay-gap-reporting>]

- The Government has admitted that they do not have the ability or intention to effectively monitor compliance and identify employers who have not complied with the gender pay gap reporting requirement.

Written Parliamentary Question , March 2017,

<http://www.parliament.uk/business/publications/written-questions-answers-statements/written-questions-answers/?page=1&max=20&questiontype>AllQuestions&house=commons%2clords&member=163&uin=68000>

Written Parliamentary Question, March 2017,

<http://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2017-03-27/69319/>

- Women make up over 60% of those earning less than the living wage set by the Living Wage Foundation <https://www.fawcettsociety.org.uk/policy-research/the-gender-pay-gap/>