



## **Consortium for the Regional Support for Women in Disadvantaged and Rural Areas**

### **Response to: The 'Good Jobs' Employment Rights Bill**

**Issued by: Department for the Economy**

**July 2024**

**Prepared by: Siobhán Harding  
Women's Support Network  
Email: [policy@wsn.org.uk](mailto:policy@wsn.org.uk)**



Foyle Women's  
Information  
Network



# **Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas**

## **1. Introduction**

**1.1** This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

**1.2** The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.<sup>1</sup> The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

---

<sup>1</sup> Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

**1.3** The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

**1.4** The Women's Regional Consortium appreciates the opportunity to respond to the Department for the Economy's Consultation on The 'Good Jobs' Employment Rights Bill. The Women's Regional Consortium welcomes this bill as an important opportunity to help address gender inequality as well as enhancing workers' rights.

**1.5** We wish to endorse the responses made by the Women's Policy Group (WPG) and the Northern Ireland Women's Budget Group (NIWBG) both of which groups the Women's Regional Consortium is represented on. We also endorse the responses made by our colleagues in the Coalition of Carers Organisations, Carers NI, Women's Platform and by the Irish Congress of Trade Unions Northern Ireland Committee (NIC ICTU). We fully endorse these responses and the recommendations they have made.

## 2.0 General Comments

Good Jobs are not only important for growing a competitive and sustainable economy and a more prosperous society but are vitally important in terms of helping to achieve gender equality.

The New Decade, New Approach Agreement committed to an enhanced focus within the Programme for Government on creating good jobs and protecting workers rights. It described Good Jobs as jobs “*where workers have a voice that provides a level of autonomy, a decent income, security of tenure, satisfying work in the right quantities and decent working conditions.*”<sup>2</sup> The draft Programme for Government (PfG)<sup>3</sup> published recently details some proposed actions around the creation of Good Jobs including helping “*individuals address barriers into employment.*” The Women’s Regional Consortium knows from our research work with local women the many structural inequalities and barriers that exist which prevent women from working or limit the amount and quality of work they can do. We believe there is much work to be done to address these barriers particularly for women and we welcome this consultation as part of this process.

### *International Obligations*

Northern Ireland is bound by the international human rights obligations of the UK, as State Party to all key human rights Conventions. As our colleagues in Women’s Platform have outlined a common thread across the international human rights framework is the right to employment, with adequate support infrastructure, protections and where required, adjustments such as reasonable adjustment for disability. The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), for example, specifically requires States Parties to take action to promote gender equality on issues from equal pay for equal work, to ensuring protections for pregnancy and maternity, and promoting equal access to education, employment, and social protection. In practice, this translates into a requirement to

---

<sup>2</sup> [https://assets.publishing.service.gov.uk/media/5e178b56ed915d3b06f2b795/2020-01-08\\_a\\_new\\_decade\\_a\\_new\\_approach.pdf](https://assets.publishing.service.gov.uk/media/5e178b56ed915d3b06f2b795/2020-01-08_a_new_decade_a_new_approach.pdf)

<sup>3</sup> <https://www.northernireland.gov.uk/sites/default/files/consultations/newnigov/draft-programme-for-government-our-plan-doing-what-matters-most.pdf>

implement flexible working and childcare, which has been highlighted in the most recent Concluding Observations of CEDAW as a key priority for Northern Ireland.

Women's Platform have suggested that it would be helpful to include reference to the human rights framework in this legislation, while guidance offers an opportunity to explore how these principles can be integrated in modern workplaces, in ways that support both employer and staff. The most significant framework in relation to employment law is the International Covenant on Economic, Social and Cultural Rights (ICESCR), which clearly set out individuals' right to work, in safe and healthy conditions with fair pay and equal pay for equal work for all men and women.

Support in this regard is within the role and remit of the Equality Commission for Northern Ireland and the Human Rights Commission for Northern Ireland, of which the latter is the National Human Rights Institution responsible for monitoring human rights to the international community. Civil society organisations, including Women's Platform, contribute to this oversight through shadow reporting, and can also assist in identifying key elements relevant to employment law in Northern Ireland.

The full set of recommendations for Northern Ireland and the UK from UN monitoring bodies is extensive, ranging from over 300 recommendations from the Universal Periodic Review in 2022 to the Concluding Observations on the Convention on the Elimination of All Forms of Racial Discrimination (CERD) in August 2024, and the report from the follow up to the Inquiry of the Rights of Disabled People under the UN Convention on the Rights of People with Disabilities, issued in April 2024. With regard to women and gender equality, it is relevant to note that the most recent Concluding Observations for the UK express concern that protections for women in Northern Ireland are falling behind those of women elsewhere in the UK, and a key recommendation is 'to put protections in Northern Ireland on an equal footing with those in England, Scotland and Wales'. The CEDAW Concluding Observations also urge for action on equal pay and ensuring equitable working conditions for men and women across the UK.

It is important that Government recognises the contextual factors which impact on women's economic participation and increase their vulnerability to poverty. These

include high rates of female economic inactivity, no childcare strategy, high numbers of women with adult care responsibilities, a weak labour market, high numbers of women working part-time and in precarious jobs and wages lower than the UK average.<sup>4</sup>

Before addressing the specific questions asked in the Consultation we would like to expand on a number of these areas which cannot and must not be seen in isolation from considerations around Good Jobs. All these issues are inter-linked and have an impact on each other therefore due consideration must be given to them in order to ensure that everyone can benefit from Good Jobs.

## **2.1 Gendered Issues within the Labour Market**

Systemic and structural inequalities across the labour market mean that women are overrepresented in lower paid and precarious jobs and are more likely to work part-time. Existing gender inequalities mean that women are more likely to be in receipt of social security benefits, more likely to be providing care either for children or other family members and more likely to have to make up for cuts to public services through unpaid work. This restricts women's ability to carry out paid work and contributes to keeping women's incomes generally lower over their lifetimes.

There needs to be a range of approaches to tackling gender segregated labour markets which leave women particularly vulnerable to low-paid and insecure work. This must involve improving pay and working conditions in precarious sectors, tackling gender stereotypes that embed gender segregation, addressing the lack of affordable, accessible childcare and increasing investment in undervalued sectors such as care.

The importance of parental leave and pay and flexible working policies in overcoming gender stereotypes and in the promotion of gender equality cannot be denied. These policies play a crucial role in getting women into employment and in helping to tackle gender inequality and disadvantage. They also enable employers

---

<sup>4</sup> Shadow report for the examination of the UK by the Committee on the Convention to Eliminate Discrimination against Women, NIWEP, January 2019

and the wider economy to make the most of women's talents and experience. It is vital therefore that these policies provide modern approaches to support women and families in the workplace so that they can truly promote gender equality and help to achieve work life balance.

***“Where are all these jobs? There are no jobs that are flexible for women, they are often low paid and 40 hours a week.”***

***“There is a lack of jobs here, the only jobs available are in call centres. I can't see many women being able to take those jobs as they are mostly shift work. What happens when the kids get out of school? It is not easy for women.”***

*(Quotes taken from Women's Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)*

## **2.2 Women and Unpaid Care**

There are over 220,000 people providing unpaid care for sick or disabled family members in Northern Ireland including over 180,000 unpaid carers of working age.<sup>5</sup> Prevailing gender norms mean there is often the assumption that women will provide care. In more traditional, patriarchal societies like Northern Ireland providing care is often seen to be “women's work”. This leaves many women out of work, under-employed and struggling to juggle their caring responsibilities with work often with little support.

***“There is still the assumption that it is women who will provide care. If there is care needed it is assumed that women will provide it whether for parents, children or grandchildren. Women are expected to care yet there are not the services there to support them.”***

*(Participant at Consultation Event)*

***“I'm the only daughter in the family and I felt the responsibility [to become an unpaid carer] very heavily.”***

*(Quote taken from Career or Care: Women, unpaid caring and employment in Northern Ireland, Women's Regional Consortium & Carers NI research, February 2024)*

---

<sup>5</sup> Career or Care: Women, unpaid caring and employment in Northern Ireland, February 2024, Carers NI & the Women's Regional Consortium  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

The latest Census figures for Northern Ireland show that nearly 60% of unpaid carers are women and that more than 1 in 6 women in employment are providing unpaid care (approximately 71,000 women). Nationally, statistics show that by the time they are aged 46, half of women have been a carer. Men have the same 50:50 chance by age 57 – eleven years later.<sup>6</sup> This means that women are more likely to find themselves in a caring role at an age when they would be expected to be in paid work.

Caring affects women's participation in the workforce and can ultimately reduce their earnings over their lifetime. Women are also more likely than men to be forced out of the labour market by caring responsibilities. This has clear implications for gender equality. Research carried out by the Women's Regional Consortium and Carers NI<sup>7</sup> Research by the Women's Regional Consortium and Carers NI<sup>8</sup> highlights the issues that women with care responsibilities face in relation to balancing unpaid care with work:

- One in three women have given up work to care (34%).
- One in four women have decreased their working hours due to a caring role (28%).
- One in six women have taken on a less qualified job or turned down a promotion to fit around caring responsibilities (17%).
- Nearly three quarters (73%) have lost out on between £500 and over £1500 per month in wages because of challenges juggling work and care.
- Women “juggle” their caring role and employment often at the detriment of their own career, finances and health and wellbeing.
- The financial impact of stopping/reducing work to provide care is felt by women not only while providing the care but throughout their lives.

---

<sup>6</sup> Will I care? The likelihood of being a carer in adult life, CarersUK, November 2019  
[http://www.carersuk.org/images/News\\_campaigns/CarersRightsDay\\_Nov19\\_FINAL.pdf](http://www.carersuk.org/images/News_campaigns/CarersRightsDay_Nov19_FINAL.pdf)

<sup>7</sup> Career or Care: Women, unpaid caring and employment in Northern Ireland, February 2024, Carers NI & the Women's Regional Consortium  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

<sup>8</sup> Career or Care: Women, unpaid caring and employment in Northern Ireland, February 2024, Carers NI & the Women's Regional Consortium  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>



- Carer's Allowance in terms of its value and low earnings threshold is inadequate to support women to balance care and work.
- Support for carers in work is often a lottery, dependent on individual employers and line managers.
- Inadequacies in wider support services, including social services, healthcare, education and childcare are stopping women from working altogether or limiting the amount of work they can do.
- For some women work can be positive in terms of mental health and wellbeing and gives them a break from their caring role.
- Women feel reliable, accessible support services, a range of flexible working options, carer's leave and a change to the eligibility criteria for Carer's Allowance would help balance work and care.
- A lack of support for carers in the workplace results in a loss of valuable and skilled individuals to the labour market.

Women's Regional Consortium and Carers NI research<sup>9</sup> called for Government, employers and society to do more to value carers. It called for carers rights to be enshrined in legislation including important rights to flexible working and carers leave.

***“I ended up having to take redundancy because they wouldn't accommodate my caring needs along with work. I initially asked if I could reduce my hours from 32 hours/week to two and a half days and they said no. Then I asked for hybrid working and they said no to that. Then I asked for a career break and they said no to that too. In the end the redundancy package came up and I had no choice but to take it.”***

***“What I find limiting is being able to move jobs, being able to apply for promotions, things like that. I'm too afraid to leave the set up I have now in case it wouldn't be as flexible, wouldn't be as understanding that my number one priority is my mum.”***

---

<sup>9</sup> Career or Care: Women, unpaid caring and employment in Northern Ireland, February 2024, Carers NI & the Women's Regional Consortium  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

***“I don’t see myself being able to work full-time as a result of my caring responsibilities. It does leave things tight, if I was working full-time it would be easier especially in this current climate with the cost of living crisis.”***

*(Quotes taken from Women’s Regional Consortium and Carers NI Research on Women, Unpaid Caring & Employment in Northern Ireland, February 2024)*

### **2.3 Women’s Economic Inactivity**

The Northern Ireland economic inactivity rate has increased to 27.5% and it is consistently above the UK average (now at 21.9%). Northern Ireland has the highest economic inactivity rate of the twelve UK regions. The female economic inactivity rate is higher at 30.8% compared to 24% for men.<sup>10</sup> In looking at the detail of economic inactivity it shows that almost a quarter (23%) of women who were unavailable for work gave the reason for inactivity as family/home commitments (43,000) and this was the least likely reason for male inactivity (at 6,000 or 4%).<sup>11</sup> This is an important consideration in terms of education, training, childcare and employment investments as women are clearly in need of increased support in order to be able to move into work.

The Women’s Regional Consortium has recently carried out research with local women on Economic Inactivity and the barriers women face entering and staying in employment. This research has not yet been published (likely to be published December 2024) but initial analysis of the results shows some key areas for Government focus to address high levels of economic inactivity for women:

- The most common reasons given for being out of work were sickness/disability, looking after children and unpaid care.
- Women reported sickness/disability, childcare, the need for training, lack of confidence, unpaid care, fear of losing benefits, transport and not enough suitable jobs in the area as the main barriers they faced to getting into work.
- In terms of jobs women would most like to do if the barriers they faced were removed the main areas women said they would like to work are social care,

---

<sup>10</sup> Northern Ireland Labour Market Report, NISRA, September 2024  
<https://datavis.nisra.gov.uk/economy-and-labour-market/labour-market-report-september-2024.html#>

<sup>11</sup> Northern Ireland Labour Market Report, NISRA, September 2024  
<https://www.nisra.gov.uk/publications/labour-market-report-september-2024>

community work, office/administration work, arts/design, education/training, retail, hospitality/catering, personal care and services.

- Women reported that better supports for illness/disability, more jobs with flexible working, flexible, affordable childcare, better transport, skills/training opportunities in Women's Centres, more good jobs to apply for and better social care services would help them to make the move into work.
- In terms of other supports women said that allowing benefits to continue for longer after starting work, confidence/softer supports, mental health support, help with CVs/application forms and advice on finances and better-off calculations would help them move into work.

We welcome the fact that the consultation document highlights the need to address barriers to employment and specifically points out those with disabilities, parents and those with caring responsibilities especially women. These barriers can be significant and can prevent women from entering, remaining in or returning to the workforce. We stress the importance of acknowledging and addressing the gendered nature of economic inactivity so that effective actions can be developed and implemented to make a real difference in this area. We caution on taking a gender-neutral approach to policy making in this regard.

## **2.4 Childcare**

Research confirms the social norms that exist in relation to family life and the care of children. Women with any children in the family are 9 percentage points more likely than those without children in the family to be inactive to look after home/family. For each child under the age of 5 the likelihood of being inactive to look after home/family increases by 5 percentage points.<sup>12</sup> This research makes the point that these relationships are not evident for men – men with dependent children are 1 percentage point more likely than their peers without dependent children in the family to be inactive to look after the home/family. The research also shows that women with the highest levels of education are also less likely to be inactive to look after the

---

<sup>12</sup> Economic Inactivity Report 1: Literature, Context and Quantitative Analysis on Economic Inactivity in Northern Ireland; And A Review of the Welfare System in relation to Economic Inactivity in Northern Ireland, Queen's University Belfast and the Economic and Social Research Institute, October 2023 [Economic Inactivity in Northern Ireland - Report 1 \(economy-ni.gov.uk\)](https://www.economy-ni.gov.uk/economic-inactivity-in-northern-ireland-report-1)

home/family than those with lower educational attainment and the same is not evident for men.

Despite commitments in the New Decade, New Approach (NDNA) agreement Northern Ireland still has no Childcare Strategy in place (work is currently ongoing on developing a Strategy). With the restoration of the Northern Ireland Assembly in February 2024 childcare was stated to be a priority for the Assembly and Executive and has been included as one of the nine immediate priority areas in the draft Programme for Government.

In May 2024 Education Minister Paul Givan announced a Northern Ireland Childcare Subsidy Scheme.<sup>13</sup> This Scheme will entitle some working parents in Northern Ireland to get help with their childcare bills through the tax-free childcare scheme. The scheme includes a 15% subsidy on top of the 20% provided by the Government. The Northern Ireland Executive has set aside £25million for childcare in the budget but this falls far short of the £400million investment needed to fully fund an Early Learning and Childcare Strategy for Northern Ireland.<sup>14</sup>

The World Economic Forum has found that the UK has some of the highest childcare costs in the world.<sup>15</sup> Compared with OECD member states (the Organisation for Economic Cooperation and Development), Northern Ireland is ranked third highest for the highest share of average household income spent on childcare costs.<sup>16</sup> The Northern Ireland Childcare Survey report for 2023 has shown that childcare is the biggest monthly bill faced by 41% of families in Northern Ireland costing more than their mortgage or rent payments and for 64% of parents their childcare bill is their largest or second largest monthly outgoing.<sup>17</sup>

---

<sup>13</sup> <https://www.education-ni.gov.uk/publications/frequently-asked-questions-early-learning-and-childcare-measures-2024-25>

<sup>14</sup> [Childcare provision: NI strategy could cost up to £400m - BBC News](#)

<sup>15</sup> <https://www.weforum.org/agenda/2023/07/highest-childcare-costs-by-country/>

<sup>16</sup> Economic inactivity, key employment barriers and childcare costs potentially impacting those barriers: initial considerations for Northern Ireland, Northern Ireland Assembly, May 2024 [Assembly Research and Information Service Briefing Paper - Economic inactivity, key employment barriers and childcare costs potentially impacting those barriers: initial considerations for Northern Ireland \(niassembly.gov.uk\)](#)

<sup>17</sup> Northern Ireland Childcare Survey 2023, Employers For Childcare, December 2023 <https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023/>

The latest Northern Ireland Childcare Survey report<sup>18</sup> has found that the cost of childcare has been rising in Northern Ireland and that it is impacting on parent's ability to work and their productivity while in work. The research showed that:

- On average, parents are spending around £9,360 a year on childcare rising to over £14,000 for parents with a child under 5 who are using formal childcare only.
- The average cost of a full-time childcare place in Northern Ireland is £10,036 a year (an increase of 14% since 2021) and more than the maximum costs supported through Tax-Free Childcare.
- 56% are using means other than their income to pay for childcare including savings, credit cards and loans.
- 81% of parents report there is not enough provision of childcare in their area.
- Parents are reducing their working hours, passing up on opportunities for career progression and, in some cases, leaving work altogether because of difficulties affording or accessing childcare.
- 88% of parents have had to change their work arrangements due to the cost of childcare.
- More than three quarters (76%) are likely or very likely to change their working arrangements in some way due to childcare.
- Most parents using childcare (95%) report that childcare stress impacts on productivity at work, 61% report this is at least weekly.

Crucially, in terms of parent's ability to take up or stay in work and the ability to progress in their work the Employers For Childcare research<sup>19</sup> found that:

- Parents in lower income households are more likely to have had to stop work due to the cost of childcare.
- 63% of stay-at-home parents said they would be able to get back into work if they could access more affordable childcare.
- 89% of working parents said being able to access more affordable childcare

---

<sup>18</sup> Northern Ireland Childcare Survey 2023, Employers For Childcare, December 2023  
<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023/>

<sup>19</sup> Northern Ireland Childcare Survey 2023, Employers For Childcare, December 2023  
<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023/>

would impact on their career including enabling them to progress (63%), or to participate in education, training or skills development (48%).

A report by Employers For Childcare and the Joseph Rowntree Foundation<sup>20</sup> stated that the system has reached “*breaking point*” and that: “*Lower-income families are least likely to benefit from quality childcare, reducing household incomes as a result of working fewer hours or stopping work altogether. Disadvantaged children are therefore missing the benefits of quality provision.*” The report stressed that the early learning and childcare system must be well designed to remove disadvantage rather than making it worse and that at present: “*high costs and barriers to access make it difficult for parents to afford the childcare they need, which can prevent them generating income through work.*” Of parents from lower income households, 17% with a household income of up to £20,000 reported that they had had to stop working altogether due to the cost of childcare compared to just 1% of parents with a household income of over £70,000.<sup>21</sup>

The CEDAW Committee has also raised the issue of childcare costs specifically in Northern Ireland noting its concern “*that childcare costs remain excessive, particularly in Northern Ireland, which constitutes an obstacle for women to enter and progress in the workplace.*”<sup>22</sup> The Committee recommended that Government should ensure the availability of affordable and accessible childcare particularly in Northern Ireland.<sup>23</sup>

It is clear that the high cost of childcare in Northern Ireland affects the ability of parents to work and that childcare costs act as a significant barrier to parents entering and staying in the workforce particularly for women. The availability of accessible, affordable childcare is key to helping tackle economic inactivity,

---

<sup>20</sup> Tackling disadvantage through childcare in Northern Ireland, Employers for Childcare and Joseph Rowntree Foundation, January 2024

<https://www.employersforchildcare.org/report/childcare-brief/>

<sup>21</sup> Northern Ireland Childcare Survey 2023, Employers For Childcare, December 2023

<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023/>

<sup>22</sup> Concluding Observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, March 2019, para 45

[https://tbinternet.ohchr.org/\\_layouts/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8&Lang=En](https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8&Lang=En)

<sup>23</sup> Ibid, para 46

disadvantage and gender inequality. Childcare is a vital part of our economic infrastructure and therefore must be invested in accordingly. We support the Childcare for All statement that *“the childcare needs of everyone in the Northern Ireland workforce must be at the forefront of planning to ensure parents and providers are not facing unnecessary risks or barriers to work.”*<sup>24</sup>

***“I am a lone parent, there is a lack of suitable jobs in the area, expensive childcare and I have mental health issues. I would struggle financially if working full-time with childcare costs, rent and regular expenses so it isn’t really a viable option.”***

*(Participant at Consultation Event)*

***“I can’t afford childcare as I don’t get any support with it. I am lucky I have family to look after my kids. Without them I would need to leave work. My salary is not enough to pay the mortgage and childcare without some help.”***

*(Participant at Consultation Event)*

***“I have two children under four. The cost of childcare is extortionate. It is our biggest outgoing. Despite help from grandparents we struggle to make these payments.”***

*(Participant at Consultation Event)*

***“I am a single parent and I have two children. I live in a rural area and I used to have a good job in the city. I had to give up the job as I couldn’t get good quality, affordable childcare outside normal office hours to suit the job and the travel times to and from work. I had to leave home early to get to work and was home later because of the travel time involved. I took a job closer to home so that I could drop the children off and pick them up from school. The job suits my home situation but is about a third of the salary I used to have.”***

*(Participant at Consultation Event)*

***“I couldn’t afford childcare so I had to come out of work. I can’t afford crèche fees I’m on my own. I’ve no help. It literally sent me into a spiral of depression. It left me feeling so inadequate not being able to work, I’ve worked all my life. I do want to work but I can’t afford to, I can’t.”***

---

<sup>24</sup> Childcare for All Campaign – COVID-19 Statement, May 2020  
<https://www.childcareforallni.com/post/childcare-for-all-campaign-covid-19-statement>

***“I have to consider childcare, I have three kids and no one to mind them so I have to be able to work weekends/evenings in holiday times. I would have to take a lot into consideration before I could take work. There may not be a benefit in me taking a full time job with the cost of childcare – you are tied. I feel that this is more an issue for women.”***

*(Quotes taken from Women’s Regional Consortium and Ulster University Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)*

#### **2.4.1 The Women’s Centres Childcare Fund (WCCF)**

The WCCF enables Women’s Centres to provide childcare places that are 100% supported for the most disadvantaged children and families. These sessional places (77,000 two-hour sessions) ensure that disadvantaged children have an opportunity to experience a childcare setting, to socialise, interact, play and learn in a supported environment.

Parents who avail of WCCF supported childcare also access a wide range of programmes available in their communities. Many of the services involve support to parents including: parenting skills, back to work programmes, advice services and health programmes. Therefore, WCCF enables the most excluded in disadvantaged communities to access support and engage in community development activities.

For some of the most marginalized women (including ethnic minorities and lone parents) the prospect of increased economic participation can depend on the availability of appropriate integrated childcare and access to education/training opportunities at community level. A lack of appropriate integrated childcare and community education acts as a fundamental barrier to the engagement of socioeconomically disadvantaged women in education and training and in employment. This is the kind of integrated provision that is provided by WCCF and which is so vital to these women.

WCCF contributes to reducing child poverty, provides opportunities for parents to better themselves and contributes to their communities thereby tackling disadvantage. As such the WCCF strongly aligns with a number of government strategies including: the Child Poverty Strategy, the Anti-Poverty Strategy and the Gender Equality Strategy. It also aligns with one of the immediate priorities of the



Executive: ‘Delivering a fair and compassionate society that supports working families and the most vulnerable’ as detailed in New Decade, New Approach.<sup>25</sup>

Despite the importance of this childcare offering in tackling disadvantage and promoting equality WCCF continues to be administered on an annual basis and has been subject to Departmental cuts/austerity measures since 2012 which has seen the overall allocation reduced by just over 20% in that period. Any progress on childcare provision in Northern Ireland must recognise the need for low cost/no cost childcare provision for marginalised women in disadvantaged and rural areas. The Consortium also believe that government should recognise the case for properly sustaining childcare provision through the WCCF model on a ring-fenced, protected basis given the Fund’s positive evaluation<sup>26</sup> in terms of need, impact and value for money.

***“I can only do a course if it has childcare available.”***  
*(Participant at Consultation Event)*

## **2.5 Low Paid and Quality Work**

Northern Ireland was one of the regions with above average proportion of jobs paid below the Living Wage in April 2023 at 15.6% third in the list behind the North East (15.9%) and the East Midlands (15.7%). Women are significantly more affected by low pay than men with more women earning less than the Living Wage in the UK (15.4% compared to 10.4%). Jobs held by women also accounted for 59.5% of all jobs paid below the Living Wage (2.2million in total). A higher proportion of part-time jobs (28.3%) were paid below the Living Wage in April 2023 than full-time jobs (7.5%).<sup>27</sup>

Women are also significantly more likely to work part-time than men with almost 7 out of 10 part-time workers being female (69.7%) and nearly two thirds of full-time

---

<sup>25</sup> New Decade, New Approach, January 2020  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/856998/2020-01-08\\_a\\_new\\_decade\\_a\\_new\\_approach.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf)

<sup>26</sup> Evaluation of Regional Support Arrangements for the Voluntary and Community Sector, Final Report, June 2015, DSD and DARD

<sup>27</sup> Employee jobs paid below the Living Wage: 2023, Living Wage Foundation, February 2024  
[https://www.livingwage.org.uk/sites/default/files/2024-02/Employee%20Jobs%20Below%20The%20Living%20Wage\\_V7.pdf](https://www.livingwage.org.uk/sites/default/files/2024-02/Employee%20Jobs%20Below%20The%20Living%20Wage_V7.pdf)

workers being male (61.8%).<sup>28</sup> This has a significant impact on women's income as women often struggle to increase their hours of work due to caring responsibilities. Providing care limits both the number of hours a person can work and the distance they travel for work and this can leave many women locked in poverty especially when jobs are low paid.

Research has shown that women in both Northern Ireland and the Republic of Ireland are more likely than men to work in low paid jobs.<sup>29</sup> In 2022, 21% of females and 14% of males were low-paid in Northern Ireland using the definition of earning less than two-thirds of the median hourly pay. This report highlights the policy challenges that exist as a result of the disadvantages faced by lone parents (93% of lone parents in Northern Ireland are women) both in accessing employment and in the conditions of employment: *“The emphasis on labour market activation in the welfare system is stronger in Northern Ireland, yet the participation rate is lower. This points to the persistence of barriers that go beyond welfare disincentives. Tackling low pay among lone parents is a key concern if they are not to be activated into in-work poverty.”*

In 2023, the overall gender pay gap for all employees (full-time and part-time combined) stood at 7.8% indicating that female employees earned, on average, 7.8% less than their male counterparts.<sup>30</sup> Modelling on employees aged 25 years and older showed that after adjusting for age, job-related and personal characteristics, the gender pay gap narrowed from 20.3% to 9.4% in the private sector and from 11.2% to 2.8% in the public sector. As the gender pay gap report outlines: *“While individual occupational choices partially explain the gender pay gap, these choices are influenced by educational, societal, and workplace factors, many of which involve forms of overt or implicit discrimination. For instance, biases in the education system or societal expectations may result in females not being*

---

<sup>28</sup> Main statistics for Northern Ireland, Statistical bulletin, Labour market, NISRA, March 2023  
<https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-3-statistical-bulletin-labour-market.pdf>

<sup>29</sup> Gender and Labour Market Inclusion on the Island of Ireland, Economic & Social Research Institute, April 2024  
[https://www.esri.ie/system/files/publications/RS176\\_0.pdf](https://www.esri.ie/system/files/publications/RS176_0.pdf)

<sup>30</sup> Gender pay gaps in Northern Ireland, NISRA, August 2024  
[https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/Summary%20report\\_8.pdf](https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/Summary%20report_8.pdf)

*encouraged to pursue maths and science subjects, which often lead to higher paying STEM jobs. In the workplace, overt discrimination can result in women not being given the same opportunities as men, including being passed over for promotion.”*

The Women’s Regional Consortium believes that much more needs to be done to protect women, their families and communities from low-paid, precarious and involuntary part-time work. These working arrangements have clear implications for gender equality, women’s financial wellbeing and their participation and progression within the economy.

NISRA Statistics on Work Quality<sup>31</sup> show that a higher proportion of females reported having flexible work than males (61.5% compared to 46.9%). While there are some work quality indicators that have fairly similar proportions between males and females, such as neither under nor over employed and secure employment, others showed a larger difference. Self-reported opportunities for career progression were lower for females at 57.5% compared to 62% for males and self-reported opportunities for involvement in decision making were 54.9% for females compared to 60.7% for males.

## **2.6 Women, Poverty, Austerity and the Cost-of-Living Crisis**

Women are generally more likely than men to live in poverty across their lifetimes due to the issues outlined above. Lone parents are even more vulnerable to poverty. In Northern Ireland the family type at the highest risk of being in relative poverty was ‘single with children’ at 38%.<sup>32</sup>

A decade of austerity and welfare reform policies have disproportionately impacted on women. Research by the House of Commons Library shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women. It shows that, by 2020, men will have borne just 14% of the total burden of welfare cuts, compared with 86% for women.<sup>33</sup>

---

<sup>31</sup> <https://www.nisra.gov.uk/publications/work-quality-july2022-june2023>

<sup>32</sup> [https://datavis.nisra.gov.uk/communities/PII\\_report\\_2223.html](https://datavis.nisra.gov.uk/communities/PII_report_2223.html)

<sup>33</sup> Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017  
<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

Locally, an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)<sup>34</sup> showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income. Research by the Women's Regional Consortium on the impact of austerity<sup>35</sup> and on the impact of Universal Credit<sup>36</sup> on women shows how welfare reform changes have left women more vulnerable to financial hardship and poverty.

Women often bear the brunt of poverty in the home managing household budgets to shield their children from its worst effects. This means that women end up acting as the 'shock absorbers' of poverty going without food, heat or clothes in order to meet the needs of children and/or other family members when money is tight.<sup>37</sup>

Concerns about austerity measures have been raised internationally by the CEDAW Committee. Following its recent examination of the UK, the CEDAW Committee raised concerns about the impact of austerity measures on women stating its concern about the *"disproportionately negative impact of austerity measures on women, who constitute the vast majority of single parents and are more likely to be engaged in informal, temporary or precarious employment."*<sup>38</sup> The Committee recommended that the UK government *"undertake a comprehensive assessment on the impact of austerity measures on the rights of women and adopt measures to mitigate and remedy the negative consequences without delay."*<sup>39</sup>

---

<sup>34</sup> Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019

[https://www.nihrc.org/uploads/publications/Final\\_CIA\\_report\\_Oct\\_2019.pdf](https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf)

<sup>35</sup> Impact of Ongoing Austerity: Women's Perspectives, Women's Regional Consortium, March 2019 <http://www.womensregionalconsortiumni.org.uk/sites/default/files/Impact%20of%20Ongoing%20Austerity%20Women%27s%20Perspectives.pdf>

<sup>36</sup> The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020 <http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

<sup>37</sup> A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women's Budget Group, February 2019

<https://fabians.org.uk/a-female-face/>

<sup>38</sup> Concluding Observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, March 2019 (para 17)

[https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CEDAW/C/GBR/CO/8%20&Lang=En](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolNo=CEDAW/C/GBR/CO/8%20&Lang=En)

<sup>39</sup> Ibid, para 18

Research by the Women's Regional Consortium and Ulster University<sup>40</sup> on the impact of the Cost-of-Living Crisis has shown the damaging impacts of inflationary pressures on low-income women both out of work and in work. Around a third of the women who took part in this research (33%) were in some form of work either full-time or part-time with or without social security benefits. Most were in low-paid work and therefore struggled to make ends meet on low incomes often without any access to help/support with their bills.

The cumulative effects of poverty, austerity, welfare reform and now an ongoing Cost-of-Living Crisis have meant that women are facing many challenges in affording the essentials and providing for their children and families. This has negative impacts on their mental health and wellbeing and reduced their ability to seek work/get better jobs and afford the necessary childcare to enable them to do so.

***“The benefits system forces women with children to go out to work. But there is a lack of jobs available and the jobs that are available are often the lowest paid which means that women can't afford childcare or you end up paying to work.”***

*(Participant at Consultation Event)*

***“The benefits system doesn't help people to go out and seek work. The jobs women do are often the lowest paid. If they leave benefits for low paid work they just end up getting further into the poverty trap.”***

*(Participant at Consultation Event)*

***“You're not entitled to anything if you work. As soon as you're not on any benefits you don't get any help. Just because you're working doesn't mean you can afford life. There is no help for anyone who works. A lot of people think that because you work you can afford things but I'm actually broke.”***

***“Government need to take into account the cost of rent, food, gas and electric costs. Wages no longer cover monthly outgoings so I've had to put heating oil and car repairs on my credit card.”***

---

<sup>40</sup> Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium and Ulster University, June 2023

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

***“My pay does not stretch to cover food costs and fuel. We have been buying cheaper brands to make it through the month. I only put £70 in my car per month so going to see family who live 45 miles away is a no go, we can only do it once every few months.”***

*(Quotes taken from Women’s Regional Consortium and Ulster University Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)*

## **2.7 Community-based education and training**

*“The role of education in enhancing employment prospects and job quality means that ensuring access to education and training opportunities is a key policy lever.”<sup>41</sup>*

The importance of education and training is important in a Northern Ireland context where 7.6% of all young people aged 16 to 24 in Northern Ireland were not in education, employment or training (NEET). The NEET rate was higher for females at 8.2% compared to 7% for males.<sup>42</sup> Research by ESRI on gender and labour market inclusion<sup>43</sup> also highlights that while education attainment levels have been rising in both Ireland and Northern Ireland, the proportion of the working-age population in Northern Ireland holding degrees and post-secondary qualifications is significantly lower. This research suggests that: *“while significant improvements in the initial educational system would be needed to bring about large-scale change, access to lifelong learning could play an important role in enhancing job quality among women (and indeed men), an issue highlighted by policy stakeholders.”*

Women’s exclusion from participation may be significantly impacted by educational disadvantage which can profoundly restrict their life prospects and wellbeing. Effective policy responses to addressing women’s disadvantage can rely on the integrated availability at community level of appropriate childcare and learning pathways to potential employment. Community-based women’s education and training has emerged and evolved in response to this educational disadvantage with

---

<sup>41</sup> Gender and Labour Market Inclusion on the Island of Ireland, Economic & Social Research Institute, April 2024

[https://www.esri.ie/system/files/publications/RS176\\_0.pdf](https://www.esri.ie/system/files/publications/RS176_0.pdf)

<sup>42</sup> <https://www.nisra.gov.uk/news/young-people-not-education-employment-or-training-neet-october-december-2023>

<sup>43</sup> Gender and Labour Market Inclusion on the Island of Ireland, Economic & Social Research Institute, April 2024

[https://www.esri.ie/system/files/publications/RS176\\_0.pdf](https://www.esri.ie/system/files/publications/RS176_0.pdf)

the express aim of accommodating unmet learner need. Improved employment prospects for mothers through education and training can translate as improved outcomes for children and the reverse is also true restricting wellbeing for the mother and also the wider family.

Community based education and training is generally delivered based on local community needs and takes account of the complexity of women's lives and the barriers they face such as education, childcare, course fees and the academic environment. It provides a fundamental building block in supporting women to rebuild their confidence and their capability to enter the workplace and is a means to maintaining overall wellbeing.

We believe that the women's sector has an important contribution to make to education, training, skills accessibility and development in Northern Ireland particularly for the most marginalised and disadvantaged women. Women's Centres are often best placed to address skills shortages and provide opportunities for lifelong learning because they operate within local communities and are trusted to do this work. They are able to reach and engage those who are the most marginalised and some of those most affected by the legacy of the Troubles, austerity/welfare reform and the Cost-of-Living Crisis.

### **2.7.1 Funding for the Women's Sector**

The services delivered by Women's Centres and groups across Northern Ireland provide a lifeline to local people and communities. They provide wrap-a-round services that support not only the woman but the whole family. Services include personal development and confidence building, trauma counselling, adult training & education, advocacy for vulnerable adults, programmes and initiatives that support families and/or tackle addictions in addition to providing a full range of childcare.

In order to be able to deliver community-based frontline services in disadvantaged and rural areas Women's Centres and groups must secure a cocktail of funding, often from different Departments either directly or through their agencies. Of the 14 Women's Centres, three receive funding under the Community Investment Fund (CIF) and/or Neighbourhood Renewal (People and Places) to support longer term

community development via funding towards key essential staff salaries and some overhead costs. However, since 2012 these funds have been subject to austerity cuts which has resulted in little or no funding for overheads and in some cases a reduction in funded staff hours.

In addition to the cuts, over this period the Living Wage has increased, employee pensions have been introduced and contributions raised which has increased substantially the gap between what was originally funded and what can actually be covered now. While there was a small increase of 2% for salaries in 2022/23, well below inflation, and some additional support for running costs in both 2022/23 and 2023/24 to meet the cost of living increases this only went a small way towards meeting organisational overhead increases. The 2% increase in salaries due to be awarded again in 2023/24 was withdrawn due to Departmental budgetary constraints, the Minimum Wage increase was met but not the 'Real Living Wage' which the Department had encouraged organisations to sign up to. These additional costs had to be met from organisational reserves.

These vital services delivered locally by community organisations such as Women's Centres and supported by the work of the Women's Regional Consortium are vital to tackling disadvantage and promoting gender equality. These local services which support statutory provision are the most cost-effective way of ensuring that local needs are met and ensures the best outcomes for the communities they service. Much greater value must be placed on these unique and trusted services.

***“Education for women has been cut in the last 10 years and reduced away to nearly nothing. Things need to be resourced.”***

*(Participant at Consultation Event)*

***“The work of the women's sector and women's centres is not valued. We are just fed crumbs of funding. Yet the sector is constantly firefighting doing the work on the ground but the funding always goes elsewhere.”***

*(Participant at Consultation Event)*

***“It needs people working at grass roots level. There needs to be a bottom-up approach so that everyone's voices will be heard.”***

*(Participant at Consultation Event)*



## 2.8 Investment in a Caring Economy and Care Skills

The Commission on a Gender-Equal Economy have proposed the creation of a 'Caring Economy'<sup>44</sup> based on gender equality, wellbeing and sustainability as a way to build back better after the Covid19 pandemic. A Caring Economy would prioritise care for each other and for the environment in which we live. Women's Budget Group research<sup>45</sup> found that a 2% GDP investment in care (for example, social care, childcare, parental leave and care leave) creates double the number of jobs for women and almost as many for men than the same investment in construction. Investment in free, universal childcare especially returns almost all of its initial investment.

Eurostat data suggests that the care industry is 30% less polluting (in terms of Greenhouse Gas emissions) than the construction industry and that the education industry is 62% less polluting than the construction industry.<sup>46</sup> This makes investment in this type of social infrastructure economically, environmentally and equality sound. We suggest that investment in a Caring Economy including care skills would help build our skills base, address skills shortages in the social care sector, promote gender equality and have positive impacts for a stronger and more sustainable economy.

---

<sup>44</sup> Creating a Caring Economy: A Call to Action, Commission on a Gender-Equal Economy, Women's Budget Group, October 2020

<https://wbg.org.uk/wp-content/uploads/2020/10/WBG-Report-v10.pdf>

<sup>45</sup> Investing in the Care Economy: A gender analysis of employment stimulus in seven OECD countries, International Trade Union Confederation, March 2016

[Investing in the Care Economy - International Trade Union Confederation \(ituc-csi.org\)](https://www.ituc-csi.org/en/publications/investing-in-the-care-economy)

<sup>46</sup> WBG calculations from Eurostat data

<https://ec.europa.eu/eurostat/data/database>

### 3.0 Consultation Questions

We have not attempted to answer all the individual questions asked in the consultation exercise. For **Themes A, B and C** we have instead provided more general comments around some of the content within these themes. For **Theme D** we have answered the individual questions as we have more detailed knowledge and evidence to support our answers under this theme.

**P1 Your name:**

Siobhán Harding

**P2 Your email address:**

[policy@wsn.org.uk](mailto:policy@wsn.org.uk)

**P3 Are you:**

- An individual
- An employer
- Representing a trade union
- Representing an industry or employer association
- Representing a charitable or community and voluntary organisation
- Other (please specify)

**There are various impact assessments and equality screening documents published in parallel with this consultation.**

**If you have any comments or observations to make on the content of those documents, please do so below:**

#### **Rural Needs Assessment**

The consultation states that: *“Equality, Regulatory and Rural impact assessments have been conducted for these policy proposals. Currently we do not anticipate the policies to result in any adverse impacts on any of the Section 75 groups or for those who live rurally.”* We do not agree with this assertion and given the fact that Northern

Ireland has a significant rural population with 36% of the population living in rural areas<sup>47</sup> we believe there will be rural impacts. Information in relation to the rural impacts has been highlighted by our Consortium partner the Northern Ireland Rural Women's Network here:

Rural people of working age are more likely to be in full time employment (59%)<sup>48</sup> than those living in urban areas. Workers from rural areas are more likely to leave school with 5 or more GCSE's and to have entered higher education and report being more highly skilled (58%) than urban counterparts<sup>49</sup>. Despite these factors there remains a disproportionate impact on rural women in terms of accessing 'good jobs'.

The job sectors and the size of business impacts on the availability of 'good jobs' for women. More than half (58%) of NI businesses are in rural areas, yet rural businesses account for less than a quarter (21%) of employees and around a quarter (25%) of total business turnover; so fewer employees and smaller budgets for job creation. For women in rural areas this is compounded by the fact that rural businesses predominantly engage in agriculture, forestry, fishing and construction (57%), with urban businesses more widely spread across a variety of sectors. These sectors are predominantly male oriented. The strong levels of gender segregation on the labour markets in the UK and Ireland are evidenced very plainly in rural areas. According to the World Economic Forum, gender segregated labour markets not only lower innovation levels in professions which lack gender diversity, but also that this professional gender divergence has a compounding effect on gender pay gaps.<sup>50</sup>

Connectivity, particularly access to transport is often cited by rural women themselves as a major barrier to accessing 'good jobs'. In 2023 rural workers (90%)

---

<sup>47</sup> Mid-Year Population Estimates – Urban/Rural Change, NISRA

<https://www.daera-ni.gov.uk/publications/mid-year-estimates-population-change>

<sup>48</sup> Key Rural Issues, Northern Ireland 2023

<https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Key%20Rural%20Issues%202023.pdf>

<sup>49</sup> Key Rural Issues, Northern Ireland 2023

<https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Key%20Rural%20Issues%202023.pdf>

<sup>50</sup> World Economic Forum (2020), 'Mind the 100 Year Gap' Global Gender Gap Report 2020  
[https://www3.weforum.org/docs/WEF\\_GGGR\\_2020.pdf](https://www3.weforum.org/docs/WEF_GGGR_2020.pdf)

were also much more likely to use their own transport to commute than those from urban areas (82%), though this gap has narrowed. In 2021, workers from rural areas had an average commute almost double that of urban-based workers, travelling on average more than 600 miles more during the year to get to work<sup>51</sup>. As caring responsibilities are more likely to fall to women, the extra travel further from home, the extra cost of the childcare day and the need to have access to your own vehicle all are factors which impede access to 'good jobs' whilst trying to achieve work-life balance. Employers for Childcare 2023 Survey<sup>52</sup> indicated that the greatest percentage increase (15%) in childcare places across the Trust areas in NI was in three Trust areas outside the Belfast Trust area. In addition, the Survey Reports; families in counties Tyrone, Derry/Londonderry and Fermanagh are more likely to report using casual childcare. In Tyrone, almost 1 in 5 families report using casual childcare at least regularly. The increasing cost of childcare cannot be viewed in isolation from access to good jobs and indeed the lack of an effective Childcare Strategy is certainly impeding access for those living in rural areas.

**P4 If you are an individual, are you:**

- Employed
- Self-employed
- Unemployed
- Retired
- Not looking for work
- Other

---

<sup>51</sup> Key Rural Issues, Northern Ireland 2023

<https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Key%20Rural%20Issues%202023.pdf>

<sup>52</sup> NI Childcare Survey 2023 Employers for Childcare

<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2023>

**P5 If you are in employment, are you:**

- Permanent Worker
- Temporary Worker
- Agency Worker
- Other
- Don't know
- Not Applicable

**P6 If you are in employment, what type of organisation do you work for?**

- Private sector organisation
- Public sector
- Charity/voluntary sector
- Other

**P7 If you are in employment, how many people work for your organisation?**

- Micro-business (0-9 employees)
- Small business (10-49 employees)
- Medium-sized business (50-249 employees)
- Large business (250+ employees)

**P8 If you are an employer – please provide the name of your company/organisation:**

N/A

- Please indicate here if you are content for the name of your organisation to be listed in an Annex to the Departmental Response? The Annex will list the name of the organisation, but not the person who responded on its behalf.**

**P9 If you are an employer, how would you classify your organisation?**

- Private sector organisation
- Public sector
- Charity/voluntary sector
- Other

**P10 If you are in employer, how many people work for your organisation?**

- Micro-business (0-9 employees)
- Small business (10-49 employees)
- Medium-sized business (50-249 employees)
- Large business (250+ employees)

**P11 If you are responding on behalf of a Trade Union – Please provide the name of your trade union:**

N/A

- Please indicate here if you are content for the name of your organisation to be listed in an Annex to the Departmental Response? The Annex will list the name of the organisation, but not the person who responded on its behalf.

**P12 If you are responding on behalf of an Industry or Employer Association – Please provide the name of the Industry or Employers Association that you represent:**

N/A

- Please indicate here if you are content for the name of your organisation to be listed in an Annex to the Departmental Response? The Annex will list the name of the organisation, but not the person who responded on its behalf.

**P13 If you are responding on behalf of a charitable or community and voluntary organisation - Please provide the name of your Organisation:**

Women's Regional Consortium

- Please indicate here if you are content for the name of your organisation to be listed in an Annex to the Departmental Response? The Annex will list the name of the organisation, but not the person who responded on its behalf.**

**P14 You responded as 'Other' - Please describe the capacity in which you are responding to this consultation and if responding on behalf of an organisation please provide its name:**

N/A

**If you are responding as an individual, please indicate below whether you consent to anonymised extracts being included in the published Departmental response.**

- I consent to anonymised extracts being included in the published Departmental response.
- I do not consent to anonymised extracts being included in the published Departmental response.

**If you are responding on behalf of an organisation and have confirmed you are content for the name of your organisation to be listed in an Annex to the published departmental response, please indicate below whether you consent to extracts being included in that response.**

- I consent to extracts being included in the published Departmental response.
- I do not consent to extracts being included in the published Departmental response.

## THEME A: TERMS OF EMPLOYMENT

### **Replacing Zero Hour Contracts with contracts that provide flexibility and protect workers' rights**

We welcome the Minister's aim stated in the consultation "*to explore ways to improve the situation for those that have little control or agency over their working arrangements.*" We believe that the replacing Zero Hours Contracts is necessary because of the lack of security these types of contracts offer employees which can result in unpredictable working schedules, difficult working environments, an inability to assert their rights and irregular incomes. All this can impact on a person's mental health and wellbeing with instability and lack of control leading to anxiety and stress.

There is a gendered aspect to precarious work and as outlined in the consultation "*a disproportionate number of women, 545,000 compared to 487,000 men are on zero hours contracts.*" Statistics show that people on zero hours contracts are more likely to be young, part-time, women or in full-time education when compared with other people in employment.<sup>53</sup> Single parents (who are mostly women) are twice as likely to have a zero-hours contract as other family types.<sup>54</sup> More recent statistics from the Work Foundation<sup>55</sup> show that women are 1.2 times more likely to be on zero-hour contracts than men and one in ten young workers in the UK are on these contracts in 2023.

As far back as 2018 research by the Women's Regional Consortium on In-Work Poverty<sup>56</sup> found links between precarity of employment, particularly zero hours contracts and in-work poverty. Participants in this research underlined the need for stability and security in employment and legislative action prohibiting such contracts. In terms of addressing in-work poverty this research called for work that pays for disadvantaged women so that employment provides a genuine living wage indexed to the actual cost of living.

We note the example of the Republic of Ireland provided by NIC ICTU in their Good Employment Plan policy briefing.<sup>57</sup> This example highlighted that in the Republic of Ireland legislation was passed to outlaw zero-hours contracts in 2019 and noted that:

---

<sup>53</sup> EMP17: People in employment on zero hours contracts, Office for National Statistics, August 2020 <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/emp17peopleinemploymentonzerohourscontracts>

<sup>54</sup> Caring without sharing, Gingerbread, November 2020 <https://www.gingerbread.org.uk/wp-content/uploads/2020/11/Gingerbread-Caringwithoutsharing-v3.pdf>

<sup>55</sup> Zero Choices: Swapping Zero-Hour Contracts for Secure, Flexible Working, The Work Foundation, March 2024 <https://www.lancaster.ac.uk/media/lancaster-university/content-assets/documents/lums/work-foundation/reports/ZeroChoices.pdf>

<sup>56</sup> In-work Poverty: Women's Perspectives, Women's Regional Consortium, 2018 [InWorkPoverty.pdf \(womensregionalconsortiumni.org.uk\)](https://www.womensregionalconsortiumni.org.uk/InWorkPoverty.pdf)

<sup>57</sup> The Good Employment Plan: Contributing to a more prosperous and fairer society, NIC ICTU policy briefing, September 2024



*“these changes did not result in any adverse economic consequences in Ireland. Businesses did not close, and employers did not dismiss workers en masse. Employment flexibility continues to exist.”* We agree with our colleagues in NIC ICTU that introducing a ban on zero-hours contract in Northern Ireland would not harm responsible employers instead protecting them from being undercut by unscrupulous competitors who exploit their workers to reduce labour costs often at great human cost to those workers and their families.

We wish to stress once again the gendered nature of these types of employment contracts and the resulting damage they can cause to the individuals who are subject to them. This harm not only extends to the points outlined in the consultation document (income insecurity, unpredictability and inability to assert rights) but to the individual’s health and wellbeing and extends even further to their families and communities.

Replacing zero hours contracts is however only one step in a wider process to deal with the issue of precarious employment which is prevalent in Northern Ireland. We welcome the aims of the Bill to replace zero hours contracts with contracts that provide flexibility and protect workers’ rights. However, this does not deal with other issues in the labour market such as low pay and involuntary part-time work which give rise to many of the same impacts for employees particularly women.

**The Women’s Regional Consortium agrees with the overarching objective to replace zero hours contracts with contracts that provide flexibility while protecting workers’ rights and agrees there should be an outright ban on zero-hours contracts.**

### **Employment Rights: Written Statement of Particulars**

We agree with the assertion in the consultation document that: *“it is equally important that both employers and workers fully understand the terms and conditions of that employment. At the start of any employment relationship, workers need to be informed as to what they are entitled to when they perform their duties.”*

Employees and workers must be able to fully understand the terms and conditions of their employment at the start of their employment relationship. We see many examples where women are not able to assert their rights to a range of entitlements (not just in relation to employment but the principle is the same) simply because they do not know about them or how to enforce their rights. Information in the right format and at the right time is critical to ensuring that employees and workers know their rights and how to take action if they are not being afforded them. We cannot see how this could be onerous for any responsible employer to provide.

**The Women’s Regional Consortium agrees that the right to a written statement of particulars should be extended to workers and that a written statement should be a day one right. We also agree that the written statement should contain all of the additional information listed in the consultation document. We support the recommendation made by our colleagues in NIC ICTU that not only should workers be issued with a written statement of particulars of employment but that this should be issued together with associated enforcement provisions.**

## **THEME B: PAY AND BENEFITS**

### **Fair and Transparent Allocation of Tips, Gratuities and Service Charges**

The consultation document details that the businesses where the payment of tips is prevalent “*exist primarily in the hospitality and service sectors and include hotels, bars, restaurants, hairdressers and beauty salons.*” We note that women are more likely to work in these sectors so this issue is particularly relevant to them. Statistics from the Census show that women are more likely to work in ‘Accommodation and food service activities’ (21,300) than men (17,500).<sup>58</sup> We have already highlighted that women are more likely to be in low-paid work (see Section 2.5) and this work is often concentrated in the service sector. Withholding all or a proportion of workers tips means that these workers are not properly rewarded for the work they do and contributes to the low levels of pay that some workers receive. If workers are tipped by customers for good work or service then it is only fair that they should receive these tips. As the consultation states “*unfair tipping practices are unfair to the workers concerned and to customers who expect their tips to go to those who provide good service.*”

**The Women’s Regional Consortium agrees that legislative provisions should be introduced that would require employers to pass on tips to their workers in full and in a fair and transparent manner. We agree with our colleagues in NIC ICTU who support the proposal as it brings Northern Ireland into line with Britain on tips, gratuities and service charges.**

### **Payslips**

Following from the points we made in relation to the Written Statement of Particulars we believe that employees and workers must be able to fully understand the terms and conditions of their employment including their pay. A lack of information about pay and how it is calculated makes it harder for workers to understand how their pay is calculated and enforce their rights. We agree with the assertion in the consultation

---

<sup>58</sup> <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-3-statistical-bulletin-labour-market.pdf>

document that: *“Not being provided with a breakdown of how pay has been calculated for variable hours worked makes it difficult for workers to determine whether they have been paid correctly for the actual hours worked.”*

**The Women’s Regional Consortium agrees that the right to a pay statement should be extended to workers and that it should contain information regarding the number of paid hours worked by the employee or worker in situations where the employee’s pay varies as a consequence of the time worked.**

### **Working Time Regulations: Right to Disconnect – Call for Information**

Many people find themselves working longer hours and the ability to escape from the working environment is made even more difficult especially given advances in communications. This makes it harder for workers to switch off from work and to strike a healthy balance between their work and home lives. It not only has implications for the worker in terms of their health and wellbeing but it often has implications for their home and family life too. A right to disconnect can not only help promote greater staff wellbeing, it can also be an effective way for employers to show they care for their staff which can help with staff retention and attracting new employees.

A right to disconnect is particularly important for workers with caring responsibilities including working parents and unpaid carers and some workers with a disability as it provides a more flexible and manageable work schedule.

***“For me I want a job where I can leave it at work. I don’t want to be stressing at home. When I worked as Deputy Manager in a childcare job my days off weren’t days off any more, they were constantly ringing me at home if someone didn’t come in, etc. It was a nightmare.”***

*(Participant at Consultation Event)*

**The Women’s Regional Consortium believes there is a need for government action in this area and that workers should have the right to switch off from work outside of working hours without suffering any negative consequences for doing so.**

### **THEME C: VOICE AND REPRESENTATION**

As we have outlined throughout this response women are more likely to be in low-paid, part-time and insecure work, are more likely to provide unpaid care and to have to make up for cuts to public services through unpaid work. The lived experience of many women in work is hard work, low-pay, insecure contracts, poverty, working extra hours to make ends meet and ending up with zero pay in order to meet

expensive childcare costs. Trade Unions have been vital to the health and wellbeing of women throughout history and many of the issues women face in the fight for equality are Trade Union issues. Women need access to decent public services, a welfare state that provides a genuine safety net and well-paid unionised jobs.

As our colleagues in Women's Platform have highlighted the right to join a trade union is included in the International Covenant on Economic, Social and Cultural Rights. It clearly states that all individuals have the right to join a trade union and be protected from discrimination as a result of trade union membership.

Collective and sectoral bargaining can be very important for women workers for pay and terms and conditions of employment. Northern Ireland is a small business economy and many workers know their employer personally. It can therefore be more difficult to enforce rights in these situations. Collective and sectoral bargaining is therefore important in this context.

We point the Department to the information contained in the NIC ICTU Good Employment Plan Policy Briefing<sup>59</sup> in relation to Collective Bargaining which clearly shows the benefits in terms of reducing inequalities including for women, young people, low-skilled workers and migrants:

*“The OECD argue that co-ordinated systems are linked with higher employment and lower unemployment, also for young people, women and low skilled workers than fully decentralised systems.*

*Rather than being associated with higher unemployment, collective bargaining has been shown to strengthen employment. Moreover, collective bargaining structures also play a role in promoting greater access to employment for groups that would otherwise struggle. Studies have shown that collective bargaining can be efficient in designing family friendly work arrangements that encourage much greater female employment. Once again, Scandinavian countries with very high collective bargaining coverage tend to have much greater outcome where “migrants who enter the labour market are more equally distributed among economic sectors, have more chance for equal wages and upward mobility than in other countries”.*

As highlighted by the Nevin Economic Research Institute<sup>60</sup> *“Collective bargaining is at the very least, associated, with higher average pay for workers after differences in age, qualifications, jobs and workplaces are accounted for. There is a clear incentive for workers to organise and collectively bargain for pay either at firms, sector or*

---

<sup>59</sup> The Good Employment Plan: Contributing to a more prosperous and fairer society, NIC ICTU policy briefing, September 2024

<sup>60</sup> The Impact of Collective Bargaining on pay in Northern Ireland, Nevin Economic Research Institute, May 2020

<https://www.nerininstitute.net/sites/default/files/research/2020/Union%20Wage%20Premium%20WP.pdf>

*economy-wide level.” It states that collective bargaining offers a mechanism for workers to secure a greater share of the fruits of their labour and recommends that “The Northern Ireland Executive should actively encourage the adoption of collective bargaining throughout the economy in order to boost economic growth and the incomes of workers.”*

**The Women’s Regional Consortium supports the recommendations made by our colleagues in NIC ICTU around promoting collective bargaining and strengthening trade union rights (see pages 52-59 of the NIC ICTU policy briefing ‘The Good Employment Plan: Contributing to a more prosperous and fairer society.’). We support their recommendation that the new employment bill should place duties on the Department for the Economy to increase collective bargaining coverage and facilitate the right to collectively bargain.**

## **THEME D: WORK-LIFE BALANCE**

The Women’s Regional Consortium have provided detailed answers to the questions in this section on Work-Life Balance. We know from our work with local women the extent to which issues of low-paid, poor quality work and a lack of flexible and family-friendly policies have negative impacts on their lives, families and communities. Work-life balance is a key aspect of well-being and if there is an imbalance between work and personal life it can affect physical, mental, and emotional health. Work-life balance is a particular issue for women who are more likely to be providing care whether for children or for other family members (see Section 2.2) and more likely to be carrying out domestic chores in the home. Women spent an average of 3 hours and 37 minutes per day doing unpaid work activities including housework, caring for others and volunteering between 23 September and 1 October 2023; this was 54 minutes more than the average among men at 2 hours and 43 minutes.<sup>61</sup> The British Social Attitudes Survey also found that despite more than three-quarters of respondents saying that domestic labour should be split between men and women, two-thirds of respondents said that women do more than their fair share of washing and ironing and most said women still do most of the cleaning and cooking.<sup>62</sup> These statistics help to explain the pressure that many women are under in relation to juggling their working life with their home life and responsibilities and show the importance of work-life balance policies to women’s health and wellbeing.

The Women’s Regional Consortium welcomes the acknowledgement from the consultation document of the need for flexibility in the workplace and the need to address the barriers to employment that exist especially for women and that work in this regard must be cross-departmental:

---

<sup>61</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/timeuseintheuk/23septemberto1october2023>

<sup>62</sup> <https://www.bbc.co.uk/news/uk-66866879>

*“A key component of a good job is one which allows an individual to balance their work with their family and private life. Flexibility in the workplace, underpinned by policies which support working families, is key to achieving this aim. With the right support, more people will also be able to access employment. It is strategically important therefore to address barriers to employment. For example, for those with disabilities, parents and those with caring responsibilities, especially women, from entering, remaining within, or returning to the workforce. These are complex, crosscutting issues which will require a combined approach by several Executive Departments.”*

We are also pleased to see the inclusion of Women’s Regional Consortium research with Carers NI on Women, Unpaid Caring and Employment<sup>63</sup> as part of this consultation document. We often see important research carried out by the Voluntary and Community Sector excluded from Government consultations and Equality Impact Assessments. This research carried out with local women across Northern Ireland providing unpaid care gave a valuable insight into their experiences juggling their caring role with their work (see Section 2.2).

### **Flexible working**

**D1 Do you agree that an employee should be entitled to make up to two statutory flexible working requests within a 12-month period?**

- Strongly agree**
- Agree**
- Disagree**
- Strongly disagree**
- Don’t know**
- No opinion**

---

<sup>63</sup> Career or Care: Women, unpaid caring and employment in Northern Ireland, February 2024, Carers NI & the Women’s Regional Consortium  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

**D2 Do you agree that an employee should only make a second flexible working request when an employer has considered a previous request, including when an appeal against the outcome of that request has been made?**

- Strongly agree
- Agree
- Disagree (see D5)
- Strongly disagree
- Don't know
- No opinion

**D3 Do you believe an employee should be entitled to make a flexible working request from the first day of their employment?**

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know
- No opinion

**D4 Do you agree that an employee should no longer be required to explain the effect a flexible working request would have on their employer when making such a request?**

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know
- No opinion

## D5 Additional Information

**Please provide additional information or clarification to any response in the space below:**

Flexible working arrangements are important in terms of gender equality as they provide greater possibilities for entering work, staying in full-time jobs and striking a better work-life balance particularly for women who are often struggling to balance work with care. Women are more likely to have flexible working arrangements than men (61.5% compared to 46.9%)<sup>64</sup> reflecting the greater likelihood of women having caring responsibilities.

The CEDAW Committee has also recommended that the UK government take action on making access to flexible working a day one right by recommending that the government: “*consider removing the 26-week waiting period for employees who wish to apply for flexible working arrangements.*”<sup>65</sup> While legislation has been passed in England, Wales and Scotland to provide for flexible working requests as a day one right this is not the case in Northern Ireland and including this in the Bill would bring Northern Ireland into line with Britain.

Women’s Regional Consortium and Carers NI research<sup>66</sup> with women providing unpaid care found that 72% of women carers in the State of Caring Survey 2023 said that flexible working was a workplace support that currently helps them balance work and care. 28% said that they would like to have flexible working to help them balance work and care. The ability to be able to avail of flexible working was cited by many of the women who took part in this research as being very important in allowing them to balance work with their caring responsibilities.

We support the points made on Flexible Working in the response made to this consultation by the Coalition of Carers Organisations of which Women’s Support Network is a member. The Coalition of Carers Organisations have called for flexible working to be a day one right as a carer’s need for flexible working is often present from day one of employment and having immediate access to flexible working can make the difference in a carer’s ability to take on paid employment or not.

The Women’s Regional Consortium supports the call by our colleagues in the Women’s Policy Group for the Department to take “*an approach that stresses the*

---

<sup>64</sup> <https://www.nisra.gov.uk/publications/work-quality-july2022-june2023>

<sup>65</sup> Concluding Observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, March 2019, para 46  
[https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C%20/GBR/CO/8&Lang=En](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C%20/GBR/CO/8&Lang=En)

<sup>66</sup> Career or Care: Women, unpaid caring and employment in Northern Ireland, February 2024, Carers NI & the Women’s Regional Consortium  
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>



*benefits to employers if they actively cultivate a culture that values flexible working - in terms of reducing employee turnover and keeping essential skills rather than losing valued staff to difficult life circumstances. Too often, flexible working is seen as a burden on employers rather than a tool in their toolbox.”*

The Women’s Regional Consortium also supports the recommendations made by our colleagues in NIC ICTU who have called for flexible working to be a day one right and also for:

- A change in the law so that employers must publish flexible working options in job adverts, or justify why the job can’t be done flexibly.
- All workers to get the right to request flexible working at any stage in their employment.
- Introduce a formal “right to return” to the original working pattern at the end of an agreed period where the flexible working arrangements are limited in duration, and a right to request to return to the original pattern earlier in the event of a change of circumstances.
- An appeal process should be introduced that allows individuals and their trade union to scrutinise and challenge the reasons given for rejecting a request.

***“Flexibility is so important in terms of work, life, balance when you are a mother.”***

*(Participant at Consultation Event)*

***“I tend to start work very early and finish early. I have to do that for my caring responsibilities which are mostly in the afternoon. I’m lucky to have an employer that allows me to be flexible with my time.”***

*(Quote taken from Career or Care: Women, unpaid caring and employment in Northern Ireland, Women’s Regional Consortium & Carers NI research, February 2024)*

**D2** – We agree with our colleagues in NIC ICTU that the current timeframe for employers to consider flexible working requests is too long. As NIC ICTU have outlined this means that employers *“have up to 28 days to consider a request but if they turn it down, and we know that 1 in three applications are refused, there is a further stage of 14 days that the employer has to write to inform the outcome of an appeal. This effectively means that an employee could be waiting for over 8 weeks for a decision.”*

## Carer's Leave

**D6 We would welcome your views on whether carer's leave should be a paid right; and, if so, who should be responsible for making the payment and what the rate of pay should be. In answering these questions, we would be grateful if you would provide reasoning for your responses and identify any issues or benefits with your suggested approach.**

We support the Coalition of Carers Organisations (of which Women's Support Network is a member) who believe that *"carer's leave should be a statutory right paid for by Government. The benefit should be paid at an employee's full wage. No one should be financially penalised for caring for a sick or disabled person."*

There is ample evidence within other leave policies, such as paternity leave, to suggest that pay is an important factor in ensuring the take up of rights. Pay is a significant barrier to employees taking the time off they need to provide care in whatever form that may take. Many people, particularly those on the lowest incomes, cannot afford to take unpaid leave as their finances are already under pressure. There is simply no point in having rights on paper that do not provide proper support for carers and therefore do not get used in practice. Any new rights must provide a realistic option for carers to enable them to take leave when they need it without worrying about how they are going to pay their bills.

Providing statutory paid carer's leave would help to ensure that all carers can avail of this important right and that they were able to take the leave without worrying about the financial impacts. Research by the Carer Poverty Commission NI<sup>67</sup> has shown that one in four unpaid carers in Northern Ireland (25%) are living in poverty – significantly more than Northern Ireland's non-carer population (16%) and higher than the carer poverty rate across the UK (23%). On the major drivers of poverty this research found that carers in Northern Ireland struggle to combine paid work with unpaid care: *"Many carers spoke of having to leave the labour market to meet the demands of their caring role, a decision with immense financial and personal costs. Carers that do remain in work often work fewer hours than they would like to. Those who leave the labour market struggle to re-enter, as finding a job flexible enough to accommodate their caring responsibilities is often very difficult."*

---

<sup>67</sup> The experiences of poverty among unpaid carers in Northern Ireland, Carer Poverty Commission NI, August 2023  
<https://www.carersuk.org/media/jb0ah2xh/the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf>

The Carer Poverty Commission NI<sup>68</sup> have held that: *“International evidence provides a strong case that better support for unpaid carers not only improves their well-being but also brings far-reaching benefits to the government and the economy.”* This research review found compelling evidence that statutory paid leave and other flexible working policies have potential to help carers remain in work, resulting in higher tax receipts, lower benefit spending, improved well-being of carers, and lower costs to employers.

Evidence from Carers UK<sup>69</sup> shows that 53% of carers who are employees’ said they would like paid Carer’s Leave and suggests that paid Carer’s Leave would be even more effective in supporting carers to increase hours or return to work. A third of carers (33%) who had given up work or reduced their working hours to care said that the ability to take time off through paid Carer’s Leave would help them return to work or increase their working hours. This is higher compared with unpaid Carer’s Leave which was at 19% for the same question.

Research from Carers NI and the Centre for Care<sup>70</sup> estimate that those providing unpaid care for sick or disabled family members and friends are saving Northern Ireland’s health service £5.8 billion in care costs each year. In total, unpaid carers in Northern Ireland are saving the equivalent of 80% of the Department of Health’s entire day-to-day spending budget for 2023-24. It is therefore time for this caring work to be valued and providing for paid carer’s leave is an important step in this process.

***“For me it is not an option to take a week off work without any pay.”***  
(Carer’s Interview)

***“My employer was not very supportive of my caring role. I had to take unpaid leave if anything happened. It came to the point it all got too stressful. My partner, who I care for, rang me in distress and I needed to leave. My employer told me I couldn’t go. I ended up walking out and I left the job, it was far too stressful.”***  
(Carer’s Interview)

---

<sup>68</sup> Policies to address unpaid carer poverty: an evidence review, Carer Poverty Commission NI, August 2024

<https://www.carersuk.org/media/u1wliqs1/policies-to-address-unpaid-carer-poverty.pdf>

<sup>69</sup> Carers’ employment rights today, tomorrow and in the future, Carers UK, November 2023  
[https://www.carersuk.org/media/hiekwx0p/carers-uk-crd-employment-report-2023\\_final.pdf](https://www.carersuk.org/media/hiekwx0p/carers-uk-crd-employment-report-2023_final.pdf)

<sup>70</sup> Valuing Carers 2021 Northern Ireland, Carers NI and the Centre for Care, November 2023  
<https://www.carersuk.org/media/irkn5e00/valuing-carers-northern-ireland.pdf>

***“Paid carer’s leave would be so helpful. My mum was in hospital for a week and if I had got three days carer’s leave that would have been three days pay I wouldn’t have lost. Even one day, anything!”***

***“You can get unpaid leave for an emergency in my work, but it has to be an emergency on that day. So if my son had a fit the night before it doesn’t count even though I might be still dealing with the fallout of it the next day. It shouldn’t be for emergencies only. Instead of me owing them four hours for a day because I’ve had to leave I should be able to take leave. Paid leave for carers would be great.”***

*(Quote taken from Career or Care: Women, unpaid caring and employment in Northern Ireland, Women’s Regional Consortium & Carers NI research, February 2024)*

**D7 Do you agree that the definition of caring relationships for the purpose of Carer’s Leave should mirror that used for dependant relationships?**

- Strongly agree
- Agree
- Disagree (see D14)
- Strongly disagree
- Don’t know
- No opinion

**D8 Do you agree a carer providing care for an individual with physical or mental health problems likely to last for more than three months, or a disability, or who requires care for a reason connected with their old age should be entitled to Carer’s Leave?**

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don’t know
- No opinion

**D9 Do you agree the reasons for taking Carer's Leave should be broadly defined?**

- Strongly agree**
- Agree**
- Disagree**
- Strongly disagree**
- Don't know**
- No opinion**

**D10 Do you agree that caring for a person with short-term care needs and childcare (other than where the child has a disability or other long-term caring needs) should be out of scope for Carer's Leave?**

- Strongly agree**
- Agree**
- Disagree**
- Strongly disagree**
- Don't know**
- No opinion**

**D11 Do you agree that the leave should be available to be taken as individual days or half days up to one whole week (both options to be pro-rated for part-time employees)?**

- Strongly agree**
- Agree**
- Disagree**
- Strongly disagree**
- Don't know**
- No opinion**

**D12 Do you agree that an individual should be required to give their employer notice ahead of taking Carer's Leave?**

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know
- No opinion

**D13 Do you agree an employee exercising their right to request or take unpaid Carer's Leave should have the same protections as those taking other forms of statutory leave?**

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know
- No opinion

#### **D14 Additional Information**

**Please provide additional information or clarification to any response in the space below:**

##### *Gendered Nature of Care*

The latest Census figures for Northern Ireland show that nearly 60% of unpaid carers are women and that more than 1 in 6 women in employment are providing unpaid care (approximately 71,000 women). Women have a 70% chance of providing care in their adult life and are more likely to care early in their life.<sup>71</sup>

Womens' Regional Consortium research with Carers NI on Women, Unpaid Care and Employment<sup>72</sup> (see also Section 2.2) highlights the following in relation to the impact of care on women in work:

---

<sup>71</sup> Will I care? The likelihood of being a carer in adult life, Carers UK, November 2019  
<https://www.carersuk.org/media/warllcph/carersrightsdaynov19final-2.pdf>

<sup>72</sup> Career or Care: Women, unpaid caring and employment in Northern Ireland, February 2024, Carers NI & the Women's Regional Consortium

- 1 in 3 (34%) women with unpaid caring roles have given up employment to care.
- 1 in 4 (28%) women with unpaid caring roles have decreased their working hours because of caring.
- 1 in 6 (17%) women with unpaid caring roles have taken on a less qualified job or turned down promotion to fit around their caring responsibilities.
- Women “juggle” their caring role and employment often at the detriment of their own career, finances and health and wellbeing.
- The financial impact of stopping or reducing employment to provide care is felt by women not only whilst providing the care but also throughout their life course.

Given the disproportionate levels of unpaid caring responsibilities taken on by women and the negative impacts this can have on women’s participation in paid work and on their earnings over their lifetimes this is a gendered issue which must be addressed in order to prevent further embedding of gender inequality.

#### *Benefits of paid Carer’s Leave*

The Women’s Regional Consortium welcomes these proposals for carer’s leave but want to see paid carer’s leave as a statutory right to ensure that all carers can avail of this right and do not suffer financial hardship as a result. We agree with the Coalition of Carers Organisations that delivering the workplace protections proposed in this consultation *“will help unpaid carers to fully participate in the labour market, preventing people from being forced out of employment because of the demands of caring. They will also help carers balance their caring role and employment improving their own health and wellbeing and finances.”*

We also believe that the introduction of paid carer’s leave has benefits not only for the carer and the person they look after but for businesses in retaining skilled employees and also to support the health service and social care more broadly.

Carers who are properly supported in the workplace will benefit from increased wellbeing and feel better able to balance their caring role with their work commitments. This has the potential to translate into less sickness absence and the possibility for improved productivity as wellbeing levels improve as the employee is able to take leave instead of trying to work and cope with tiredness, lateness and stress. The benefits to employers are therefore clear – the retention of experienced staff, reductions in employee turnover and associated costs, potential reductions in sick leave and boosting employee wellbeing/productivity.

---

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

### *How Carer's Leave should be taken*

We believe that the leave should be available to take as individual days (including half days) up to a block of one week. We suggest that it is more useful for both carers and employers to take the leave they actually need rather than having to take it in a block. This ensures that time taken off is not wasted and kept for those times when it is really needed. This could be particularly useful where a carer needs to accompany the person they care for to a medical or other appointment that normally takes place during working hours. Allowing the leave to be taken in this way provides much needed flexibility for carers with ongoing caring responsibilities.

***“It would be better if this leave could be taken in small blocks. That would work out better for the person who is being cared for and the carer. It is much handier to have this leave able to be spread out. It makes it more flexible.”***

*(Carer's Interview)*

***“Carer's Leave should be able to be taken in a way that best suits the carers which should include half days. One size does not fit all.”***

*(Carer's Interview)*

### *Notice for Carer's Leave*

We agree that it is reasonable to expect a carer to give their employer notice ahead of taking Carer's Leave. However, caring is often unpredictable so there may be times when it will not be possible for the carer to give notice. Current pressures on the health service mean that appointments can sometimes be at short notice and cannot be changed. We agree with the Coalition of Carers Organisations that *“this inability to give notice at times must be recognised and appropriate protection built into the legislation to ensure this does not present a barrier to carers being able to avail of Carer's Leave.”*

***“When you are caring for someone who is not well, you never know what the next day will bring so it is hard to plan in advance.”***

*(Carer's Interview)*

***“I've lost count the number of times I've had to go to the school because of my son. It's just finding that employer that's going to understand that these things are going to happen and I'm the person that gets the phone call.”***

*(Quote taken from Career or Care: Women, unpaid caring and employment in Northern Ireland, Women's Regional Consortium & Carers NI research, February 2024)*



## *Training*

Our research with Carers NI on Women, Unpaid Care and Employment<sup>73</sup> stressed the need for training for line managers/employers so that they recognise the value of their staff with caring responsibilities, that they fully understand carer's entitlements and afford them their rights/entitlements without any negative attitudes.

***“They make you feel like you have to beg for your entitlements. It comes down to the awareness of employers and managers, it all comes down to their training and awareness.”***

***“Flexibility from day one, a proper carer’s policy within workplaces and I would love something around attitude training for employers and boards and committees because while legislation/policies might be in place they can still make you feel like shit for asking.”***

*(Quotes taken from Career or Care: Women, unpaid caring and employment in Northern Ireland, Women’s Regional Consortium & Carers NI research, February 2024)*

## *Care for more than one person*

We are pleased to see the consultation document acknowledge that two people can be providing care for the same person and therefore that two people can share Carer’s Leave. However, we agree with the Coalition of Carers Organisations that the Department should reconsider the situation where a carer is providing care for more than one person, for example, a carer looking after two children with additional needs. As the Coalition of Carers Organisations states: *“the number of appointments and other caring duties arising from this will be greater and we would suggest that carers, such as these, should be able to claim additional carer’s leave reflecting the additional demand on their time.”*

***“Having an extra weeks leave would be really beneficial so you could set it aside for appointments that you can’t get outside working hours. That would really make a difference.”***

*(Carer’s Interview)*

***“It’s the embarrassment factor of having to ask. My son could maybe have three or four seizures in the space of a month. It’s having to go back to your employer and saying you need to leave again as there is no one else to look after him. I can’t leave him with my mother, she’s in her 70s. It sounds like I’m making it up. If I had access to a weeks leave it would remove some of that embarrassment and guilt.”***

*(Carer’s Interview)*

---

<sup>73</sup> Career or Care: Women, unpaid caring and employment in Northern Ireland, February 2024, Carers NI & the Women’s Regional Consortium

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

***“Where every other staff member uses their annual leave for rest and recuperation, a certain percentage of my annual leave I have to book off to take my mum to appointments. When they’re just discharged from hospital there may be an appointment every week.”***

***“Over the years I’ve had to take unpaid leave for caring responsibilities – appointments, etc. I had to work part-time when the kids were younger. Sometimes they would have had 12 appointments in a week, and they are prolonged appointments. Speech therapy nearly every week, long appointments over weeks and weeks same with OT appointments. This is a heavy burden for carers who are working. I was lucky that I could make up my hours, but many can’t.”***

***“There are not enough jobs suitable for carers, they have to be very flexible all the time. When you go for a job you have to explain I have loads of hospital appointments, we’ve lots of doctor’s appointments, lots of dentist appointments. They just look at you going ‘Why are you even here?’”***

***“When I worked for a larger employer, you could have had three days paid Carer’s Leave. In the six years I worked there I only needed to use it once. When I did, I honestly felt like I was begging. I’d asked for the time off as my son was going through a really tough time. My manager said ‘Yes I’ll sign that off for you but don’t make a habit of it!’ I just thought it was a cheap comment to make. Don’t make me feel like I’m begging for something that’s already written into my employment contract.”***

*(Quotes taken from Career or Care: Women, unpaid caring and employment in Northern Ireland, Women’s Regional Consortium & Carers NI research, February 2024)*

**D7** – We agree with our colleagues in NIC ICTU that the definition of caring relationships for the purpose of Carer’s Leave needs to be expanded to cover a wider breadth of caring relationships including, for example, someone else who lives with the employee as a member of their family or someone who relies on the employee in an emergency. We support the call by NIC ICTU for employers to be asked to interpret this flexibly.

### **Neonatal Care Leave and Pay**

**D15 Do you agree that parents of babies who enter neonatal care in the first 28 days following birth and who spend at least 7 continuous days in neonatal care should have an additional week of statutory leave and/or pay from work for each week that their child is in hospital, up to a maximum number of 12 weeks?**

- Strongly agree
- Agree (see D28)
- Disagree
- Strongly disagree
- Don't know
- No opinion

**D16 Do you agree that employees who would have had the main responsibility for caring for the child, had their baby not been admitted to neonatal care, should be eligible to receive neonatal care leave and/or pay?**

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know
- No opinion

**D17 Do you agree that access to neonatal care leave and/or pay should be open to parents whose babies have spent a minimum of 7 continuous days in neonatal care, i.e. are seriously ill or likely to be in hospital for an extended period of time?**

- Strongly agree
- Agree
- Disagree (see D28)
- Strongly disagree
- Don't know
- No opinion

**D18 Are there other circumstances that you think should be considered for inclusion within the scope of neonatal care leave and/or pay?**

**Yes**

**No**

**If yes, what are they?**

We ask the Department to reconsider the entitlements to neonatal care leave and/or pay in relation to multiple births. The consultation states that *“where a parent has multiple births, the maximum entitlement to neonatal care leave and/or pay will not increase, i.e. having more than one baby in care at any one time will still give rise to only one entitlement to leave and/or pay.”* According to the Twins Trust around 40% of multiple birth babies need some extra help in hospital after the birth.<sup>74</sup> Nine months after giving birth, mothers of multiple births are nearly 20% less likely to have returned to work than mothers of single babies.<sup>75</sup> This points to a clear need for additional leave for parents of multiple births.

We also agree with our colleagues in NIC ICTU who have suggested that: *“There may be special circumstances, for example a single parent of a sick baby, where the parent needs additional support from a grandparent/relative or friend. In these circumstances, there should be the possibility of these nominated people availing of neo-natal leave and care.”*

**D19 Do you agree that neonatal care leave should be a ‘day one right’ in line with maternity leave, adoption leave and parental bereavement leave?**

**Strongly agree**

**Agree**

**Disagree**

**Strongly disagree**

**Don’t know**

**No opinion**

---

<sup>74</sup> <https://twinstrust.org/information/pregnancy-and-birth/in-hospital/neonatal-care.html#:~:text=Around%2040%20percent%20of%20multiple,%20or%20'neonatal'%20care.>

<sup>75</sup> <https://committees.parliament.uk/writtenevidence/116637/pdf/>

**D20 Do you agree that the qualifying conditions for statutory neonatal care pay should mirror the qualifying conditions for other family-related statutory pay?**

- Strongly agree
- Agree
- Disagree (see D28)
- Strongly disagree
- Don't know
- No opinion

**D21 Do you agree that the entitlement to neonatal care leave and/or pay should be available for up to 12 weeks (each week to be comprised of 7 continuous days) that a baby is in neonatal care?**

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know
- No opinion

**D22 Do you agree that a father/partner should be required to give notice as soon as is reasonably practicable after their child is admitted to neonatal care, and has a stay of at least 7 continuous days, in order to take neonatal care leave and/or pay?**

- Strongly agree
- Agree
- Disagree (see D28)
- Strongly disagree
- Don't know
- No opinion

**D23 Do you agree that a person taking neonatal care leave and/or pay after maternity/ adoption leave should be required to give notice, akin to that which is required for taking annual leave, in order to take neonatal care leave and/or pay?**

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

No opinion

**D24 Do you agree that employers should be allowed to ask for a declaration of entitlement to neonatal care leave and/or pay?**

Strongly agree

Agree (see D28)

Disagree

Strongly disagree

Don't know

No opinion

**D25 Do you agree that when and how neonatal care leave and/or pay is to be taken should be sufficiently flexible to accommodate other periods of pre-booked family-related leave and in a way that balances the needs of parents and employers?**

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

No opinion

**D26 Do you agree that parents on neonatal care leave should have the same protections as employees on other family-related leave?**

- Strongly agree**
- Agree**
- Disagree**
- Strongly disagree**
- Don't know**
- No opinion**

**D27 Do you agree that neonatal care pay should be paid at the same rate as existing family related statutory payments?**

- Strongly agree**
- Agree (see D28)**
- Disagree**
- Strongly disagree**
- Don't know**
- No opinion**

#### **D28 Additional Information**

**Please provide additional information or clarification to any response in the space below:**

**D15** – We strongly agree that parents of babies who enter neonatal care in the first 28 days following birth should have an additional week of statutory leave and/or pay from work for each week that their child is in hospital, up to a maximum number of 12 weeks. However, we do not agree that the babies should spend at least 7 continuous days in neonatal care to have this entitlement. We believe that parents of babies who enter neonatal care in the first 28 days following birth and who spend at least **48 hours** in neonatal care should be entitled to this right. We believe that the 7 day threshold is too long.

**D17** – As previously stated we would like to see the threshold for accessing neonatal leave and/or pay reduced from the proposed 7 days to 48 hours. It can be difficult to know how a neonatal illness can impact on parents and families and therefore every effort should be made to ensure parents have enough time to adjust to the situation and provide the care they need for their children.

**D20** – We believe that access to neonatal leave and pay should be a day one right.

**D22** – We agree that a father/partner should be required to give notice as soon as is reasonably practicable after their child is admitted to neonatal care. However, we do not agree that the stay should be at least 7 continuous days and have in our previous answers suggested that this should be reduced to 48 hours. This policy should be as flexible as possible to account for the often sudden and distressing circumstances for which this leave may be sought.

**D24** – We agree that evidence requirements for neonatal care leave and pay should mirror those for some existing family-related leave entitlements, ie, a self-declaration of entitlement. There should be no need to disclose medical information or any further details given the sensitivity of the situation and the unlikelihood of parents pretending their baby is seriously ill in order to avail of extra leave.

**D27** – We welcome the statement in the consultation document that *“this entitlement is a floor, not a ceiling”* and that many employers will provide more generous terms and conditions around family-related leave. We would like to see employers offer additional support to employees in this situation given that there are not likely to be large numbers involved. We would like to see no parents in this situation losing out financially as a result of their children needing neonatal care.

### **Protection from Redundancy – Pregnancy and Family Leave**

**D29** Do you agree that the redundancy protections period during pregnancy should apply from the point that the employee informs their employer that they are pregnant, whether orally or in writing?

- Strongly agree
- Agree
- Disagree (see D33)
- Strongly disagree
- Don't know
- No opinion



**D30** Do you agree that protections from redundancy during relevant family leave should be extended to include a period after the employee returns from leave?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know
- No opinion

**D31** Do you agree with the principle that the period of protection should be 18 months from when the child is born, stillborn, expected to be born, or is placed for adoption?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know
- No opinion

**D32** Do you agree that, for those taking shared parental leave, there should be a minimum six-week threshold of continuous leave before enhanced protections from redundancy can apply?

- Strongly agree
- Agree
- Disagree (see D33)
- Strongly disagree
- Don't know
- No opinion

### **D33 Additional Information**

**Please provide additional information or clarification to any response in the space below:**

These rights around protection for redundancy are particularly important for women as many women have been made redundant either when pregnant, during maternity leave or shortly after their return from maternity leave. The consultation references a number of pieces of research both local and national on this issue and there is a clear need for enhanced protections in this area. Local research by the Equality Commission for Northern Ireland <sup>76</sup> found that 50% of women thought their career opportunities were worse than before their pregnancy and 36% of those surveyed believed they were treated unfairly or disadvantaged at work as a result of their pregnancy or having taken maternity leave. 20% of those surveyed felt that they had lost their job as a result of their pregnancy or taking maternity leave. This included dismissal, non-renewal of contract and redundancy. Worryingly this research found that 16% of employers who took part in a focus group believed it was reasonable to give careful consideration to hiring young women. This research alone makes a clear case for the need for increased protections from redundancy both before and after birth.

While these protections are to be welcomed we believe there is more to be done to protect women who are pregnant or who have recently given birth. Women are often not made redundant but put in a position by their employer where they simply can no longer keep working. This might be because their employer refuses to grant them part-time or flexible working arrangements. More must be done to provide protections and redress for women in these situations.

**D29** – We agree with our colleagues in NIC ICTU that there can be circumstances where an employee does not inform her employer of an early pregnancy: *“these include health related concerns as well as discrimination faced by women in the workplace. We recommend that the protected period begins at the start of a woman’s pregnancy. If instances occur where a woman is selected for redundancy and she has not informed her employer about her pregnancy, the redundancy decision should be reviewed to ensure the it has not been taken as a result of pregnancy. This could be, for example, when a woman has been absent because of pregnancy related reasons but has not disclosed this on her sickness absence record and the record is subsequently used in selection for redundancy.”*

---

<sup>76</sup> Expecting Equality, The Equality Commission for Northern Ireland, November 2016  
[https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/Expecting\\_Equality-PregnancyInvestigation-SummaryReport.pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/Expecting_Equality-PregnancyInvestigation-SummaryReport.pdf)

**D32** – We do not agree that there should be a minimum six-week threshold of continuous leave before enhanced protections from redundancy can apply. We agree with our colleagues in NIC ICTU who suggest “*that enhanced protections should apply to anyone who has taken a minimum period of SPL (i.e. one week). As SPL is flexible in nature, it is unrealistic to apply it to continuous period of leave.*”

We are also concerned about the absence of protection for employees taking paternity leave. While statutory paternity leave is only two weeks long some fathers may choose to add other forms of leave to extend this period (such as annual leave, parental leave or any additional paternity leave provided by their employer). A father who takes a combination of leave bringing him up to six weeks would still not be eligible for any protection as the leave was not shared parental leave.

### **Paternity Leave**

**D34** Do you agree that paternity leave should be available to be taken as a single block of two weeks or two non-consecutive blocks of one week?

- Strongly agree
- Agree (see D39)
- Disagree
- Strongly disagree
- Don't know
- No opinion

**D35** Do you agree that paternity leave should be available to be taken at any time within the first 52 weeks following birth or adoption?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know
- No opinion

**D36 Do you agree that the notice requirements for paternity leave related to birth and surrogacy should be 28 days for each period of leave?**

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

No opinion

**D37 We would welcome your views whether paternity leave should be available for up to four weeks in the north of Ireland. In answering this question, we would be grateful if you would provide reasoning for your responses and identify any issues or benefits with such an approach.**

The Women's Regional Consortium strongly agrees that paternity leave should be available for **at least** four weeks in Northern Ireland. We agree with our colleagues in the Women's Policy Group that extending paternity leave is "*a key policy driver in terms of achieving gender equality.*" It is vital to gender equality that men can be seen as primary caregivers as well as women and goes some way in addressing the value of care work and the development of a Caring Economy (see Section 2.8).

Extended paternity leave and the increased parental involvement it allows, has wide-reaching benefits for fathers, children and employers. It not only provides benefits to the mother in terms of her health and recovery after birth but helps to share the burden of care, develops the bond between the baby and father and can provide benefits to other siblings while they adjust to a new baby. It is also important for women's retention in the workplace helping to address the 'motherhood penalty' the disadvantage that mothers face in the workplace leading to lower wages and decreased career opportunities compared to men or those without children.

The Gender Equality Strategy Expert Panel report <sup>77</sup> highlighted that "*figures from OECD show that the average length of paid leave reserved for fathers is 8.1 weeks which is significantly higher than the two weeks entitlement in Northern Ireland.*" The report provided a range of examples from OECD countries and said that lessons can be learned from these other countries in finding a better model for paternity leave in Northern Ireland. In its

---

<sup>77</sup> Gender Equality Strategy Expert Advisory Panel Report, December 2020  
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

recommendations the Gender Equality Strategy Expert Panel stated that *“Northern Ireland compares badly to other regions in relation to paid family leave and the provisions for maternity and paternity leave are inadequate and should be increased.”*

George Gabriel writing in The Guardian<sup>78</sup> states: *“The UK has the worst statutory paternity leave offer for dads and co-parents in Europe: just two weeks paid at £184.03 – less than half the minimum wage. Self-employed fathers get nothing.”*

Research from The Centre for Progressive Policy (CPP), Pregnant Then Screwed and Women in Data on the societal and economic impact of paternity leave<sup>79</sup> finds that increasing paid paternity leave to six weeks could reduce the gender pay gap and help to equalise men and women’s participation in the labour market. The research says the economic case for tackling gender inequality is strong, with analysis suggesting that closing gender employment gaps could increase economic output by £23 billion.

Survey data outlined in this research reveals that for 1 in 5 (20%) dads, no parental leave options were available to them following the birth or adoption of their child. Of those that were entitled to some leave, but returned to work early, 43% cited financial hardship as the reason for not taking their full entitlement. 63% of all recent fathers said they did not feel mentally ready to return to work when they did. The research also found that fewer than one in five (18%) prospective parents say they or their partner could afford to take six weeks of paternity leave at the current statutory rate of pay. By contrast, 57% of prospective parents said they or their partner could afford to take six weeks of paternity leave if it was paid at 90% of their income, as statutory maternity pay is for women.

CPP and Pregnant then Screwed are calling on the Government to increase the length of non-transferable paternity leave to a minimum of six weeks and to pay it at 90% of income in line with current statutory maternity pay.

CPP analysis of OECD data finds that countries with more than six weeks of paid paternity leave have a 4 percentage point smaller gender wage gap and 3.7 percentage point smaller labour force participation gap than countries that have less than six weeks.

---

<sup>78</sup> [https://www.theguardian.com/commentisfree/2024/sep/25/dads-time-kids-labour-review-paternity-leave?utm\\_term=Autofeed&CMP=tw\\_t\\_gu&utm\\_medium&utm\\_source=Twitter#Echobox=1727272549](https://www.theguardian.com/commentisfree/2024/sep/25/dads-time-kids-labour-review-paternity-leave?utm_term=Autofeed&CMP=tw_t_gu&utm_medium&utm_source=Twitter#Echobox=1727272549)

<sup>79</sup> Leave in the lurch, Paternity leave, gender equality and the UK economy, 15 June 2023  
<https://www.progressive-policy.net/publications/leave-in-the-lurch>

**D38 Do you agree that paternity leave should be a day 1 right?**

- Strongly agree**
- Agree**
- Disagree**
- Strongly disagree**
- Don't know**
- No opinion**

**D39 Additional Information**

**Please provide additional information or clarification to any response in the space below:**

**D34** – We believe that paternity leave should be available to be taken in the most flexible way possible to ensure that it works for fathers and families and to maximise uptake which as we have outlined will help further the goal of achieving gender equality.

**The Women's Regional Consortium would also like to highlight the following gaps in employment legislation in Northern Ireland which need to be addressed urgently:**

- **Duty on employers to take reasonable steps to prevent sexual harassment of their employees in the workplace.** Our colleagues in NIC ICTU have raised the fact that in the UK the Worker Protection Act which comes into effect in October 2024 and creates a duty on employers to take reasonable steps to prevent the sexual harassment of their employees in the workplace. However, this only applies to England, Wales and Scotland and leaves workers in Northern Ireland without this protection.
- **Gender Pay Gap Reporting Legislation.** Our colleagues in the Women's Policy Group have highlighted that: *"The European Trade Union Confederation estimates that if women were paid the same as men, the poverty rate among working women could be halved and 2.5 million children would come out of poverty."* Like our colleagues in the Women's Policy Group we are extremely concerned that Gender Pay Gap reporting legislation and associated measures, which were promised in the Employment Act (Northern Ireland) 2016, are still to be delivered and implemented. Despite a commitment to introduce regulations there is still no clear timetable some five years after its introduction. We support the Women's Policy Group recommendation for *"the swift introduction of reporting regulations and would further recommend that measures outlined in the original schedule are included. These include financial penalties for employers who flout the law as well as a requirement to report on pay gaps on the grounds of disability and race."*

- **Sick Pay, Parental Leave and Protection from Unfair Dismissal.** We agree with our colleagues in Women’s Platform who have suggested that: *“It would be important to also include a review of sick pay within, or following, the legislation. Proposals to extend sick pay provisions have been highlighted by the new Labour government, as part of a package of reforms to be introduced as the Employment Rights Bill. This Bill includes a new Day 1 right to sick pay, as well as extending parental leave and protection from unfair dismissal – which is missing from the current Bill in Northern Ireland.”* The Good Jobs Bill has a focus on addressing existing gaps in legislation between Britain and Northern Ireland and therefore it is essential to reflect provisions in this Bill prior to passing legislation in Northern Ireland, to ensure no new gaps can emerge between Northern Ireland and Britain.<sup>80</sup> These provisions are also vital for women; the Women’s Budget Group estimates that the reforms will benefit 1.47 million women in Britain alone through extending sick pay provision, while research by the think tank highlights that improved protections can reduce economic inactivity and the £88.7bn lost to the UK economy each year through women’s lower labour market participation.<sup>81</sup>

## NEXT STEPS

1. **This consultation seeks views on a range of potential policy avenues which will inform decisions about which should proceed to legislation stage. What issues do you think should be a priority for consideration by the Department?**

We would like to see the prioritisation of the rights proposed under Theme D Work-Life Balance. In addition, we would like to see the prioritisation of replacing zero-hours contracts, the fair allocation of tips, gratuities and service charges and the right to disconnect. In all these areas women are likely to benefit more from the protections provided. This is necessary given women’s greater likelihood to be economically inactive and the many issues around economic participation for women outlined in this response.

2. **What assistance should the Department offer to businesses in understanding and implementing any future employment legislation?**

Access to employment rights depends on genuinely supportive employers so that policies go beyond words and are committed to in practice. Employees must feel that they truly have access to these rights. Some employees experience negative attitudes from their employers when trying to exert their rights in relation to the full range of family friendly and parental leave rights.

---

<sup>80</sup> <https://www.gov.uk/government/news/business-leaders-and-unions-to-work-hand-in-hand-to-deliver-new-plans-to-make-work-pay>

<sup>81</sup> <https://www.wbg.org.uk/publication/the-feminist-future-of-work/>

Employees report “*feeling guilty*” about asking for their rightful entitlements or feeling like they “owe” their employer if they are “*allowed*” to take leave or are given flexible working arrangements. All employers must be provided with clear information and supported around the provision of these rights so that employees can access them without fear or favour.

Lack of knowledge of rights and entitlements is a big issue and information must be available in ways that people can easily understand. This is true for both employers in understanding and implementing the rights available but also for employees in terms of exerting their rights. It is therefore vital that these statutory rights are supported by clear, comprehensive and timely guidance that supports both employers and employees to understand these rights. Information and advice around these policies must be provided in a format that is accessible and easily understood. We support the call from the Coalition of Carers Organisations that “*to ensure good awareness amongst carers and across business roll out of these rights should be accompanied by an information campaign.*” We believe that for the introduction of any of these new family-friendly rights the Department should undertake a public information campaign to both inform and highlight the benefits to workers and employers of providing these rights.

### **3. What specific considerations should be given to small and micro businesses in assisting them in dealing with legislative changes?**

Northern Ireland is a small business economy. The majority of businesses in Northern Ireland are micro businesses. In March 2023, the majority of businesses (89% or 70,795) in Northern Ireland were micro businesses (less than 10 employees). Just over 2% (1,655) of businesses had 50 or more employees.<sup>82</sup> It can be more difficult for small businesses to provide flexible working opportunities and to provide enhanced leave as they can experience more problems with disruption to their business. As we have previously outlined flexible working including additional leave entitlements depends on genuinely supportive employers so that these policies go beyond words and are committed to in practice.

Small businesses need to be better helped and supported by Government so that any increased rights to leave do not simply exist on paper and employees have realistic access to them. As outlined in our answer to Question 2 we believe that clear, comprehensive and timely guidance to employers to help with these legislative changes is important. We would also like to see this supported by a public information campaign.

---

<sup>82</sup> <https://www.economy-ni.gov.uk/news/northern-ireland-business-activity-size-location-and-ownership-2023>



We also believe that it is important particularly for small and micro businesses to emphasise the benefits to employers of providing flexible, family-friendly and compassionate workplaces. The benefits are well documented and there is no doubt that employees feel more goodwill towards their employer if they are valued and respected within their working environment. This helps to increase loyalty and retention rates. It helps to reduce employee turnover and associated costs, potential reductions in sick leave and helps to boost employee wellbeing and productivity. It can also help organisations to attract new staff and diverse workforces.