



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

Response to: Making Work Pay: Strengthening Statutory Sick Pay

**Issued by: Department for Work & Pensions
December 2024**

**Prepared by: Siobhán Harding
Women's Support Network
Email: 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.¹ 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)

¹ 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 Work and Pensions Consultation on Making Work Pay: Strengthening Statutory Sick Pay (SSP). The Women's Regional Consortium welcomes proposals to strengthen SSP as part of a package of measures which will help to 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.

2.0 General Comments

In Northern Ireland 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.”*²

The 2024 draft Programme for Government (PfG)³ outlined proposals (subject to NI Executive approval) to introduce a new Employment Rights Legislation and a Good Work Charter to *“ensure better quality jobs and promote a healthy work-life balance. These initiatives aim to make workers feel valued and supported in their workplace.”* The Department for the Economy has recently consulted on The ‘Good Jobs’ Employment Rights Bill in Northern Ireland. Minister for the Economy, Conor Murphy, has stated that the purpose of his Good Jobs agenda is to *“ensure that working people can provide their families with a decent and secure income, and meet their family and caring responsibilities.”*

The Women’s Regional Consortium have welcomed the proposals as women are more likely to be found in poor quality, low-paid jobs and often suffer from poor working conditions as a result of the structural inequalities they face particularly around the provision of care. 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

² https://assets.publishing.service.gov.uk/media/5e178b56ed915d3b06f2b795/2020-01-08_a_new_decade_a_new_approach.pdf

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

in Northern Ireland, to ensure no new gaps can emerge between Northern Ireland and Britain.⁴

We wish to briefly raise the following considerations as part of our response:

- Northern Ireland ranks third lowest of the UK regions in employee earnings with weekly earnings more than £60 below the UK average in 2024.⁵
- Under 5% of all jobs in NI were 'low-paid' (based on OECD measure of low pay) in 2024 and is the highest proportion of the 12 UK regions.⁶
- Northern Ireland was one of the regions with above average proportion of jobs paid below the Living Wage in April 2023 at 15.6%. 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%).⁷
- The employment rate for females in NI has been consistently lower than for males over the past ten years. For most of the last 10 years the number of female employees has been slightly higher than male employees (+15,000 in 2023), however, the number of self-employed males was just under three times the number of self-employed females.⁸
- 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 workers being male (61.8%).⁹

⁴ <https://www.gov.uk/government/news/business-leaders-and-unions-to-work-hand-in-hand-to-deliver-new-plans-to-make-work-pay>

⁵ <https://www.economy-ni.gov.uk/news/employee-earnings-northern-ireland-october-2024#:~:text=NI%20had%20the%20joint%20lowest,the%20UK%20average%20in%202024.>

⁶ Ibid

⁷ 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

⁸ Women in Northern Ireland 2023, NISRA, November 2024 https://datavis.nisra.gov.uk/economy-and-labour-market/women-in-northern-ireland-2023.html#1_Overview

⁹ 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>

- Approximately 60% of employed women with dependent children worked full-time, compared to 96% of employed males with dependent children.¹⁰
- Research has shown that women in Northern Ireland are more likely than men to work in low paid jobs.¹¹ 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.
- In 2023 in Northern Ireland, 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.¹²
- 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).¹³
- Research by the Women's Regional Consortium and Carers NI¹⁴ shows that 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%) and nearly three quarters (73%) have lost out on between £500 and over £1500 per month in wages because of challenges juggling work and care.
- The Northern Ireland economic inactivity rate is 27.5% and 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.¹⁵
- Approximately eight in ten women (79%) with dependent children were economically active in 2023, compared with 94% of men with dependent children.¹⁶

¹⁰ Women in Northern Ireland 2023, NISRA, November 2024

https://datavis.nisra.gov.uk/economy-and-labour-market/women-in-northern-ireland-2023.html#1_Overview

¹¹ 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

¹² Gender pay gaps in Northern Ireland, NISRA, August 2024

https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/Summary%20report_8.pdf

¹³ 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>

¹⁴ Ibid

¹⁵ Northern Ireland Labour Market Report, NISRA, September 2024

<https://datavis.nisra.gov.uk/economy-and-labour-market/labour-market-report-september-2024.html#>

¹⁶ Women in Northern Ireland 2023, NISRA, November 2024

- The largest difference between men and women with dependent children was for those with pre-school children. The economic activity rate for women with pre-school age children (70%) was substantially lower (by 26pps) than for men with pre-school age children (95%).¹⁷
- Statistics from the Work Foundation¹⁸ show that women are 1.2 times more likely to be on zero-hour contracts than men.
- The Northern Ireland Childcare Survey report¹⁹ 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 most parents using childcare (95%) report that childcare stress impacts on productivity at work, 61% report this is at least weekly.
- 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.²⁰
- 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.

https://datavis.nisra.gov.uk/economy-and-labour-market/women-in-northern-ireland-2023.html#1_Overview

¹⁷ Ibid

¹⁸ 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>

¹⁹ Northern Ireland Childcare Survey 2023, Employers For Childcare, December 2023

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

²⁰ <https://www.economy-ni.gov.uk/news/northern-ireland-business-activity-size-location-and-ownership-2023>

3.0 Consultation Questions

1. Which of the following best describes how you are responding to this consultation. Are you responding?

- Other (please specify): Charitable/community and voluntary organisation

2. Thinking about employees earning below the current weekly rate of Statutory Sick Pay (£116.75 per week), what percentage of their average weekly earnings should they receive through the Statutory Sick Pay system? Number must be between 0 to 100.

100%

3. Why do you think the percentage rate of earnings should be set to this level?

There is no minimum word limit for this question, however we strongly encourage a maximum limit of 500 words.

- We dispute the fact that it is possible to live a decent, healthy life on or below the current rate of Statutory Sick Pay (£116.75 per week) given the rising cost of essentials.
- We agree with the Women's Budget Group (WBG) that *"the current rate of Statutory Sick Pay (SSP) is wholly insufficient and has failed to keep pace with the cost of living, inflation and even increases in the living wage."*²¹
- We believe the percentage rate of earnings should be set at no less than 100% of pay for workers earning below the current earnings limit. We agree with the WBG that this approach addresses deep-rooted inequalities and provides meaningful support to vulnerable workers.
- We also support the Women's Budget Group recommendation: *"To avoid creating unfairness between those earning below and just above the lower earnings limit, and to take further steps to tackle economic and health inequalities, the rate of SSP should actually be increased to at least the real living wage rate for 52 weeks."*

²¹ Women's Budget Group Submission to the Work and pensions select committee - Statutory Sick Pay (SSP), December 2023
<https://www.wbg.org.uk/wp-content/uploads/2024/01/Work-and-pensions-select-committee-Statutory-Sick-Pay-SSP-December-2023.pdf>

- The priorities outlined in the consultation on removing the waiting period and the lower earnings limit are vital for women. The Women’s Budget Group estimate that 1.47 million women will have new rights to sick pay under the new provisions.²² We agree with the Women’s Budget Group who state that: *“extending it to all workers and paying it at an adequate rate increases the impact on economic activity, allowing workers to take time off at early stages of a health condition and increasing the chances of recovery and remaining in labour market.”*
- As a result of structural inequalities, women are more likely to be in low-paid, insecure and part-time employment and therefore make up the majority (70%) of those in jobs that are ineligible for SSP.²³ 6.5% of women do not earn enough to qualify for sick pay compared to 2.8% of men.²⁴
- Women are more likely to live in poverty and be in debt than men. The cumulative impact of austerity, COVID-19, and the Cost-of-Living crisis has exacerbated this, stripping their economic resilience and depleting their already minimal financial reserves on which to fall back on if they fall sick.²⁵
- We support the Women’s Budget Group recommendations on SSP²⁶:
 - Abolish the earnings threshold for SSP extending coverage to almost 2 million workers.
 - For all absences, remove the waiting period for sick pay.
 - Increase sick pay to at least the real living wage rate for 52 weeks.
 - Pay SSP from day one of sickness absence.
 - Provide additional funds to ensure employers can afford to pay sick pay.
 - Extend sick pay to the self-employed.

²² <https://www.wbg.org.uk/article/wbg-response-to-the-governments-employment-rights-bill/>

²³ Women’s Budget Group Submission to the Work and pensions select committee - Statutory Sick Pay (SSP), December 2023

<https://www.wbg.org.uk/wp-content/uploads/2024/01/Work-and-pensions-select-committee-Statutory-Sick-Pay-SSP-December-2023.pdf>

²⁴ <https://www.wbg.org.uk/article/wbg-response-to-the-governments-employment-rights-bill/>

²⁵ Women’s Budget Group Submission to the Work and pensions select committee - Statutory Sick Pay (SSP), December 2023

<https://www.wbg.org.uk/wp-content/uploads/2024/01/Work-and-pensions-select-committee-Statutory-Sick-Pay-SSP-December-2023.pdf>

²⁶ Ibid