



**Submission to Joint Oireachtas Committee on Gender Equality
in relation to the recommendations made by
the Citizens' Assembly on Gender Equality**

1. Introduction

The 30% Club Ireland is very pleased to have been invited to make a submission on foot of the recommendations made by the Citizens' Assembly on Gender Equality.

The 30% Club is a global campaign supported by chairs and CEOs of medium to large organisations committed to greater gender balance at senior levels in organisations, to drive better business outcomes. The 30% Club's global mission is to achieve at least 30% representation of all women on boards and in c-suites. The 30% Club in Ireland was established in 2015 and now has over 285 Chair and CEO supporters representing over 650,000 employees across the country.

In our initial submission to the Assembly, we focused on three core areas in relation to a) talent pipeline starting at the point of education, b) access to the workplace and c) senior Representation. It is against that backdrop that we have considered the recommendations made by the Assembly. We believe that the recommendations that apply to our areas of interest are numbers 21, 22, 23, 25, 26, 30, 32, 33 and 42.

2. General observations

As a business representative body, we share a common goal with the Assembly to see increased gender balance in all senior decision-making fora, whether commercial or state led. However, we propose that in the business arena better, and more sustainable, progress, is made when organisations are actively encouraged to be accountable for their own progress, particularly when the evidence supports better business outcomes. It is on this basis that we have a very strong preference for the application of targets rather than quotas. A number of the recommendations on which we are commenting involve the imposition of quotas, whether on governing bodies of cultural, sports, arts, and media organisations or on private companies. The 30% Club does not believe that quotas are an effective way to achieve gender balance and indeed can be counterproductive.

When quotas were introduced in Norway in 2006 for board membership, the result was that the number of women in executive roles plummeted as organisations were focused on trying to comply with the quota. We believe that targets are a much more preferable and sustainable way to achieve gender balance and set out a floor for progress, whereas quotas are more likely to set a ceiling, with no incentive for extending beyond the mandatory requirement. We believe that history has shown this to be the case, particularly in Ireland where Balance for Better Business has set targets for various categories of companies and good progress has been made in that regard. For example, when the 30% Club was established in Ireland, the percentage of women on ISEQ 20 boards was around 12.5%. Based on the voluntary actions taken by those organisations, most of whom are 30% Club supporters, together with the approach adopted by Balance for Better Business in 2018, that percentage in 2022 now stands at just over 32%.



We believe that organisations working individually and collectively to reach a target achieves a great more deal sustainable progress than imposing quotas on a compliance basis.

We will now comment on the specific recommendations that we believe apply to our work.

3.1 Recommendation No. 21

As stated above, we are very supportive of the idea that greater progress is made when businesses take ownership for driving gender progress and are self-accountable for outcomes. While we support the idea of gender progress being part of the submission process, we would be less confident that applying a specific quota requirement would drive real change and could instead just drive many firms to pull out of funding processes, which would be counterproductive in encouraging greater diversity across the community as a whole. Instead, we would ask that consideration be given to the requirement to include information on gender targets and progress as part of funding processes as demonstration of action. This would reflect visible changes in commercial procurement and investment funding processes where the ability to demonstrate plans and actions is becoming a market pre-requisite to competitive tenders.

In relation to 21b. we believe that the current methodology being applied by Balance for Better Business, in driving targets for private companies, is already starting to drive results and should be given time to demonstrate progress, before quotas would be considered as the only option. , We do recommend that Government makes it clear that gender balance is a key strategic imperative and priority for the Government and we believe that organisations will respond accordingly. It may be the case, in due course, that if the imposition of targets and general policies in this direction do not work, it may be necessary to impose quotas, but we do not believe we are yet at the point.

3.2 Recommendation No. 22

We would again recommend that Government encourage these organisations to have a target of 30% by 2025 and 40% by 2030 which we believe would achieve the same aim, as opposed to making public funding conditional on that. We believe it is a very good idea that these organisations might publish plans to adapt gender equality in their organisations as formulating and publishing plans makes people focus on this. Likewise, we agree that annual reporting and progress towards these targets (as opposed to quotas) would be a good idea.

3.3. Recommendation No. 23

We strongly support progress in gender balance across all sectors of the business community and are proud to count many State bodies within our supporter group. We believe that State and semi-State bodies have opportunity and responsibility to lead by example. It is on this basis that we fully support the proposal that any form of family leave, particularly any form of leave set out by law, should be equally available to elected representatives in delivery of their paid responsibilities.

3.4 Recommendation No. 25

In this recommendation, we believe that workplaces should be encouraged, rather than required, to develop, resource, implement and monitor gender neutral recruitment and promotion policies and practices, including the items set out in Recommendations 25(a) to 25(c).

The introduction of an agreed code around recruitment practices as well as an education programme around encouraging gender neutral selection and promotions processes will achieve the same outcome in a more collaborative and cooperative way. We believe that trying to change culture through law can be quite challenging and that it is the culture that needs to change.

3.5 Recommendation No. 26

One of the important tenets of our work is the focus on talent pipeline, from education through to the workplace. We strongly support the proposal that all schools should be resourced to support a full range of subjects to mitigate against any gender stereotyping in later career choices.

In relation to career guidance information, we support the position that advice should be gender neutral, but we would ask that this proposal be taken further to encompass a review that better solutions be available for improved career guidance whether by additional training for counsellors, pooling of resources so that quality of support is not school-specific, a regional/cluster approach with a service provided to several schools by multi-disciplinary experienced specialist teams, or other means to ensure that girls and boys are directed towards the best career guidance advice irrespective of their gender, and in a bid to diminish gender stereotyping in further education and career choices.

3.6 Recommendation No. 30

We wholeheartedly agree with the recommendation that the State provide funding and resources to strengthening the existing programme to encourage women into male-dominated careers such as STEM, including apprenticeships and likewise developing initiatives aimed at encouraging men into female-dominated careers.

We believe that this recommendation is critical in relation to school environments. At the 30% Club, we have worked with DCU to provide STEM internships for teachers so that they can understand the role of STEM in the workplace and then encourage pupils to appreciate the benefits of STEM subjects and having a STEM career. We believe that this programme, which is unique to Ireland, should be considered for State support so that it can become an essential part of the teacher training curriculum for all our teachers, who play such a critical role in encouraging girls and boys in fully developing their interest and capability in STEM related subjects.

Likewise, we think it is very important to encourage men into what are now female-dominated careers such as teaching and the caring professions. One of the challenges in terms of establishing gender balance across all areas of society is that certain jobs and roles are designated or considered as 'women's work' which in turn generally leads to lower pay levels in these professions.

3.7 Recommendation No. 32

Gender pay gap reporting is a useful mechanism by which companies can bring a greater focus to the drivers of the gap and the actions that are needed to address it. However, as we have seen in other countries, gender pay gap is rarely linked to unequal pay but instead is a function of unequal representation, particularly at senior levels in organisations. For some industries, based on current structural imbalances, decreases may be achieved, but total eradication of the gap may not be possible in the short or even medium term, irrespective of efforts made. Therefore, we do not believe that it is realistic to set blunt targets in terms of reducing the hourly gender pay gap to 9% by 2025 and to 4% by 2030, but we do actively encourage continued focus on the need to publish not just the gap, but action plans and progress. This requirement will ensure that the focus of the conversation continues to be a business issue considered at the boardroom table. Companies reporting their gender pay gap with a narrative explaining why this gender pay gap has arisen will encourage behaviour which will ultimately result in the gender pay gap being narrowed and hopefully eliminated at some point into the future. Again, we believe that we need to give companies and organisations an opportunity to explain the position and to address their own gender pay gap before including targets in legislation which would be counterproductive and further add to the confusion about exactly the differential that the gender pay gap is designed to measure.

3.8 Recommendation No. 33

We do believe that the Gender Pay Gap Information Bill should be enacted and implemented without delay as proposed. We understand that the regulations are about to be published and we look forward to working with our supporter organisations as they deliver on this requirement.

3.9 Recommendation No. 42

As employers we recognise the value of encompassing a complete approach when we focus on Diversity and Inclusion matters. However, the topic of gender equality is not a minority issue and as such needs specific focus in terms of social, governmental, and business actions – it also provides an opportunity to focus on ALL women. This need for an holistic approach focuses equally on education, social welfare, enterprise and jobs, employment legislation etc., and until such time as women are no longer disadvantaged in their role within society, within the workplace and as decision-makers at the most senior tables, we would support the application of resources driving cross government co-ordination of actions to improve gender equality issues in a more cohesive and effective way.

Renewed thanks for inviting us to make a submission to the Committee. As stated in our covering letter, we would be very pleased to attend at a committee hearing to discuss these matters further.

30% Club Ireland
11 May 2022