

Equal Pay for Equal Work

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Abstract

This Research Paper focuses on the Law that prevails with respect to “*Equal pay for Equal Work*”. The Equal Remuneration Act of 1976 provides for equal pay for men and women for their equal work. The paper will also highlight Constitutional as well as the International Perspective and will cover Article 14 read with Article 39 of the Indian Constitution Act. International Trends with respect to Equal pay are covered and Effective and Promising Actions will be discussed for reducing the gender pay gap. This Research Paper will be concluded by the decided case laws for equal pay irrespective of gender.

Keywords- Constitutional Perspective, Equal Payment, Equal Remuneration, Indian Constitution Act, International Perspective, International Trends

1. Introduction

What are the things that human beings desire after the primary needs such as food and shelter? Every human being desires social security. India is a welfare state, and in a welfare state, an employee who is occupied in an activity cannot be paid less than the other employee who is occupied in a similar activity and is performing the same share of responsibilities. According to the Apex Court of India, it was held that our nation has been a signatory party of Article 7 of ICESCR (International Covenant on Economics, Social and Cultural Rights) for the past 38 years. It was said by the bench that any activity where any two people are performing the same task but are paid differently constitutes an act of exploitation and it shall not be entertained. In India, a major part of the population is under the poverty line, and they accept whatever wages are given to them even if it is less than the minimum wage as per the guidelines issued by the government. Underprivileged people have pressure on them to send their children to school, provide them with education, and be able to afford daily bread for their family, in this cultural arrangement it has become difficult to survive and this forces them to be a part of the unfair culture of unequal pay for equal work.

The Pay Gap is an issue that has become a topic of national concern due to the rising cases of discriminatory wages. We the people as a welfare and democratic institution, lack in the implementation of a transparent equal pay policy.

Payment of wages to female workers is very low as compared to the male workers in the same occupation and is one of the prevalent unfair labour practices in most countries. Such widespread unfair labour practices could not escape the notice of the International Labour

Organizations (ILO) were set up in Geneva in 1919 for promoting world peace by formulating International Labour Standards for its member countries. The International Labour Organizations (ILO) adopted Equal Remuneration for men and women workers for work of equal value, without discrimination based on sex as its fundamental principle included in the Constitution.

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1.1 Aim and Objective of the Paper

The paper aims to understand that there should be Equal Pay for Equal Work. This paper talks about payment for equal remuneration to both male and female workers for equal work and the prevention of discrimination, on the grounds of sex, against women in the matter of employment and the matters connected therein incidental too.

1.2 Scheme of the Paper

The paper is divided into Six Parts.

The First Part talks about the Introduction.

The Second Part talks about the Constitutional and International Perspectives.

The Third part talks about International Trend for “*Equal Pay for Equal Work*”.

The Fourth Part talks about the Remedies for Reducing the Gender Pay Gap.

The Fifth Part talks about the Landmark Judgements regarding equal pay.

The Sixth Part is the Conclusion of the paper.

1.3 Methodology Used

The research methodology used for the present paper is a traditional doctrinal research method. As most of the information was sought from the available literature by referring to books, articles, journals, websites, etc.

2. The Doctrine of “*Equal pay for Equal Work*”

The doctrine of “*Equal Pay for Equal Work*” states that every individual should be entitled to equal remuneration when they are doing the same work, irrespective of caste, sex, and religion. To ensure that there is no discrimination between any individual. This legal principle “*Equal Pay for Equal Work*” is very well recognized in India.

Legislations are there which mention about the same-

The Constitution of India refers to this doctrine under Article 39 which is to be read with Article 14 of The Constitution, Furthermore, there is an issue that relates to labour rights. An Act under the Labour Law that is- “*The Equal Remuneration Act, 1976*” provides for equal pay for equal work for both men and women workers, to avoid any sort of discrimination on the grounds of sex.

This principle is also identified on an International Platform. *International Covenant on Economic, Social and Cultural Rights (ICESCR)*, *the European Social Charter African Charter on Human and Peoples’ Rights*, *the Constitution of the International Labour Organization* also focus on the same policy. The factor of equality is an important element and signifies that women have the freedom to be themselves and are free to develop their capabilities without any restrictions set by stereotypes or rigid gender roles.

2.1 Constitutional Perspective

The Legal Principle of “*Equal Pay for Equal Work*” is mentioned under The Constitution of India under Part IV Article 39(d). It states that the “*State should direct its policy towards securing the objective that there is an equal remuneration for both men and women*”. It indicates that two people holding identical or similar posts or

ranks should not be treated differently based on gender when all the circumstances and considerations are similar.

In the case of *Randhir Singh vs. UOI*², it was held by the Supreme Court that the principle of “equal pay for equal work” though not a Fundamental Right is certainly a constitutional goal and therefore capable of enforcement through constitutional remedies under Article 32 of the Indian Constitution. The doctrine “equal pay for equal work” applies to the persons employed on a daily wage basis. Daily wages are entitled to the same wages as other permanent employees in the department employed to do the identical work. In this case³ the court also held that this principle can only be invoked if there is similarity like the nature of the job and it carries the same qualification otherwise it cannot be said to qualify the doctrine.

This doctrine tries to balance the rights of individuals and tries to promote respect, equity between them. The Preamble of the Constitution seeks to achieve and provide social, economic, and political justice to all the citizens of the country.

Article 14 guarantees equality within the Indian Territory and Article 15 prohibits discrimination on the grounds of sex, religion, caste, etc. Therefore, the Indian Constitution treats every citizen equally and provides them with equal rights.

2.2 The Equal Remuneration Act, 1976

Under the Constitution of India, an ordinance was promulgated on 26th September 1975 which is known as the Equal Remuneration Ordinance, 1975. It was converted into an Act in 1976, the Equal remuneration Act⁴. Before this Act, struggles for equal rights and wages were faced by women. This Act provides provisions against discrimination in the recruitment and promotion of men and women⁵. The same decision was also given in the case of *Dharwad District P.W.D. Literate Daily Wage Employees Association and others v. State of Karnataka and another*⁶.

Section 5 of this Act mentions “that there shall be no discrimination while appointing men and women for identical work” The Act further establishes an Advisory Committee to increase the employment opportunity for women and also have the power to decide on the related matters. It also provides for the maintenance of registers or any other document to avoid any unfair practices. The main objective of this entire legislation is to provide equal pay or wages to an individual.

2.3 International Perspective

The concept of equal pay has not only a domestic concern but also has a worldwide concern and so has been discussed on the International platform through various charters and conventions. Convention Number 100 which is quoted as the Equal Remuneration Convention, 1951 it clearly says that wages shall be equal for the works of similar or identical work without any discrimination among individuals⁷. *The International Covenant on Economic, Social and Cultural Rights (ICESCR)* which replicate the equal right of men and women to the enjoyment of all human rights⁸ mentions that the State Parties to the Covenant shall provide basic rights

² (1982) LLJ 344

³ Deb Narayan Shyam v. State of West Bengal, (2005) 2 SCC 286

⁴ S.N Mishra, Labour and Industrial Laws (28th Edition, Central Law Publication 2018)

⁵ Equal Remuneration Act, 1976: Rules and Regulations

⁶ (1991) II LLJ 328 (SC)

⁷ Equal Remuneration Convention, 1951, International Labour Office

⁸ International Covenant on Economic, Social, and Cultural Rights

to the people concerning the equal remuneration for equal work and women shall not be treated inferior to men. The same has been provided by the European Social Charter under Article 4⁹.

3. International Trend concerning “Equal Pay for Equal Work”

3.1 United Kingdom

The United Kingdom Equality Act 2010 is referred for the “Equal Pay for Equal Work”. According, to Section 78 of the Equality Act 2010¹⁰, amended by the Equality Act 2010 (Gender Pay Gap Information) Regulation 2017, came into force in April 2017 which governs how the large private and voluntary sector employers which are defined as the those with 250 or more employees report on 5th April each year and publish information relating to their gender pay gaps.

According, to Section 78 of the Equality Act 2010, for the beginning of Financial Years or after 6th April, employers, must publish-

- There are overall figures for relevant employees of gender pay. (It is calculated by using both the mean and median average hourly pay rates)
- The men and women proportion in each of four pay bands, based on the employer’s overall pay range.
- Information on the employer’s gender bonus gap. (That is the difference between men’s and women’s mean and median bonus over 12 months).
- The male and female employee proportion who received a bonus in the same 12 month period.

The Bill¹¹ looks towards extending the coverage given under the Equality Act 2010 to a higher percentage of the workforce and proposes various amendments to Section 78 of the Equality Act 2010. This would give the scope of employers’ gender pay gap reporting to:

- It requires reporting to include differences in the pay of employees of different ethnic origins and certain additional information is required, as well as additional information on the mean and median average hourly pay earned by part-time and full-time employees and for employees of different ethnic origins.
- To lower the threshold of employees for organizations that are required to report from 250 to 100 or more employees.
- Requirement of employers to publish a document setting out what course of action they propose to take to reduce any differences in pay between male and female employees and employees of different ethnic origins. Sub-section 8 of the Bill also sets out elements that regulations may prescribe from part of such action plans.

If the bill becomes a law, then there will be increased gender pay gap reporting obligations on employers, which may come with added financial implications as a result of employers seeking to comply with the Bill and also as a result of new court and Employment Tribunal cases being brought by employees concerning their pay. The Bill would also provide the employers with the Equality and Human Rights Commission a discretionary power to enforce employees’ Right to Know, which could also have financial implications on employers.

⁹ European Social Charter

¹⁰ The Equal Act 2010 (Chapter 3)

¹¹ The Equal Act 2010 (Gender Pay Information) Regulations 2017

3.2 Canada

Pay Transparency Act, 2018¹² of Ontario had come into force on 1st January 2019. The Act Pay Transparency Act, 2018 elevates requirements on employers to promote the equality of compensation between men and women, and to increase the transparency of information regarding compensation and workforce composition.

In developing the legislation, Ontario looked to other jurisdictions which include the UK, Australia, and Germany, and the Act puts the province ahead of other governments who are stepping up efforts to close the gap.

The Following requirements are as follows:

- In all publicly advertised job postings, a salary rate or range must be stated.
- Past Compensation should not be asked from the job candidates.
- Employees who discuss or disclose compensation no reprisals may be made against them.
- Employers with 100 or more employees and prescribed employers (that are prescribed by forthcoming regulations to the Act) must track and annually report compensation gaps based on gender and other prescribed characteristics (in “pay transparency reports”).
- Such employers will need to post their pay transparency report online, or in at least one conspicuous place, in every workplace of the employer.
- The province will also publish pay transparency reports, which may be done online.

According, to Article 4 of the Pay Transparency Act, 2018 it talks about the-
The purpose of the Act is to-

- Promote gender equality and equal opportunity in the workplace and employment, which also includes equality in compensation between men and women, by increasing transparency of pay and workforce composition.
- Promote equal participation of women in the workplace and increase the disclosure of inequities with respect to employment and compensation for women may experience in the workplace.
- Promote the elimination of gender in hiring, promotion, employment status, and pay practices amongst employers.
- Support compensation and equal opportunity and support open dialogue and workplace consultation between employer and employees.
- Support workplace for women and for other groups, and economic growth through the advancement of equity in employment.

In Canada, all jurisdictions have equal pay legislation and certain jurisdictions also have pay equity legislation. Law on equal pay requires equal pay for equal or similar work. Employers are required to pay men and women equally when they are doing the same work that is performed in the same establishment, requiring substantially the same skill, effort, and responsibility and performed under similar working conditions. Law on Pay equity requires equal pay for work of equal value, regardless of whether or not it is similar, assessed by reviewing the skill, effort, responsibility, and working conditions of the jobs. Employers are required to pay equally to both female and male employees if they are performing the same work of equal value in the same establishment, even if they do entirely different jobs. In Ontario and Quebec, legislation on pay equity applies to all employers except to private sector employers with fewer than 10 employees. As mentioned in the federal pay equity system is currently a complaints-based model administered by the Canadian Human Rights Commission.

¹² Pay Transparency Act, 2018, S.O. 2018, c.5- Bill 3

3.3 France

France has enacted legislation that is designed to create pay parity. “*Equal Pay for Equal Work*”¹³ became part of French law in 1972 which was enacted by an amendment to the French Labour Code. Further law was passed in 1983 that required companies with more than 50 employees to carry out surveys of comparative salary between men and women.

In 2001, a similar law was again passed, now this time it was with regard to the potential criminal sanctions for senior management officials at companies that did not carry out gender surveys or discussions on how the pay gap to be addressed.

A measure has been discussed in France recently that would put pressure on employers to close their ‘unfair’ gender pay gap.12 software would be installed on company payroll systems and if gaps exist, companies could be fined up to 1% of their total wage bill.

4. Remedies for Reducing Gender Pay

4.1 Effective Actions

1. Include multiple women in shortlists for recruitment and promotions

While preparing a shortlist of qualified candidates, it is required to have more than one woman. Shortlisting with only one woman will not increase the chance of a woman being selected¹⁴.

2. Use skill-based assessment tasks in recruitment

Rather than relying only on interviews, candidates should be asked to perform tasks in the role they are applying for. Candidates should use their performance on those tasks to assess which are suitable for their role. Standardize the tasks and how they are scored to ensure fairness across candidates¹⁵.

3. Use Structured interviews for recruitment and promotion

Interviews that are structured and unstructured have both strengths and weaknesses.

There are unstructured interviews that are more likely to allow unfair bias to creep in and influence decisions.

Use structured interviews are:

- Exactly the same questions to all candidates in a predetermined format and order.
- Responses are graded using pre-specified, standardized criteria because this makes the responses comparable and reduces the impact of unconscious bias¹⁶.

¹³ Pay equity across the globe by: Talene M. Carter, Martyn Redfern and Lewis Gayle

¹⁴ Johnson, S.K., Hekman, D.R., & Chan, E.T. (2016). If there’s only one woman in your candidate pool, there’s statistically no chance she’ll be hired. Harvard Business Review, 26(04).

¹⁵ Cabrera, M.A.M., & Nguyen, N.T. (2001). Situational judgment tests: A review of practice and constructs assessed. International Journal of Selection and Assessment, 9(1-2), 103-113

¹⁶ Levashina.J., Hartwell, C.J., Morgeson, F.P. & Campion, M.A. (2014). The structured employment interview: Narrative and quantitative review of the research literature. Personnel Psychology, 67(1), 241-293; Oh, I., Postlethwaite, B.E. & Schmidt, F.L. (2013). Rethinking the validity of the interviews for employment decision making: Implications of recent developments in meta-analysis (Chapter 12, pp. 297-329). In D.J. Svyantek & K. Mahoney (Eds.), Received wisdom, kernels of truth, and boundary conditions in organizational studies.

4. Encourage salary negotiations by showing salary ranges

Women are less likely to negotiate their pay¹⁷. This is partly because women are discouraged they are not sure about what is a reasonable offer. The salary range should be clearly communicated on offer for a role to encourage women to negotiate their salary. This helps the applicant know what they can reasonably expect¹⁸.

In addition, if the salary for a role is negotiable, employers should state this clearly as this can also encourage women to negotiate¹⁹. If women negotiate their salaries more, they will end up with salaries that more closely match the salaries of men.

5. Introduce transparency to promotion, pay and reward processed

Transparency means being open about processes, policies, and criteria for decision-making. This means employees are clear about what is involved, and that managers understand that their decisions need to be objective and evidence-based because those decisions can be reviewed by others. Introducing transparency to promotion, pay, and reward processes can reduce pay inequalities²⁰.

6. Appoint diversity managers and/or diversity task forces

Diversity managers and task forces monitor talent management processes (such as recruitment or promotions) and diversity within the organization. They can reduce biased decisions in recruitment and promotion because people who make decisions know that their decision may be reviewed. This accountability can improve the representation of women in your organization²¹.

Diversity managers should have:

- Senior/executive role within the organization.
- Visibility of internal data.
- Been in the position to ask for more information on why decisions were made.
- Been empowered to develop and implement diversity strategies and policies.

4.2 Promising Actions

1. Improve workplace flexibility for men and women

- To advertise and offer jobs having flexible working hours/options, such as part-time work, remote working, job sharing, or compressed hours.
- People should be allowed to work flexibly whenever possible.

2. Encourage the uptake of Shared Parental Leave

¹⁷ Leibbrandt, A., & List, J.A. (2014). Do women avoid salary negotiations? Evidence from a large-scale natural field experiment. *Management Science*, 61(9), 2016-2024.

¹⁸ Mazei, J., Hümeier, J., Freund, P.A., Stuhlmacher, A.F., Bilke, L., & Hertel, G. (2015). A meta-analysis on gender differences in negotiation outcomes and their moderators. *Psychological Bulletin*, 141(1), 85.

¹⁹ Leibbrandt, A., & List, J.A. (2014). Do women avoid salary negotiations? Evidence from a large-scale field experiment. *Management Science*, 61(9), 2016-2024.

²⁰ Castilla, E.J. (2015). Accounting for the gap: A firm study manipulating organizational accountability and transparency in the pay decisions. *Organization Science*, 26(2), 311-333.

²¹ Dobbin, F., & Kalev, A. (2016). Why diversity programs fail. *Harvard Business Review*, 94(7/8), 52-60.

- The gender pay gap has dramatically widened after women have their children, this can be reduced if both men and women are equally able to share childcare. Pay and Shared Parental Leave enable working parents to share up to 50 weeks of leave and up to 27 weeks of pay in their child's first year.
- Shared Parental offers to enhance Pay at the same level as enhanced maternity pay.
- To encourage both men and women to take up Shared Parental Leave²².

For Example-

- To inform men/fathers of the children that it's their Legal Right to request Shared Parental Leave.
- To provide parents guidance and personal support to understand the scheme to the future parents.

5. Landmark Case Laws

- **Dharwad District P.W.D. Literate Daily Wage Employees Association & Others vs. State of Karnataka & Another**²³

In this case, the Equal Remuneration Act, 1976 was enacted for providing equality of pay for equal work between men and women which is a part of the principle "*Equal Pay for Equal Work*". The daily rated and monthly rated employees in the State of Karnataka are, therefore, entitled to pay regular employees. Therefore, the Government must pay salary to such workmen at the rates equivalent to the minimum pay in the pay scale of the regularly employed workers.

- **M/S. Mackinnon Mackenzie & Co. Ltd. vs. Andrey D'Costa & Another**²⁴

In this case, it was urged on behalf of the management that the difference between the remuneration of male stenographers and confidential women stenographers was on account of a settlement that arrived and after proper negotiation. It was held that in view of Section 3 of the Act the provision of the Act shall have effect notwithstanding anything inconsistent therewith contained in any other law or in the terms of any award, agreement, or contract of service whether made before or after the commencement of the Act or in any instrument having effect under any law for the time being in force. Therefore, the settlement must yield to the provision of the Act.

- **Budhan Choudhary vs. State of Bihar**²⁵

In this case, the Supreme Court held, that the concept of equality does not require that the law treat all individuals equally, classification made between individuals must be reasonable. Hence, the classification must be grounded on two rationales-

- Firstly, on an intelligible differentia which distinguishes people of one group from other groups.
- Secondly, such differentia must have a rational relation to the object sought to be achieved.

Although, the facts of the case itself did not deal with the idea of "*Equal Pay for Equal Work*", however, the principles laid down have been significantly relied on by the courts in the cases involving such issues.

²² Sharedparentalleave.campagin.gov.uk/

²³ (1991) II L.L.J. 328 (SC)

²⁴ (1987) I L.L.J. 536 (SC)

²⁵ 1955 AIR 191

- **Kishori Mohanlal Bakshi vs. Union of India**²⁶

In this case, guidelines for “*Equal Pay for Equal Work*” were considered. The Supreme Court announced that it is unequipped for being implemented in the court of law. This case got due acknowledgment in 1987 through the case of Mackinnon Mackenzie, the issue, in this case, was of equivalent compensation for both male and female stenographers.

The court decided in favor of the female stenographer and was supportive of the principle “*Equal Pay for Equal Work*”. Misinterpretations were there for the said principle as it was held in the case **N.S. Nakara vs. Union of India**²⁷ that the court was in the opinion that Article 38(d) of the Indian Constitution that the state will endeavor to limit the imbalances in pay and attempt to take out disparities in status, offices, and openings among people as well as among gatherings of individuals living in various territories with various livelihood.

- **Randhir Singh vs. Union of India**²⁸

In case it was held by the Supreme Court that the principle of “*equal pay for equal work*” though not a Fundamental Right is certainly a constitutional goal and therefore capable of enforcement through constitutional remedies under Article 32 of the Indian Constitution. The doctrine “*equal pay for equal work*” is applicable to the persons employed on a daily wage basis. Daily wages are entitled to the same wages as other permanent employees in the department employed to do the identical work. In this case²⁹ the court also held that this principle can only be invoked if there is a similarity in the nature of the job and it carries the same qualification otherwise it cannot be said to qualify the doctrine.

This doctrine tries to balance the rights of individuals and tries to promote respect, equity between them. The Preamble of the Constitution seeks to achieve and provide social, economic, and political justice to all the citizens of the country.

6. Conclusion

It can be said that the issue of “*Equal Pay for Equal Work*” stems from the idea of discrimination rooted in society. There are many reasons for such discrimination which affect a person economically in equally multifarious ways but in different quantum.

Our Constitution embraces the idea, however, the limited understanding of various aspects related such as gender, race, caste, etc. can become an impediment to its aim. When legislative actions are looked upon, it is realized that the strong moves were taken by the government, still, the initial aim of brig parity remains partially realized. This is to say that, not only do we have to achieve the aims actually set out in our statutes to root out discrimination against women, and also expand the aim towards more deep-seated problematic aspects in our society.

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²⁶ 1962 AIR (SC) 1139

²⁷ 1983 AIR 130

²⁸ Supra Note 1

²⁹ Supra Note 2

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