

Study on Equal Pay for Work of Equal Value

Part I A Paper on the subject of Equal Pay for Work of Equal Value prepared by the Equal Opportunities Commission

Part II Feasibility Study on Equal Pay for Work of Equal Value (1997-1998)

Part III Consultant's Report – Consultancy Study on Equal Pay for Work of Equal Value in the Public Sector (2004)

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Introduction

1. The Equal Opportunities Commission (EOC) is a statutory body established under the Sex Discrimination Ordinance (SDO) in 1996 to implement the SDO, Disability Discrimination Ordinance (DDO) and Family Status Discrimination Ordinance. The Commission works towards the elimination of discrimination on the grounds of gender, disability and family status and to promote equality of opportunities between men and women, between persons with a disability and persons without a disability and irrespective of family status. It also aims to create a better understanding of discrimination and equality through research and public education.

2. The Commission was asked by the Home Affairs Bureau (HAB) to include the promotion of the principle of Equal Pay for Work of Equal Value (EPEV) in the Commission's portfolio. Apart from including the principle of EPEV in the Code of Practice on Employment under the SDO and commissioning the Feasibility Study on EPEV in 1997, the Commission was granted a sum of \$2 million from the Government in January 2001 to carry out its work on EPEV.

Concept of EPEV

3. EPEV is not the same as 'Equal Pay for Equal Work' (EPEW). EPEW was a concept that was first developed at the beginning of the 20th century to address the issue that women, as a group, were paid less than men for doing the same job. Such treatment is made unlawful under the Sex Discrimination Ordinance (SDO) which has been operative since 1996.

4. EPEV, on the other hand, is a concept which deals with redressing discrimination which arises when women and men are segregated into different jobs, but the jobs done mainly by men have a higher status and more highly rewarded than those done by women, even though they may require similar credentials and similar work experience and have comparable value and may not be affected by market forces at play. The concept of EPEV requires that all jobs be paid on the basis of their 'values', as determined by 'job evaluations' which quantify attributes of the jobs (such

as skills, effort, responsibility, working conditions as in the Canadian job evaluation model.)

EPEV in Hong Kong

5. The principle of EPEV has been recognized in equal pay legislation in some major industrialized countries overseas, including Canada, the United Kingdom and Australia. Although there is no specific equal pay legislation in Hong Kong, it should be noted that the Government is bound by a number of international human right instruments to implement the principle of EPEV.

6. The International Covenant on Economics, Social and Cultural Rights (ICESCR), now enshrined in Article 39 of the Basic Law, was extended to Hong Kong in 1976. Article 7(a)(1) of ICESCR recognizes the right to '*Fair wages and equal remuneration of work of equal value without distinction of any kind, in particular women being guaranteed conditions of work not inferior to those enjoyed by men, with equal pay for equal value of work.*' In 1996, the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) was extended to Hong Kong and its Article 11(1)(d) provides for the '*right to equal remuneration, including benefits, and to equal treatment in respect of work of equal value, as well as equality of treatment in the evaluation of the quality of work.*' The Government is also required to implement this principle under its obligations to the International Labour Organization (ILO) since its adoption of the ILO Declaration on Fundamental Principles and Rights at Work in June 1998.

7. The Government takes the view that the provisions in the SDO already cover the concept of EPEV and are adequate to address such type of discrimination.

The Feasibility Study in 1997-1999

8. In Hong Kong, there has been a gradual increase in the number of women joining the work force. However, gender-related occupational segregation and pay gaps do exist. The persistent gender pay gap may be attributable to a number of factors, such as occupational segregation, socialization, under-valuation of so-called 'female jobs', market forces and discrimination. The EOC considered that such persistent gender pay gap warranted concern and investigation to identify the underlying causes.

9. The EOC commissioned the Feasibility Study in 1997 and the draft Final Report was submitted to EOC Members in mid 1999.

10. The research team of the Feasibility Study recommended assuasive approach towards EPEV rather than making EPEV mandatory through legislation. The rationale for this was that: job evaluation is inherently subjective; recent trends in pay system design are moving away from compensation based on narrowly defined jobs to compensation based on individual characteristics; Hong Kong has a significantly smaller gender wage gap than the advanced economies which have practised equal value for decades; and the advanced countries such as the European Union and the UK that have practised equal value, are moving away from it. Another important point is that all the firms and the majority of unions which were interviewed by the research team were clearly against the compulsory introduction of EPEV. They were apprehensive of the costs and red tape that the implementation of such concept would bring.

11. Although the research team did not recommend compulsory introduction of EPEV, it did make some preliminary suggestions to address the pay differentials between men and women. These included voluntary practice of equal value by large organizations, while employment discrimination could be tackled by current equal employment opportunities legislation. Discriminatory policies and stereotypical socialization and attitudes could be changed through education.

12. It should be noted, however, that even without laws to make EPEV 'compulsory', if the view that EPEV is covered by the existing provisions of the SDO stands, the implementation of EPEV by employers is already required. Otherwise they will fall foul of the sex discrimination law.

Formation of Task Force on EPEV

13. The EOC held a conference on EPEV on 18 March 2000, with a view to introducing the principle to the public and bringing it into the public arena for discussion. At a meeting of the LegCo Panel on Manpower held on 25 May 2000, there was deliberation on the subject by the Panel Members. They welcomed the establishment of a Task Force on EPEV by the EOC, with representatives from the Civil Services Bureau (CSB), the Joint Secretariat for the Advisory Bodies on Civil Service and Judicial Salaries and Conditions, Home Affairs Bureau (HAB), the then Health and Welfare Bureau (*now the Health Welfare and Food Bureau (HWFB)*) and the Labour Department. The EOC also invited Professor Kenneth Law and Ms. Carole Petersen,

academics from the Hong Kong University of Science and Technology and the University of Hong Kong respectively, to join the Task Force, with an EOC Member served as the Convenor of the Task Force.

14. At the same LegCo Panel Meeting, the EOC explained to Panel Members that the work of the Task Force would be divided into three phases. The first phase would involve an examination of the situation in the public sector; the second phase would involve an examination of companies in the private sector with over 200 employees; and the third phase would involve an examination of smaller companies. It was anticipated that benchmarks for assessing the value of jobs would have been developed by the time the third phase was launched.

Consultancy Study

15. Following the EOC's presentation to the LegCo Panel on Manpower, the Task Force decided to proceed to the Phase One Study (the Study) in which two public sector employers, (i.e. the Civil Service and the Hospital Authority), were selected. The Civil Service was selected because the government is the largest employer in the public sector, and the Hospital Authority was selected because it is one of the largest employers of women in the public sector when compared with other government departments and statutory bodies. The Study commenced in September 2001 with the collaboration of Ms. Carole Cameron, (a pay equity specialist seconded from Canada), Mr. Patrick Maule (the lead Consultant of the Study) and Dr. Thomas Leung (the local Consultant). The Study also aims to build capacity and expertise in EPEV, to raise public awareness and to put EPEV work practices into place. The Study is a research-oriented endeavour to see whether there is any pay inequity on the basis of gender in the context of EPEV. It is not an investigative study based on specific complaints lodged with the EOC. Should the latter be the case, a more detailed study would need to be undertaken.

16. Due to time and resources constraints, only 49 gender-dominated jobs out of 392 male- or female-dominated jobs identified within the Civil Service and 27 out of 156 gender-dominated jobs identified in the Hospital Authority were selected for review and evaluation.

17. The Study adopted a Canadian job evaluation model which used four job-related factors to determine the value of the jobs: 'skill', 'effort', 'responsibility' and 'working conditions'. For Civil Service jobs, only basic salary was measured as the Consultants believed that exclusion of allowances should have no significant

bearing on the results. However, the Hospital Authority jobs evaluation did include job-related allowances.

18. The Study was conducted by interviewing employees who had to fill in a Job Analysis Questionnaire, which was designed to elicit information on 12 job-related factors falling within the four major groups of job-related factors referred to above. The Consultants then used the information to evaluate each job according to a Job Evaluation Plan. When the study team evaluated a job, they decided which degree of a pre-determined point value should be accorded for each job factor. The sum of point values of all selected degrees of a job was the final evaluation score of the job value for the job under evaluation.

19. The results of the data were plotted onto charts to assist in drawing conclusions. The evaluation scores were plotted against their salaries for each of the separate jobs and a 'line-of-best-fit' was drawn between all the male jobs and separately for all the female jobs. If the two lines-of-best-fit broadly coincided, it indicated that there was no discrimination against either sex. However, if the lines were clearly separated, then there was a prima facie case that some discrimination had unwittingly occurred, with the extent of discrimination being reflected by the vertical distance between the two lines.

Initial Comments of Task Force Members and ex-EOC Members

20. The Task Force members did not reach consensus on the interpretation of data or the future steps to be taken. Members' divergent views were mainly concerned with the methodology adopted in the Study, the interpretation of data and whether the findings of the Study could support the recommendations made. Some members also commented that as the female and male regression lines crossover about the middle of the total job evaluation points, they did not see the problem of 'sex discrimination' or pay discrimination based on gender in general. Despite the concerns and divided views expressed by some Task Force members, an embargoed draft Report was submitted for EOC Members' consideration in June 2003.

21. The then EOC Members commented that the concept of EPEV was very complex and the subject was controversial, and it would be necessary to look into the background before concluding that pay differentials were due to gender discrimination. They considered that more work should be done in identifying the issues and practicability of implementing EPEV and in mapping out a strategy for implementation. They also opined that, in view of the complexity of the subject, the embargoed Report

should not be made public at that point of time.

Resumption of Task Force Meeting

22. The EPEV Task Force resumed meeting in March 2004. Some Task Force members reiterated their disagreement with the methodology of the Study, some of the findings and the recommendations in the embargoed draft Report; others expressed strong reservations about the findings and recommendations made in the draft Report which were derived from the Study. In view of the fact that no consensus could be reached by the Task Force, the Task Force decided that the Study Report should not be positioned as the Task Force Report. Instead, they proposed that the draft embargoed Report be positioned as the Consultant's Report subject to the lead Consultant's agreement which was later obtained. The proposal allowed the Task Force members and the EOC to present their respective views and comments on the Consultant's Report.

The Consultant's Report

23. The Consultant's Report which was available in May 2004 made the following major recommendations:

- Hong Kong needs more clarity and guidelines on pay equity. It is recommended that the Government should reconsider its position on the need to draft legislation in order to provide clarity to employers and employees in the implementation of EPEV. Alternatively, the Government should consider amending the SDO to clearly provide for the principle of EPEV.
- In view of the fact that pay ranges and scales vary significantly from job to job and produce anomalies which could be interpreted as discriminatory, the Government should re-examine its pay structure.
- The Hospital Authority (HA) pay system has inherited several aspects of the Civil Service (CS) pay system, in particular the emphasis on academic qualifications in determining pay scales while ignoring other skills and relevant job factors. The Hospital Authority should therefore review the whole pay system.
- The EOC should strengthen public education and training for human resources professionals on the concept of EPEV.
- The EOC should work towards the development of guidelines on the implementation of EPEV to supplement the existing Code of Practice (CoP) on Employment under the SDO.

EPEV Task Force Members' Views on the Revised Consultant's Report

24. Members of the Task Force have divided views on the Consultant's Report, which are appended intact to the Report.

25. Notwithstanding the different views of the Task Force members, the following has been agreed upon by the Task Force:

- Phases two and three of the Study should not be pursued, as it is not realistic to expect private sector and the small and medium enterprises (SMEs) to have clear delineation of job groups. The chances of enlisting cooperation and support from the private sector and SMEs to participate are slim and the EOC has no mandate to require them to cooperate.
- Public education should be strengthened to remove stereotyping and to promote better understanding of the EPEV concept. This could be done in collaboration with concerned stakeholder groups and the Women's Commission.
- The Code of Practice on Employment under the SDO should be reviewed in order to provide more specific guidelines and illustrations to explain the complicated concept of EPEV.

Ways Forward Proposed by the 2004 EOC Board

26. Taking note of the Consultant's recommendations and the views of the Task Force members, Members of the EOC agreed in meetings held in late 2004 the following ways forward:

- ♦ strengthening public education and training to remove gender stereotyping;
- ♦ encouraging and supporting the tertiary institutes to work in collaboration with stakeholder groups to conduct baseline survey on public understanding of EPEV; and
- ♦ encouraging employers to introduce family-friendly employment policies and practices.

2005 EOC Board's Comments on the Consultant's Report

27. In early 2005, (following another change in chairpersonship), further technical questions on data analysis were raised by EOC Members. The lead Consultant's

answer to the technical questions and opinion of an independent expert were also obtained. In the meantime, a completely new EOC Board was appointed in May 2005 and a working group consisting of seven EOC Members was formed in December 2005 to take the subject forward.

28. Members noted that the statistical analysis of the Consultant's Report shows that there are pay anomalies in both the Civil Service and the HA. In the case of the Civil Service, the findings reveal a number of anomalies when jobs are evaluated on the four-factor basis using the Canadian Model. The results show that women in the junior ranks are paid better than men but that women in the middle and senior ranks are paid less than men for work of equivalent value. (Annexes 7-9 of the embargoed draft Consultant's Report, and paragraphs 20-24 of Section III of the Consultant's Report refer.) Pay anomalies also exist between male dominated jobs. The family of Fireman to Fire Station Officers consistently fall below the male wage line revealing that they too could also be unfairly remunerated.

29. As for the HA jobs, the findings reveal that at the minimum of the pay range, female dominated positions are lower paid than the male at the junior level and at the senior level the opposite is true. At the mid point and to an even greater degree at the maximum of pay range, female jobs are above male jobs at the junior levels and below at the senior level. (Annexes 10-12 of the embargoed draft Consultant's Report, and paragraphs 33-39 and paragraph 42 of Section III of the Consultant's Report refer.)

30. The consultants also used statistical analysis to show the pay anomalies by constructing a line-of-best-fit (wage line) where it could be seen that many of the data points (i.e. job evaluation scores vs. existing salaries) derived from the job evaluations fall outside the wage line.

31. In an ideal situation, the data points should form a single cluster all appearing in the wage line (straight line). Since many of the data points fall outside the wage line, it means that the rate for those jobs are either too high or too low, given the pay rate for other jobs.

32. Although it is the Consultant's view that there are pay anomalies, they do not suggest systemic discrimination on the basis of gender, as there is no evidence to suggest that the salary structure or salary policy in either the Civil Service or HA create or perpetuate disadvantages for women only in respect of the jobs examined. As pay anomalies identified by the Consultant exists in both female and male dominated jobs, therefore, they are not biased on one single sex only.

33. It is also noted that the wage line constructed by the consultants may have technical questions or flaws. As pointed out in the Consultant's Report, a sampling technique was adopted for this exercise whereby 10% to 15% of jobs of either male or female dominance were taken through the evaluation process. However, it was difficult for the consultants to get an even spread of male or female dominated jobs throughout the different ranks and hence the selection of jobs was not entirely random. Moreover, in the case of the Hospital Authority, most of the jobs were chosen from one hospital only. Accordingly, a few abnormal jobs among a relatively small sample could have a notable effect on the overall results. However, this is only a research-oriented pilot study which is not for the purpose of investigation for rectifying pay inequities. Should investigation be the purpose, more jobs need to be analyzed to overcome this effect. In addition, the wage line constructed was meant to illustrate the pay anomalies but not for the purposes of rectifying such anomalies.

Insight from the Exercise

The application of EPEV

34. The results of the study only confirm that the subject of EPEV is a most complex one. Unlike Equal Pay for Equal Work, which principally compares apple to apple, and like with like, the concept of EPEV endeavours to compare orange to apple, an Engineer to an Accountant, and a Secretary to a Technician which can be hard to understand or conceptualize. Different job evaluation methods and the weightings applied to different job factors in the method used to determine job worth will impact on the final score and hence the pay for the job. Moreover, employees' jobs are no longer static in today's environment and even if clearly defined jobs exist, job evaluation is inherently subjective. Different incumbents in the job will be more or less skillful in describing their duties and explaining the more demanding aspects of their jobs. Different experts evaluating the same job could also give substantially different scores. Moreover, pay anomalies suggested by the current study will at most lead to a conclusion of whether there is pay discrimination, not necessarily gender discrimination in pay. This is understandable as this is only a first level study and further and detailed analysis is required to ascertain the real causes of the pay anomalies identified and whether the pay differential is caused by gender bias and otherwise the extent to which market forces such as supply and demand and recruitment difficulties have come to play which have impacted on the pay ranges.

Job segregation exists

35. Job segregation concerns the tendency for men and women to be employed in different occupations from each other across the entire spectrum of occupations. Traditionally, women are concentrated in jobs such as nurse, teacher and secretary whereas men are concentrated in jobs such as engineer, firefighter and law enforcement etc.

36. The Study revealed that there were 154 male-dominated jobs and 26 female-dominated jobs in the Civil Service entry rank jobs. When promotional ranks were included, the total number of male-dominated and female-dominated jobs increased to 341 and 51 respectively. Of the 341 male-dominated jobs, 203 jobs had 100% male incumbents. Of the 51 female-dominated jobs, 28 jobs were 100% female. On the other hand, there were 83 male-dominated jobs and 73 female-dominated jobs within the Hospital Authority. Of the male-dominated jobs, 50 jobs were 100% male. This confirms that traditional job segregation still exists in the public sector in Hong Kong and such phenomenon should be addressed.

Job evaluation focuses on job contents only

37. The campaign for EPEV in all countries is confronted with two common questions: the establishment of job comparisons, and finding of a realistic and yet effective procedure for promoting the principle of equality. For example, the “Value” of a job can be assessed from the point of view of work content (e.g. skill, responsibility, effort, working conditions, etc.), or from the point of view of the market (e.g. relative shortage of certain types of labours). The current study used the job evaluation approach adopted in Canada and assessed the “value” of the jobs studied from the point of view of work content only.

38. Unlike Canada, Hong Kong does not have any statutory provision which defines that the “value” of a job should be evaluated on the basis of job content only.¹ Moreover, employment practice worldwide has now moved towards a more competency-based salary determination, based more on the job holder’s actual performance and contribution (output) rather than the job content. Thus, the manner in

¹ Subsection 11(2) of the Canadian Human Rights Act stipulates: “In assessing the value of work performed by employees employed in the same establishment, the criterion to be applied is the composite of the skill, effort and responsibility required in the performance of the work and the conditions under which the work is performed.”

which equal value in terms of how performance is applied may need to be reconsidered.

Sources of salary discrimination

39. The sources of salary discrimination are many and complex. Thus, salary discrimination cannot be tackled effectively unless action is also taken simultaneously to identify and deal with all of its sources and the policy remedies are different. For example, are women paid less in a particular job even if they are equal to men in every way (in training, education, experience, hours worked etc.)? If so, then the gap is due to labour market discrimination. Such discrimination may be tackled by equal employment policies (which prohibits discrimination in hiring and promotion) or equal opportunity legislation.

40. Of course, even in the absence of labour market discrimination, women may get less pay because they have been provided with less education, training and so on and this part of the gap may be attributable to discriminatory socialization. Discriminatory socialization, which is the result of history and culture should be changed through education.

The practicability of introducing specific EPEV legislation

41. Introduction of specific EPEV legislation may well be an effective tool to combat wage inequality for some countries as it has the potential to address the salary gap in an across-the-board manner. However, whether it should be mandatory as a policy for all establishments, including small and medium enterprises (SME) that comprise more than 90% of the establishments in Hong Kong, to undertake is less certain.

42. Job evaluation, the instrument of implementing EPEV is not designed for small firms. Few SMEs in Hong Kong have clearly defined jobs and very few can afford a job evaluation. Further, job evaluation requires stable jobs and stable organisational structure which are no longer common for a highly competitive and fluid economy like Hong Kong.

43. Based on the Consultant's findings and analysis, the EOC makes the following major recommendations which are summarized below:

	Consultants recommendations	EOC Office/Task Group's recommendations	Remarks
1.	Consider legislating against EPEV	Not necessary for the time being (see Remarks).	<p>1. No evidence of EPEV discrimination in respect of the jobs examined in the Study.</p> <p>2. No EPEV discrimination complaint has so far been received by EOC office.</p> <p>3. Internal EOC complaint handling mechanism in place to handle such complaints.</p>
2.	Promote concept of EPEV through more public education	Supported.	Unlike Equal Pay for Equal Work, EPEV is a very complex subject.
3.	Improve existing CoP on Employment under the SDO to explain more clearly the concept EPEV	Supported.	EOC office will also make reference to salary determination policy of large corporations to develop some "Best Practice" to promote the concept.
4.		Address unequal pay for equal work. To initiate investigation into contraventions through "self-initiated investigation" .	This is a much more serious issue. Some female workers in certain occupations such as cleaners, property officers/estate attendants, manual labour in the catering industry are

	Consultants recommendations	EOC Office/Task Group's recommendations	Remarks
			seemingly underpaid compared with their male counterparts. The wage differential could be genuinely due to discriminatory factors on the ground of sex.
5.	In light of the pay anomalies identified, the salary structure in the Civil Service and the Hospital Authority to be re-examined in order to reflect a fairer situation of jobs enjoying similar salary scale with similar number of increments from starting to maximum salary point	Government to consider.	Government is currently conducting a comprehensive pay level review of the Civil Service.
6.	When higher academic qualifications are required for jobs, and can be demonstrated to be required in the way the jobs are undertaken, these changes should be acknowledged and reflected in the entry salaries.	Hospital Authority to consider.	The Consultant's stated that the phenomenon of higher academic qualifications not being reflected in the salary scale is most evident in the Nursing grade. Nurses have in the past few years been required to have higher educational requirements for their job. The stated recruiting practice at the time of data

	Consultants recommendations	EOC Office/Task Group's recommendations	Remarks
			collection was to exclusively engage nurses with degree qualifications, but this requirement had not yet been officially recognized or reflected in their salary scales. <i>[Paragraph 36 of Section III of the Consultant's Report refers.]</i>
7.	That Government's pay level review include the issues identified in this study and recommend the replacement of the salary setting system that overly emphasizes on academic qualifications.	Government to consider.	

Ways Forward

44. The Feasibility Study indicates that both the gender pay differential and the unexplained component of that differential (which may be attributed to employers' discrimination) have decreased rapidly from 1981 to 1996. Moreover, in comparison with other advanced economies (USA, Canada, UK, Australia, Japan, Singapore, Finland and Sweden), Hong Kong has the smallest gender wage gap between 1983-1999². The research team of the Feasibility Study does not recommend compulsory introduction of equal value in Hong Kong. Instead, the research team considers a suasive approach more appropriate and fruitful.

² According to World Bank Policy Research Working Paper 3256, April 2004 "*Globalization and Gender Wage Gap*", Hong Kong had a rating of 0.08 amongst the 13 High Income Countries with Japan at 0.33 being the highest.

45. On the other hand, the Consultant's Report states that 'Hong Kong needs more clarity and guidelines on pay equity and recommends that the Government reconsiders its position on the need to draft legislation in order to provide clarity to employers and employees in the implementation of Equal Pay for Work of Equal Value. Alternatively, the Government should consider amending the SDO to clearly provide for the principle of 'Equal Pay for Work of Equal Value'.

46. The EOC considers that in view of the fact that there is no evidence of EPEV discrimination in respect of the jobs examined in the Study, and taking into account the complexity of the issue, introducing new legislation on EPEV is not opportune for the time being. Instead, EOC will promote and implement the principle of EPEV by the following means:

Regulatory roles

47. The concept and principle of EPEV is enshrined in the SDO. Complaints of unequal pay for equal work could be handled under the existing legislation. EOC's complaint handling mechanism is always available to people who have a genuine EPEV complaint which arises out of gender.

Address unequal pay for equal work

48. At times the concept of EPEV has been confused with that of EPEW. Some female workers engaged in certain job groups such as cleaners, security guards, manual labour in catering industry etc. are underpaid as compared with their male counterparts. Often times, different job titles are assigned to jobs of essentially the same nature performed by male and female workers. Women are often excluded from certain jobs, such as night-shift security guards. In such cases, the wage differential could be genuinely due to discriminatory factors on the ground of sex and therefore could be dealt with under the present framework of the SDO.

49. To address such concerns, the EOC has taken steps to approach workers of the respective industries through stakeholders and women representatives to ascertain the situation. The EOC can also obtain information on pay structure from employers of certain industries where the absence of EPEW allegedly exists. If the situation so warrants, the EOC may initiate investigation into contraventions through the 'self-initiated investigation' mechanism.

Public education

50. The ‘self-initiated investigation’ process itself is already an educational and training opportunity for employers to review their pay policy to ensure that it is gender neutral and non-discriminatory. The investigation process could also allow the stakeholders and the women’s groups to have a clearer understanding of the crux of their concern about pay disparity between different genders and the appropriate measures to improve the situation. Public education to promote understanding of EPEV will also be organized.

CoP on Employment under the SDO

51. The current CoP on Employment under the SDO would be reviewed with a view to explaining more clearly the concept and principle of EPEV. After consolidating the information gathered from the women’s groups and the employers’ groups, and taking, if necessary, the experience in complaint handling, the CoP on Employment under the SDO would be revised in order to incorporate more specific and solid examples to facilitate public understanding of this complex subject. Where possible, reference could also be made to the pay policy of large corporations so that the EOC could develop some ‘Best Practice’ or guidelines to promote the concept of EPEW and EPEV.

Equal Opportunities Commission

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