

# Mind the gap for a gender- equal future

How to reach gender pay equity and  
how to close the gender pay gap:

Good examples from  
Nordic-German Trade Unions

**FRIEDRICH  
EBERT**   
**STIFTUNG**



**NFS** 

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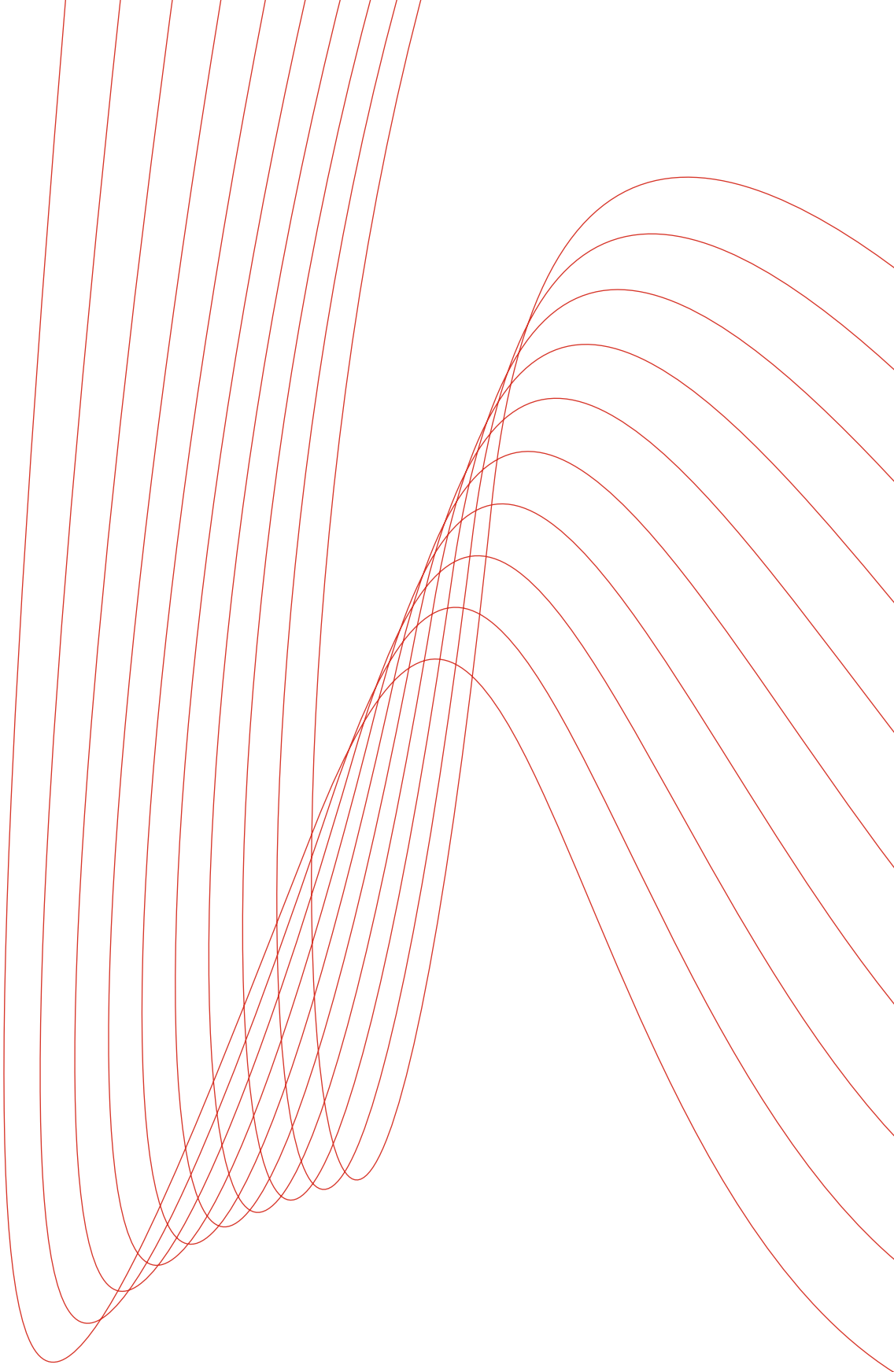
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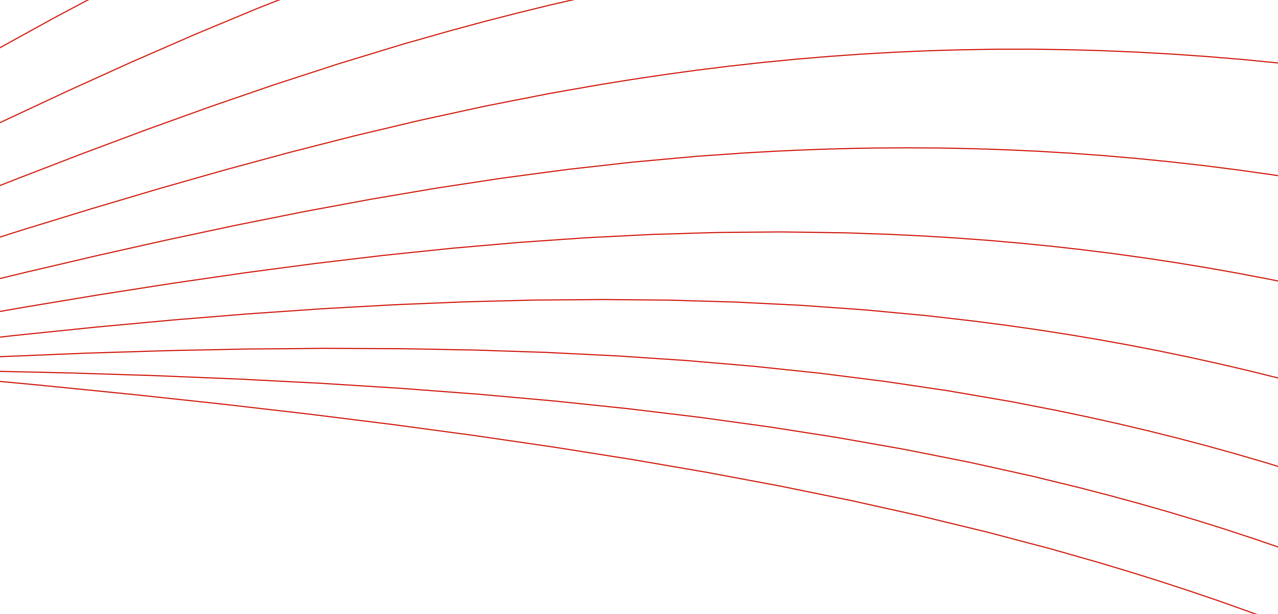
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# Executive Summary

Women face inequalities on the labour market and earn unequal pay. Closing the gender pay gap and to ensure the **principle of equal work of equal value** is essential to achieving a gender-equal society. The ILO Equal Remuneration Convention No. 100, which states the principle of equal remuneration for men and women for work of equal value, and the UN CEDAW convention on all forms of discrimination against women, are still not realised in any country.

The purpose of this Nordic-German report is to look more closely – **from a trade union perspective** – on how to reach **pay equity and how to close the gender pay gap**. Despite the fact that the countries in this study – **Denmark, Finland, Germany, Iceland, Norway, Sweden** – have come far and often are singled out as frontrunners, none of the countries has closed the gender pay gap. The current developments indicate that it will still be a very long time before this is achieved. More needs to be done, and this report aims to contribute to this effort by **sharing knowledge and inspiration, fostering discussion and political debate** on possible next steps. Besides an overview on the current situation of Equal Pay in the five Nordic Countries and Germany, this study presents also a look at the obstacles and challenges to Equal Pay in these countries. An outcome of the report is a **selection of good examples** regarding Equal Pay in the countries in this study. These good examples are intended to give other countries, as well as the countries that are part of this study, **new ideas and a smorgasbord** of measures to tackle unequal pay and promote a gender-equal labour market. The report concludes with an analytical view of how to achieve equal pay and the role of social partners.



The project initially aimed to focus solely on pay equity, but during the process it became clear that **pay equity** alone, while a valuable tool, is not enough to close the gender pay gap. There are many other factors and conditions that influence a person's wage, career and life over time, for example, parenthood and care responsibilities. Therefore, the basis of this report, the **definition of Equal Pay developed by the European Commission** was adjusted with a trade-union perspective to include the role of collective agreements and the social partners. The definitions comprise four dimensions of explanations for unequal pay:

1. pay discrimination
2. horizontal segregation in the labour market
3. unequal shares of paid and unpaid work
4. vertical segregation (the glass ceiling)

One of the most significant insights of the report is that, as the four dimensions are **closely interconnected**, understanding wage inequality requires viewing them as a whole. All four areas must be strengthened simultaneously.

The current situation shows that in the last few decades all six countries in the report have been able to reduce the gender pay gap. The countries have used different kinds of mechanisms against **pay discrimination**, for example, the Equal Pay Standard in Iceland, the wage-mapping requirement in Sweden or the German Pay Transparency Act.

But at the same time, important **obstacles and challenges** remain, standing in the way of faster progress. For example, Germany's joint taxation for married couples is a structural factor behind less labour market participation among women and their unequal share of care. Adopting individual taxation could promote equal pay. Similarly, long female parental leave, especially in Finland, Norway, Denmark, and parts of Germany, limits women's labour market participation.

**Horizontal segregation** exists in all six countries. A key factor is the high share of women in the public sector, particularly in healthcare and education, while men dominate higher-paying fields such as industry and construction. The sectorial and occupational segregation is reflected in the early educational preferences of boys and girls.

Throughout the region, there is an **unequal share of paid and unpaid work**. Men are more present in the workforce than women, and women are doing more unpaid work. The main reason for this is explained by child-minding (parental leave, sick-child leave, caring for children with disabilities) still being regarded as a predominantly female duty. Overall, men work full-time to a greater extent than women. The larger absence on the labour market and the lower number of working hours for women are important reasons behind the pay gap. The national parental support systems, as well as social partner agreements, are important not only for compensating these women, but also in providing incentives to balance out responsibilities with men in families. There are some differences however, owing to the availability of childcare, the length of the parental leave and options for mainly mothers to stay at home longer.

There are big differences in the roles of men and women in the labour market, which is visualised in **vertical segregation**. In all countries in this study, work-life mobility is greater for men than women. Men become managers earlier in life, they often climb even higher and have higher salaries as managers compared to female managers. In addition, men hold managerial positions in different types of jobs than women. Horizontal and vertical segregation interact and contribute to unequal wages. But even in female-dominated sectors, men are overrepresented in managerial roles.

The report gives a **selection of good examples** from all six countries: From **Denmark** good examples are the Danish labour court rules for equal pay and the boss ladies project, which aims to combat sexist culture and horizontal segregation. Furthermore, the well-developed childcare in Denmark is highlighted. From **Finland** the tripartite Equal Pay Programmes are a good example of a collective initiative between the social partners and the government. The Equality Ombudsman in Finland as an independent authority is another good example. From **Germany** the initiative on Pay Justice of the Food and Catering Union, the collective agreement for the Bakery craft in Berlin and Brandenburg and the equal wages of teachers at primary and secondary levels are good examples for Pay Equity and Pay Justice. From **Iceland** work-time reduction of normal working hours in the public sector are looked at, as well as the Equal Pay standard and the Job Evaluation tool as examples of combatting pay discrimination. From **Norway** the tripartite agreement regarding

women leaders is highlighted as an example of reducing vertical segregation, as well as the generous system of sick-child leave as an example of more equal sharing of care work. Moreover, the gender point quota in education (Kønnspoeng) is put forward as a tool against horizontal segregation. From **Sweden**, individualized taxation is given as an example of important structural reforms for gender equality with broad impacts on the participation of woman in the labour market. In addition to this the generous Swedish parental leave is stressed, alongside the low-wage and gender-equality focus in wage bargaining by the trade unions.

A key lesson from this study highlight the **importance of trade unions** and the need to **prioritize Equal Pay** to achieve results. The social partners in the six countries studied play a central role in improving equality in the labour market and in creating equal wages. Trade unions play a crucial role in ensuring wage surveys are conducted, advocating for pay transparency, and pushing for greater gender diversity in the labour market. Trade unions must also focus on issues affecting women, such as their overrepresentation in part-time work, sick leave, parental leave, and caregiving, to bring about real improvements and shape public opinion.

It is evident how deeply entrenched **traditional gender norms** remain and the role they play in upholding the acceptance of gender inequality, despite these countries being among the world's most progressive in challenging them. This is perhaps most apparent in the motherhood wage penalty, career choices and societal expectations of what roles women and men should pursue. These norms need to be questioned in order to achieve Equal Pay.

A notable finding is the value of cross-country experience sharing on these issues. Even among Nordic countries and between Nordic trade unions and Germany, the study has increased our knowledge and provided new inspiration. This demonstrates how **collaborative projects** not only inspire others with new methods but also strengthen knowledge exchange among countries. With a trade-union perspective on Equal Pay, with a strong will and with a set goal, it is possible to create gender equality, and it is possible to close the pay gap. Even though no country in the world has yet reached the goals of Equal Pay, there are enough **good examples to piece together**.

# Table of Contents

<b>Executive Summary</b>	4
<b>Foreword</b>	12
<b>1. Introduction – Equal Pay is possible, closing the gender pay gap and achieving gender-equal labour markets</b>	14
<b>2. Equal Pay – definitions and theoretical perspectives</b>	16
2.1 The Equal Pay concept – definitions and criteria	17
2.2 Equal Pay in a trade-union study about the Nordic countries and Germany	18
<b>3. The Equal Pay criteria in a trade-union study on the Nordics and Germany</b>	20
3.1 Pay discrimination	20
3.2 Unequal share of paid and unpaid work	20
3.3 Horizontal segregation	21
3.4 Vertical segregation	21
<b>4. The current situation of Equal Pay in Denmark, Finland, Germany, Iceland, Norway, and Sweden</b>	22
4.1 Pay discrimination	22
4.1.1 The gender pay gap	22
4.1.2 The pay gap in the six countries 2010-2021 over time	23
4.1.3 Mechanisms against pay discrimination	24
4.1.4 Collective bargaining agreements and pay discrimination	25
4.2 Horizontal segregation	26
4.2.1 Educational segregation	28
4.2.2 Measures to combat the horizontal segregation	28
4.3 Paid and unpaid work	29
4.3.1 Parental and family support	31
4.3.2 Childcare and stay-at-home mothers	32
4.3.3 Social partner agreements and compensation for unpaid work	33
4.3.4 Unpaid household work and unpaid parental leave	34
4.4 Vertical segregation	35

<b>5. Some obstacles and challenges to Equal Pay</b>	38
5.1 Denmark	38
5.2 Finland	40
5.3 Germany	41
5.4 Iceland	43
5.5 Norway	43
5.6 Sweden	44
<b>6. Good examples of Equal Pay in Denmark, Finland, Germany, Iceland, Norway, and Sweden</b>	46
6.1 Denmark	46
6.1.1 The Danish labour court rules for Equal Pay	47
6.1.2 Boss Ladies – combatting sexist culture and horizontal segregation	48
6.1.3 A well-developed childcare and women’s work	49
6.2 Finland	50
6.2.1 The tripartite Equal Pay Programs	50
6.2.2 The equality ombudsman	50
6.3 Germany	51
6.3.1 Initiative on Pay Justice of the Food and Catering Union and its results	51
6.3.2 A new collective agreement for the Bakery craft in Berlin and Brandenburg	52
6.3.3 Equal wages for teachers at primary and secondary level	53
6.4 Iceland	54
6.4.1 Work-time reductions	54
6.4.2 Equal Pay standard	55
6.4.3 Job Evaluation tool	56
6.5 Norway	56
6.5.1 A tripartite agreement on women leaders	56
6.5.2 Paid child sick-leave	57
6.5.3 Kønnspoeng – Gender point quota in education	58
6.6 Sweden	58
6.6.1 Individualized taxation	58
6.6.2 Generous parental leave	59
6.6.3 Low-wage and gender equality focus in wage bargaining	60

<b>7. Reaching Equal Pay in Germany and the Nordic countries</b>	62
7.1 Pay discrimination	62
7.1.1 Legislation and the social partners	63
7.1.2 Gender Discrimination in the labour market	64
7.1.3 The importance of collective agreements in pay discrimination	65
7.1.4 The role of trade unions in the fight against pay discrimination	66
7.2 Horizontal segregation	66
7.2.1 Gender norms that steer career choices	67
7.2.2 The impact of horizontal segregation on the pay gap	67
7.2.3 Measures to break Horizontal segregation	68
7.2.4 Social partners and horizontal segregation	69
7.2.5 What is the root of the problem, and what remains to be done?	69
7.3 Unequal paid and unpaid work	70
7.3.1 Labour participation	70
7.3.2 Parental insurance and shared responsibility for care	71
7.3.3 Flexible jobs and women's freedom	72
7.3.4 Childcare and women's opportunity to work	73
7.3.5 The motherhood penalty	74
7.3.6 Social partners and paid and unpaid work	75
7.4 Vertical segregation	75
7.4.1 Social partners and vertical segregation	76
7.5 Analytical summary – Equal Pay in Denmark, Finland, Germany, Iceland, Norway and Sweden	76

<b>8. Concluding remarks:</b>	
<b>The social partners and the future of Equal Pay</b>	78
<b>Bibliography</b>	82
<b>List of figures/tables</b>	94
<b>Appendix:</b>	
<b>On the cooperation partners</b>	96
<b>The Friedrich-Ebert-Stiftung</b>	96
<b>DGB</b>	96
<b>NFS</b>	97
<b>Affiliates of NFS contributing in the project</b>	97
<b>Denmark</b>	97
Akademikerne	97
<b>Finland</b>	97
SAK	97
STTK	97
<b>Iceland</b>	98
ASÍ	98
BSRB	98
<b>Norway</b>	98
LO	98
UNIO	98
YS	98
<b>Sweden</b>	98
LO	98
TCO	98

# Foreword

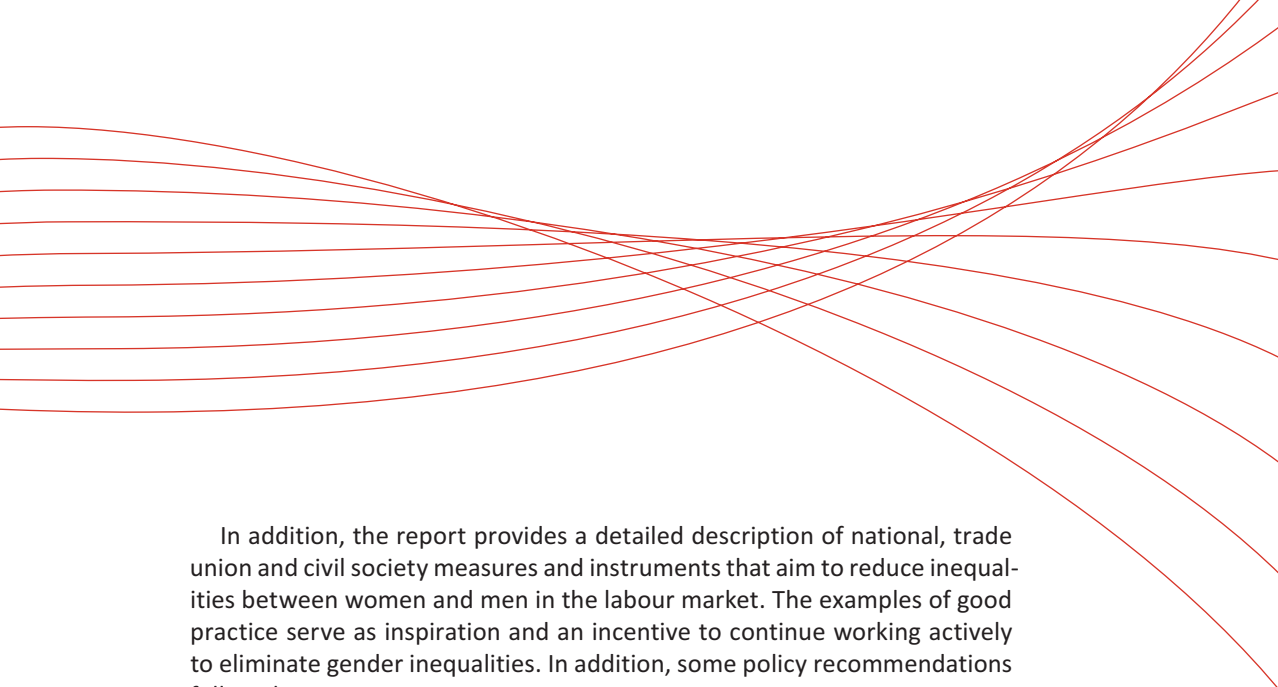


**T**his report deals with one of the central issues of our time: gender equality and explicitly the persistent income inequalities that still exist today. The issue of pay discrimination is of central importance in our society as it affects the fundamental principles of justice and equality.

Despite numerous advances in recent decades, the gender pay gap remains a persistent problem that puts women at a disadvantage in many areas of life, and it is part of a larger problem on the labour market and the gender inequalities that exist there, from how women's work is evaluated to how our societal structure affects women, who often carry the burden of the unpaid care and domestic work.

Against this background, the project "A Nordic-German Trade Union Cooperation on Pay Equity" was launched by the Friedrich-Ebert-Stiftung Nordic Countries (FES), the Council of Nordic Trade Unions (NFS) and the German Trade Union Confederation (DGB), funded by Council of Nordic ministers through NIKK. The project then expanded and became this report "Mind the gap for a gender-equal future. How to reach gender pay equity and how to close the gender pay gap: Good examples from Nordic-German Trade Unions." The aim of this project is to shed light from a trade-union perspective on the current challenges and progress in this area and to derive approaches for action from a transnational perspective. The idea is to show that even in a region often praised for doing well on equality issues also has much work ahead to achieve a gender-equal labour market and fair and equal pay for all.

The report is based on extensive analyses, research and interviews in the Nordic countries and Germany. It presents the development of Equal Pay in the countries involved as well as the current situation and clearly describes the obstacles to achieving Equal Pay.



In addition, the report provides a detailed description of national, trade union and civil society measures and instruments that aim to reduce inequalities between women and men in the labour market. The examples of good practice serve as inspiration and an incentive to continue working actively to eliminate gender inequalities. In addition, some policy recommendations follow the report.

Special thanks go to the NFS, DGB and the Friedrich-Ebert-Stiftung and Hans-Böckler-Stiftung for the excellent and pleasant cooperation. Equally heartfelt thanks go to the experts and representatives of the trade unions involved, whose expertise and experience contributed significantly to the quality of this study. They have made it possible not only to discuss theoretical concepts, but also to identify practical examples that show how obstacles can be overcome on the path to genuine Equal Pay.

The report shows that there is still a long way to go to achieve full equality, but it also offers solutions and positive examples that are encouraging. It should help to raise awareness of the structural injustices and show ways in which these can be overcome.

We hope that the results of this report will provide impetus for further committed discussion and resolute measures to promote Equal Pay. Politics, business and society can only create a fairer and more equal working environment and enforce equal pay for equal work or work of equal value through joint efforts.



**Kristina Birke Daniels**      **Magnus Gissler**      **Elke Hannack**

FES Nordic Countries

NFS, Council of Nordic  
Trade Unions

DGB, German Trade  
Union Confederation

*Director*

*General Secretary*

*Deputy President*

# 1. Introduction – Equal Pay is possible, closing the gender pay gap and achieving gender-equal labour markets

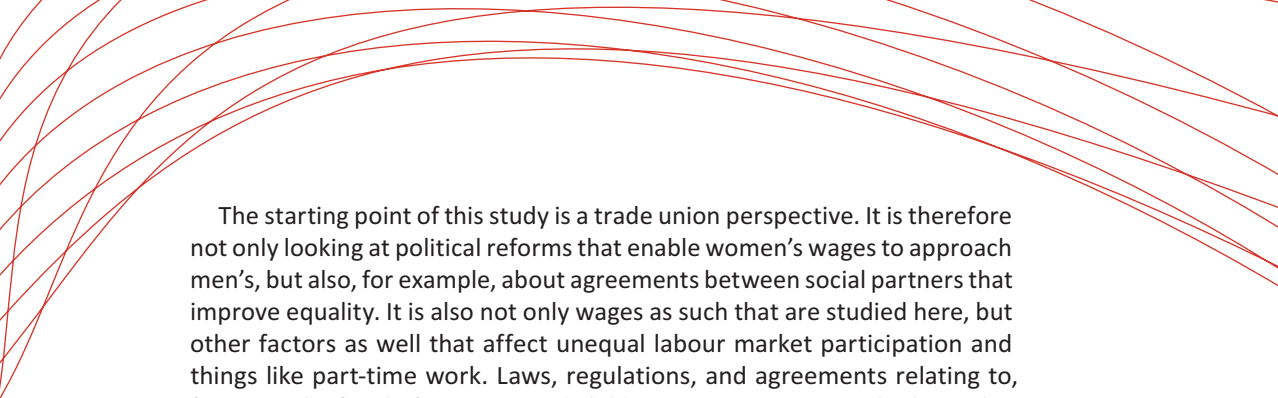
**T**he five Nordic countries and Germany have come a long way on the road to gender equality. Women in the region have had the same legal rights as men for decades. Compared to most other countries in the world, economic and social freedom can be guaranteed – regardless of gender.

But even though the six countries in this study – Denmark, Finland, Germany, Iceland, Norway, and Sweden – have made such great strides towards women’s equal rights, there is still a long way to go. A fundamental part is still missing: wages are not equal between the sexes.

This study is about Equal Pay, a concept used to understand and measure the unequal wages in a society. It is not an easy problem to solve; no country in the world has the same wages regardless of gender. And despite the fact that the countries in this study have come further than others, there are still measures to be taken to reach the goal of equal wages.

The purpose of this report is to show how the six countries – which are often highlighted as being the forerunners – still have not cracked the code for Equal Pay. But the purpose is even wider than that: all six countries are moving in the right direction, and the gap is narrowing as a result. Good practice examples from all the six countries show that Equal Pay is possible.

The countries have each implemented important actions that have reduced the pay gap. There are therefore good reasons to be inspired by these measures, to see them as pieces of a puzzle that together can solve the puzzle for Equal Pay. This study is intended to inspire both the countries that are part of the study, as well as other countries that strive to reduce and ultimately close the gender pay gap.



The starting point of this study is a trade union perspective. It is therefore not only looking at political reforms that enable women's wages to approach men's, but also, for example, about agreements between social partners that improve equality. It is also not only wages as such that are studied here, but other factors as well that affect unequal labour market participation and things like part-time work. Laws, regulations, and agreements relating to, for example, family formation and childcare are important to look at. This study focuses exclusively on measures that affect unequal pay based on the theoretical framework used, namely the concept of Equal Pay, based on the definition of the European Commission. The report does not provide an overall picture of gender equality in general in the region, nor is it a reference book for a comprehensive picture of laws and regulations on the subject.

It is also important to emphasize that the good examples that are highlighted from the individual countries are just examples. There are several other that could have been raised in this study, but the ones selected here are some of the most important, and together they provide a smorgasbord of measures that can be used to close the gender pay gap. Some of the good examples provided cannot directly conclusively be shown to have an effect on Equal Pay and reducing the gender pay gap, but nevertheless, when looking at the big picture, they can contribute to a more gender equal labour market and perhaps have the long-term effect of closing the gender pay gap. This study started out with the intention of solely focusing on pay equity, but it became apparent early on that pay equity alone, though it is an important tool, will not close the gender pay gap, neither will just looking at pay as such; to achieve equal pay, one also needs to bear in mind the factor of life-long incomes and the many factors impacting a life and career that need to be looked at over time.

The principle of pay equity stated in the ILO 100 Convention is an important tool for achieving equal pay, which in itself is a goal in achieving a gender-equal labour market. The original intention of this project was to focus solely on pay equity. However solely focusing on examples of pay equity does not solve the fundamental problems underlying the labour market and societies which keep women's wages down. Therefore, this report decided to broaden its scope and look at Equal Pay and as all the countries are in some capacity linked to the European Union, the European Commission's definitions was a natural fit.

In order to have equal pay, lifelong equal incomes and ultimately a gender-equal labour Market, many more factors need to be addressed besides equal remuneration. The Nordic Model, with strong macroeconomic welfare states and strong social partners, is an integral part of this. Trade unions have important roles in highlighting all aspects of achieving equal pay on the labour market and in revealing the various faults that add up to unequal life-long incomes, such as undervaluing female dominated sectors, education choices, parental leave.

## 2. Equal Pay – definitions and theoretical perspectives

To measure and understand Equal Pay in the scope of this study, a generally accepted definition is needed, as well as a framework derived from research and previous similar studies.

To begin with, it needs to be determined what international agreements this report is based on. There are several international conventions that support the view that pay should be given according to the principle of Equal Pay for work of equal value, rather than gender, and that force countries to act. Although this report mostly looks at Equal Pay through the lens of the European commissions' definition, at times where it is applicable, we will also look at examples of pay equity based on the ILO Equal pay for work of equal value. One of the most important is the 1951 ILO Equal Remuneration Convention, (No. 100), ratified by all six countries, which states the principle of equal remuneration for men and women workers for work of equal value. The concept of equal remuneration for work of equal value is broad and encompasses men and women doing different work. Another important international convention is the Convention on the Elimination of All Forms of Discrimination against Women from 1978, where all countries that ratify must, among other things, ensure women's economic equality and must regularly report on the implementation to the CEDAW committee (United Nations Human Rights, 1979).

## 2.1 The Equal Pay concept – definitions and criteria

Income inequality is a concept used by the OECD to explain the economic division between women and men, which includes several different factors (OECD 2021). Income is defined as household disposable income in a particular year. It consists of earnings, self-employment and capital income and public cash transfers; income taxes and social security contributions paid by households are deducted. Although income inequality is important for understanding the aggregated resources that generally differ between men and women, a narrower scope was needed for this study. As it has a trade union starting point, it is primarily income from work that is at the centre of this report. Wages form the basis of the vast majority of people's livelihood, and they are a result of the effort made during a large part of a person's working hours.

However, to understand this particular inequality, the sum of everyone's work is not all that is relevant. It is not a coincidence that women, as a group, earn less than men. The values in society are changing rather slowly, which is reflected in the norms of our societies. This can also be seen in the traditional view of the roles of women and men in society. It is still a widespread view that the man is the main family breadwinner. There is an obvious aspect of discrimination, something that is to be included in the analysis. But it doesn't stop there. The strong gender-normative division in society's sectors is also an obvious reason for women's lower wages. The fact that women work in the public sector to a very large extent, in professions such as assistant nurses, childminders and teachers, in contrast to the dominant proportion of men who work in the private sector with often higher salaries and to a significantly greater extent as managers, results in skewed gender-based salaries. There is also a third aspect that cannot be removed from the equation which is also related to traditional gender norms. Women's greater absence from the labour market due to greater responsibility for children and the household is something that affects not only their concrete salary, but also their salary development, career, access to further education and, in the future, their pension. This report will focus mostly on binary gender male and female as the most comprehensive statistics are still made with this categorisation. The various systems are also to a large extent based on a traditional nuclear family model which will also be reflected in this paper. This does unfortunately mean that some perspectives are not added in this paper such as LGBTQI families and statistic with an intersectional perspective are also missing.

There are different yardsticks used to explain and understand the different salaries of men and women. This study uses the definition of Equal Pay developed by the European Commission. The concept is in wide use within the European Union and puts an appropriate emphasis on women's and men's wages – but it also includes factors that affect wages.

The EU commission concept has four separate criteria which individually and together explain the unequal wages, but which can also be used to find

solutions (EU Commission 2022). The four criteria are described below from an EU perspective:

1. **Pay discrimination:** In some cases, women earn less than men for doing equal work or work of equal value even if the principle of Equal Pay is enshrined in the European Treaties (article 157 TFEU) since 1957.
2. **Sectoral segregation:** Around 24 per cent of the gender pay gap in the EU is related to the overrepresentation of women in relatively low-paying sectors, such as care, health, and education. Highly feminized jobs tend to be systematically undervalued.
3. **Unequal share of paid and unpaid work:** Women have more work hours per week than men, but they devote more hours to unpaid work, a fact that might also affect their career choices. This is why the EU promotes equal sharing of parental leaves, adequate public provision of childcare services and adequate company policies on flexible working time arrangements.
4. **The glass ceiling:** The position in the hierarchy influences the level of pay: fewer than one in ten of top companies' CEOs are women. Nevertheless, the profession with the largest differences in hourly earnings in the EU were managers, with 23 per cent lower earnings for women than for men.

## 2.2 Equal Pay in a trade-union study about the Nordic countries and Germany

The European Commission's concept of Equal Pay and the four separate criteria form the theoretical basis for this study. As already demonstrated, this offers a good framework for looking at the various factors that are important for understanding the existence of unequal pay, but also for highlighting the good examples that exist in the separate countries when closing the gap. Since there is a trade union starting point in this study, however, there is a reason to modify the four criteria somewhat. To begin with, not only political decisions and laws are of importance here. Contracts and agreements between social partners can also help in narrowing the gap. It is therefore important to also include factors like trade union organisation, collective agreements, collective bargaining, wage increases and extended wage benefits in the event of, for example, sick-leave and parental leave. It will also be important to use employment conditions and actual salary income as a starting point in the study, which means that students, people on sick-leave and early retirees are not included in this study. In the next chapter an operationalization is provided, along with a discussion of how each criterion is adapted to the scope of this report, based on the already-mentioned trade union point of departure.



## 3. The Equal Pay criteria in a trade-union study on the Nordics and Germany

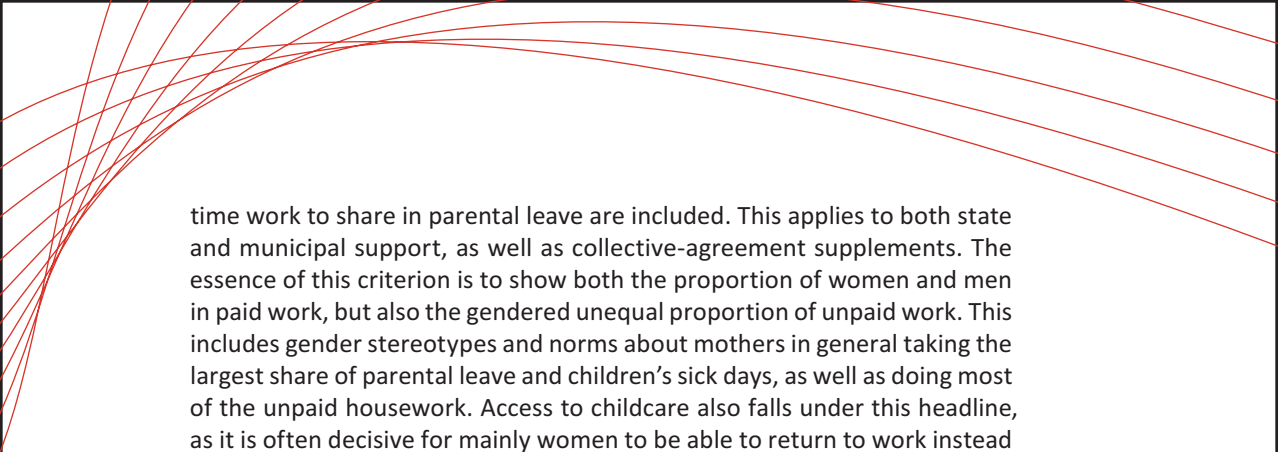
The criteria used by the European Commission are adapted to this study, with a trade union starting point and with a focus on the six countries. Below are the definitions that forms a basis to this study.

### 3.1 Pay discrimination

The wage differences in the six countries are at the centre stage of this Equal Pay principle, relying on statistics that monitor these differences. The focus is on the actual wage differences between men and women and developments over time. It is obvious that the Gender Pay Gap is no direct measurement or indicator of pay discrimination in the sense of the legal principle of Equal Pay for equal work or work of equal value, as it calculates pay differences without considering the work done for these payments. But nevertheless, it is an important indicator of different opportunities for women and men on the labour market generally and for earning wages especially, and therefore it plays a central role for the study of gender equality in working life. In order to get an understanding of the pay discrimination in the region under study here, an overview of the national laws and regulations that exist to prohibit wage discrimination will also be presented. In addition, some of the efforts undertaken by the individual countries and social partners to reach the goal of Equal Pay for equal work will be presented.

### 3.2 Unequal share of paid and unpaid work

This is a broad category to study, since everything from women's and men's labour force participation and part-



time work to share in parental leave are included. This applies to both state and municipal support, as well as collective-agreement supplements. The essence of this criterion is to show both the proportion of women and men in paid work, but also the gendered unequal proportion of unpaid work. This includes gender stereotypes and norms about mothers in general taking the largest share of parental leave and children's sick days, as well as doing most of the unpaid housework. Access to childcare also falls under this headline, as it is often decisive for mainly women to be able to return to work instead of continuing their unpaid parental leave, or alternatively to offer other solutions to reimburse them for staying at home with children. Under this heading, there are statistics for comparison across the countries over time. National legislation is also described here for the different types of support given in the event of, for example, parental leave or illness.

### **3.3 Horizontal segregation**

Women's and men's different career choices are important to understand in the context of Equal Pay. This is often already visible in girls' and boys' educational choices, as well as later in life in the different salaries they receive. But it is not enough to merely look at sectors, occupational segregation is equally important. For example, it is not true to state that everyone in the health sector has low wages. Medical doctors in areas where men dominate have significantly higher salaries than nurses. **Horizontal segregation** is therefore used as the term for the criterion in this study, rather than sectoral segregation. Under this headline, statistics on the gender distribution that exists in the labour market are reported. Trends in gendered occupational choices are also made, as well as a description of measures taken to equalize the gender distribution both in education and on the labour market.

### **3.4 Vertical segregation**

As already mentioned, this study has a trade union point of view, which yields a slightly different perspective on career paths and upward ways for women in working life compared to the EU Commission's definition. From this perspective, one cannot claim that breaking through the glass ceiling and getting more female managers is a point of success that carries as much weight as the three other criteria in this study. From a trade union perspective, the basic level is more important, to ensure equal wages for the vast majority, rather than putting efforts into appointing more female managers. Instead of the term "glass ceiling", it is relevant to use the term **vertical discrimination**, when looking at the gender differences in flexible labour movements. This is somewhat more difficult to measure than the other three principles. Here there will be statistics for the proportion of female vs. male managers, as well as salary differences between them.

## 4. The current situation of Equal Pay in Denmark, Finland, Germany, Iceland, Norway, and Sweden

Below is a brief description of the situation in the six different countries based on the four parts of Equal Pay that we have chosen to apply in looking at the problem in this report.

1. pay discrimination,
2. horizontal segregation,
3. paid and unpaid work and
4. vertical segregation

### 4.1 Pay discrimination

Pay discrimination is based on the EU-Commission definition, focusing on the actual wage differences between men and women. The legal situation per country will be looked at as well as national measures to narrow the pay gap. Lastly, we will examine the role of the social partners and the level of their responsibility for equal pay.

#### 4.1.1 The gender pay gap

*Table 1: Unadjusted gender pay gap (2022)*

Country	The unadjusted pay gap in %, 2022
Denmark	13.9
Finland	15.5
Germany	17.7
Iceland	9.3
Norway	14.4
Sweden	11.1

(Data source: Eurostat 2022)

As shown in the statistics in Table 1, the gender pay gap exists in all six countries, although clear improvements have been made during the last decades. There are two separate measurements often used when calculating the gender pay gap. The first is the unadjusted wage gap, which compares women’s wages to men’s. The second is the adjusted wage gap, which is corrected for differences in occupation, sector, education, age and part time work (The Swedish Mediation Office 2023). For the sake of correct statistical comparison, only the “unadjusted” measure will be used in this report. This is because there are some differences among the countries in how the “adjusted” pay gap is calculated.

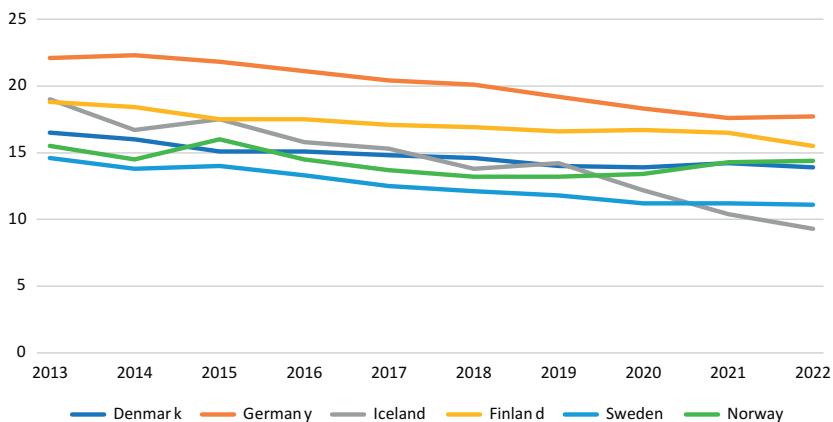
#### 4.1.2 The pay gap in the six countries 2010-2021 over time

*Table 2: Unadjusted gender pay gap longitudinal*

Country	Pay Gap (unadjusted in %)									
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Denmark	16.5	16.0	15.1	15.1	14.8	14.6	14.0	13.9	14.2	13.9
Finland	18.8	18.4	17.5	17.5	17.1	16.9	16.6	16.7	16.5	15.5
Germany	22.1	22.3	21.8	21.1	20.4	20.1	19.2	18.3	17.6	17.7
Iceland	19.0	16.7	17.5	15.8	15.3	13.8	14.2	12.2	10.4	9.3
Norway	15.5	14.5	16.0	14.5	13.7	13.2	13.2	13.4	14.3	14.4
Sweden	14.6	13.8	14.0	13.3	12.5	12.1	11.8	11.2	11.2	11.1

(Data source: Eurostat 2022)

*Figure 1: Development of Gender Pay Gap (longitudinal)*



(Data source: Eurostat 2022)

*Iceland* has been the most successful country in narrowing the wage gap among the six countries, as is visualized in Figure 1. In second place is Sweden, also moving quite rapidly in the right direction. Norway and Denmark are closing in, but the curve has been moving slightly upwards in recent years. And while Finland has been falling behind since the start, the development is slowly going towards closing the gap. Germany still has the biggest gender pay gap since 2013, but could reduce it by 4.4 percentage points.

*Table 3: Shares of low-wage earners*

Country	Low-wage earners (Shares in %), 2018	
	Men	Women
Denmark	6.98	10.23
Finland	3.43	6.42
Germany	15.81	26.20
Iceland	9.76	12.18
Norway	7.14	10.35
Sweden	2.76	4.42

(Data source: Eurostat 2018)

#### 4.1.3 Mechanisms against pay discrimination

In *Iceland* the Equal Pay standard was initiated by the social partners in the private sector in 2008 and implemented in 2012. It started in the private sectors, but other actors soon joined in. An international standard was developed as an ISO-standard, called IST-85. The Gender Equality was replaced with the Equal Pay Act in 2018, which meant that all employers with at least 25 employees must certify their pay systems according to Equal Pay standards. In *Norway* private employers, with more than 50 employees, and all employers in the public sector have an obligation to report their work on gender equality annually. Every other year, a pay equity analysis is to be done, including gender distribution in different groups, analysis of compensation differences for men and women and mapping of involuntary part-time work, based on gender (Payanalytics 2024). In *Denmark* the legislation stipulates that companies annually must prepare gender-segregated pay statistics using a system called DISCO-8 codes, or a similar system. This applies to companies with a minimum of ten male and ten female employees with comparable job functions. According to the National Equal Pay Act, employers with at least 35 employees are obliged to gender-split wage statistics with the help of Statistics Denmark (European Commission 2020).

In *Sweden*, the requirement for annual external wage mapping was introduced in the Equality Act in 1994 (NIKK 2020). All employers are required to

conduct surveys and analyse the criteria for wage setting, for fringe benefits and bonus systems in relation to all grounds of discrimination. The Discrimination Act (chapter 3) also states the employers' requirement to survey differences in pay between women and men. It also requires the active cooperation between employers and employees (§11). In *Finland*, the Act on Equality between Women and Men states that Equal Pay audits or pay surveys are obligatory parts of a plan that must be carried out every two years by employers with at least 30 employees. A pay audit must include details of the employment of women and men in different jobs, as well as a survey on the classification of jobs, the pay for those jobs and the differences in pay by gender. If no acceptable reason is found for differences in pay, the employer must take corrective action.

Until 2017, there was no specific law against pay discrimination in *Germany*. The German Constitution (Grundgesetz) has granted equal rights for women and men as a fundamental right since 1949, and since 2006, the General Equal Treatment Act (AGG) has generally prohibited disadvantages in terms of employment and working conditions including pay (European Institute for Gender Equality 2022). In 2017, the German Pay Transparency Act (PTA, Entgelttransparenzgesetz) came into force. It defines the legal principle of Equal Pay and introduces three measures for equal pay: an individual right to wage-comparison information in companies with more than 200 employees, voluntary equal pay checks in private companies with more than 500 employees and equal pay reports in certain large companies (without any regulations or requirements concerning the contents of these reports). Collective bargaining policy is largely excluded from this law.

#### 4.1.4 Collective bargaining agreements and pay discrimination

The union density and the coverage of collective bargaining are important factors when understanding Equal Pay in the six countries. The situation is quite different, as can be seen in the chart above. The Nordic model, its history and its importance in the Nordic countries explains the higher collective bargaining coverage compared to Germany.<sup>1</sup>

In short it means that in the Nordic countries, trade unions and employers' organisations are responsible for wage formation, but also for establishing employment conditions. There are differences across the Nordic countries, however. In Denmark, Finland, Norway and Sweden, collective agreements mainly regulate the labour market, as there is little legislation and social partners play an important role, collective agreements concerning gender equality and Equal Pay are agreed on. All this thus has wider impacts. In *Iceland*, the collective bargaining coverage is the highest in the region. But

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1 Read more about the Nordic Model <https://www.norden.org/en/information/social-policy-and-welfare>

their version of the Nordic model is slightly different from the other Nordic countries. In Germany, the social partners also play an important role in the labour market. Their autonomy to bargain for labour conditions is granted by the constitution, one reason for the exclusion of collective agreements is the German Pay Transparency Act. In the past decades, trade union density has been decreasing rapidly. Although collective bargaining coverage is still about 54 per cent on average, it is far less than in the Nordic countries. Additionally, collective bargaining coverage differs by sector and region. In East Germany the coverage is even lower than in the West of Germany. Collective bargaining takes place at sector and company level.

*Table 4: Share of collective bargaining and union density*

Country	Collective Bargaining (in %)		Union Density (in %)
	2017	2018	2019
Denmark		82.0	67.0
Finland	88.0		58.8
Germany		54.0	16.3
Iceland		90.0	90.7
Norway	69.0		50.4
Sweden		88.0	65.2

(Data source: OECD 2018, OECD 2019)

## 4.2 Horizontal segregation

Sectoral segregation is evident in all six countries. This is particularly evident in male-dominated sectors, where all Nordic countries have a lower proportion of women – between 19 and 22 per cent compared to the EU’s 25 per cent. An important reason for the large gender division in the labour market in the researched countries is the large proportion of women in the public sector, in occupations in healthcare and education, while there is a male dominance in better-paid jobs in industry, construction, transportation, mining, forestry and storage.

This has a historical background: When female work participation quickly starting in the 1960s in the Nordic countries and later also in Germany, the female-coded jobs were the primary options available (University of Jyväskylä 2021). In Denmark, over 60 per cent of all employees work in a profession where their own gender accounts for 75 per cent or more of the workforce, and women make up 78 per cent of employees in the public sector. Correspondingly, men make up most private sector employees, at 74 per cent (Nordics Info 2019). In Sweden, fewer than 20 per cent of employees work in an occupation with an even gender distribution (Nordic Labour Journal 2024). In Finland only ten per

*Table 5: Share of men and female in male and female dominated industries and the public sector*

Country	Male-dominated industries <sup>2</sup> , 2021 (in %)		Female-dominated industries <sup>3</sup> , 2021 (in %)		Women in public sector, 2020 (in %)
	Men	Women	Men	Women	Women
Denmark	78	22	27	73	69.5
Finland	78	22	22	78	72.2
Germany*	75	25	28	72	55.5
Iceland	79	21	24	76	64.2
Norway	81	19	25	75	69.9
Sweden	78	22	27	73	77.5
EU average	75	25	25	75	

\*For Germany own calculations based on data from Eurostat  
(Data source: Nordic Co-operation 2023, Eurostat 2021, OECD 2023b)

cent of wage earners work in equal occupations. The most female-dominated sectors in 2022 were health and social services, with an 85-per cent share of female employees. In contrast, 90 per cent of employees in construction were men (Ministry of Social Affairs and Health, Finland 2016).

In Iceland 64 per cent of women active in the labour force in 2023 worked in the public sector. In Norway close to 67 per cent of all employees in the public sector are women. Correspondingly, over 60 per cent of all who work in the private sector are men. It is also in the private sector where the jobs are found that make up the top ten per cent of salary distribution (Likeløn 2024).

While sectoral segregation compares the larger scale of how women and men are divided between public and private sectors, and wider categories of work, occupational segregation is equally important in understanding unequal wages. As an example, in Norway, where women hold the majority in the health and social services sector, women earn 88.1 per cent of men's wages. This relates to the fact that women dominate among nurses and health professionals. Among medical specialists, who have higher salaries, the majority are also women, but they are on average almost four years younger than their male colleagues (ibid). In Sweden, less than 20 per cent work in an

2 Male-dominated industries: Agriculture, forestry and fishing, mining and quarrying, manufacturing, electricity, gas, steam and air conditioning supply, water supply, sewerage, waste management and remediation activities, Construction, Transportation and storage, information and communication.

3 Female-dominated industries: Education, human health and social work activities, other service activities. Activities of households as employers, undifferentiated goods and services producing activities of households for own use.

occupation with an even gender distribution (Nordic Labour Journal 2024).

In Germany, 55 per cent of women active in the labour force work in the public sector. From the 16 sectors in production and agriculture/forestry, eight sectors were male dominated (more than 70 per cent male employees), eight were mixed (between 30 and 70 per cent male employees), no production sector was female dominated (more than 70 per cent female employees). Looking at the 19 different service sectors, three of them were female dominated: Healthcare, Social services incl. caring homes and Education/Teaching. The largest part of the service sectors, namely 12 sectors, were mixed with the highest shares of women in legal, tax and management consultancy, accommodation, and retail trade (excluding motor vehicles). Four service sectors were male dominated (Pfahl et al 2023a).

#### 4.2.1 Educational segregation

*Table 6: Share of females in tertiary education in STEM education fields*

Country	Female tertiary education graduates in STEM education fields, 2021 (in %)
Denmark	34.4
Finland	30.2
Iceland	42.8
Norway	29.0
Sweden	36.7
Germany	27.7

(Data source: Eurostat 2021b)

Since the 1980s women have had a growing share in higher education compared to men. And while women have achieved a more equal and sometimes dominant position in the corresponding occupations over time, there are still unexplainable wage differences.

#### 4.2.2 Measures to combat the horizontal segregation

There is research showing the great societal benefits of a less-segregated labour market. Some of the findings show better health and greater work-place satisfaction in more gender-divided jobs (Arbetsmiljöverket 2013). This aspect, alongside the lower likelihood of harassment and more gender equality as such, is often the argument behind projects to combat horizontal segregation. In Denmark and Norway, efforts have been made to get more men to work in preschools. As a result, Denmark has a relatively high proportion of male workers, and exemplifies this trend: seven per cent of workers in centres (Cameron 2014) with children under three, 11 per cent in kindergartens with children aged three-to-six-years, 24 per cent in out-of-school services, and 28

per cent in leisure-time centres. In Norway, the proportion of men in preschools has increased fivefold since 1990, following a national action plan adopted in 1997 where employers were required by law to hire a male applicant for a preschool position, if applicants from both sexes had equivalent skills NIKK. (2019). Other examples are the Gender Point System in Norway and the Boss Lady Project in Denmark, both described further on in this report.

In Germany, as in the Nordic countries, occupational segregation starts with educational segregation in schools and the choice of professions for vocational training. Looking at STEM professions only, the share of women was only 11 per cent of all new vocational education contracts. In contrast: In healthcare and social services professions, the female share of new contracts was 89 per cent. Among the top-ten professions of 2021 (the ten professions that were chosen most) only three professions were female dominated, while four were male dominated (Kompetenz 2024).

That's why measures to support cliché-free occupational choices have been introduced. One is called Girls' Day and Boys' Day (Girls Day 2024). Another measure is the alliance "Initiative cliché-free" (Klischeefrei 2024) which runs a web portal, compiles and publishes a range of information e.g. for cliché-free vocational consultations or lessons in kindergarten or at school.

### 4.3 Paid and unpaid work

Throughout the region, men are more present in the workforce than women. The main reason for this is explained by child-minding (parental leave, child sick leave, caring for children with disabilities) still being dominantly a female chore.

*Table 7: Average working hours per country*

Country	Average working hours, 2023 (in hours)	
	Men	Women
Denmark	36.0	31.6
Finland	37.6	33.7
Germany	38.5	30.9
Iceland	41.7	34.4
Norway	36.6	32.1
Sweden	39.7	36.8

(Data source: Eurostat 2023)

Average working hours differ across the countries, as can be seen in Table 7, and there are visible gender differences in all countries. There are several explanations for this, one important one being the gender-segregated labour market, where part-time work and irregular working conditions are more

common in traditional female occupations than in male occupations. Sweden has the longest working hours among women, whereas Germany has the lowest on average (due to a high part-time share).

*Table 8: Share of part time employment and employment rate*

Country	Part Time employment, 2023 (in %)		Employment Rate, 2023 (in %)	
	Male	Female	Male	Female
Denmark	14.7	34.1	81.5	76.2
Finland	9.6	20.0	77.3	77.3
Iceland*	/	/	/	/
Norway	13.8	29.6	82.3	77.4
Sweden	11.7	25.7	84.3	80.4
Germany	11.3	47.9	83.8	76.2

\*No comparable data available for Iceland  
(Data source: Eurostat 2023b, Eurostat 2023c)

Overall, men work full-time to a greater extent than women. The larger absence on the labour market and the lower number of working hours for women are important reasons behind the pay gap. Below are average actual incomes in the respective countries divided by gender. The greatest income difference is in Germany and the smallest in Sweden.

*Table 9: Average income by sex*

Country	Average income by sex, 2022, (in USD)		
	Male	Female	Difference
Denmark	6364.26	5501.09	863.17
Finland	5360.37	4370.3	990.07
Iceland	/	/	/
Norway	5850.74	5125.77	724.97
Sweden	4864.94	4062.84	802.1
Germany	5443.09	3740.37	1702.72

\*No comparable data available for Iceland  
(Data source: Statista 2022)

#### 4.3.1 Parental and family support

One of the most important reasons for women's greater absence from work and dominance in part-time work is often the greater responsibilities they assume for their families, children and the household, as well as women's lower salaries. The national parental support systems, as well as social partner agreements, are important for compensating these women, but also in their incentives to even out responsibilities with men in families.

Sweden was the first country in the world to introduce parental leave, replacing "maternity leave", in 1974. In total, there are 380 paid parental days per child, up to a set cap, and 90 days on a lower level. There are three earmarked months per parent, and there is an upper time-limit, when the child turns 12 years (Nordic Health and Welfare Statistics 2024). In Iceland, since 2021 the paid parental leave grants a total of six months per parent (for children born 2021 and after), with six transferable weeks between the parents. This makes 4.5 months the minimum and 7.5 months a maximum amount of time individually. The Norwegian parental leave has two options, either 49 weeks with 100 per cent income compensation up to a cap, or 59 weeks with 80 per cent income. The parents have 15 earmarked weeks each and 26 weeks and that can be shared freely between mother and father (NAV 2023). Statistics show that Norwegian fathers take 20 per cent of the paid parental leave (Nordic Co-operation 2019). In Denmark, each parent is entitled to 24 weeks' paid leave, with 11 weeks earmarked per parent. The remaining 13 weeks can be transferred between the parents if both agree. Denmark has the highest monetary level of compensation of parental leave in the region. Finland was the last country in the Nordic region to introduce paternity leave, in 1985. Since 2022, a total of 160 days are earmarked per parent. Of those days, 63 are transferable to the other parent, and if the remaining 97 days aren't use, they vanish (Kela 2024). Since the EU Directive changes, there has been an increase in father's share of paid parental leave to around 15 per cent (FPA 2023).

*In Germany*, parental allowances are paid for the first 14 months after the birth. Each parent can receive parental allowance for two to 12 months. Parents can also choose "Parental Allowance Plus" which provides a 50 per cent allowance but paid for 24 months. Additionally, if parents work part-time at the same time for at least four months, further four months of parental allowances are added (Destatis 2024). In 2023, the average time for which fathers received parental allowances was 3.7 months, for mothers it was 14.8 months. Nevertheless, the participation of fathers in parental care is constantly growing, from 24.8 per cent in 2020 to 26.2 per cent in 2023 (Destatis 2024a).

#### 4.3.2 Childcare and stay-at-home mothers

In all countries in this report, childcare is available and is commonly used by families with small children. There are some differences however, owing to

childcare availability, the length of the parental leave and options for mainly mothers to stay at home longer. The highest enrolment – on at least part-time basis – among children 3-5 years, is in Denmark, Norway and Iceland. The lowest is in Finland, mainly due to the high percentage of mothers staying at home longer with their children.

*Table 10: Share of children enrolled in childcare*

Country	Enrolment in Childcare	
	2021	2021
	0–2-year-olds	3–5-year-olds
Denmark	54.3	97.0
Finland	36.9	88.4
Germany	38.6	93.1
Iceland	48.8	96.7
Norway	59.2	97.3
Sweden	47.6	95.2

(Data source: OECD 2022)

In Finland, Norway, and Denmark there are subsidized ways for parents to stay home longer with their children after parental leave. In Finland, the system of compensating stay-at-home parents is quite common. Nine out of ten families with children sometimes use guardianship benefits, and every second child has been at home for three years (Duvander, Cedström 2017). All parents with children between 160 weekdays and three years old, can receive support for home care of children. One Finnish study shows the long-term negative effects of home-care compensation on women. It impacts maternal employment and earnings up to ten years after the birth of the child (FIT 2023).

In Norway, the cash-support system is called “Kontantstøtte”, and can be distributed full-time or part-time (NAV, 2024a). 14 per cent of Norwegian children’s parents were full- or parttime recipients of this allowance in 2023, a majority of whom, 80 per cent are mothers (Nav 2024b). In Denmark there is an option of receiving cash benefits while staying at home with children, instead of childcare. This is regulated on the municipal level and has a much lower usage than in Finland and Norway (Duvander, Cedström 2017). In Norway, most parents use the Kontantstøtte between the period of paid parental leave and until the child is enrolled in childcare. In Finland it is more common for especially mothers staying at home longer, and for children not entering childcare. Roughly two thirds of Icelandic municipalities have rules for children’s admission (BSRB 2022). Municipal preschool is subsidized as well. In Germany, a law granting allowances to parents caring for children at

*Table 11: Distribution of paid parental leave days used by men and women*

Country	Distribution of paid parental leave days (in %) <sup>4</sup>	
	Men	Women
Denmark	13.1	86.9
Finland	15.6	84.4
Germany	26.1	73.9
Iceland	32.3	67.7
Norway	30.8	69.2
Sweden	30.9	69.1

(Data source: Danmarks statistik, SVT 2024, Vinnulastofnun 2022, Nordic Statistics 2022, SCB 2024, Statistische Ämter des Bundes und der Länder 2022).

home called “Betreuungsgeld”, was introduced in 2013, surrounded by deep conflicts and lively debates. In 2015, the Federal Constitutional Court ruled that the law was not compatible with the constitution, because this issue had to be dealt with by the Federal States, not by the central Federal Government. Bavaria and Saxonia are the only two stated (out of 16) that still pay “Betreuungsgeld” after this court decision. Since 2018, the allowance is now called Family Allowance, and in Bavaria it is paid to parents when the child is at home or in childcare (Zentrum Bayern Familie und Soziales). In Saxonia it is called state child-raising allowance and is paid to parents when the child is at home (Familien in Sachsen 2021).

#### 4.3.3 Social partner agreements and compensation for unpaid work

In Norway, fathers are entitled to two weeks of unpaid leave at childbirth. However, in the public sector and in large parts of the private sector, collective bargaining agreements grant compensation. In practice, many collective or individual agreements cover the wage difference between the cap and full replacement of previous income during sick leave, sick-child leave and parental leave, including in the public sector<sup>5</sup>. In Norway, one study shows that 65 per cent of the fathers who had salaries over the allowance cap were compensated by the employer (NIKK 2018). Those with higher wages with compensation from employers were more likely to use more days than were earmarked for them than fathers with lower salaries and those not compensated (NAV 2019).

4 Note that the statistics surrounding paid parental leave is measured differently in the different Nordic countries. We still judge the data to be comparable and to show the overall trend of parental leave in each country.

5 In practice, many collective or individual agreements cover the difference between the cap and full replacement of previous income, including in the public sector.

In Denmark, employees with collective agreements have a built-in earmarked paternity leave, adding on to the national legislation. Several trade unions pay fathers their full salaries if they choose to take the weeks of parental leave that are reserved for them in collective agreements. If employers pay more than ordinary parental leave benefit, they receive a refund of up to a set cap. Most Danes are compensated with 100 per cent of their salary during sickness, during a period that varies depending on the agreements. There is also a legal right (Retsinformation (2024) to sick-child leave however not always entitled with compensation, the law only provides a narrow right to absence and no payment, however many with or without collective agreements have compensation when on sick-child leave in their contracts, regulated in contracts or in collective agreements (Staff Service at AU 2023).

The most common provision in Swedish collective agreements is that the statutory parental leave benefit, which amounts to about 80 per cent of the income up to a ceiling, is supplemented so that the employee receives 90 per cent of the actual wage in total. The compensation for sick-child leave is regulated through legislation, as well as sick-leave. The sick-leave system however has a “qualifying day”, the compensation is only distributed starting with the second day (Försäkringskassan 2023). In Iceland, parents have the right to stay home with sick children, but without a legal right to compensation. There are regulations in collective agreements that compensate, and it is common for employers to pay regular salaries (UN 2005). The number of days, depending on length of employment, is regulated in collective agreements, such as the agreement between “Sameykis” – the biggest trade union in public service – and the Minister of Finance and Economy formerly Treasury (Sameykis 2023).

In Finland, collective agreements may include additional provisions regarding the employer’s obligation to pay wages for a period of illness, or during parental leave (Info Finland 2024). The same rules are most commonly applicable for sick-child leave. At the employer’s request, the employee is required to provide a reliable explanation of the reason for the temporary child-care leave. A medical certificate is primarily considered to be reliable (My Fondia 2022).

#### 4.3.4 Unpaid household work and unpaid parental leave

The unpaid, “invisible” work is mainly the responsibility of women, which is shown in Table 12. German women are in the lead, performing 92 minutes more on these chores daily compared to men, Swedish women are at the bottom, with 49 minutes per day. Calculated per week, German women work 10 hours and 43 minutes unpaid, while Swedish women do the same for 5 hours and 45 minutes. Overall, Swedish fathers take out 30 per cent of the paid parental leave. But about one third of the total parental leave is unpaid, and while mothers in general stay at home for four additional months unpaid, fathers take out less than one month (ISF 2023). This results in the fathers’ share of the total parental leave being 21 per cent in Norway, both parents

*Table 12: Time spent on unpaid work<sup>6</sup>*

Country	Unpaid work. Minutes per Day.		
	Men	Women	Time difference, women-men
Denmark	186.1	242.8	56.7
Finland	157.5	235.8	78.3
Germany	150.4	242.3	91.9
Iceland*	/	/	/
Norway	168.5	227.4	58.9
Sweden	171.0	220.2	49.2

\*No comparable data available for Iceland  
(Data source: OECD 2021b)

have a right to one year of unpaid leave. But it is gender-divided; 48 per cent of mothers and 11 per cent of fathers took unpaid leave as an extension of the paid parental benefit period. Of these, mothers took an average of 16 weeks' unpaid leave, while the fathers took 11 weeks (Bungum, Kvande 2022).

#### **4.4 Vertical segregation**

There are big differences in the roles of men and women in the labour market, which is visualized in the vertical segregation. In all countries in this study, work-life mobility is greater for men than women. Men become managers earlier in life, they often climb even higher and have higher salaries as managers compared to female managers. In addition, men hold managerial positions in different types of jobs than women.

6 Time spent in unpaid work includes: routine housework; shopping; care for household members; child care; adult care; care for non-household members; volunteering; travel related to household activities; other unpaid activities. There is a lack of comparable international data and diversity in methodologies used across different countries. The latest available data from the OECD Time Use Database varies, and some of the data is outdated or missing. The data for Denmark is from 2001, for Finland from 2009/10, for Germany from 2012/13, for Norway from 2010/11, and for Sweden from 2010. There is no data available for Iceland from this source.

*Table 13: Share of female board members in companies*

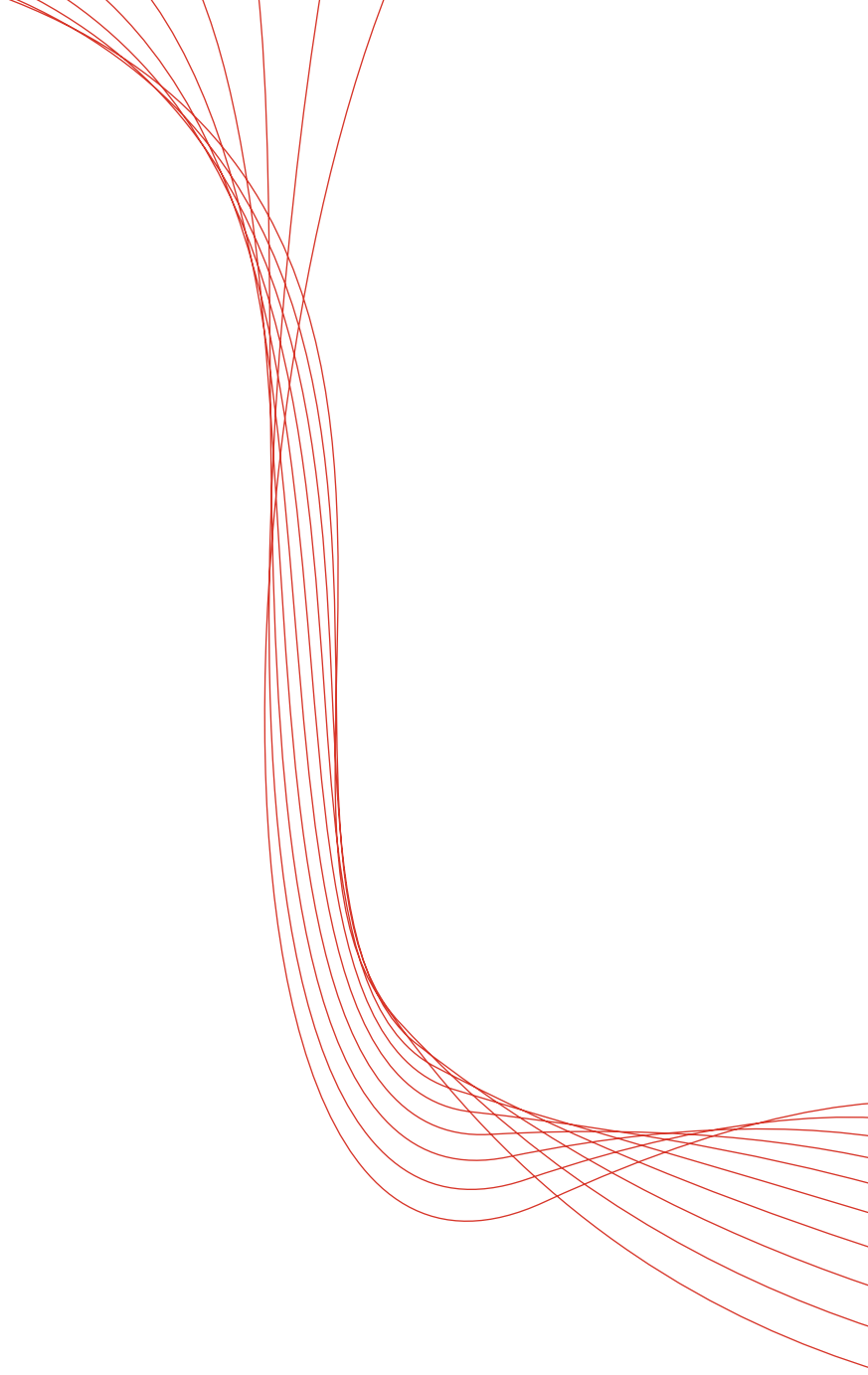
Country	Female Board Members, 2023 (in %)	Female Executives, 2023 (in %)
Denmark	41.4	23.6
Finland	38.3	27.9
Germany	38.7	23.5
Iceland	42.4	31.0
Norway	43.1	31.3
Sweden	36.6	28.6

(Data source: Eurostat 2023d)

Horizontal and vertical segregation interact and contribute to the unequal wages. But even in female-dominated sectors, men are overrepresented in managerial roles. In Sweden, where women make up over 70 per cent of the employees in the municipal sector, men hold managerial positions in 275 out of 290 municipalities (SCB 2023). In only four municipalities is the proportion of managers equal between the sexes. In Finland, the share of female managers increased until 2019, with a top rating at 36 per cent, but has decreased since then. The reasons for this go back to gender-stereotypical attitudes, where men are considered the norm for a good manager.

In Denmark, men are in the majority on company boards – with eight out of ten seats – an unchanged order of magnitude since 2014. The most unequal are the managements of small and medium-sized companies (The Local DK 2023). A study from 2020 shows that in the 1,000 largest Danish companies, there are 69 female directors. The number has declined: In 2019, there were 75 female directors (Daalgard, Seaton Saabye 2020). Iceland ranks at the top for women in workplaces within OECD (Organization for Economic Co-operation and Development), according to The Economist’s Glass-Ceiling Index (The Economist 2024). Iceland has made the greatest progress toward closing the pay gap in the region observed. Yet no woman is CEO of a company listed on the Icelandic stock exchange in 2020. Women CEOs are more likely to lead small enterprises, and women account for 13 per cent of CEOs in larger companies (Óladóttir, Christiansen, Aðalsteinsson 2021).

In Norway, the topic of women’s share in high positions is a highly debated and prioritized subject. Since 2004, there has been a quota system to encourage women in company boards and in leadership roles. Still, the percentage of women in higher positions is relatively low. The highest share of women is in energy supply (29 per cent), communication services (26 per cent), information technology (24 per cent) and health (22 per cent) (Statista 2024).



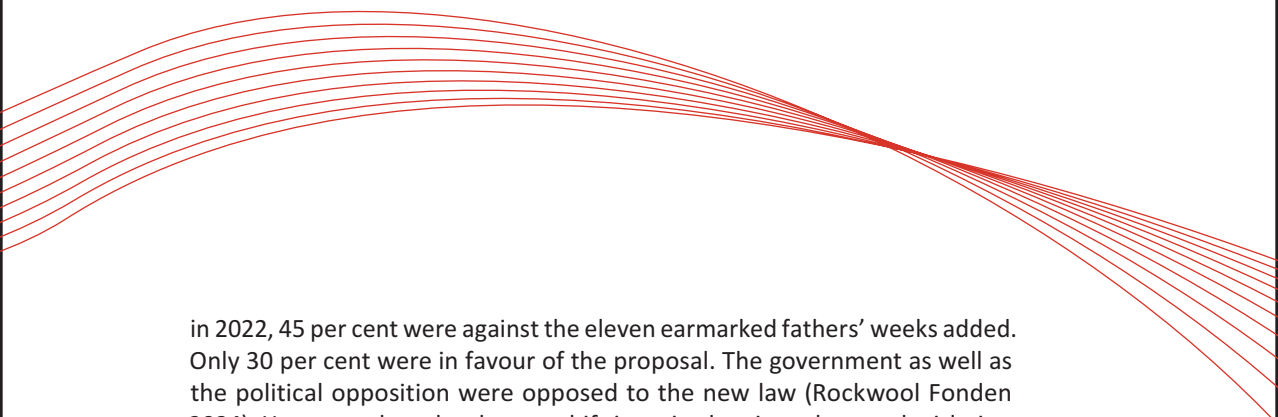
## 5. Some obstacles and challenges to Equal Pay



There has been progress in closing the Equal Pay gap throughout the region. But at the same time, important obstacles and challenges remain, standing in the way of a faster pace. Below, some of the challenges identified in the region are explored, from a trade-union perspective. The examples below are drawn from the individual countries, although the same challenges are common in the region as a whole. This section does not compare the countries and to what extent they are facing the same obstacle; it rather gives a picture of the complexity that the region is facing, through the examples shown in individual countries. The obstacles identified also serve as a basis for a discussion on what remains to be overcome, in order to reach Equal Pay in the region. By looking more closely at the challenges of individual countries, we get a clearer picture of the difficulties that exist. In the same way that the good examples in this report provide puzzle pieces that together can solve the puzzle of Equal Pay, the challenges that the countries face show a patchwork of shortcomings, which need to be alleviated and put together in order to move forward.

### 5.1 Denmark

Denmark has for a long time been at the bottom of the list among the Nordic countries, having the lowest **paternity leave** rates. Up until the EU directive on shared parental leave in 2022, Danish fathers took out 25 days on average, compared to mothers' 231 days (Grosshög, H. 2019). The EU directive met with a lot of resistance. According to a survey



in 2022, 45 per cent were against the eleven earmarked fathers' weeks added. Only 30 per cent were in favour of the proposal. The government as well as the political opposition were opposed to the new law (Rockwool Fonden 2024). However, there has been a shift in attitudes since the new legislation was enforced in August 2022. During an eight-week period in 2022, fathers and co-mothers took an average of 2.5 weeks more parental leave compared to the year before, while mothers took an average of 3.3 weeks less in leaves, according to data from the Danish social security authority Udbetaling Danmark (The Local Denmark 2023). The resistance among fathers has been overcome to some extent, which is an important lesson, and at the same time is promising for the future.

In Denmark, a majority of basic **social security and family security rights are depending on employment, collective agreements, and job-related regulations**. On the labour market there are challenges. Collective agreements cover 82 per cent of employees, with a difference between sectors: 100 per cent in the public sector are covered compared to 73 per cent in the private sector (DA, FH and Ministry of Employment 2021). Also, collective-agreement coverage is declining, from 85 per cent coverage in 2000 to 82 per cent in 2018 (OECD 2023). Among other things, collective agreements decide on parental leave rights and child sick-allowance, which is not available for employees without agreement coverage (European Commission 2020). After the birth of a child each parent has the right to 24 weeks' leave with daily allowances, DKK20,359 a month. 13 of the 24 weeks are transferrable to the other parent. Regarding leave when the child is sick, many employees without collective agreements also have the right to one day's paid leave. The system makes it uneven for families in terms of to what extent parents can stay at home when children are sick. However, as there are days for the separate parents, there are incentives to share the sick days which should counteract the tendency not to share sick-child leave equal between parents, since women earn less. Achieving equal parenting is one of the most important aspects of achieving equality in society – as well as of achieving Equal Pay. The EU Work-life Balance Directive has been important in speeding up a development that has been difficult to do anything about, something that has been noticed primarily in Denmark and Finland. But it is clear that the traditional, conservative view that women are better suited to take care of children, and their homes is

prevalent in all the countries in this study. It is equally clear that it is possible to change this, but that it will not happen by itself. To equally divide the parental days in the parental insurance is beneficial for the equal share of a couple, it is also beneficial when collective agreements add payments and supplements. This is also helpful not only for parental leave but also for sick leave caring for sick children.

The fact that such a large part of welfare is absent in jobs without collective agreements, as in Denmark, is both an asset but also a problem from the point of view of Equal Pay. The benefits that the collectively agreed jobs provide are a strength of the Nordic model, as well as the fact that union membership has a clear added value for individuals. But the risk is that there will be a division where those who do not have work – or work with a collective agreement – do not have the most basic protections, such as in the event of illness or in the event of a child's illness. This becomes particularly problematic as the degree of union membership decreases, as well as when being home from work – when starting a family and when sick – becomes more gendered.

## 5.2 Finland

In Finland, one key issue in closing the gender pay gap is the **lack of pay transparency** in workplaces (Måwe 2019). Research has shown that when employees lack the knowledge about what other employees earn at a certain workplace, pay differences more easily occur, often based on discriminatory grounds such as gender. Workplaces that are more transparent about employees' pay have smaller pay gaps (Elsesser 2021). Trade Unions and the Finnish equality ombudsman have been strongly in favour of increasing pay transparency as a tool for evening wages. The previous Finnish government was planning to implement legislation on this, for employees. This was stopped, however, after being rejected by the main employers' organization, the Confederation of Finnish Industries (EK), who left the parliament pay transparency working group in 2020.

Finland has the **lowest childcare enrolment** in the region as concluded earlier in this report (NIKK 2019). The reason is largely due to the well-developed home care system, that allows mainly mothers to stay at home for a longer time with their children. In Finland, a parent can be paid a home care allowance if a parent has a child under three years of age who does not attend municipal early childhood education. The right to child a home care allowance starts right after the period of parental allowance. Home care allowance is widely used in Finland; almost 80 per cent of mothers of 1-2-year-old children who responded to a survey had been or were currently receiving a home care allowance. Almost one third planned to be or had been on home care support for more than a year.

**Pregnancy and family leave discrimination** are important obstacles to equal pay.

The Finnish Equality Ombudsman to Parliament receives a large amount of contacts per year about pregnancy discrimination. Primarily women in uncertain labour-market situations are particularly at risk. Also, among Finnish trade unions, this is a common problem. In 2017, 46 per cent of trade unions announced that they are contacted weekly by people who have experienced discrimination due to pregnancy (Hasselblatt mfl. 2019). The most common case of discrimination is that contracts are not renewed by the employer when a pregnancy becomes evident. According to a study, one in four pregnant people experience pregnancy discrimination (Statistikcentralen 2014).

As a way to address the issue, a working group on equality at work and family leave was set up in 2023, in order to identify effective ways of preventing discrimination on grounds of pregnancy and family leave, and they will be finished with their task by February 2025 (Ministry of Social Affairs and Health 2023).

Lack of pay transparency is an important problem throughout the region. Knowing what colleagues with the same or equivalent tasks in the same workplace earn, makes it easier to demand equal pay. When wages are kept secret from the employees and negotiated individually, unequal wages arise; we see this everywhere. This is therefore an important issue in all countries from a trade-union perspective.

The fact that women stay at home for a long time in connection with parental leave is problematic from a salary perspective. The total salary income over a lifetime will be lower, affecting pensions negatively. But it is negative in several other respects, not least in reduced economic independence for women. The motherhood penalty, which also exists in countries such as Sweden and Iceland, where women do not stay at home as long as in Finland, Norway, Germany and partly Denmark, hits particularly hard when women receive financial support to stay at home for many years without going to work. This is also connected to a more tangible form of discrimination in Finland, where employers are discouraged from hiring women of childbearing age and where pregnancy discrimination is becoming more common. This is a problem that also exists in the other countries – and has been so more historically compared with now. It is clear that non-discrimination legislation is not enough to protect Finnish mothers-to-be from being discriminated against.

### 5.3 Germany

Three major obstacles to pay equity can be identified in Germany. The first obstacle is **insufficient legal regulations on Equal Pay**. The German Pay Transparency Act, PTA, has been criticised from the beginning for its limited scope, its limited implementation power and the non-binding character of most of its provisions. The effectiveness of the PTA has been evaluated twice, and both evaluations arrived at discouraging results, stating that “no statistically significant effects of the measures of the PTA on equal pay for women and

men can be proven” (BMFSFJ 2023: 17). That’s why a lot of trade unionists, Equal Pay activists and scholars hope that the EU Wage Transparency Directive will change the legal situation in Germany principally.

Outdated or lacking collective agreements turn out to be a second obstacle for Germany. Many collective agreements still use traditional grading regulations, sometimes without any transparent job evaluation or with outdated job descriptions and job examples that reflect gendered evaluations of times (hopefully) gone by. These are hard to change because the willingness of the employer is also necessary for the collective agreement to be reviewed. Additionally, because of the declining collective-bargaining coverage, there are growing parts of the labour market with no collective agreements at all.

This leads to non-transparent pay structures that can’t be reviewed for possible discrimination. This situation becomes even worse if there are no employee representatives (works councils) or trade union representatives in the company. And even if they exist, it is not an easy duty for them to achieve the necessary deep knowledge on enhancing pay equity, among other reasons, because they have a large variety of issues to handle.

The third challenge is deep-rooted gender stereotypes that affect Equal Pay. Although gender relationships have already gone through and are still going through a deep transformation in Germany, gender stereotypes still exist and influence labour market conditions and pay structures largely, even if they do so largely unconsciously. Furthermore, there are gender stereotypes that still attribute leadership competencies, responsibility, strategic thinking and decision making to men. On the basis of these stereotype attributions, men seem to be more suitable for leading positions – and they get them. And last but not least, gender stereotypes play a major role in the unequal allocation of paid and unpaid work among the sexes. They are reinforced by the lack of sufficient facilities to reconcile family and work life, e.g. too few childcare places or insufficient or unreliable opening times of childcare facilities, which reduces the possible time for paid work for women. Additionally, as long as women earn less on average and have worse career opportunities than men, it is a simple and reasonable economic choice for parents that the mother interrupts or reduces her employment and does (unpaid) care work for the family instead. Gender stereotypes and their consequences have to be tackled with an eye to increasing pay equity. One practical and highly debated measure is to change provisions in the German tax system, which still favours “one-earner households”. Additionally, it would be necessary to focus on organisational culture and gender-sensitive human-resource policies as well.

Gender stereotypes are present throughout the region and are in many ways the root causes of gender inequality and unequal pay. The strongest still-existing normative idea is that women are the primary caregiver to children, elderly relatives as well as the household. Also, the idea that women are naturally better at performing tasks in care and health work. Joint taxation

for spouses has been a reality in all countries in this study but still truly exists only in Germany and Iceland. The removal of this system in Sweden, Finland, Norway and Denmark is often explained as one of the most important measures for economic independence and gender equality during the late 1900s. The incentives of actually earning money instead of staying at home for tax reasons is also an important incentive for families to share work more equally.

#### **5.4 Iceland**

In Iceland paid parental leave is granted for the child's first 12 months. But it is unusual for parents to get access to childcare for their children that early. A so-called childcare gap is recognized, with a lack of a structural solutions for families to solve the time between parental leave and childcare. The average age for Icelandic children to be enrolled in childcare is 18 months (BSRB 2022). Most families solve this gap by having the mother stay at home longer, unpaid, to take care of the child several more months. According to recent figures, around 20 per cent of Icelandic mothers take on this responsibility compared to seven per cent of men (Varda 2023).

One available solution is placing the child with a childminder, but, depending on the municipality, the placements are too few for the high demand, it is not always available full-time or is not subsidized full-time. In reality this means that full-time work is difficult for women with young children, or that they can't work at all until a childcare placement is available. The childcare gap problem is widely recognized in Iceland, but there are few solutions aiming at fixing the gap. And although this is a more common phenomenon in Iceland, it exists in the region as such; Denmark is the only country that has a guarantee of a pre-school placement within a short time. In Norway, it can be difficult to get a preschool place due to a lack of preschools, and in Sweden, admissions to preschools are normally only made on one or two occasions per year. This means that parents are forced to extend parental leave, usually unpaid, something that usually means that women take this leave.

From an Equal Pay perspective, this is problematic, because the woman not only takes more time off for paid parental leave but is also more often absent for the unpaid leave. This affects financial independence, the division of unpaid domestic work, but potentially career opportunities as well. Reducing the childcare gap is therefore an important measure to create equality in the family and in society, as well as in creating equal wages.

#### **5.5 Norway**

The “**front wage model**” organises wage negotiations in Norway by prioritising export companies that compete internationally. This male-dominated export sector negotiates its wage growth first, the wage growth for the other sectors is then negotiated in accordance with this. The model ensures that wage levels are not too high, allowing the export sector to maintain its competitiveness

and thus avoid layoffs. As the aggregated level for wage growth is set, it is difficult to change relative wage levels across sectors and, hence, between men and women. In general, higher education pays off more in the private, male-dominated sector than in the public, female-dominated, sector. For this reason, the front wage model for wage bargaining is being debated in Norway. Although it has an egalitarian aim, focusing on keeping salaries high and unemployment low, the model is gender blind. According to evaluations and research on the matter, if the labour market were less gender segregated, it would not have had the same effect of widening the gender gap (Teigen 2021). There have been other ways of trying to raise women's wages, usually through low-wage initiatives. As this has indeed increased the wages of the women who have had low wages the longest, it has not led to unequal wages in the rest of the labour market.

Another, notable obstacle is the sharp increase in Norwegian **women's use of unpaid parental leave**. In 2008, 18 per cent of mothers stated that they took unpaid leave to extend the parental benefit period (Grambo, Myklebø 2008). In 2017, this applied to approximately 30 per cent, and in 2021, the percentage of mothers with unpaid leave rose to approximately every other mother (48 per cent). This was four times as much as for fathers (Bakken 2021).

The Norwegian pattern-bargaining model has served Norwegian workers generally well over time, and Sweden has a similar system. In Norway there has been some debate about the effects of the model on Equal Pay. In order to even out wage development from a gender perspective, it is important that more focus is put on this, that the pattern-bargaining model needs to be evaluated and discussed.

## 5.6 Sweden

Sweden has the highest **regulated normal full-time working** hours in the Nordic region, 40 hours per week. Part-time working hours are also the highest (Eurostat 2024) There is an ongoing, heated, debate about shortening the full-time working hours. There are different positions in the discussion, where some of those in favour wish for a legislative approach and others are in favour of a collective-bargaining solution. Swedish women have the highest average working hours per week in the region under study here. But with a high share of women in part-time work, in worse working environment than men, and with a high workload, particularly in the female-dominated sectors such as welfare, the high number of working hours is becoming problematic. Particularly when the majority of household and care work is being done by women, leading to a very high numbers of work hours, when paid and unpaid workload are combined. The harsh working conditions in the female-dominated professions combined with the high number of working hours and larger share of care responsibilities make the situation hard for women. The main arguments for shorter working hours are better health and increased

work-life balance. It could also prompt the high number of women working part-time to attain full-time employment – and salary, and in the end Equal Pay.

One in four women **work part-time in Sweden**, compared to nine per cent of men. It is most common among blue-collar women, where almost half of women work part-time (LO 2023). According to Vårdförbundet, the trade union organising trained nurses, half of their part-time working members would consider full-time if the full-time measurement were reduced (Vårdförbundet 2023). Working conditions have become increasingly tougher in many female-dominated occupations. Women have twice the number of sick days compared to men (TCO 2022). Women, and particularly women with higher education, are more affected by work-related problems, such as stress, difficulties sleeping, anxiety, depression and burn-outs. 26 per cent of Swedish women with higher education have work-related problems that affect their private lives, according to a study from TCO. Many women also decide to work part-time as a result of this (Försäkringskassan 2021).

Sweden is the only country in the Nordic region with a **qualifying day in the social security system** for sick-leave allowance. This system has been in place since 1993. It has effects on the gender pay gap, when women are registered as sick more often than men and since women are in the majority in health and care occupations that more easily can get infected with disease, and who cannot work from home while sick.

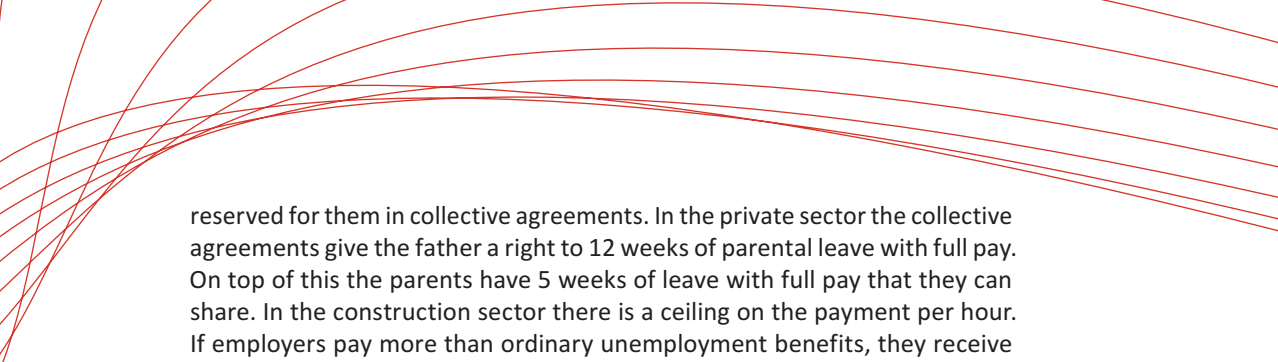
The relatively high normative working hours in Sweden has been heatedly debated during the last year. Comparisons to the other Nordic countries are often made as arguments for decreasing the working hours. And although the impact on Equal Pay can be seen as exaggerated, it is important to emphasize the connections. One is that women are more often home from work ill, that women have stressful occupations and would benefit healthwise, and therefore income-wise, by working fewer hours. The larger responsibilities for care and household work would also provide women with a better work-life balance if they had shorter working days. The harsher working conditions for women are palpable in the region as a whole, as well as a larger share of women being physically and psychologically ill. The qualifying day in the sick leave system hits women more than men, more often already having lower wages, and being sick more often. This, combined with the harder work environment in female-dominated jobs, the overall higher frequency of sickness among women, also long-term sickness, compared to men is an important obstacle to overcome. It affects women more – and decreases the total wage income compared to men even more. A removal of the qualifying day, as well as more efforts to promote preventive health and provide assistance in rehabilitation returning to work, would affect women's health and work participation – and lead to more equal real wages.

## 6. Good examples of Equal Pay in Denmark, Finland, Germany, Iceland, Norway, and Sweden

**T**he pay gap has narrowed in all six countries in this report. It is moving in the right direction, which is positive. But measures to increase gender equality look partly different across countries. There are successful practices, initiatives, legislations or contractual advances that are worth highlighting. Each of these best practices are pieces of the puzzle for reaching Equal Pay. If they are put together, the puzzle is completed, maybe the wage gap can be closed. The good examples can inspire – from one country to another – but also countries elsewhere that are looking for proven ways to reduce the gender pay gap. In this chapter, the best practices are presented per country, serving as examples of measures that have contributed to more Equal Pay based on the starting points of this report. In several examples that are highlighted here, other countries also have similar systems and have seen similar successes. The aim is not to give an overall picture of all positive initiatives going on in the region, but to provide good examples where the most visible effects are being shown or where progress is the most promising.

### 6.1 Denmark

In Denmark, there have been some promising developments affecting Equal Pay. The uniquely developed childcare system, the “Boss-Lady project” and the Danish labour court are described here as pieces of the Equal Pay puzzle. Collective agreements have included the right to parental leave. Some have even agreed to pay fathers their full salaries if they choose to take the weeks of parental leave that are



reserved for them in collective agreements. In the private sector the collective agreements give the father a right to 12 weeks of parental leave with full pay. On top of this the parents have 5 weeks of leave with full pay that they can share. In the construction sector there is a ceiling on the payment per hour. If employers pay more than ordinary unemployment benefits, they receive a refund of up to around DKK 200 per hour from barsel.dk or the maternity fund they are covered by through the collective agreement (Life in Denmark 2024). The Financial Sector Union is one of the most progressive trade unions with about 40,000 members. It has negotiated the right to 16 weeks of paid parental leave for fathers. The 2006 men's average use of parental leave has increased by 89 per cent in the financial sector in Denmark. In the same period white-collar male workers have on average increased their use of parental leave by 33 per cent, according to the Confederation of Danish Employers (Nordic Council of Ministers 2019). Since Denmark changed their parental leave in 2022, with an increase of earmarked weeks for the father, the share of parental leave taken out by fathers has increased from 14% in 2021 to 21% in 2022 (Rockwool Fonden, 2024).

#### 6.1.1 The Danish labour court rules for Equal Pay

The Danish judicial system is based on the traditions of civil law, as in continental Europe. A Public Conciliator, as well as the Labor Court, has been set up by the state to assist in resolving conflicts in the labour market. They do not have a role in cases in matters of Equal Pay, however; the labour court system in Denmark can take on cases, often driven by trade unions, and improve the cases' situations as such as well as having a normative effect, especially when cases get public attention. Cases concerning Equal Pay are normally settled in professional arbitration, however, with Equal Pay boards determined by collective agreement or the ordinary courts. The outcomes of those cases then establish precedents – and make broader change.

Cases concerning Equal Pay are handled in various legal instances. These cases often concern discrimination during pregnancy or parental leave, unlawful dismissals, and unequal wages for the same value compared to other colleagues. One of the best-known cases is the equal pay case from Danfoss, in 1989. It concerned the issue of men and women getting the same basic salary, but due to different allowances, men earned between 1,000 and 1,500 kroner more per month than female employees.

The HK Service trade union went to the then EC court, which ruled that the company's various allowances were so incomprehensible that the employer would have to prove that the women received lower wages for legitimate reasons and not because of their gender. Danfoss could not meet this so-called reverse burden of proof (Eurlex 1989).

Some more recent examples include a male employee in 2015 who found that the parental leave policy of his employer was an infringement of the

right to non-discrimination on grounds of gender as well as an infringement of the Equal Pay Act. According to the policy, the entitlement to compensation related to parental leave for mothers was calculated based on seniority whereas the compensation for fathers was a fixed amount. Accordingly, there was the potential for mothers to receive a higher level of compensation than fathers. The Equality Board found this to be an infringement of the right to equal pay (*Danish Equality Board, case 2017-6810-22191*).

Cases are also taken to other courts. One example that was taken to the Supreme Court, ruling U 2012.511 H, involved a pregnant fixed-term hairdresser who was not offered continued employment. It was documented that the employer had taken the pregnancy into consideration in the decision not to offer the hairdresser an available position. Compensation of DKK 25 000 was granted for the decision not to hire, in breach of the Equal Treatment Act 34 (Krarup Olesen, Keiding, 2024).

Again, it is important to note that these court cases are rarely directly linked to Equal Pay unless these matters are usually solved in industrial arbitration. However, having cases that can show discrimination, for instance in regards to pregnancy, is also part of a larger structure, and correcting such errors and having public trials and documentation should also serve to set a different norm, making it harder to discriminate and give incentives for employers to strive to provide equal pay for work of equal value at work places.

### 6.1.2 Boss Ladies – combatting sexist culture and horizontal segregation

The Boss Ladies project is a collaboration between trade unions and employers' organizations, run by the NGO "Divers" in Denmark. It has been active since 2018. The project aims to break the gender-segregated labour market and motivate young women to enter traditional male occupations, with a focus on the building and construction industry. Statistics show that women only make up nine per cent of the workforce in these sectors, and with an upcoming shortage in staff, the campaign aims at attracting young women to enter the field.

The project includes various parts: Ambassador craftswomen who share their experiences and facilitate workshops that challenge the traditional choices of education at primary and vocational schools.

An evaluation, "Rethink your skills", of the activities shows that the project has succeeded in creating initial change and building a strong foundation for cultural and structural changes in the industries. But if a really noticeable effect is to be created, it is recommended that efforts at vocational schools be intensified and that in-depth efforts be launched in companies (Tiegerfonden 2021). Overall, the evaluation indicates that the project is particularly successful in creating changes on individual levels for the young women who are part of and/or are considering entering the construction and installation industries. Also, it has succeeded in establishing a strong foundation for forward-looking

cultural and structural changes in the industry sector, forwarding a gender-equality agenda. It has managed to raise awareness about the problem of the uneven male-dominated sector and in the vocational education facilities, and about the advantages of including more women. The evaluation shows that while the project has been successful in some respects, it has not yet led to noticeable changes at the cultural level among vocational schools and in companies. To implement this change is the main focus moving forward.

### 6.1.3 A well-developed childcare and women's work

Denmark has the highest proportion of young children in childcare in the EU: 97 per cent of children aged 3–5 year and 89 per cent of children aged 1-2-year-olds. Children start childcare earlier than in the other Nordic countries; the enrolment rate for 0-1-year old's is 18 per cent. As early as the 1980s, most small children were enrolled in some type of childcare services. There is a childcare guarantee in place, which means that all children are entitled to childcare services from 26 weeks of age. If the family wants a placement immediately at 26 weeks, the municipality has a deadline of four weeks to offer the placements. If this is not fulfilled, the municipality is obliged to compensate the family. 75 per cent or more of the childcare costs are subsidized by the municipality. The self-cost is rather low, only two per cent of Danish parents find that they cannot afford childcare (Eurydice 2023).

In addition to the subsidy of at least 75 per cent, there are further free-place subsidies, sibling subsidies, treatment free-place subsidies and social-educational free-place subsidies as complements.

There are several types of childcare services in place: day nurseries for children 0-3 years old, kindergartens for children 3-6 years old and pre-school/after-school centres for children 6-10 years old. Among these, a growing number attend preschool, 75 per cent, while 25 per cent attend day nurseries. Since 2020 nationwide standards for staff-to-child ratio in formal day care have been regulated. This, combined with a high level of educated staff has had a significant impact on the quality of childcare and early education (Ibid). Among children up to two years, the staff-to-child ratio is 1:3, while the ratio for children aged three to five is 1:6. This is an improvement since 2017, when the corresponding ratios were 3:1 and 6:2 for the same daycare institutions. Some municipalities provide subsidies for parents to care for their own children from the age of 24 weeks until school starts. One requirement is that the parent has lived in Denmark for at least seven out of the latest eight years, and that the language spoken is Danish (Børne- og undervisningsministeriet 2024). In 2019, 12 per cent of children in day care were in a home-based ECEC provision (Statistics Denmark 2021). The local municipality decides whether it will subsidize parents for care of their own children (Børne- og undervisningsministeriet 2024). However, the demand has been increasing for home-based daycare in recent years (Eurydice 2023).

## 6.2 Finland

In Finland, there are measures taken to increase gender equality on the labour market, which has effects on the pay gap. The tripartite Equal Pay Programs is one, and the Equality ombudsman in another mechanism that is important to highlight.

### 6.2.1 The tripartite Equal Pay Programs

The tripartite Equal Pay Programmes are a collective initiative including the central labour and employers' organizations and the government. The programmes have been implemented since 2006, focusing on Equal Pay for the same work or work of equal value, irrespective of gender. The first program ran between 2006–2015 and aimed to reduce the average gender pay gap from 20 per cent to 15 per cent. The programme included several different research and development projects, for example the introduction of a salary system that does not discriminate against gender. The measures were coordinated and monitored by a group of experts composed of these parties. During the period, reforms also took place regarding the requirements for employers in terms of equal employment plans and salary mapping, as well as changes to the law to increase fathers' share of the parental leave. After the first Equal Pay programme, the target was not reached. In 2016 a new Equal Pay programme was initiated and ran until the end of March 2019. It contained a variety of measures aimed, for example, at improving work with gender equality planning in the workplace, increasing knowledge and transparency around wages. The aim was to bring the gender pay gap in Finland down to 12 per cent by 2025. As part of the Tripartite Equal Pay Programme 2020–2023, central labour market organizations drew up guidelines for workplaces on equality plans and pay surveys. The measures under this programme aimed at promoting the gender impact assessments of collective agreements, pay systems that support Equal Pay and pay awareness, support the reconciliation of work and family life, and dismantle the traditional division of labour between genders. Possible measures also included guidelines for equality plans at workplaces and an extensive joint project to dismantle segregation.

A renewed tripartite Equal Pay Programme for 2024-2027 has recently been agreed on between the parties (Sosiaali- ja terveystieteiden ministeriön 2024).

### 6.2.2 The equality ombudsman

The Equality Ombudsman in Finland is an independent authority that has worked for equality between genders since 1987. The ombudsman's tasks are to monitor that the law on equality between women and men is followed, the prohibitions against discrimination and discriminatory advertising inform the public about the Equality Act and how it should be applied. The work is performed through initiatives, advice and instructions that contribute to the achievement of the law's purpose. The Ombudsman also follows up that gender

equality is implemented in various areas of society, and to take measures to achieve settlements in discrimination cases referred to it under the Equality Act. The monitoring of gender-equality plans on the Finnish labour market is performed by the Ombudsman for Equality, including gender-equality plans and pay surveys or Equal Pay audits. The Ombudsman monitors gender-equality plans in situations where the workplace is suspected of discrimination. There is also targeted monitoring, where several employers in certain sectors have been requested to submit equality plans to the Ombudsman. However, the Ombudsman's office has limited resources available, which prevents more extensive and regular monitoring.

The Gender equality plans and pay surveys must be drawn up in cooperation with employee representatives: union representative, occupational safety representative or a group of employees. Also, the equality plans and results of the equal pay audits must be shared with employees. An evaluating report from 2020 commissioned by the Ministry of Social Affairs and Health and conducted by Statistics Finland examined the prevalence and the quality of equality plans and Equal Pay audits in the private and public sector (Attila, Koskinen 2020). It showed that a majority (70 per cent) of the organizations had made equality plans, but only half (53 per cent) carried out the Equal Pay audit. The variation was large across sectors in auditing: 86 per cent of public sector employers, 68 per cent of municipal employers, 50 per cent of private employers. Also, the quality of the plans was often deficient (ibid).

However, there is a way for the Ombudsman to force employers to set up an equality plan, when it has been neglected, through instructions and advice, ensuring that the employer makes the plan. If the employer still neglects it, the Ombudsman can set a deadline by which the plan must be drafted. If this is not adhered to, the Ombudsman can take the matter to the National Non-Discrimination and Equality Tribunal. The Tribunal may, under threat of a fine, oblige the employer to prepare a plan within a defined period. If the employer still neglects the equality plan, the board will enforce the fine. Up until the writing of this report, no such a fine has ever been imposed. The Ombudsman serves as a centre for information but also helps with legal aid in individual cases on gender discrimination, gender identity or gender expression. The equality ombudsman can also take individual cases **to the National Non-Discrimination and Equality Tribunal**.

### 6.3 Germany

For Germany, three trade union initiatives and measures will be briefly described as examples of good practice.<sup>7</sup>

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<sup>7</sup> More examples for Germany have been collected and are documented in Jochmann-Döll 2024.

**6.3.1 Initiative on Pay Justice of the Food and Catering Union and its results**  
The Food and Catering Union (NGG) has launched the Initiative Pay Justice in 2013 in order to establish a basis for gender-neutral grading systems and collective agreements that guarantee equal pay for work of equal value (NGG 2024). The background was the observation that many collective agreements are outdated and do not adequately describe and classify (grade) modern jobs. Grading and pay structures therefore become non-transparent and no longer mirror the reality of jobs in companies.

The initiative consisted of a training programme for unionists, members of bargaining commissions and local employee representatives on equal pay and discrimination-free job evaluation. All collective agreements should be tested with a special pay equity tool, EG-check (Antidiskriminierungstelle des Bundes 2019) and re-negotiated if potential for discrimination was found. This was paralleled by information and sensibilisation campaigns for members and the public in the sector. In many workshops and training sessions discriminatory potential in collective agreements on national, regional or company levels was identified. Some of them have already been altered and modified, like for the butchery craft of the Saarland, a large meat producing company (Vion), the hotel and catering industry in North-Rhine-Westphalia and the bakery craft in Berlin-Brandenburg (next example).

### **6.3.2 A new collective agreement for the Bakery craft in Berlin and Brandenburg**

In many workshops of the Initiative Pay Justice, bakery trade agreements were tested for the guarantee the principle of Equal Pay for work of equal value. These tests clearly pointed out the undervaluation of the work of (female-dominated) bakery saleswomen in comparison to (male-dominated) bakers. With a non-discriminative job evaluation method (provided by eg-check.de) these jobs were rated as being of the same value, but in the pay agreements they were grouped in different pay grades with saleswomen earning up to 500 Euro per month less than bakers. This example of undervaluation of women's work became quite famous within and outside the NGG and was presented and discussed on many occasions. In 2022, the NGG in the region Berlin and Brandenburg could bargain a pay structure where bakers and salespersons earned the same hourly wage for the first time<sup>8</sup>. The situation was favourable and ripe for this success because:

- The bakery saleswomen were aware that their jobs had changed enormously, and the requirements have increased, especially with respect to knowledge of baking and physical requirements. They had gained self-confidence, pride in their work and courage to stand for their right to Equal Pay.

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<sup>8</sup> Information based on an expert interview with two union officers responsible for collective bargaining and women's policies for this regional division of the NGG.

- The labour market in general had changed, and qualified personnel was in short supply in Germany. Many bakeries, too, suffered from the work force shortages and saw equal pay for salespersons as a good argument to win employees for the shops.
- Not only on the side of the NGG, but also on the side of the employers' association, there were gender-oriented individuals that supported the aim of equal pay for men and women.

### 6.3.3 Equal wages for teachers at primary and secondary level

In Germany, teachers are, on the one hand, civil servants and as such paid according to governmental rules and provisions, and, on the other hand, they are employees whose working conditions (but not the teaching commitment and the salary grade) are regulated by collective bargaining agreements. Both legal and collective wage provisions as well as school forms and qualifying processes of teachers differ among the Federal states. That's why the profession of teachers in the different states and school forms is very diverse. But one fact has been consistent throughout many years: Primary school teachers were paid less than teachers at secondary and upper secondary level in all German states. The German Education Union (GEW) has successfully changed this.<sup>9</sup>

It all started already in 1968 when the GEW stated at its congress that all teachers' jobs are of equal value and should be paid the same. The Kick-Off for a new campaign came in 2008 with an academic labour study showing that primary school teachers and teachers at secondary schools (like grammar schools) were of the same value. The results of this study have been highly controversial inside the GEW, because at that time it was not appreciated that the women's department exerted influence on the tasks of the collective bargaining department. It took another seven years until, in 2015, the campaign "JA 13" ("Yes to A13")<sup>10</sup> was launched, supported by a legal opinion that clearly stated the discriminatory undervaluation of primary school teachers. Now, in February 2024, the aim of equal pay for primary school teachers has been reached for 13 of the 16 German federal states. The remaining three are expected to follow.

Summarising, the main success factor was the mixture of a central strategy and support, on the one hand, and freedom to act and a variety of measures and activities on decentral level (regional or state districts), on the other hand. This required a high level of trust in the competence of the state divisions but made it possible for every division of the GEW to find its own appropriate way. Another important influence came from the fact that the GEW stands

<sup>9</sup> Information based on an expert interview with a member of the chair board of the GEW, responsible for women's, equality, and gender policy

<sup>10</sup> The name reflects the demand that primary school teachers should be graded in pay grade A13 like secondary teachers.

for all workers in the education sector, from kindergarten to university, which provided a broad basis of solidarity.

## **6.4 Iceland**

In Iceland, there are several initiatives that have increased gender equality on the labour market to narrow the pay gap. The work-time reductions, the job evaluations and the Equal Pay standard are presented below.

### **6.4.1 Work-time reductions**

Two separate trials of work-time cuts were initiated in Iceland, in 2014 by the city of Reykjavik and in 2015 by the government of Iceland. The trials eventually encompassed more than 2,500 staff members working in over 100 workplaces. This is about 1.3 per cent of Iceland's total workforce (Autonomy 2021). There were two separate aims with the trials. The first was to see if working-time reduction could address poor work-life balance, given the centrality of this concern to the pre-existing public campaign. The second aim was to understand if shorter working hours could increase productivity and see how this might be achieved in practice. The worktime was shortened from 40 to 36 hours and as low as 32 hours for shift workers, but with the same wages. The results of the trials were evaluated and compared to workplaces that were not part of the study. This was in collective agreements in 2020.

The benefits with shorter working hours dominated, quite early on. Surveys during the government trial showed positive changes at participating workplaces compared to the control groups (ibid)-. cross both trials, many workers expressed that after starting to work fewer hours they felt better, more energized, and less stressed, resulting in them having more energy for other activities, such as exercise, friends, and hobbies. Although women didn't immediately see results in the form of men taking more responsibilities at home, it made women have more free time, which was perceived as positive. All of this had a positive effect on the employees' work (ibid). Worker wellbeing increased across a range of indicators, from perceived stress and burnout to health and work-life balance. Following the trials' success, Icelandic trade unions and their confederations achieved permanent reductions in working hours. In total, roughly 86 per cent of Iceland's entire working population has now either moved to working shorter hours or have gained the right to shorten their working hours. These reductions were won in contracts negotiated between 2019 and 2020 and have already come into effect for many employees, depending on the contracts. Some of these contracts establish shorter hours to all union members, while other contracts stipulate that staff, and their individual workplaces can negotiate shorter hours. All the public sector workers are in the new scheme (36 hours for daytime workers and 32-36 for shift workers). In the private sector there are provisions that allow for a 36-hour work week on a company-by-company basis. The process

is still ongoing, and long-term research is not yet available on the gender outcomes of the work-time reductions. Already in the trials, it was however evident that the work-life balance increased, and stressed was reduced – for women and men.

#### 6.4.2 Equal Pay standard

Pay discrimination has been illegal in Iceland since 1961, but it has been evident that the law was not enough to close the gender pay gap. The Act on Equal Status and Equal Rights of Women and Men was established in 1976 and was modified several times, the latest version is from 2020 (Ministry of Welfare). An Equal Pay standard was initiated by the social partners in 2008 and completed by 2012. It started in the private sectors, but other actors soon joined in. The standard itself has been developed by the organization Icelandic Standards, and the social partners, who were also in charge of leading the project. An international standard was developed as an ISO-standard, called IST-85. This work was finished in 2012 when a committee for Equal Pay was mandated to prepare the implementation by the Icelandic government. A couple of studies were made, and several trials were run throughout the country. The Equal Pay law entered into force in 2018, which meant that all employers with at least 25 employees must certify their pay systems according to Equal Pay standards (Government of Iceland 2020).

By law, employers must create a wage system that guarantees that wages are set in the same way for women and men. The criteria for salary setting must not contain any form of gender discrimination (Måwe 2019). The classification of jobs is conducted according to “valid” factors, such as experience rather than one based upon “invalid” criteria, such as race, origin, and gender, that lead to discriminatory practices (Payanalytics 2023). In practical terms, it is accredited accountants who check that employers pay systems meets the criteria in the Equal Pay standard. When the employer become approved, the certification is sent to Jafnréttisstofa, a national agency responsible for administering the Equality Act. Jafnréttisstofa gives the employer an Equal Pay symbol. Every three years the operations are reviewed, and the certification is renewed. The Directorate of Equality, the jafnréttisstofa has the responsibility to ensure that employers procure and comply with the Equal Pay standard, and that it is renewed every three years. Any person who believes that their rights are being violated, upon recruitment to a job or as regards wages, may consult with the Centre for Gender Equality (Jafnréttisstofa) and seek advice. Research shows that, although the pay gap has decreased since the introduction of the Equal Pay standard, there is no visible difference between employers with or without the standard (Icelandic Review of Politics and Administration 2022). One explanation is that collective agreements bargaining during the period mainly focused on raising the lowest salaries – which has led to higher wages for broad groups of women. Another explanation is that the standard may

have had an indirect effect on the labour market through public discourse, which has led to a general decrease. The same research shows concerns about inaccurate work practices and that the standard lends legitimacy to the differences related to occupational segregation and the gender pay gap.

### 6.4.3 Job Evaluation tool

Another tool used in Iceland is the job evaluation tool that the municipalities use. It is a joint endeavour between the social partners. For instance, in the city of Reykjavik this work has been ongoing since the late 1990s. It was first introduced into a collective agreement in 1998, since then it includes about two thirds of the city's employees. The trade union participation is crucial in getting this coverage and a negotiation with employees to get this included in collective agreements. There is a job evaluation committee consisting of the trade unions and Reykjavik, and the same goes for the other municipalities. The evaluation itself is done through a systematic approach, whereby various categories are looked at, the main ones being knowledge and experience, effort, responsibility and work environment, which are split into subcategories. Employees are instrumental in outlining the categories by answering surveys about their jobs with a focus not on the individual's performance but instead on factors related to the job. These are then scored, and the scores are the basis for the salary for the job. The scores are available in an open database (Starfsmat 2024). The collective agreements write out how scores are connected to salary.

Looking at Reykjavik, the adjusted gender pay gap has decreased from 15.2 per cent in 2001 to 0.2 per cent in 2022 (Reykjavik.is 2023). The gender pay gap for all the municipalities is the lowest in the labour market, 7.4 per cent in 2019 compared to 13.9 per cent overall (Hagstofa Íslands 2020). There have also been some adjustments made throughout the years to try to counter inherent gendered biases that might affect how categories are viewed and scored. Overall though the systematic approach and working with experts on job evaluation and keeping a focus on not falling into traps of gendered bias has had a positive effect on closing the gender pay gap. The biggest point of criticism has been that the system only covers basic wages and therefore other wage components might lead to pay discrimination. The tool of job evaluation has since 2024 been enlarged into encompassing a pilot project on measuring and comparing female dominated sectors with male dominated sectors and occupations across institutions (Iceland Government Offices 2024).

## 6.5 Norway

In Norway, there are several initiatives taken to narrow the gender pay gap. Some of the most important examples are described here: The gender point system, the initiative on women leaders and the paid sick-child leave system.

### 6.5.1 A tripartite agreement on women leaders

There have long been efforts taken to reduce the vertical segregation on the Norwegian labour market. As early as 2006, the first law was in place, granting women a minimum of 40 per cent of seats in boards of public companies. An evaluation was undertaken in 2015, showing an improvement among the companies included. However, it also showed that men still had the leading positions on those boards. Also, a great number of the public companies changed into other forms of companies during the period, avoiding the regulations (Arbeidsliv i Norden 2015). In 2016, the Norwegian parliament decided to expand the legislation to also include state authorities and also that 40 per cent of chairs of boards, were to be women (Sveriges radio 2016). The development was not fast enough, however, and in 2023 an agreement was made between the government, the trade unions, and employers' organisations to speed up the process. The agreement was expected to cover approximately 8,000 companies the same year and 20,000 companies with more than 30 employees from 2028. It ensured that companies with more than 100 million Norwegian kroner in operational or financial income were covered by the rules of 40 per cent women in their boards. In the longer run the limit will be lowered to companies with incomes over 50 million Norwegian kroner (Ummelas 2023). The initiative is designed to decrease the vertical segregation on the labour market, both directly – having more equal power in the companies' deciding rooms, and indirectly – motivating girls and women as well as putting pressure on the labour market as such valuing women's work as much as men's.

### 6.5.2 Paid sick-child leave

The Norwegian system of sick-child leave is the most generous in the whole region. All employees in Norway are entitled to stay at home with a sick child until the year that it turns 12 years, in accordance with the Work Environment Act (Arbeidsmiljøloven §12-9). The same is true if the child's childminder is ill. For the first three days of the illness episode, a self-certification of absence ("egenmelding") is sent in for a sick child or childminder. From the fourth day of absence, a medical certificate that documents the child's illness is required from the responsible authorities (NTNU 2024). All parents who are employed for more than four weeks have the right to ten fully compensated sick days per year, from the employer. If the parent is single, the days are doubled, and if there are three or more children in the household, the days are 15 per year and parent. For parents that are newly employed, a medical certificate is needed from day one of the child's illness, to get the compensation. More men are taking this responsibility in Norway than in other Nordic countries. Women are however in majority in terms of staying at home with sick children, 45 per cent of mothers compared to 15 per cent of fathers claim to be the primary parent taking this responsibility (Fagereng Jacobsen, Krøvel 2023). There are

differences between different groups of fathers, however. Among fathers with a home-office, or with the possibility of working from home, 23 per cent more often stay at home with their children compared to their partners. Among fathers without flexible working conditions, only five per cent give the same reply (Ingelsrud, Moen Dahl, Nørgaard 2023). The more equal child sick-leave has a positive impact on more equally divided unpaid household work. Also, higher compensation for staying at home with sick children has effects on the total income of women, by not financially punishing mothers.

### 6.5.3 Kønnspoeng – Gender point quota in education

As of 1981 Norway introduced a quota system for breaking gender patterns in education and occupation choices. In 1996 and in 2004 it was enlarged, but in 2016 the system was removed, which has resulted in a negative gender balance. For instance, in the industrial economics and technology management programme, the number of women entering declined from 53 per cent in 2015 to 19 per cent in 2016 (Gjengedal 2019). In 2018 under the new Equality and Anti-Discrimination Act, the gender points were re-instituted, also aiming at reaching men, who had so far only been targeted in the NMBU's veterinary and animal care programs. The aim is to attain a more equal attendance of at least 30/70 per cent balance between women and men. There is an ongoing process to decrease the number of faculties and study programmes with gender points. 2024, the NTNU applied to retain gender points for 32 programmes and introduce gender points for women in seven new programmes and one new one for men from the coming autumn, but most of this was rejected by the department. Also, other institutions, such as the University of Oslo and the University of Bergen have expressed their will to extend the scheme with additional point for men who are admitted to the professional study programme in psychology (Halvorsen Bjørgan 2023).

## 6.6 Sweden

In Sweden, there are several initiatives that are increasing gender equality with a bearing on decreasing the wage gap. The examples included here are Equal Pay mapping, special taxation reform, parental leave system, and low-wage bargaining.

### 6.6.1 Individualized taxation

Individualized taxation is often mentioned as one of the most important reforms for gender equality in working and family life in Sweden. It was implemented in 1970 and made it even significantly more profitable for married women to work. Up until 1970, spouses' incomes were combined and taxed according to a tax scale with high, and sharply increasing, percentages. It was considered the man's job that was important, the man being regarded as the breadwinner by the standards of the time. Therefore, the woman's salary mostly became

something extra, but was taxed at the margin – and taxed with a relatively high marginal tax. An ordinary salary for a teacher, nurse, secretary was in practice taxed at 50 to 65 per cent depending on the husband’s salary level. When the cost of childcare was added to the household budget, the woman’s work often became unprofitable (TCO 2020).

With the individualized taxation reform, public subsidized preschool was also expanded, which meant that women entered the labour market on a broad front. Between 1970 and 1990, the number of women in the workforce increased by 700,000. This meant that women increased their share of the workforce from 60 to 85 per cent. The total labour market grew radically and positively affected the country’s GDP (Emtinger, Stråth 2020). After 1971, further individual taxation reforms, of income and of wealth, were carried out (Sohlman 2013).

### 6.6.2 Generous parental leave

The Swedish parental leave system is celebrating 50 years of existence in 2024. As early as 1974, the previous “maternity allowance” was replaced with a “parental allowance”. A major campaign was carried out, promoting fathers to stay at home with their children. The first year, only 0.5 per cent of the allowance was taken by men. In 1995, the first “paternal month” was launched, earmarking one month to each parent. By 1998, 10 per cent of the parental leave was taken out by fathers. In 2002, a second earmarked month was regulated, resulting in men taking out more days, 20 per cent by 2006 (Försäkringskassan 2024a).

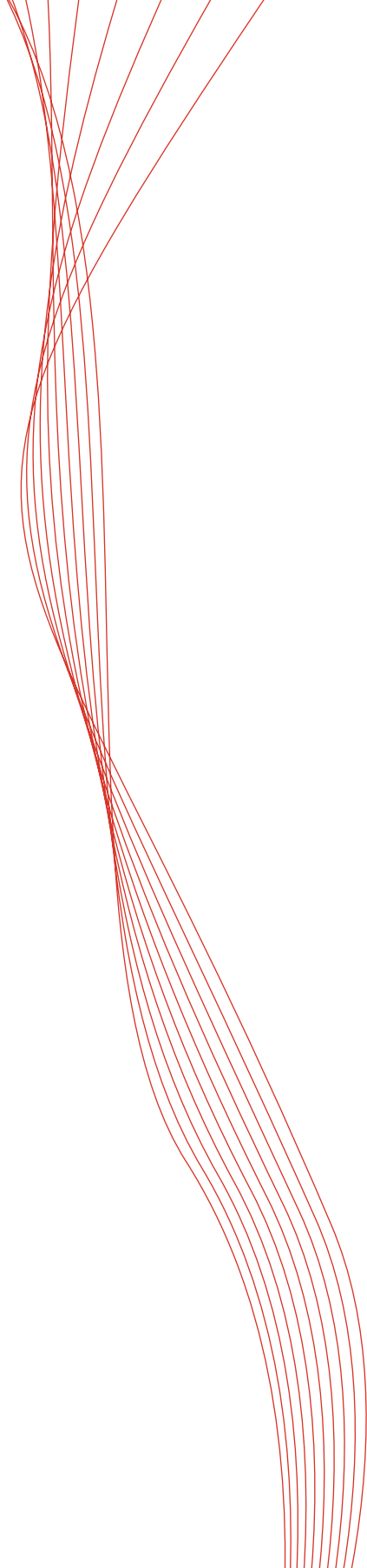
Between 2008 and 2017 there was an “Gender equality bonus” that parents could apply for to receive tax credits for the days they took out beyond the two reserved months. In 2016, a third “father month” was instituted. The statistics from 2022 show that men take out 30 per cent of the parental leave. The unpaid parental leave, which mainly women take out, adds to this (ibid). The proportion of parents sharing equally has been increasing over time. This is more common where parents have a higher level of education and higher incomes. In couples where women had a high wage, 38 per cent shared the paid parental days equally (Försäkringskassan 2024b). However, more women take unpaid days among these parents (ISF 2023). There is research about the effects of a generous and divided parental allowance. Staying at home after giving birth to a child improves the mental health of both parents (Karolinska Institutet 2023). Sharing parental leave equally also has effects on sharing equally in general. Staying at home with children makes doing unpaid housework more equal, according to research. Men that stay at home with their children feel less stressed and are more confident in their role as fathers (Gupea 2017). Women’s pensions can be up to 2,500 kronor per month lower because of staying at home with children longer, working part time and staying at home with sick children (Pensionsmyndigheten 2024). However, there are

some challenges presented by the Swedish parental leave system. The fact that women are off from work longer than men are, since mother's more often stay at home without parental allowance, can have negative effects on their incomes. According to TCO, women are on parental leave without taking out parental allowance for longer periods than men's total parental leave. In general women's unpaid parental leave is four months during the child's first two years, compared to the fathers' one month. In total women are absent from work for 12.7 months and the father for 3.4 months. In other words, fathers share of all parental leave is 21 per cent (TCO 2023).

### 6.6.3 Low-wage and gender equality focus in wage bargaining

An important part of the Swedish model is the norm for wage cost increases on the Swedish labour market that is set in central agreements between employers' organisations and trade unions in the industry. The wage-bargaining mark (the so-called "Märket") is important in the wage bargaining procedure (Orange 2023). One tool that has been used for several wage bargaining rounds is for the unions to demand a low-wage priority raise. The measure is a way to regulate unequal salaries between sectors, which is otherwise hard to do. The effects of this have been varied, but in general positive. When an equality pot was introduced in the municipal sector in 1996, the pay gap between men and women was reduced temporarily (National Mediation Office 2008). However, this does not expressly target women's wages; it simply targets the lowest paid employees. But since most of the lowest paid individuals are to a large degree women, it can still be seen as a gender equality effort. In their long-term goals for wages and working conditions, LO unions have agreed to work during the period up until 2028 to achieve collectively negotiated minimum wages equivalent to at least 75 per cent of the average wage for workers (LO 2018).

In the 2023 bargaining round, the blue-collar, LO unions IF Metall, Livs and GS had demanded a low-wage priority at companies and in industries where there were wages below SEK 27,100 a month, according to the same model as in the 2017 and 2020 agreements. But a low-wage investment was postponed to 2024. The priority means that wages below SEK 28,211 a month are counted as if they were SEK 28,211 when the pots for wage increases are calculated until spring 2024. By "inflating" the basis for salary increases, there will be a little more money to distribute in workplaces where salaries are low. But it is not a given that the "extra money" goes to those who earn the least – how the salary increases are distributed is in most cases decided locally at the workplace (Nilsson 2023).

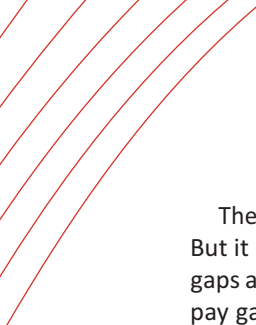


## 7. Reaching Equal Pay in Germany and the Nordic countries

**W**hat are the similarities and differences between the countries when it comes to Equal Pay? How can the lessons from the region be analysed based on the four theoretical variables that explain unequal pay which this report is based on, namely: Pay discrimination, Paid and unpaid work, Horizontal segregation and Vertical segregation? To increase the understanding of the identified situation, challenges and good examples from the individual countries and how the various pieces of the puzzle that have been presented so far can be put together in practice, an analytical review is made based on what has been presented so far, an analysis based on each of the four variables.

### 7.1 Pay discrimination

So, what does the situation look like when it comes to pay discrimination in the region? The theoretical starting point is based on the EU Commission's definition, to address the problem of women earning less than men for doing equal work or work of equal value. In practical terms, this means the actual unequal wages between women and men, at a certain point in time and over the (working) lifetime. The principle of Equal Pay brings forth the practical challenge of defining equal work or – even more challenging – work of equal value. Efforts to bring the Equal Pay into practical life include statistics on the wage gap, but also legislation and measures that are being taken to equalize wages from a trade-union perspective.



The gender pay gap analysed clearly shows that pay discrimination still exists. But it is moving in the right direction in all countries. While the smallest pay gaps are found in Iceland – with the largest reduction since 2013 – the largest pay gap exists in Germany, even though the gap is also slowly closing there. However, at the current pace shown earlier in this report it will take many years before the gap is closed. This shows that improvements implemented have been successful, although it is difficult to pinpoint the exact measures. The explanation for why the wage gap exists and why it is getting smaller differs with different perspectives, but most likely there are several types of measures that have made it better over time. It is not only improvements regarding pay discrimination that have reduced the gap, but probably a mix of measures combatting all four reasons for pay inequalities. It needs to be emphasized that the pay gap methodology itself has its shortcomings. To make the statistics comparable, the wages in the statistics are recalculated to full-time wages and to year-round employment, i.e. to standard figures based on assumptions about equal working conditions. There are methodological problems involved in showing the differences in full-time wages between the sexes, how wages change over time and in comparing countries. However, these standardised salaries are less consistent with reality for women than for men because the former more often work part-time and more often have fixed-term employment than the men. This is especially true for traditional women’s jobs in the public sector and for women with lower education levels. It is therefore important to consider that the wage income gap, the actual income from wages, between women and men is even greater than the figures presented in this report.

### 7.1.1 Legislation and the social partners

As mentioned earlier in the report, pay discrimination based on gender is illegal in all six countries. Measures have also been taken to map pay differences and make them visible, to create greater equality in this way. Iceland has come the furthest in this work, where there has been an Equal Pay standard since 2008 and where companies and social partners have been driving forces. Although the Icelandic system is not perfect, and although there is no documented evidence that it fully works, it has normative effects on the labour market. There is also good potential to further strengthen the instrument and introduce clearer incentives for employers to take it seriously. Here, the role of the unions is also important, in being a watchdog, and in pushing the employer in moving forward. In the other countries, there are similar systems, with various limits for a minimum number of employees and with different reporting requirements – and with Germany having the weakest and most ineffective legal provisions. Wage mapping and regulations regarding reporting make a difference in equalizing wages at individual workplaces and within large companies. Getting the EU’s Pay Transparency Directive through is therefore

seen as very important for Germany, in order to start a functioning system like the one in Iceland.

However, the mapping does not rely on wage differences between different employers, between and within industries. The lack of pay transparency is problematic, especially in Finland, which is highlighted in the section on obstacles and challenges. With the current political government, and with an unwillingness of the main employers' organisation, the Confederation of Finnish Industries (EK), who left the parliament pay transparency working group in 2020, there is a fear that this will not be prioritised in the near future, which is problematic. The work of the trade unions to continue raising the issue is therefore perhaps more important than for a long time. There are high hopes that the EU directive on pay transparency, which must be adopted, could have an important effect here, as in the other countries in this study.

There is a lot of potential for improvement in all six countries when it comes to pay transparency and Equal Pay for equal work. To begin with, the issue of wage mapping needs to be given higher priority than it is today, not only from authorities but also from the social partners. The system is often perceived as complicated and bureaucratic, which is why many employers do not carry out surveys or reports. The lower limits on the number of employees are there so as not to burden small businesses, which has its merits. But better methods could be constructed for simpler salary reporting, for transparency in salaries in workplaces for a self-evident starting point that employers should not be able to maintain unreasonable salary differences depending on gender. There is also much work left to do to ensure that employers complete the task, to create greater incentives for the implementation of wage surveys and some form of consequence or sanction when they are not implemented. The national authorities should institute stricter rules on this and make it simpler for employers to follow the rules. More comprehensive studies and reviews – on national or regional levels – about the consequences of wage mapping could also be a way to move forward. It should also be a higher priority for the social partners that salary mappings are done and to work for pay equity and in so closing the gender pay gap through meaningful and certified tools for wage mapping.

### 7.1.2 Gender Discrimination in the labour market

There is a lot of equality legislation that goes beyond actual pay differences but nevertheless supports pay equity indirectly. According to their respective national legislation, all countries must offer equal conditions on the labour market and provide a good working environment regardless of gender. Discrimination or equality ombudsman functions exist in all countries in the report, but with partly different tasks. One assignment in common is to keep an eye on how legislation is followed and to ensure that salary surveys are carried out. That function is important as a watchdog in pay discrimination but also in other

types of discrimination in the labour market that are connected to Equal Pay. The ombudsmen have an important role to play in matters of discrimination in employment relationships, often linked to family formation and pregnancy.

In this study Finland, Norway and to some extent Denmark stand out, where a higher percentage of mothers stay at home long after parental leave, compared to the other countries. This also leads to more prevalent discrimination, something that the Ombudsmen are highlighting. The longer absence – or the longer expected absence – among young women from the labour market can have implications for employers not to hire women of childbearing age and especially women who are pregnant. In Finland, the working group on equality at work and family leave, that is set up to identify effective ways of preventing discrimination on grounds of pregnancy and family leave, and will be finished by February 2025, can be of importance (Finnish Government 2024). It is important to have an equality ombudsman, who can collect information and contribute with legal help; without an equality ombudsman the union will be alone in pursuing issues of equality in the labour market. It should be added here that significantly more could have been done to ensure wage surveys and equal wages if the ombudsmen had had more resources. In other words, this is a question of priority. In Germany, for example, the Federal Anti-Discrimination Agency as well as the Federal Foundation for Gender Equality have to deal with all forms of discrimination in private and professional life against people with all legally protected discriminatory characteristics. Prioritization is always hard to decide upon, especially with view to the limited size of the workforce at these institutions.

### 7.1.3 The importance of collective agreements in pay discrimination

The importance of the level of union organisation and collective agreement coverage in the individual countries cannot be underestimated in a study like this. In all countries except Germany, collective agreements are dominant in all labour markets/sectors. Iceland, Finland and Sweden are in the lead with between 88 and 90 per cent, while Denmark has 82 and Norway 69 per cent coverage. In Germany, collective bargaining coverage is declining and is today only 54 per cent on average, with even lower numbers in the East. But in specific sectors and especially in male-dominated industries such as steel and automotive, the coverage is still high (as well as the wages). The coverage relates to trade union membership, where only 16 per cent are organized in Germany compared to 91 per cent in Iceland.

The good examples presented in this report from Germany show exactly how updating and clarifying collective agreements can be used as a tool to get more equal wages in a certain industry. In the initiative on Pay Justice of the Food and Catering Union, the analysis tool [eg-check.de](#) was used, tasks and occupations were classified and wages for women and men could be equalized, based on Equal Pay for equal work and for work of equal value.

The same tool has been used in many more cases, for example in Berlin and Brandenburg where the jobs of bakers and bakery salesmen were analysed and where the latter, dominated by women, could be given higher wages in an updated collective agreement. Also, the equalization of salaries for preschool teachers compared to schoolteachers, something that has so far been introduced in 13 out of 16 German federal states, is a good example of how collective agreements can be strengthened to obtain fairer and more equal wages.

To achieve Equal Pay, continued increased trade union organisation is important, as is strengthening collective agreement coverage within the countries. Something that is clear from this study is the importance of concrete added value of membership and collective agreements for individuals. Here, investments in equal parenting, compensation in case of illness or care of children, are successful examples, as they provide concrete advantages in people's lives in comparison to being a non-member and not having a collective agreement.

#### 7.1.4 The role of trade unions in the fight against pay discrimination

When it comes to pay discrimination, trade unions are of great importance. It is in the matter of wages that the labour market partners have one of their most important responsibilities, and it is here that the local trade union often plays the most important role in fighting in individual cases, but also on a broad front, to remove unjustified unfair wages.

When it comes to wage mapping, for example, the unions are often crucial. The experiences from Finland and the tripartite Equal Pay Programmes, which is a collective initiative including the central labour and employers' organisations and the government, are also interesting and worth highlighting. They show that when there is a common desire for change among the social partners and from politicians, much can be done. And the results have occasionally been very positive; they claim to account for a reduction in the gender pay gap by five percentage points. There are also risks with such joint programs, and this specifically involves the desire for change, which is currently significantly lower both on the part of employers and on the part of the government. It is not enough that the trade unions are pushing to bring about a major change, like the one that was done before. On the other hand, it is important that trade unions continue to champion joint initiatives and to drive public opinion on the matter, also to increase the incentives of the other parties.

## 7.2 Horizontal segregation

What does the phenomenon of horizontal segregation linked to Equal Pay mean in the region under study here? Based on the EU Commission's definition, a quarter of the gender pay gap in the EU is related to the overrepresentation of women in relatively low-paying sectors, such as care, health, and education, as well as the fact that highly feminized jobs tend to be systematically

undervalued. Here it is about shining light on the gender-segregated labour market and its consequences, but also to showcase measures in the various countries that have been implemented to reduce horizontal segregation. This includes both the labour market and the education system, with an emphasis on how trade unions and employers, and partly the state, municipalities and authorities, can work to break the strict gender divisions.

### 7.2.1 Gender norms that steer career choices

It becomes clear how long-lived traditional gender norms govern, even though the countries in this study are among the world's most progressive in breaking such norms in society. Perhaps it is clearest when it comes to career choices and society's view of what women and men should work with. There are still traces of a view of women's work being less important than men's. Notions live on that they are better at nurturing and looking after children and the elderly. Girls also more often choose training in traditionally female occupations, while boys more often follow in men's footsteps. It is therefore not surprising that the labour market is more or less divided into the female-dominated public and the male-dominated private sector, or in what the patterns of career choices look like in terms of gender. There is a notable and severe undervaluation of the female-dominated sectors in all countries of this study, which explains the structural, gendered uneven salaries and working conditions. For Germany, a study calculated that two thirds of the Gender Pay Gap is due to different wages for female and male dominated jobs of the same worth (measured by the Comparable-Worth-Index), and thereby, for the first time, statistically proved the undervaluation of female connotated work (Klammer et al. 2022).

In Germany the normative gender roles not only have consequences for the occupational patterns, but also for the taxation system. Married couples, regardless of having children or not, can choose between split or joint tax assessment, where the latter becomes more favourable the more different the income is. This means that many married couples divide the responsibilities, the man usually working full-time, and the woman working either not at all or part-time and taking more responsibility for home and children. This system is problematic for achieving equal pay, as it promotes by tax advantages the focus on one career with a main earner model (breadwinner model) instead of a dual earner model.

### 7.2.2 The impact of horizontal segregation on the pay gap

In all six countries, wage differences are evident. The public sector and in particular female-dominated workplaces provide lower salaries than male-dominated, private sector jobs. In Norway, as already mentioned in this report, research shows that between 60-65 per cent of the wage gap can be explained by the segregated labour market. In 2021, men in the Danish private sector earned around 47,800 Danish kroner on average, while women

in the private sector earned 42,400 kroner on average. Men also earned a higher monthly salary than women in the public sector that year (Statista 2024). Another example is from Finland, where the median monthly salary in the municipal sector was 3,379 Euro for men and 2,916 Euro for women (Statistikcentralen 2020)

The salary formation model in Sweden, with the wage-bargaining mark (märket) is an example of the consequences that horizontal segregation can have on the gender pay gap. However, in the Swedish bargaining rounds, a few low-wage initiatives have been taken in recent decades, which has mainly raised the wages of women, especially those at the very bottom of the wage scale. It has not raised wages for women in general, which has also been a recurring criticism. On the other hand, it has been important in preventing the very lowest paid from falling behind even more, which the Swedish pattern-bargaining model otherwise risks doing.

### 7.2.3 Measures to break Horizontal segregation

In all countries in this study, the problem of the gender-separated labour market has received attention, both from a political and trade-union perspective. There have also been far-reaching discussions about how gender structures should be broken. The measures have largely been about getting more women into male-dominated professions and vice versa. A common solution has been to influence young people's career choices and encourage more gender mixing.

In Norway, the system of Kjønnspoeng has meant that more women have entered traditionally male educational programmes and professions, and vice versa. This has had positive effects and, among other things, has been appreciated by the education system. However, the system has been criticised for being discriminatory and rigid and because "good" men have fallen behind, and at the time of writing most of the gender quota points have been removed. It remains to be seen whether the discussion changes and whether there will instead be other proposals for how the gender-segregated education and labour market should be equalized. In Denmark and Norway, efforts have been made to get more men to work in preschools. As a result of this, Denmark has a relatively high proportion of male workers and exemplifies this trend: seven per cent of workers in centres with children under three, 11 per cent in kindergartens with children aged three-to-six-years, 24 per cent in out-of-school services, and 28 per cent in leisure time centres (Cameron 2014). In Norway, the proportion of men in preschools has increased fivefold since 1990, all according to an action plan from 1997 where employers were required by law to hire a male applicant for a preschool position, if applicants from both sexes had equivalent skills (NIKK 2024).

### 7.2.4 Social partners and horizontal segregation

There are several examples of social partner projects to even out the gender balance in sectors and at workplaces. There is a general understanding in the countries studied in this report that this is good for the working environment and for the functioning of the workplace. In addition, connections are often made to the work against sexual harassment and gender equality in general. An example highlighted here is the social partner initiative “Boss Ladies”, which aims to get more women into the construction sector. The project has been successful in starting to break gender norms in male-overrepresented workplaces. Other examples are the Swedish initiative “Stop the macho culture”, which is a collaboration between the trade union Byggnads and their employer counterpart Byggnadscheferna. The campaign, which started in 2015, has received a lot of attention and is about both reducing injuries and accidents, but also improving the working environment by bringing in more women and by questioning and changing macho ideals in the industry (Stoppa machokulturen). There should be a basis for similar initiatives in more countries and in more industries, but it requires will and focus from the social partners. Perhaps the most important thing is to work with educational programmes, to get more girls to choose male-dominated professional and higher-educational programmes, as well as men to do the same in female-dominated programmes.

#### 7.2.5 What is the root of the problem, and what remains to be done?

There is much more to be done to increase mobility between the labour market sectors for women and men respectively. Benefits of a greater balance in the workplace need to be investigated more deeply to increase the motivation of employers to take action and give greater inspiration to the trade unions that work for less segregation. Perhaps, it is just as important to see what the biggest problem with a gender-divided labour market is: Wages for female-coded jobs are lower than those that are male coded. In other words, the gender division itself is part of – but not the main problem. A reality that cannot be ignored is that more women have moved into traditionally male jobs than men have moved into traditionally female jobs. Women who are getting a higher education have become more and more numerous and have in fact overtaken men. Many formerly male-dominated industries now have a preponderance of women as employees, which for example applies to lawyers, teachers and university employees. The reason is that wages are higher in the previously male-dominated jobs and that women benefit from entering those industries, while the incentives for men to enter female-dominated, lower-paid jobs do not exist. Pay equity can serve as one guiding principle in terms of receiving similar wages as is valuing work that is similar in the same way when removing the norms around traditional male and female work and how we value it. This does however require a great deal of work with gender biases, as we can see from the Icelandic job evaluation tool.

It can therefore be difficult to only look at the actual change of industries

and jobs depending on gender, without at the same time looking at wages themselves. Having said that, much more needs to be done to get girls and boys to choose professions based on what they want to do rather than to let the old gender norms prevail. More needs to be done to make young women feel welcome in male industries and young men in female industries. And here social partners have a very important role to play. Perhaps study guidance is particularly important here, or more types of workplace practice during school time. Spreading information about educational choices, about breaking gender patterns among youth and working on young ambassadors and creating networks, such as the Boss Lady-initiative in Denmark, are ways forward for trade unions and their counterparts. Politicians and authorities also need to take responsibility for creating lower thresholds, for girls and boys to choose education and professions more evenly. Quota systems for education such as the one in Norway can also be interesting to be inspired by, in terms of breaking down barriers and gender-based norms.

### **7.3 Unequal paid and unpaid work**

The EU Commission definition of unequal pay and unpaid work encompasses things from women's higher share of unpaid work compared to men's higher share of paid work, as well as sharing responsibilities for family and children as well as flexible working conditions or working-time arrangements. Unequally paid and unpaid work is a broad problem area, and just as in the case of horizontal segregation, the large difference depending on gender is also based here very much on old, normative, stereotypical gender norms. The fact that women are considered more suited to take care of children, look after the home and care for the elderly is not only noticeable in the educational programmes and jobs in which they are overrepresented, but also in the taking of parental leave and in a greater responsibility for home and care of the elderly.

#### **7.3.1 Labour participation**

One way to note this is men's higher labour market participation compared to women's in all countries in this study. This is partly due to women having a greater responsibility for children – through parental leave and caring for sick children. In addition, women are sick more often than men and more often have irregular employment. The biggest difference is found in Germany, with a 7.6 percentage point difference in labour market participation between the sexes, because here it is more common than in the other countries for mothers to stay at home for a long time with their children. There are, however, signs of a decrease in this gender difference during the last few years. Also, in Finland, Norway and partly in Denmark, parents can get financing and have the children at home instead of in preschool, something that the mothers do more often.

The higher proportion of part-time work for women also entails that their

wage income is lower than that of men. Here, too, Germany stands out, where almost half of women work part-time, compared to 34.1 per cent in Denmark and 29.6 per cent in Norway. Here, too, this can be explained by the greater responsibility for family and home, but also by less access to full-time positions in female-dominated occupations and sectors like retail, gastronomy or maintenance/cleaning. The fact that women generally earn less than men is often both a reason why women take a greater responsibility for the unpaid care and domestic work and a direct consequence of it. The same spiral applies to part-time work, where female-dominated industries more often have part-time employment as the norm, or alternatively have a more pronounced expectation that they should work part-time. With a lower income and more “time to spare”, it often becomes more natural for women to take on greater responsibility for children and the home.

### 7.3.2 Parental insurance and shared responsibility for care

There are clear incentive systems, both from the political and the trade-union sides, which have succeeded in helping parents share more equally the paid and unpaid work. Parental insurance, with a quota of time per parent, has been successful in getting more fathers to stay at home with their children and even out responsibilities. There is wide variation among the countries in this study regarding how long weighted parental days have existed, as well as how many days each parent has (as well as how many days each parent can carry over to the other). There is also a difference whether the parental leave and remuneration is nationally legislated, or if it’s decided between the social partners, and is part of a collective agreement. In Sweden, fathers take three out of ten paid days, in Iceland almost four out of ten. In Finland, the percentage has increased significantly since new legislation based on the impact of an EU directive, and fathers take 15 per cent of the paid parental days. Sweden also has the most generous parental insurance in the entire region. A total of 480 days is financed per child in parental allowance. The long period of time has many advantages, mainly in the opportunity to be with your child and to be able to extend the leave by alternating with unpaid days. However, it must be said that there is also a risk, in that women will be absent from the labour market for a long time, especially if they have several children relatively close to each other in age. With such a long leave, the even division between the parents is particularly important, to ensure that women do not suffer so much financially.

A recent lesson from both Denmark and Finland is that it is worth continuing to quota parental days despite scepticism or even opposition from public opinion. With the new parental leave rules that came into effect in 2022, fathers’ share of parental insurance has increased, which shows that parents are adapting to the rules being set. Continuing to earmark more days is likely one of the most important ways to continue to even out the gender

balance when it comes to unpaid and paid work. There is inspiration from all the countries in this study to draw from and continue to expand through legislation. But the social partners are at least as important in providing additional financial compensation for parental leave in collective agreements or in contributing above the set ceiling that authorities pay out. Motivating fathers to share equally is important, in the long term, to also change the ingrained gender norms about parenting, what jobs we should have and about wages.

Even when it comes to caring for sick children, it is important to strengthen the incentives to share equally. Here, too, both politics and the social partners can have an important role. In Norway, there is a system where care for sick children is partly divided into an even number of days per parent, and is 100 per cent funded. This also motivates fathers to take sick days with the children and to share the care work more equally. Sharing the care of children equally is also connected with a more equally distributed responsibility for the unpaid housework. Unpaid domestic work is divided by gender throughout the region of this study. The biggest difference is between women and men in Finland and Germany and the smallest in Sweden. In Germany, women perform 92 minutes more unpaid labour than men, in Finland, the time difference is 78 minutes, while it is “only” 49 minutes in Sweden, as can be seen earlier in this report.

### 7.3.3 Flexible jobs and women’s freedom

As part of the variable of equally paid and unpaid work, there is the possibility of having flexible jobs, in the sense of enabling more freedom and leisure, to work out the work-life balance and to create more equality for women. As already mentioned, women have a greater proportion of unpaid work, but are also less well paid for the paid work. At the same time, greater ill-health and stress show that everyday life is not functioning fully for women.

Working part-time is a strategy to use to get around the problem of a high workload, which is common. However, this results in an even lower income, which does not lead to more freedom for women. Partial solutions that have been successful are flexibility when it comes to, for example, the possibility of working from home, or flexible working hours. Since the time of the covid pandemic, that possibility has increased for many employers. However, there are many professions that cannot be managed flexibly. There is also an opposite, negative effect of too much flexibility, where employees are expected to be reachable and prepared to work also outside their regular working hours. This is a general problem that is rarely mentioned in the discussion of worktime and gender equality. Overall working time has increased on a household level over the last 50 years, as women have entered the workforce. The logical problem to find time for family, care work and work-life balance has often been solved by women through working less, working part-time, and taking the majority of house and family responsibility. To solve this for a better functioning of family-life on a broad level, this needs to be adjusted.

Decreasing the normal weekly working hours is a way of helping people to solve the life-puzzle but also to help families to become more gender equal.

On the other hand, what has worked best on a broad front is a shorter total working time. Here, Iceland has come the furthest. Iceland has made the most far-reaching change to date in reducing normal working hours, from 40 hours a week to 36. In Denmark, the weekly working hours are 37, while in Norway it is most often 37.5. One of the most important improvements when it comes to equal pay concerns shift workers in the public sector who previously worked part-time. With the shortening of working hours, most of these could go up to full-time, that is, work 36 hours, with a full-time salary. This, as well as the self-perceived increased freedom and better life-balance, shown in the evaluation of shorter working hours in Iceland, is among the most important findings linked to equal pay. Sweden, by contrast, is the country with the highest total working hours in the region, but a reduction in working hours is now being discussed, within trade unions and in politics, although there is probably a long way to go. There are different opinions on whether it should be implemented through collective agreements – many of which already have a lower weekly working time than the legally regulated one – or through legislation.

#### 7.3.4 Childcare and women's opportunity to work

For parents of young children to be able to work for a full wage, functioning and accessible childcare is often crucial. In all six countries in this study there are such systems, which are also based on the children's needs and on the pedagogical education of small children. However, these systems differ in terms of actual access, both in the possibility of getting a pre-school place when the need arises, and in being able to have the length of stay that the family needs. Denmark has been and, in many ways, still is a pioneering country when it comes to childcare. Here you will find the most well-developed accessibility and a guarantee of a pre-school place within four weeks. Denmark has also invested in having small children's groups, and since 2020 has nationwide standards for staff-to-child ratio. There is much to learn from Denmark among other countries in this study and elsewhere. Investing in and prioritizing quality in preschools has many positive effects, in addition to the fact that it contributes to parents of young children being able to work and that it facilitates Equal Pay. Children's well-being increases, and they are better prepared for school and have better conditions for the future.

Children in Finland have lower participation in childcare than in the rest of the Nordic countries, something that is mainly connected to the high proportion of mothers who stay at home with their children during the pre-school years. This also partially applies to Norway and to a lesser extent also to Denmark, where women can stay home from work with their children for compensation. Accessible childcare based mainly on mothers' needs makes a big difference in women's ability to work, as in Denmark, for example. The

countries that instead give incentives to women to stay at home longer with children, such as the two federal states Bavaria and Saxonia in Germany and Finland, go in the opposite direction in strengthening Equal Pay. It is therefore not difficult to conclude that childcare is an important key, while systems with stay-at-home mothers are destructive, both in creating equal wages and in, for example, providing equal pensions.

### 7.3.5 The motherhood penalty

The “motherhood penalty” (CEPR 2019) is a concept explaining the economic losses that mothers, and to some extent women in general, experience. It negatively affects wages, career paths and health, and is often explained by traditional views on differing responsibilities of mothers and fathers (AAUW). In Denmark, as an example, research also shows that women’s and men’s incomes develop largely in parallel until the birth of the first child. After that, women’s gross income drops nearly 30 per cent. Overall, research shows that every child costs a mother 10 percentage points on her salary (Kvinfo). In Iceland disposable income of mothers drops by 30 to 40 per cent in the first year after having a child. After two years their income is still 20 per cent lower than it was before. For fathers, the first year after a child is born, leads to a three to five per cent loss, and after two years their income is back to where it was before (Alþingi 2024). In Germany, according to the 2022 Time Use Survey, women do 44 per cent more unpaid work than men. While women do an average of 30 hours of unpaid work per week in 2022, men do just under 21 hours per week. That is an average of 9 hours more unpaid work per week – 1 hour and 19 minutes more per day. In 2022, the total amount of unpaid and paid work per week will be almost 46 hours for women and 44.5 hours for men. The difference is 1.5 hours and has therefore even increased compared to 2012/2013, when it was 1 hour. Almost two thirds of women’s total weekly working hours are unpaid, compared to less than half for men (Destatis 2024b).

A Norwegian study shows how the motherhood penalty has been reduced historically by active family politics. The study shows that the remaining gap has more to do with lack of childcare than increasing the paternity leave, when looking at the steps forward until now (Earl, A etc. 2023). In Iceland, one negative factor is the childcare gap. Here, children lack a legal right or guarantee to a childcare placement as in the other Nordic countries. The average age for children entering daycare in Iceland is quite late, when children are 17.5 months and the enrolment to preschool is mainly only available once a year, and it therefore varies between children when they enter, depending on the time of birth. This has led to a childcare gap, which forces parents – mainly mothers – to stay at home with their children longer, unpaid. Reviewing how women are not affected by this childcare gap should be a priority, and the fact that it is now being investigated in Iceland is positive.

In particular, the size of the long-run child penalty (defined as the average penalty from event time 5 to 10) differs substantially across countries. The Scandinavian countries feature long-run penalties of 21–26 per cent, the English-speaking countries feature penalties of 31–44 per cent, while the German-speaking countries feature penalties as high as 51–61 per cent (CEPR 2019).

### 7.3.6 Social partners and paid and unpaid work

When it comes to paid and unpaid work, the role of the state is important. Transfer systems and national social security systems need to be strong to finance, for example, parental leave and child sick-leave. It is also here that preschool and childcare are financed, as well as where legislation on, for example, working hours often is regulated. The Nordic model, which historically has been and still is strong in the Nordic countries, relies on a strong welfare state. This includes general taxation, a strong social security system and a general health care system. But the social partners are equally important in regulating rules and wages on the labour market. The social partners thus also have an important role to play in paid and unpaid work, not least in connection with working time regulation in collective agreements, where they can step into the breach. The trade unions have a lot to gain from being active in this area. Compensating parents through collective agreements for loss of wages during parental leave, caring for a sick child or one's own illness is an example of something that both strengthens the added value of union membership and collective agreements, and which makes a big difference to equal pay. It is also important for the unions to be active in the social debate around these issues, both to promote their members' priority issues, but also to create change on a broad front.

The motherhood penalty, as a structural and complex problem, needs to involve the social partners, to make the problem more visible to the public and to counteract the negative consequences. This can be by visualizing and counteracting the gender discrimination on the labour market through campaigns, informing trade-union members about the benefits of equal parental leave and advocating for gender-neutral collective agreements. Much could be done here, and since it is a very similar problem in the region of this study – why not cooperate on the issue for more equality and more Equal Pay?

## 7.4 Vertical segregation

The vertical segregation found here highlights the unevenness of women and men in hierarchical positions on the labour market, something that affects the wage differences to a large degree. So, what do the differences look like within the region surveyed here? The countries in this study are often cited as leaders in having a large proportion of female leaders. Nevertheless, it is not equal anywhere. Among board members, there is the lowest percentage of women in Sweden, only 37 per cent, compared to Iceland's 42 per cent. When

it comes to female managers, Denmark and Germany are at the bottom with 24 per cent, while Iceland and Norway lead with 31 per cent. Here there are several measures to be implemented, both from the political side and from the social partners. The tripartite agreement on women leaders in Norway is an initiative that aims at getting more women into leading positions. The initiative, which has existed since 2006 and is about increasing the gender balance on stock-exchange-listed boards so that women make up at least 40 per cent, has gained new momentum since 2023. Now even more companies will be included, and women will also be chairmen of boards to a greater extent. The agreement has received some criticism because it is only about representation at the very highest level, and not about managers or career development further down the hierarchy. However, this has both a symbolic and formative function. When more women have seats on the boards of listed companies, it sets an example within the companies, and it serves a normalizing function that managers should not only be men.

#### 7.4.1 Social partners and vertical segregation

Vertical segregation is important to work against for more equal wages. If women and men had the same proportion of managerial positions, the pay gap would be smaller (European Commission 2024). The Norwegian experience of quotas for women at the very highest level are one measure, but they are far from enough. Creating equal hierarchies in workplaces, and providing the same career opportunities regardless of gender, is something that the social partners can influence by mapping how women and men move vertically in an organization and work to adjust for more gender equality in relation with its counterparts. This requires an analysis of what causes men both earlier and more often to be offered managerial positions, but also an analysis of how work tasks are distributed between genders when it comes to, for example, responsibility. This goes into the discussion of horizontal segregation, as different sectors and industries also pay managers differently, but also the unpaid and paid work, as women often fall behind in their careers due to a greater responsibility for family, and due to the motherhood penalty as such.

### 7.5 Analytical summary – Equal Pay in Denmark, Finland, Germany, Iceland, Norway and Sweden

The Equal Pay instrument, derived and adapted from the EU Commission definition, has been helpful in identifying the trends in the region, the challenges and providing good, learning examples. It has also been a useful tool to analyse what is working throughout, what has made the pay gap shrink in all countries of this study, see National similarities and differences. When it comes to the analytical framework, it has been fruitful to delve into all four variables, to show the situation, trends, changes and challenges. Studying Equal Pay in depth based on clear focal points has meant that things that could

otherwise easily have been missed have been included. At the same time, the four variables are closely linked to each other. It is not possible to understand how unequal wages exist without seeing them together. This is also why solutions within one of the variables can have an impact on the others, and why it is not possible to work only against, for example, the segregated gender market, equal parenting, more female managers, or equal pay for equal work and work of equal value. All four variables need to be strengthened in parallel.

The strongest underlying factor in all six countries are gender stereotypes and rigid gender roles. An important part of the solution going forward needs to be to work on a broad front – and outside the scope of this study – to relax these and create greater mobility and more opportunities for women and men. Here, the gender-divided labour market is both a scourge but also an area to start with, since this is where gender roles are most evident and their destructive consequences greatest.

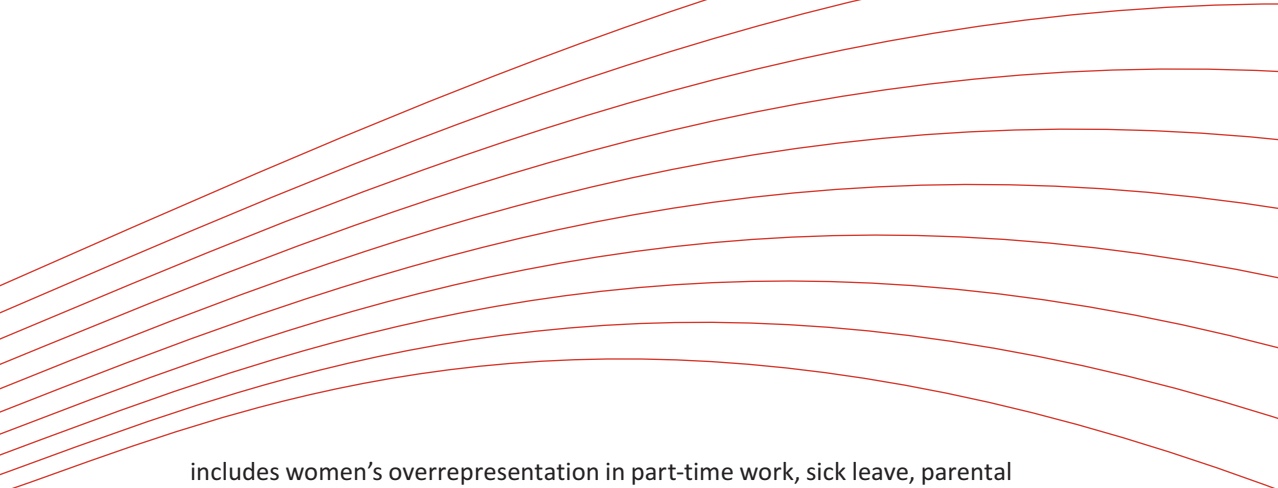
All four variables of Equal Pay are strongly guided by these standards. The countries that have come the furthest in closing the wage gap have also worked the furthest towards these standards. Iceland, Sweden and Norway have or have had a somewhat stronger political will to equalize opportunities for women and men, which has produced results. However, political will is fragile, and the social partners play an important role also because of this.

There are some initiatives that have been important so far in the countries studied and which are instructive examples for achieving equal pay. When it comes to the variables of pay discrimination, it is the employers' salary surveys and increased salary transparency that have produced the most important results and are promising for the future, as well as the updated collective agreements in Germany based on Equal Pay. Within horizontal segregation, there are national and sector-wise efforts to bring the opposite sex into gender-segregated education and work. Within paid and unpaid work, there are national and collectively agreed investments to get more men to take responsibility for children and home, as well as accessible and good preschools and shorter working hours. And finally, within vertical segregation, there are efforts to get more women into higher positions, through quotas.

## 8. Concluding remarks: The social partners and the future of Equal Pay

The social partners in the six countries in this study today play a large and important role in improving equality in the labour market and in creating equal wages. One thing that has been striking in this study is how important the exchange of experience between countries is on issues like these. Even within the Nordic countries and between trade unions in the Nordic countries and Germany, the process of this study has shown an increase in knowledge within the organisations and how inspiration among the countries has had an effect. This shows why this type of collaborative project can not only help other countries and regions to be inspired and get new methods or tools for change, but also how countries that are often assumed to already have a large exchange of knowledge can be strengthened. Continued collaboration and regular exchanges of knowledge are therefore to be recommended.

There are more important lessons from this study that concern the trade unions. Perhaps the most important measure is to prioritise Equal Pay, to achieve results. The trade unions have an important role to play in, for example, wage surveys being carried out at workplaces, to speak out when they are not done and to push the issue of the importance of wage surveys and pay transparency – to get Equal Pay. Creating greater gender diversity in the labour market is also in the interest of the unions, and more investments and collaboration in these matters can make a big difference. In other generic issues, where women are particularly affected, the social partners also need to continue to be the focus, for actual improvements and to drive public opinion. This



includes women's overrepresentation in part-time work, sick leave, parental leave and care of sick children.

The motherhood penalty is a term that encapsulates many of these consequences. It is clearly statistically proven to exist in the countries covered by this study and has a powerful communicative framework, which is why it can be a good starting point for continued collaboration around this issue. However, it is important to continue to have the four variables in the background, so that, for example, it will not “exclusively” be about mothers, but that this is about Equal Pay for all women.

Lastly, the fourth variable in this study, vertical segregation, which has received less focus compared to the others, should be investigated further. There is a lot to be done here for the social partners, in making gender segregated career paths visible and breaking the patterns that depend on gender norms rather than on meritocracy.

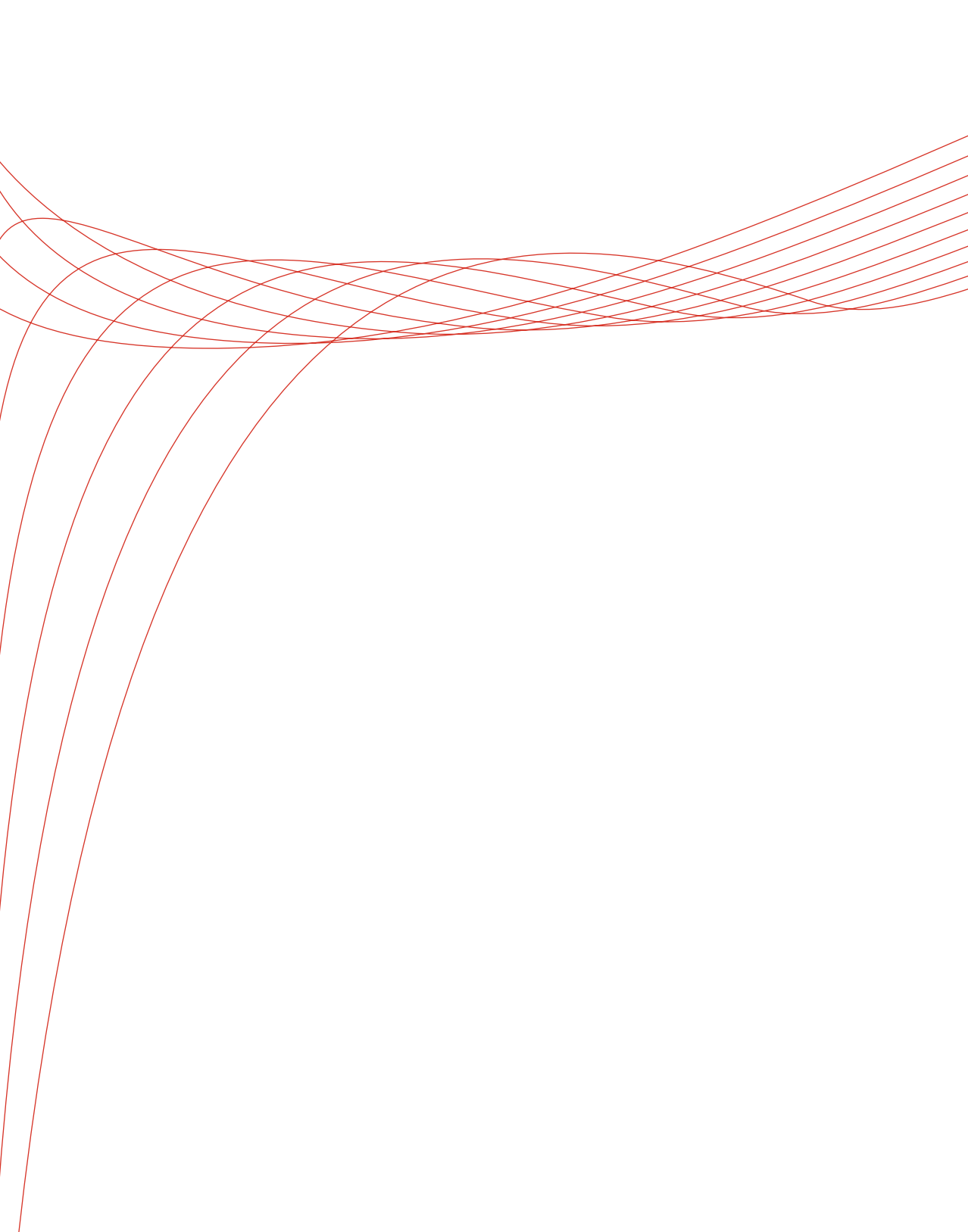
The obstacles and challenges identified in this report all need to be given high priority, more in some countries than in others. The form of joint taxation that exists in Germany for married couples is one such, highly aggravating factor, and a modern form of separate taxation would likely have good effects for equal pay in the country. The same applies to funding for parents, usually mothers, to be able to stay at home for a long time with children instead of having children in preschool, which is especially true in Finland, but also Norway and to some extent Denmark and federal states of Germany. Enabling equal participation in the labour market is very important to reach the goal of equal wages, as well as reviewing the part-time job trap, offering equal family support and investing in accessible preschools. The widespread division of women and men into traditionally gender-coded professions, education and sectors needs to be broken on a broad front.

Strong new measures are needed to ensure equal pay for work of equal value, and women need to have the same access to higher positions in working life. Pay equity is one factor in this and cannot be achieved unless a number of these aforementioned obstacles are solved. The biggest factor that needs to be corrected is the systematic undervaluation of women's work. If this is amended, one would not need to be concerned with occupational and educational choices. However, until this change occurs it is also important to look at how to end sectorial segregation. Alongside this we still do not have a strong

enough support factor to enhance work–life balance; even if pay equity is achieved, women are doomed in their lifelong earnings and income as they tend – and are expected to – to take more responsibility for caring for others. We need normative shifts and legal shifts in parental leave, we need to look at working time reductions as a tool of creating a better work–life balance on the whole. Until all the four pillars of Equal Pay are mended there is not a strong enough case to focus solely on pay equity. It is important but it is nevertheless one of many aspects that need to be focused on in parallel in order to achieve both equal remuneration and equal labour markets between the genders.

It is possible to create gender equality, and it is possible to close the pay gap; this is the starting point of this report. Even though no country in the world has yet reached the goals of Equal Pay, there are enough good examples to piece together.

By showing what has worked in some of the world’s most equal countries, this report can offer inspiration within the region, and to other countries. Here, trade unions have a key role in putting the puzzle together, in helping each other across national borders and in demanding change. With a trade-union perspective on Equal Pay, with a strong will and with a set goal, change is already underway.



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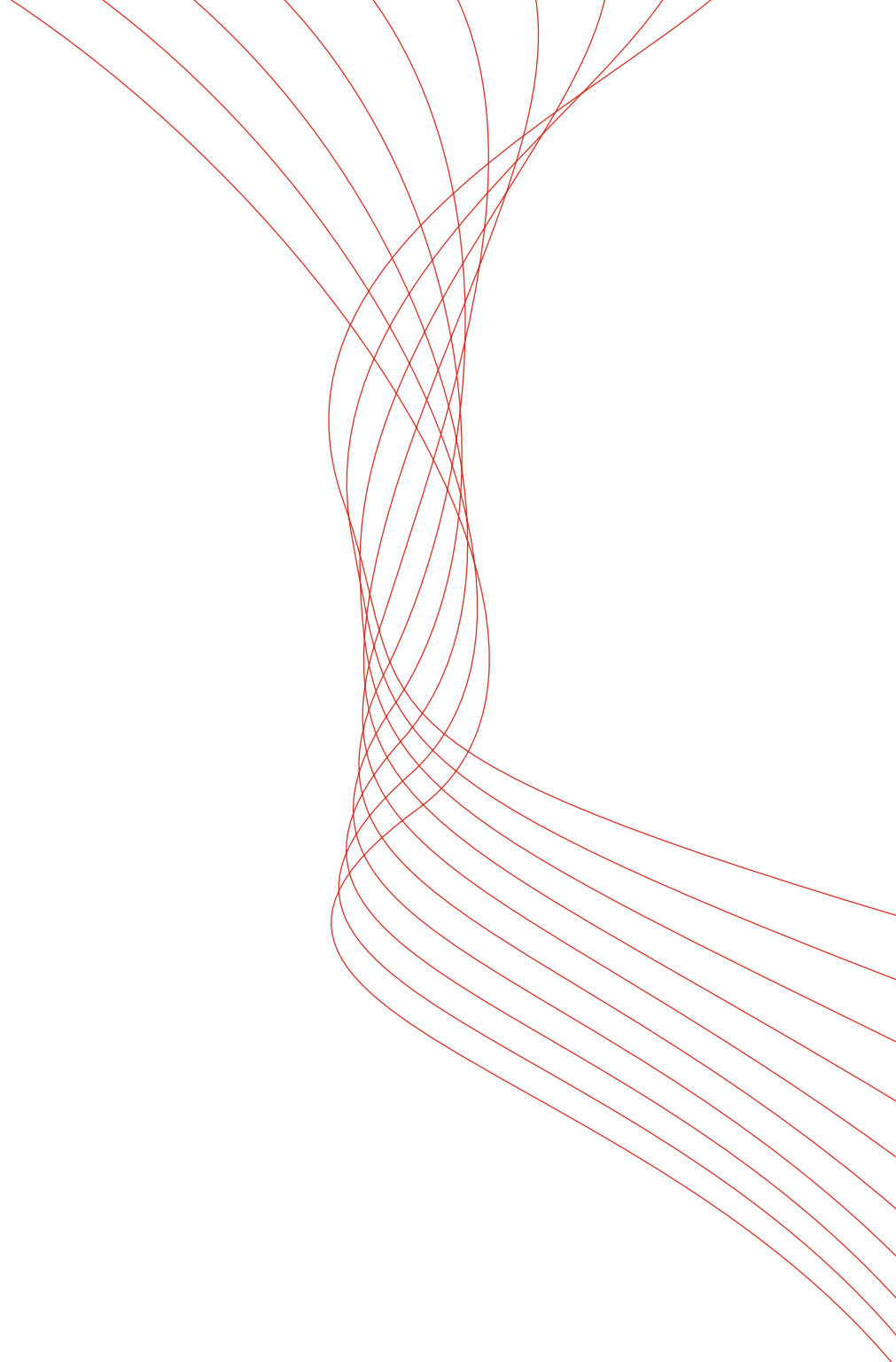
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# List of figures/tables

<b>Table 1: Unadjusted gender pay gap (2022)</b>	22
<b>Table 2: Unadjusted gender pay gap longitudinal</b>	23
<b>Table 3: Shares of low-wage earners</b>	24
<b>Table 4: Share of collective bargaining and union density</b>	26
<b>Table 5: Share of men and female in male / female dominated industries and the public sector</b>	27
<b>Table 6: Share of females in tertiary education in STEM education fields</b>	28
<b>Table 7: Average working hours per country</b>	29
<b>Table 8: Share of part time employment and employment rate</b>	30
<b>Table 9: Average income by sex</b>	30
<b>Table 10: Share of children enrolled in childcare</b>	32
<b>Table 11: Share of employees taking paid parental leave</b>	33
<b>Table 12: Time spent on unpaid household work</b>	35
<b>Table 13: Share of female board members in companies</b>	36
<b>Figure 1: Development of Gender Pay Gap (longitudinal)</b>	23



# Appendix:

## On the cooperation partners

This publication is part of a joint project entitled “**Nordic German Trade Union Cooperation on how to reach gender pay equity and how to close the gender pay gap**”. The project is a collaboration between the Council of Nordic Trade Unions (NFS), the Friedrich-Ebert Stiftung (FES) and the German Trade Union Confederation (DGB).

### **The Friedrich-Ebert-Stiftung**

The Friedrich-Ebert-Stiftung (FES) was founded in 1925. It is the political foundation with the longest history in Germany. It has remained true to the legacy of its founder and namesake, and it upholds the values of social democracy: freedom, justice and solidarity. Its ideals are linked to the Social Democratic Party and free trade unions.

The FES promotes social democracy primarily through:

- political education work to strengthen civil society
- political consultancy work
- international collaboration with foreign offices in over 100 countries
- providing financial support for gifted students
- preserving the collective memory of social democracy with facilities including an archive and a library

### **DGB**

The German Trade Union Confederation (DGB – Deutscher Gewerkschaftsbund) is the umbrella organisation for eight German trade unions. These trade unions are

- IG Bauen-Agrar-Umwelt (IG BAU), Industrial Union for Construction, Agriculture, Environment
- IG Bergbau, Chemie, Energie (IG BCE), Industrial Union Mining, Chemicals, Energy
- Gewerkschaft Erziehung und Wissenschaft (GEW), Union for Education and Science
- IG Metall, Industrial Union for Metalworkers
- Gewerkschaft Nahrung-Genuss-Gaststätten (NGG), Union for Food, Beverages, and Catering
- Gewerkschaft der Polizei (GdP), Police Union
- Eisenbahn- und Verkehrsgewerkschaft (EVG), Railway and Transport Union
- Vereinte Dienstleistungsgewerkschaft (ver.di), United Services Union

Together, the DGB member unions represent the interests of over 5.7 million people. This makes the DGB by far the largest confederation of trade unions in Germany and one of the biggest national confederations of trade unions worldwide.

## **NFS**

The Council of Nordic Trade Unions (NFS) is a regional trade union council. Its affiliates are 13 national trade union confederations of the Nordic countries which together represent more than 8.5 million members from blue collar, white collar and academic sectors in Denmark, Finland, Iceland, Norway, Sweden, Greenland and the Faroe Islands.

Founded in 1972, the main task of NFS is to coordinate and foster regional trade union cooperation in the Nordic countries, particularly with regard to employment, economic and social policy and in relation to ETUC, ITUC, TUAC, ILO and PERC. NFS represents its members in relation to the Nordic Council and the Nordic Council of Ministers and has close ties with the Baltic Sea Trade Union Network (BASTUN).

## **Affiliates of NFS contributing in the project**

### **Denmark**

#### **Akademikerne**

The Danish Confederation of Professional Associations (Akademikerne) is an umbrella organisation for its member organizations, which offer services to professional and managerial staff who have graduated from universities and other higher educational institutions.

### **Finland**

#### **SAK**

The Central Organisation of Finnish Trade Unions (SAK) is a national trade union confederation and has 17 affiliates, organising one million members in industry, transport and services, in the central and local government sectors, and in the journalism and cultural sectors.

#### **STTK**

The Finnish Confederation of Salaried Employees (STTK) is a confederation of 13 affiliated trade unions which represents approximately 300 000 members in both the private and the public sector.

## **Iceland**

### **ASÍ**

The Icelandic Confederation of Labour (ASÍ) is a confederation of trade unions in Iceland in the private sector and part of the public sector. ASI represents approximately 60 per cent of the Icelandic labour market.

### **BSRB**

The Federation of State and Municipal Employees (BSRB) organizes employees in the public sector. It has 19 member-unions with 23,000 members. About two out of three members are women.

## **Norway**

### **LO**

The Norwegian Confederation of Trade Unions (LO Norway) is the voice of around a million members organised in 23 unions. It is the largest confederation in Norway and cover all sectors in both the private and public sectors.

### **UNIO**

The Confederation of Unions for Professionals (Unio) is a politically independent trade union confederation and has thirteen national affiliates organising nearly 300,000 members, mostly in the public sector.

### **YS**

The Confederation of Vocational Unions (YS) is a politically independent umbrella organisation for labour unions. YS has 11 affiliated unions organised according to professions with around 200,000 members.

## **Sweden**

### **LO**

The Swedish Trade Union Confederation (LO Sweden) is the central organisation for 13 affiliates which organise over a million workers within both the private and the public sectors, of whom about more than half are women.

### **TCO**

The Swedish Confederation of Professional Employees (TCO) comprises thirteen affiliated trade unions representing around a million members, mostly professional and qualified employees in a wide variety of occupations.

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# Abstract

Women face inequalities on the labour market and unequal pay. Closing the gender pay gap and to ensure the **principle of equal work of equal value** is essential for achieving a gender-equal society. The purpose of this Nordic-German report is to look more closely – **from a trade-union perspective** – on how to reach **pay equity and how to close the gender pay gap**.

Despite the fact that the countries in this study – **Denmark, Finland, Germany, Iceland, Norway, Sweden** – have come far and often are highlighted as frontrunners, none of the countries has closed the gender pay gap. The current developments indicate that it will still take very long time until this is achieved. More needs to be done, and this report aims to contribute to this by **sharing knowledge and inspiration, fostering discussion and political debate** on possible next steps.

One outcome of the report is a **selection of good examples** of Equal Pay in the countries in this study. These good examples are intended to give other countries as well as the countries that are part of this study **new ideas and a smorgasbord** of measures to tackle unequal pay and a gender-equal labour market.