

Pay Transparency Reporting Project  
Corporate Policy and Special Projects  
Ministry of Labour  
400 University Avenue, 12th Floor  
Toronto ON M7A 1T7

March 27, 2019

Ministry of Labour. Pay Transparency Reporting Consultations  
April 2019

The **Ontario Council of the Canadian Federation of University Women (CFUW Ontario Council)** is an organization with 50 clubs throughout the province from Windsor to Thunder Bay to Ottawa to Welland.

Any advocacy done by CFUW and its clubs is based on policy derived from our annual grassroots resolution process, with those resolutions voted on and adopted at the Annual General Meetings.

Pay transparency is a vital tool in closing the gender wage gap. Not only do women lose purchasing power during their lifetimes, they arrive at retirement with less savings, having to depend on the state or face a limited choices at end of life.

We are thankful that the government is recognizing the seriousness of this issue.

Question 1: In order to capture a more accurate picture of the differences in compensation between men and women at an organization, which additional wage gap calculations should be required (e.g., bonuses, overtime pay, commissions)?

**All compensation** must be included including salaries, bonuses, benefits (including non-monetary ones such as room and board), stock options, pension contributions.

**All compensation** for a set period of time such as a calendar year.

Question 2: Given your answer to question 1, how should these gaps be calculated?

**Across all employment levels** – for example: full-time, part-time, casual, independent contractor. **Across job classifications** – are they different for men and women?

Question 3: What reporting period would you prefer to use to calculate average and median hourly gender wage gaps (e.g., calendar year, a prescribed period such as a pay period or specific week [please specify the date/period], fiscal year, etc.)?

**Time period related to other necessary reporting**, such as taxation which uses the calendar year. Using the same reporting timetable as this simplifies the ability to report.

Question 4: If you are an employer with 100 or more employees, do you currently have all the information you would need to calculate your organizational median and hourly gender wage gaps for a specified period?

Not applicable. Ontario Council is a non-profit organization without staff here, but is affiliated with the CFUW National that has a staff of 4.5 members

Question 5: If you are an employer with 100 or more employees, how much do you estimate the cost of pay transparency reporting will be, based on the proposal (for each of the categories below please provide an estimated cost):

- IT/software costs
- Personnel costs
- Other (please describe)
- Total costs

Not applicable

Question 6: How many hours do you anticipate pay transparency reporting will take in total? Please round up to the nearest half hour.

Do organizations not have this information readily available for taxation and other reporting necessities?

Question 7: Do you have any general comments or feedback regarding the proposed pay transparency reporting requirements?

The gender pay gap has been described as a ‘robbery that not enough people are talking about’. While setting up any new system is time consuming, the long term impact is invaluable.

Question 8: How many employees work for your organization?

Ontario Council is a non-profit organization without here, but is affiliated with the CFUW National that has a staff of 4.5 members.

Question 9: In which sector or industry does your organization operate?

CFUW Ontario Council is a non-profit non-governmental organization. We operate in an area that has major concerns vis-à-vis compensation for staff – too many demands, too little funding.

Much of this industry is female-dominated and much of it involves some form of caregiving.

**Final comments:** As mentioned pay transparency is only one, albeit a very important, tool to deal with the gender wage gap. Other aspects must gradually be dealt with:

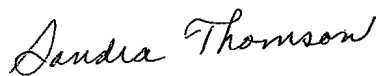
- The motherhood penalty – due to lack of affordable child care, many women must stay away from employment for extended periods of time
- Women work fewer hours in order to handle their second job – the household and family, both young and old. In time it is hoped men will share this equally.
- Women go into caregiving industries. Human services have been traditionally as they were done by organizations such as the church, volunteer organizations, and the like.

#### **CFUW ONTARIO COUNCIL**

Ontario Council of the Canadian Federation of University Women (CFUW) is a voluntary, self-funded, non-profit organization with 50 clubs across the province, which is affiliated with the national Canadian Federation of University Women.

Our mandate is to promote education and life-long learning, to encourage the participation of members in their communities and to enhance the status of women and girls.

Our main concerns include high quality public education, universal health care, a clean safe environment, the economic security of women as well as the prevention of violence against women.



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#### **CFUW ONTARIO COUNCIL**

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