



HM Government

## 1. Parental leave and pay: Supporting parents and achieving equality Response form

The consultation is available at: <https://www.gov.uk/government/consultations/good-work-plan-proposals-to-support-families>

The closing date for responses is: 29 November 2019

Please return completed forms to:

Team: Family-related Leave and Pay Team  
Department for Business, Energy and Industrial Strategy  
Postal address: 1<sup>st</sup> Floor Spur, 1 Victoria Street, Westminster, London, SE24 0DN

Tel: 020 7215 5000

Email: [supportingfamiliesconsultation@beis.gov.uk](mailto:supportingfamiliesconsultation@beis.gov.uk)

### Personal / Confidential information

Please be aware that we intend to publish a summary of all responses to this consultation.

Information provided in response to this consultation, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes. Please see the consultation document for further information.

If you want information, including personal data, that you provide to be treated as confidential, please explain to us below why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we shall take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department.

I want my response to be treated as confidential

Comments: [Click here to enter text.](#)

## About You

Name: Diana Holland

Organisation (if applicable): Unite the union

Address: 128 Theobalds Road, London WC1X 8TN

	<b>Respondent type</b>
<input type="checkbox"/>	Business representative organisation/trade body
<input type="checkbox"/>	Individual
<input type="checkbox"/>	Legal representative
<input type="checkbox"/>	Large business (over 250 staff)
<input type="checkbox"/>	Medium business (50 to 250 staff)
<input type="checkbox"/>	Micro business (up to 9 staff)
<input type="checkbox"/>	Small business (10 to 49 staff)
<input checked="" type="checkbox"/>	Trade union or staff association
<input type="checkbox"/>	Other (please describe)

	<b>If you are an individual, are you:</b>
<input type="checkbox"/>	Employed
<input type="checkbox"/>	Self-employed
<input type="checkbox"/>	Unemployed
<input type="checkbox"/>	Retired
<input type="checkbox"/>	Not looking for work
<input type="checkbox"/>	other

	<b>If you are an employer, how would you classify your organisation?</b>
<input type="checkbox"/>	Private sector
<input type="checkbox"/>	Public sector
<input type="checkbox"/>	Charity/Voluntary sector
<input type="checkbox"/>	Other (please specify)

## Further information

### Parental leave factors which support parents to combine work with childcare responsibilities

There are a range of variables which could potentially be leveraged:

- The length of leave and when it can be taken (e.g. only in the first year or over the lifetime of the child);
- The rate of pay (which can vary over the leave period);
- Whether leave is transferrable between parents or given on a ‘use it or lose it’ basis;
- Whether the parental leave can be taken flexibly (e.g. in days or half-days; in blocks separated by periods at work; and whether it can be stopped and re-started);
- Who the leave and pay applies to (e.g. just employees or all working parents); and
- Whether parents can take time off work together, sequentially or both.

### Making the right trade-offs and choices to support families

Reforming one or more parental leave and pay policies may necessitate trade-offs around:

- How entitlements to leave and/or pay are split between parents;
- Balancing flexibility and choice for families and incentivising parental behaviours (e.g. solo childcare by fathers);
- Creating more rules and incentives to determine how leave is taken and shared, versus simplicity for parents to navigate the system and make choices;
- Giving parents the flexibility to take leave when it suits them and giving their employers and co-workers certainty;

- How the costs of parental leave and pay are shared between families, employers and the Government;
- How much support is provided at the time of the birth versus giving parents opportunities to take parental leave when their child is older;
- How support is distributed across families – and whether the generosity of support should vary according to a family's income;
- How the costs are distributed across types of employers – including, the relative support provided to SMEs and large employers;
- How employers who provide enhanced contractual leave and pay would respond to Government enhancing family-related statutory pay (e.g. would they extend the period of contractual leave and pay or re-cycle the savings?); and
- The level of support offered to families with different characteristics.

## Section 1: Paternity leave and pay

This section seeks views on options for changing the different variables within paternity leave and pay, and the trade-offs and choices involved.

We are seeking views on the following questions:

### Question 1:

**What emphasis should be placed on enhancing Statutory Paternity Pay versus the length of Paternity Leave available?**

- Longer period of leave at a lower rate of pay
- Shorter period of leave with a higher rate of pay

**Please provide reasons for your answer below**

**Comments:** Unite wants to make it absolutely clear at the outset that any changes to Paternity or Parental leave must not in any way undermine and/or reduce Maternity Leave and Pay and any rights associated with it. We are also in the process of evaluating our family leave proposals and we will inform you when they are finalised.

We believe fathers/partners/nominated carers should have a longer and well paid leave so that they can bond with the baby and look after the mother. However, this should not be at the expense mothers. We are well aware that the majority of fathers/partners/nominated carers do not take their current entitlement due to the extremely low level of Paternity Pay. This goes against the purpose of Paternity Leave which has been there for the father/partner/nominated carer to bond with the baby, care for the mother after childbirth and breastfeeding and look after other children in the family. For this reason the European Commission uses "A short period of leave available to fathers, usually immediately after the birth of a child" as a definition of Paternity Leave. Unite believes that the length of Paternity Leave should be increased to four weeks and Paternity Pay should be equivalent to replacement income. There should also be flexibility for fathers/partners/nominated carers on how they wish to take this leave around the birth. Another barrier for fathers/partners/nominated carers taking this leave is the eligibility criteria. The mother and the baby need this vital care regardless of the employment status of the father/partner/nominated carer or their length of service and the level of their pay.

Additionally, Unite continues to call for the employment rights to be extended to all workers and the use of one definition for all who are engaged in work. Therefore, all workers regardless of their employment status should be entitled to this right. Government should legislate for ALL parents/partners/nominated carers to be entitled to Paternity Leave and Pay as a day one right.

Unite has called for nominated carers to have the same rights as fathers or partners. We also believe that there should be a broad definition to include friends and family. For example migrant workers who may not have their partners in the UK, single mothers or fathers, gay, lesbian and trans people or women escaping domestic violence who could be more likely to rely on friends for mutual support and care. Therefore, we believe it is time that nominated carers are included where they are, in many cases, taking the role of a parent. They should be entitled to the same rights as parents of the child.

Unite has been asking for extended leave in cases of: premature and multiple births; disabled baby; still births; mothers with postnatal depression; partners who die or are seriously incapacitated. Government should ensure there are provisions for paid extended leave in these crucial and special circumstances in order to allow fathers/partners/nominated carers peace of mind to look after their family.

## **Policy objectives**

Parental leave and pay policies give employed parents a right to time off work in the first year and subsequently. They are supplemented by a range of employment rights and protections which are intended to prevent employers from discriminating against parents or treating them unfairly because they have been absent from work on parental leave. Together, these rights and protections are intended to:

- Enable women to prepare for and recover from birth;
- Facilitate women returning to work and staying in work (i.e. boost female participation in the labour market);
- Give working families more choice and flexibility;
- Increase paternal involvement in childcare;
- Close the employment and gender pay gaps;
- Prevent pregnancy and maternity discrimination;
- Prevent discrimination against parents who take or seek to take parental leave; and
- Minimise the burdens on business.

## **Question 2: What impact would changing either leave or pay have on our policy objectives?**

**Comments:** We are extremely concerned about the wrong use of different leave entitlements and merging them all as parental leave. The purpose of Parental Leave is not to “enable women to prepare for and recover from birth”, that is the purpose of Maternity Leave. Merging different entitlements into one undermines the mother’s entitlement in her own right, fathers/partners/nominated carers’ entitlement in their own right as well as shared entitlement.

If this question relates to Paternity Leave then as we have stated before, Paternity Leave should be increased to 4 weeks around the birth and the Pay should be increased to the level of replacement income. This would ensure fathers/partners/nominated carers take their entitlement. Paternity Leave and Pay should apply to ALL fathers/partners/nominated carers from day one of employment regardless of employment status, length of service and salary levels.

**Question 3: How should the costs of providing Paternity Leave and Pay be apportioned between Government, employers and parents?**

**Comments:** This is an important government commitment to involve more fathers/partners/nominated carers in supporting and caring for the mother and the baby. Therefore, the four weeks, well paid Paternity Leave should be paid for by the government.

**Question 4: Could enhancing Statutory Paternity Pay and extending Paternity Leave result in differential impacts across families with different characteristics (e.g. families from different socio-economic groups or cultural backgrounds)?**

**Comments:** Quite the opposite. What we are asking for is to extend the leave with an enhanced pay for ALL fathers/partners/nominated carers from day one of employment and regardless of their employment status, length of service and salary levels. Paternity Pay should be at the level of replacement income. This will intentionally improve the current situation many families find themselves in where fathers/partners/nominated carers cannot afford to take their entitlement. We want to emphasise that any enhanced Paternity Leave should not reduce the length of Parental Leave as these are separate entitlements.

**Question 5: Should support vary according to family characteristics, including income levels? For example, should there be a cap on Statutory Paternity Pay for high earners?**

**Comments:** Unite is an advocate for universal rights and entitlement.

**Question 6: Should the level of reimbursement for employers vary according to their size (as now)?**

**Comments:** Government should continue to reimburse all employers with a higher level for smaller employers. Government should recognise and tell employers that statutory leave and pay are minimum standards and would need to be enhanced and employers that provide enhanced contractual Paternity Leave and Pay should receive tax benefits.

**Question 7: How might businesses that already provide enhanced Paternity Pay respond to any enhancement to Statutory Paternity Pay? For example, would they extend the period of contractual leave and pay?**

**Comments:** Through collective bargaining we have negotiated enhanced Maternity, Paternity and Parental Leave and Pay. We would ensure that those employers as well as new ones would continue to provide the enhancements. However, this is not satisfactory and government should make sure rights are underpinned by legislation and not just being reliant on negotiations with some employers. For this reason Unite will continue to call for

the abolishment of the Trade Union Act 2016 to protect strong rights for collective bargaining. We will also continue to call for the restoration of sectoral collective bargaining. Government should recognise and tell employers that statutory leave and pay are minimum standards and would need to be enhanced and employers that provide enhanced contractual Paternity Leave and Pay should receive tax benefits. As we have stated before it is important that any enhanced Paternity Leave and Pay does not result in the reduction in Parental Leave and Pay as these are separate entitlements. Also, any Paternity Pay enhancement should be equivalent to income replacement.

**Question 8: How should the timing of when leave can be taken be balanced between giving families choice and flexibility, and incentivising particular parental behaviours? For example, should fathers/partners be able to take leave and pay at any point in the first year or be required to take leave when the mother has returned to work to incentivise solo parenting?**

**Comments:** As we have stated before Paternity Leave is there for one purpose only and that is the need for fathers/partners/nominated carers to bond with the baby and support and care for the mother recovering from childbirth and her breastfeeding and therefore, it can be flexible but should be around the birth. Parental Leave however, is a period of leave to be taken in the first 18 months to care for the child(ren). This leave should be flexible and well paid to the level of replacement income.

**Question 9: How should we balance giving fathers/partners flexibility and choice (e.g. to take paternity leave in blocks) with the needs of employers and co-workers for certainty around when the father/partner is likely to be off work?**

**Comments:** As stated before, Paternity Leave should be flexible and taken around the time of birth and therefore taking it in a block of minimum of one week up to 4 weeks. As there is an ample 15 week notice period employers should be able to organise work around this leave quite easily.

## **Section 2: Shared parental leave and pay**

This section seeks views on shared parental leave and pay: how it meets our objectives, options for changing the different variables and the trade-offs and choices involved.

We are seeking views on the following questions:

**Question 10: What aspects of the current Shared Parental Leave and Pay scheme are most successful, and which are most in need of reform? Please give reasons for your answer.**

**Comments:** Unite believes a system of sharing responsibility to raise children is positive. However, the current system of Shared Parental Leave does not satisfy this purpose at all. Firstly, it is the mother giving up part of her Maternity Leave. Hence, it is Maternity Leave and not Shared Parental Leave. Secondly, the pay is even below the National Minimum Wage. Thirdly, the eligibility criteria including employment status is unfair and complicated excluding many low paid and agency workers and those on casual working patterns. Fourthly, it relies on both parent's eligibility including in cases of enhanced pay schemes. Also, parents with more than one employer could be eligible for Shared Parental Leave with one but not all employers which make arranging blocks of leave even harder. Fifthly, as stated before, nominated carers are not included. Finally, there is no protection for fathers/partners/nominated carers.

As Shared Parental Leave is essentially Maternity Leave being shared therefore, neither does the mother have a protected period of leave to recover and breastfeed nor neither does the father/partner/nominated carer to look after the mother and bond and care for the baby and other children in the family.

**Question 11: Should there be a dedicated pot of leave and pay for each parent within the Shared Parental Leave and Pay scheme?**

Yes  No  Not sure

**Comments:** As we have stated, Maternity and Paternity Leave and Pay should be protected and therefore there is a need to have dedicated months for mothers as well as fathers/partners/nominated carers as additional leave. These specific sections of leave could be taken consecutively or concurrently. Shared Parental Leave should be a day one right for ALL workers regardless of their earnings, length of service and employment status. Also, both parties should have the right to return to the same job regardless of their length of leave. It is vital that the level of pay is enhanced to the level of replacement income enabling both parties to take their entitlement. Currently, either fathers/partners/nominated carers cannot afford to take their share of this leave or mothers are forced to transfer the majority of their leave when the father/partner receive a well paid leave from their employer.

**Question 12: Should mothers continue to be the 'gatekeeper' for the Shared Parental Leave and Pay scheme?**

Yes  No  Not sure

**Comments:** As stated in Questions 10, the current system of shared leave and pay should be replaced by a true Shared Parental Leave and Pay system so that mothers and fathers/partners/nominated carers would have their individual dedicated period of leave which is additional to Maternity and Paternity Leave and Pay. Therefore, the need for a 'gatekeeper' is obsolete. However, if government is insisting on keeping the current leave and pay which is Maternity Leave shared, which we are not supporting, then the mother should be the 'gatekeeper' as this is her leave being taken away.

**Question 13: Should there be an element of pay enhancement in the Shared Parental Leave and Pay scheme?**

Yes  No  Not sure

**If so, how should the cost of any enhancement be apportioned between the Government, employers and parents?**

**Comments:** The dedicated leave and pay for each parent/nominated carer should be enhanced by the government and the employer. The pay should be at the level of replacement income. Government should recognise and tell employers that statutory leave and pay are minimum standards and would need to be enhanced and employers that provide enhanced contractual Paternity Leave and Pay should receive tax benefits.

**Question 14: Could enhancing Statutory Shared Parental Pay and/or giving fathers access to 'use it or lose it' leave through the Shared Parental Leave and Pay scheme result in differential impacts across families with different characteristics (e.g. families from different socio-economic groups or cultural backgrounds)?**

**Comments:** Government should introduce enhancement as well 'use it or lose it' parental leave which is in addition to Maternity and Paternity Leave and Pay. This would encourage more fathers/partners/nominated carers to take the leave since current low level of Shared Parental Pay is the main obstacle. If parents are properly compensated then they would want to spend time to raise their baby. However, the Leave and Pay should be a day one right available to all parents regardless of their earnings, length of service and employment status. Government should legislate for ALL parents to be entitled to an enhanced Shared Parental Leave and Pay where pay is at the level of replacement income. Many parents are fearful of losing their job or be demoted as discrimination is rife and legislation not strong. Government should legislate for a strong right to return to the same job for ALL parents/partners/nominated carers. This will also encourage a higher rate of take up for Shared Parental Leave. Government must take strong action to eliminate pregnancy, maternity and parental discrimination. Employers should be given a strong lead from the government to rid their workplaces of the macho culture that discourages men to take Parental or even Paternity Leave.

**Question 15: Should support vary according to family characteristics, including income levels?**

**Comments:** As stated before the crucial issue is the level of pay therefore, government should provide a simple, well paid system of leave for ALL parents and carers so that no worker would be out of pocket because they have a baby.

**Question 16: How should any enhancement to Statutory Shared Parental Pay interact with the level of statutory pay available under paternity and maternity**

**provisions, in particular how should Government prioritise the different entitlements in terms of providing enhanced pay?**

**Comments:** As stated before, Maternity and Paternity Leave and Pay should be protected with a pay enhancement equivalent to replacement income and Paternity Leave to be extended to 4 weeks. The current system of Shared Parental Leave and Pay which is maternity Leave shared, does not serve its purpose and should be replaced by an additional period of leave and pay specified for each parent/nominated carer. To ensure take up Shared parental Pay should be equivalent to replacement income. Also, parents/nominated carers should be able to take the leave solely or concurrently with strong rights to return to the same job. Having specific periods of leave for each parent/nominated carer reduces the current complications of the pay system which relies on both parent's eligibility including in cases of enhanced pay schemes.

**Question 17: How might businesses that already provide enhanced Shared Parental Pay respond to any enhancement to Statutory Shared Parental Pay? For example, would they extend the period of contractual leave and pay?**

**Comments:** Through collective bargaining we have negotiated enhanced Shared Parental Leave and Pay. We would ensure that those employers as well as new ones would continue to provide the enhancements. However, this is not satisfactory and government should make sure rights are underpinned by legislation and not just being reliant on negotiations with some employers. For this reason Unite will continue to call for the abolishment of the Trade Union Act 2016 to protect strong rights for collective bargaining. We will also continue to call for the restoration of sectoral collective bargaining. As stated before the current system of Shared Parental Leave and Pay should be replaced by a true additional parental leave with dedicated periods for each parent/nominated carer. Also, any Parental Pay enhancement should be equivalent to income replacement.

## **Section 3: Maternity leave and pay**

This section seeks views on the implications for maternity leave and pay of potential reforms to paternity leave or shared parental leave.

We are seeking views on the following questions:

**Question 18: Given your views on priorities for reform of Paternity Leave or Shared Parental Leave, are there any implications for maternity arrangements including:**

**A. The length of Maternity Leave?**

Yes  No  Not sure

**Comments:** As stated before, we are extremely concerned about the wrong use of different leave entitlements and merging them all as parental leave undermining Maternity

Leave. “Reform of Paternity Leave or Shared Parental Leave” should not pose any implications for maternity arrangements as they are different entitlements and serve different purposes. Unite calls for the protection of Maternity Leave for it to be extended to one year. Government should recognise and tell employers that statutory leave and pay are minimum standards and would need to be enhanced and employers that provide enhanced contractual Maternity Leave should receive tax benefits.

## **B. The level and extent of Statutory Maternity Pay**

Yes  No  Not sure

**Comments:** As stated before, we are extremely concerned about the wrong use of different pay entitlements and merging them all as parental pay undermining Maternity Pay. “Reform of Paternity Leave or Shared Parental Leave” should not pose any implications for maternity arrangements as they are different entitlements and serve different purposes. Unite calls for the protection of Maternity Pay and for it to be extended to one year with an enhanced pay equivalent to replacement income. Also, pay should reach the threshold at which national insurance starts to protect mother’s benefit and pension positions. Government should recognise and tell employers that statutory leave and pay are minimum standards and would need to be enhanced and employers that provide enhanced contractual Maternity Pay should receive tax benefits.

## **C. The current inflexibility as to when Maternity Leave can be taken?**

Yes  No  Not sure

**Comments:** Maternity Leave is a specific leave for mothers covering the period before and after the birth. Therefore, it is designed to support the mother to prepare for childbirth and recovering from birth as well as to breastfeed. Consequently, this leave has to be taken at this particular time and should stay a solid period of leave. Unite calls for the protection of Maternity Leave and for it to be extended to one year with pay.

## **Section 4: Parental leave for parents of older children**

This section seeks views on parental leave for parents of older children: how it meets our objectives, the balance between leave and pay for this set of parents, and options for reform.

We are seeking your views on the following questions:

**Question 19: What aspects of the current arrangements for parental leave (which can be taken up to and including the child’s 18th birthday) are most successful, and which are most in need of reform? Please give a reason for your answer.**

**Most Successful:**

**Comments:** Having the right to Parental Leave is an important entitlement. However, since it is unpaid most parents are unable to take it which defeats the purpose. Also, many parents are unaware of this right which interestingly, the government has not made any effort to publicise. The 21 days' notice period; 4 week limit on leave parents can take in a year; being forced to take it as whole weeks rather than individual days, except if your child is disabled; the fact that the employer can postpone leave; and eligibility criteria excluding workers due to their employment status, length of service and parental responsibilities; does not correspond with the situation many parents/nominated carers are faced when their children need them. All these areas should be reformed.

**Most in need of reform:**

**Comments:** As stated before, lack of pay is a major barrier to parents/nominated carers' ability to take this leave but as above, all the other aspects of this leave make it ineffective and frustrating for parents including the notice period, the limit on the annual entitlement, inflexibility on taking the leave employers' right to postpone leave and the eligibility criteria.

**Please give your reasoning below:**

**Comments:** Children of any age need their parents/nominated carers whether they are unwell or healthy. Older children face a series of pressures that need to be recognised, from exams and family bereavement or breakdown, to bullying and negative peer pressure. Parents/nominated carers should not have to put their jobs at risk or face loss of pay in order to support their family. The chance for parents/nominated carers to work more flexibly to support their older children at demanding times is vital.

**Question 20: How should the Government balance the length of leave for parents of older children with the level of pay in order to incentivise take up?**

**Comments:** Unite calls for the right to Parental Leave for older children to be awarded from day one of employment and to ALL parents/nominated carers regardless of their employment status, length of service or whether they are foster parents or not. Parental Leave should be paid to at least the level of enhanced Maternity Pay.

**Question 21: Are there any other reforms to parental leave for older children that would support the Government's wider goals for parental leave policies?**

**Comments:** As stated before, lack of pay is a major obstacle. Parents/nominated carers should be able to take this leave in blocks from a minimum of half a day and/o on a part-time basis. Parental Leave should be available with no, or minimum notice and made available to all those with caring responsibilities including adult relatives and friends. Employers should be encouraged to contribute towards childcare costs through facilities, subsidised places or allowances. Employers' right to postpone Parental Leave should be

removed. There should be greater flexibility to take this leave and parents/nominated carers should be able to take Parental Leave starting from half a day to several full weeks. There should be great flexibility for nominated carers to apply for “parental responsibility”. There should be a broad definition of a nominated carer with “parental responsibility” to include friends and family. For example migrant workers who may not have their partners in the UK, single mothers or fathers, gay, lesbian and trans people or women escaping domestic violence who could be more likely to rely on friends for mutual support and care. Therefore, we believe it is time that nominated carers are included where they are, in many cases, taking the role of a parent. They should be entitled to the same rights as parents of the child.

## **Section 5: Towards a comprehensive suite of parental leave policies**

This section seeks views on the high-level options and challenges of potential reforms to parental leave and pay.

We are seeking your views on the following questions:

**Question 22: Do you agree with the Government’s objectives for parental leave and pay policies? (Objectives can be found in section 1)**

Yes       No       Not sure

**Please give your reasons**

**Comments:**

**Question 23: Do you think the Government should consider a more radical change – potentially moving to a single ‘family’ set of leave entitlements, or seek to reform the existing entitlements?**

**Move to single family set of leave entitlements**

**Seek to reform the existing entitlements**

**Comments:** Unite does not support single family set of leave entitlements since it will undermine Maternity and Paternity Leave which have a specific and vital purpose for the mother, father/partner/nominated carer and the baby. Therefore, as stated before, Maternity and Paternity Leave should be protected with Paternity Leave extended to 4 weeks around birth and both Leaves to be paid equivalent to replacement income. The current Shared Parental Leave should be replaced by a true additional shared leave for parents/nominated carers. This should be dedicated periods of well paid leave for each parent/nominated carer which can be taken solely or concurrently.

**Question 24: If we were to move to a new model for parental leave and pay, which areas for reform are most important? Please give a reason for your answer. In particular:**

**A. Is more support needed for families around the time of the birth of a child or later, when the child is older?**

**Around Birth**  **Later**  **Don't know**

**Please give your reasons**

**Comments:** Clearly, families need support around the birth of a child as well as later. We believe it is wrong to ask this question in the first place since these are not options or choices. Support at all stages of a child's life as well as their parents/nominated carers is societal obligation and the government should advocate and support that.

**B. Should any incentives for fathers to take more responsibility for childcare focus on: a specific paternity entitlement; changes to the Shared Parental Leave and Pay scheme; or parental leave for older children?**

**Paternity entitlement**

**Shared Parental leave and parental leave**

**Don't know**

**Please give your reasons:**

**Comments:** As stated before, fathers/partners/nominated carers should be entitled to 4 weeks Paternity Leave with Pay equivalent to replacement income. Also, they should have an additional dedicated well paid period of leave for themselves. Parental Leave should be paid and all its obstacles removed as stated in answers to questions in Section 4.

**C. Should the Government give greater priority to the length of leave available or to the pay enhancements available?**

**Length**  **Pay enhancements**  **Don't know**

**Please give your reasons:**

**Comments:** Again, this is not a choice the government should have as both are intertwined. Leave should be enhanced and so should pay as stated in questions above.

**D. Should support be directed to any particular groups of families? If so which groups, and how?**

**Comments:** Only a well-paid, sufficient leave period for ALL parents/nominated carers regardless of their employment status, length of service and salary would benefit everyone and does not leave behind certain groups.

**E. How should the costs of any reforms fall between families, the Government and business? Please provide reasons for your answer.**

**Comments:** As stated before families should not lose out because they have children. Pay for their leave entitlement should be equivalent to replacement income. Government should recognise and tell employers that statutory leave and pay are minimum standards and would need to be enhanced and employers that provide enhanced contractual Paternity Leave and Pay should receive tax benefits.

**Question 25: Should Government prioritise reform of parental leave policies over other Government policies which support parents to combine work with family life?**

**Comments:** Policies to help and support families go hand in hand. Government should provide sufficient well-paid leave for ALL parents as well free and affordable childcare, carers leave and pay and strong rights to flexible working and not just to request it.

**Question 26: If you consider that the Government should prioritise reform of parental leave and pay policies, which policies are most important and why?**

**Comments:** As stated above.

Thank you for your views on this consultation.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

At BEIS we carry out our research on many different topics and consultations, and your views are valuable to us. Would you be happy for us to contact you again from time to time either for research or about other consultations?

Yes

No