



17 February 2016

**MMM response to the EU consultation “A new start to address the challenges of work-life balance faced by working families”**

The purpose of this consultation:

In August 2015, the Commission published a "Roadmap" for the initiative ‘A new start to address the challenges of work-life balance faced by working families’ to replace the 2008 Commission proposal to revise the Maternity Leave Directive[1]. The objective for this initiative is to increase the participation of women in the labour market by modernising and adapting the current EU legal and policy framework to today's labour market to allow for parents with children and/or dependent relatives to better balance family and work life, allow for a greater sharing of care responsibilities between women and men, and to strengthen gender equality in the labour market.

In line with Article 154(2) TFEU, the Commission has launched the first stage consultation with the European social partners to obtain their views on the possible direction of European Union action, in particular on legislative measures concerning family leaves and flexible working arrangements that could address these challenges. In accordance with Article 155 TFEU, during the first stage consultation social partners may inform the Commission on their wish to initiate a negotiation process for a social partner's agreement. In such a case, the Commission suspends its initiative for the duration of the negotiations. If these are successfully concluded, social partners may request their agreement be implemented by the Commission presenting a proposal for a Council Decision.

Legislative and policy measures can be complementary elements in a package in order to improve work-life balance. Therefore the roadmap also outlines possible non-legislative options for the way forward, including comprehensive policy guidance to Member States in the area of work-life balance, as well as reinforced monitoring, better use of EU funds and knowledge-sharing activities.

The purpose of this consultation is to gather views on the development and implementation of a range of possible tools at EU-level to support work-life balance.

[1][http://ec.europa.eu/smart-regulation/roadmaps/docs/2015\\_just\\_xxx\\_maternity\\_leave.en.pdf](http://ec.europa.eu/smart-regulation/roadmaps/docs/2015_just_xxx_maternity_leave.en.pdf)

## **A. General Feedback**

The background document outlines several challenges to work-life balance and women's participation in the labour market.

\* **Do you agree with the description of the challenges?**

- Yes
- No
- Partially
- Don't know

\* **Are there any other challenges that should be taken into account?**

- Yes
- No
- Don't know

→ *Challenge 1:*

The motherhood penalty: the disadvantages in pay, perceived competence, and benefits encountered by working mothers relative to childless women and specifically the per-child average wage gap of approximately 5%.

→ *Challenge 2:*

“The Rush hour”: the period when one starts a career which often includes intense work coupled with the time to have children all at the same time.

## **B. Policy areas**

The background document outlines several key policies that have a positive impact on work-life balance and women's participation in the labour market. These policy areas include:

- \* Childcare
- \* Long-term care services
- \* Family-related leave arrangements for both women and men
- \* Flexible working arrangements for both women and men
- \* Tax-benefit systems that make work pay for both partners

\* **Do you agree that the above list of policy areas is accurate and complete?**

- Yes
- No
- Partially

Don't know

\* **Is there another policy area that is missing?**

- Yes
- No
- Don't know

The recognition of unpaid care work and the validation of informal skills acquired when performing this work at home.

Below is a list of possible policy measures.

In your view, which would be the most important measures to improve work-life balance and female labour market participation in your country?

	Highest Priority (max. 3)	Medium Priority	Low Priority	Not important at all	Don't know
*Improving the possibilities and/or incentives for parents and other people with dependent family members to take-up caring responsibilities and work-life balance measures (such as leave and/or flexible working arrangements)	X				
*Improving the possibilities and/or incentives for men, in particular, to take-up caring responsibilities and work-life balance measures (such as leave and/or flexible working arrangements)	X				
*Better facilitating parents' transitions back to work after taking maternity/parental leave (e.g., adapting workplaces to better allow for breastfeeding, informing them of employment promotion and training opportunities while they are on leave)		X			

*Improving the availability of childcare (e.g., number of places)		X			
*Improving the affordability of childcare		X			
*Improving the quality of childcare			X		
*Improving the availability of formal long-term care services, including home/community-based services					X
*Improving the affordability of formal long-term care services		X			
*Improving the quality of formal long-term care services					X
*Improving the availability of disability-related home support			X		
*Improving support measures for people with ill/disabled/frail relatives (e.g., financial support, support services)					X
*Removing tax-benefit disincentives for parents/people with caring responsibilities to enter the labour market (e.g., tax disincentives for the lower earning partner to work, benefit traps)	X				
Other policy measure(s)	X				

**Please specify:**

The recognition of unpaid care work and validation of informal skills acquired when performing this work at home. This would facilitate the re-entry into the labour market after a career break.

**C. EU-Level Action**

\* **In your view, is there a need for further EU-level action on measures to address work-life balance challenges?**

- Yes  
 No  
 Don't know

\* **In your view, is there a need to improve the EU-level legislative framework in order to address the challenges of work-life balance, for example in relation to maternity leave, parental leave, flexible working arrangements, careers' leave and/or paternity leave?**

- Yes

- No
- Don't know

[NB] A separate consultation is being conducted with the social partners on issues in the current EU legal framework, such as in the area of leaves and flexible working arrangements. The outcome of this public consultation shall not influence the outcome of the consultation with the social partners.

**\*Please explain what type of improvements could be considered as regards the current EU legislative framework.**

Including the right to request flexible working conditions for everyone as it exists in the UK.  
Developing a better legal framework for supporting chosen and quality part-time work.  
Extending the maternity leave period to 18 paid weeks.  
Adding the paternity leave (a remunerated period of at least 10 days).  
Extending parental leave to 6 months, making it flexible, remunerated and until 18 years of the child.  
Validating informal skills acquired when performing unpaid family care work.

\* **In your view, is there a need for further EU-level policy guidance on measures to address work-life balance challenges?**

- Yes
- No
- Don't know

\* **In your view, is there a need for strengthened monitoring at EU-level on measures to address work-life balance challenges?**

- Yes
- No
- Don't know

\* **In your view, could the EU support further exchanges of good practice among Member States and stakeholders in this area?**

- Yes
- No
- Don't know

**\* Do you think the EU could develop meaningful benchmarks \* in the area of work-life balance policies that could be monitored, for example, through the European Semester process?**

\* A benchmark can be defined as “a standard or point of reference against which things may be compared or assessed” (Pearsall, 1999: 125).

- Yes
- No
- Don't know

**Please indicate which policy areas these benchmarks could cover (choose all that apply)**

- Childcare**
- Long-term care services
- Family-related leave arrangements for both men and women**
- Flexible working arrangements for both women and men**
- Tax-benefit systems that make work pay for both partners**
- Other:**
- Don't know

**Please specify:**

Validation of informal skills acquired when performing unpaid family care work.

**Currently, the EU financially supports Member States in their implementation of work-life balance policies through its funds, notably the European Social Fund and European Regional Development Fund.**

**Do you find the current funds and their regulations effective in supporting work-life balance?**

- Yes
- No**
- Don't know

25% of workers say they experience work-related stress (OSHA and Eurofound reports from 2014) and 7% to 9% suffers from burn out. The ESF could be a useful tool in tackling this challenge. Impact assessments carried out on funded project must be conducted in order to evaluate their effectiveness and focus on projects delivering results.

**\*Do you think that the EU could provide clearer guidance to national/regional/local authorities on how existing EU funds could be used to financially support work-life balance?**

- Yes
- No
- Don't know**

\* **In your view, is there a need for further awareness raising activities on work-life balance policies?**

- Yes
- No
- Don't know

\* **Who should be in the main target group for any awareness-raising activities? Please select 3 from the list below.**

at most 3 choice(s)

- National authorities
- Local / regional authorities
- NGOs
- Employers
- Employees
- General public
- Other :
- Don't know

**Please specify:**

Carers, parents and in particular fathers.

**\*In your view, how effective would the possible new EU-level measures mentioned below be in addressing work-life balance challenges?**

	Very effective	Effective	Not very effective	Not effective at all	Don't know
*1. Improved EU-level legislation	X				
*2. Strengthened EU-level policy guidance		X			
*3. Enhanced monitoring of work-life balance issues at EU-level and public reporting of the findings		X			
*4. More exchanges			X		

of good practice amongst Member States and stakeholders						
*5. EU-level benchmarks		X				
*6. Strengthened EU-level financial support	X					
*7. Clearer guidance to national/regional/local authorities on how existing EU funds can be used					X	
*8. Further awareness-raising activities			X			
*9. Other measures	?					

**Do you think the effectiveness of the above individual measures could be increased by combining them with others?**

**Yes**

No

Don't know

**Please specify which measures could be combined by using the numbers in the table below**

(for example, if you think measure 6 should be combined with measure 3 and 5, type in "3,5" next to measure 6).

	The number(s) of the measure(s) to which you would combine this measure (max 6)
1. Improved EU-level legislation	2, 3, 5, 6
2. Strengthened EU-level policy guidance	1,3,5, 6
3. Enhanced monitoring of work-life balance issues at EU-level	1,2, 5, 6
4. More exchanges of good practice among Member States and stakeholders	1, 3, 6
5. EU-level benchmarks	1,2, 3, 6
6. Strengthened EU-level financial support	1, 2, 3,



7. Clearer guidance to national/regional/local authorities on how existing EU funds can be used
8. Further awareness raising activities
9. Other measure (if specified above)

**\*If you have any additional comments and/or suggestions, feel free to use the open answer box below.**

1500 character(s) maximum (1500 characters left)

Results from a survey we conducted with almost 12,000 European mothers in 16 countries <http://www.mmmeurope.org/en/survey-of-mothers-in-europe-results> , showed that mothers want to have more time to spend with their family and choice to adjust their work and family life. 63% of the respondents would prefer some combination of part-time employment and family care duties. Therefore, we would like to include in the initiative the right to request flexible working conditions for parents and people with caring responsibilities. It implies the right for workers to request their employer to adapt their working conditions. These include compressed hours, flexitime, job sharing, part-time work, working from home, etc. The employer is obliged to duly consider it and any rejection has to be motivated by reasons specifically listed in the law. It offers an alternative to any employee who may need flexibility to remain in the workforce. Benefits are proven: Productivity and job retention increase, absenteeism decrease, resources allocated in a better manner and better employee commitment. The Right to Request exists in the UK for working parents since 2003 and due to its success it was extended to every employee since 2014. Since January 2016, the Netherlands is also implementing the Act on Flexible Working including the right to request. MMM wants to see this right broadened to all European countries and beyond. For more information: [www.gov.uk/flexible-working](http://www.gov.uk/flexible-working)

For more information: [http://ec.europa.eu/justice/newsroom/gender-equality/opinion/1511\\_roadmap\\_reconciliation\\_en.htm](http://ec.europa.eu/justice/newsroom/gender-equality/opinion/1511_roadmap_reconciliation_en.htm)