



Department for Business, Energy & Industrial Strategy Consultation: Transparency of flexible working and family related leave and pay policies

Response from AXA UK

About AXA UK

1. AXA UK (AXA) is part of the AXA Group, a worldwide leader in financial services. AXA Group operates in 61 countries with over 170,000 employees and 105 million customers. AXA has around 11 million customers in the UK and operates through specific operating companies – AXA Insurance and AXA PPP healthcare.

Executive summary

2. AXA welcome the opportunity to submit to this consultation. Diversity and inclusion is an integral part of everything we do at AXA and we recognise that different employees have different needs. In order to create an inclusive environment and an engaged workforce AXA is extremely supportive of the transparent promotion of flexible working policies and parental leave and pay policies.
3. In recent months, AXA has created a new Ways of Working policy and included summaries on flexible working and parental leave on our careers website. Ensuring our employees can achieve a sustainable work-life balance is vital for AXA and we recognise the benefits transparency can bring for both prospective and existing employees.
4. AXA is in agreement with a number of the proposals set-out in this consultation paper and is supportive of their overall aims. However, AXA do have reservations regarding the effectiveness of certain strategies such as the reworking and publication of technical internal policy documents and mandatory reporting requirements.

Publishing family-related leave and pay and flexible working policies

Question 1: Do you agree that large employers (250+ employees) should publish their family-related leave and pay policies on their website?

5. AXA agree that large employers should publish their family-related leave and pay policies on their website. Ensuring our employees can achieve a sustainable work-life balance is extremely important to AXA and we want prospective employees to be aware of the benefits on offer in relation to family-related leave and pay. AXA's policies can be found on our careers [website](#).
6. Publishing policies in this manner promotes transparency on parental leave and can provide prospective and existing employees with the ability to make informed decisions about their choice of employer.
7. Moreover, AXA believe that the publication of family-related leave and pay policies could result in positive outcomes such as the reduction of the motherhood penalty, reduction of the gender pay gap and increasing the number of men who consider taking family-related leave.



Question 2: Do you agree that large employers (250+ employees) should publish their flexible working policies on their website?

8. AXA agree that large employers should publish their flexible working policies on their website. At AXA, we want our prospective employees to be completely aware of the benefits and entitlements on offer in relation to flexible working policies.
9. Publishing policies in this manner promotes transparency around the areas of flexible working and can provide prospective and existing employees with the ability to make informed decisions about their employer.
10. Moreover, AXA believe that the publication of flexible working policies could result in positive outcomes for organisational culture. The CIPD's flexible working [guide](#), released in June 2019, identified through cross-sector analysis that the promotion of flexible working can improve employee engagement, work performance, diversity and inclusion and a workforce in line with needs.

Question 3: Do you agree that transparency of these policies will help employers to recruit and retain staff?

11. AXA agree that transparency of these policies will help employers to recruit and retain staff. The feedback received by AXA employees is that 74% believe that AXA is an inclusive place to work. One of the reasons for AXA's inclusive culture is transparency around flexible working and family-related leave and pay policies.
12. Moreover, AXA believe that a culture of openness and transparency creates enhanced employee engagement, improved communication and enhanced retainment rates.

Question 4: Do you agree that, where the employer has a policy on family-related leave and pay which extends the statutory minima, reworking and publishing an internal policy document on a public-facing website would be simple and inexpensive?

13. AXA strongly disagree as we believe that the technical language and legal implications of some internal policies means it can be hard for them to be appropriately adapted for external audiences. However, as discussed elsewhere in the consultation, AXA has recently placed summaries of our parental leave policies on our careers website.

Question 5: Do you agree that, as for family related leave and pay, reworking and publishing a flexible working policy on a public-facing website would be simple and inexpensive?

14. AXA disagree as we believe that the technical language and legal implications of some internal policies means it can be hard for them to be appropriately adapted for external audiences. However, as discussed elsewhere in the consultation, AXA has recently placed summaries of our flexible working policies on our careers website.



Question 6: How helpful would the following information be if it was held (and viewable) on a central database – for instance the Gender Pay Gap Reporting Portal:

- a) Whether flexible working may be available from the start**
- b) Approach to place, hours and times of work**
- c) Approach to informal flexible working (such as later starts to accommodate health and other appointments)**
- d) Enhancements to different types of family-related leave and pay, for example: Maternity Leave and Pay; Paternity Leave and Pay; Adoption Leave and Pay; Shared Parental Leave and Pay; parental leave taken in respect of older children; or, any other contractual enhancements to family-related leave and pay.**

15. AXA believe that the use of a central database, such as the database used for the Gender Pay Gap Reporting Portal, for family-related leave and pay policies and flexible working policies can be considered at the current time as neither helpful nor unhelpful. The reason for this response is that there is currently little evidence that a central database would be successful at improving the visibility and transparency of employer's policies.
16. Moreover, AXA believe that prospective employees tend to look at an employer's website rather than a central database to find out information on benefits and entitlements. Therefore, focus on improving visibility on the website of large employers may be more beneficial to achieve the aims of greater transparency. An additional concern of this approach is that the Gender Pay Gap database is not user-friendly, a similar Reporting Portal for family-related leave and pay policies and flexible working policies may not be effective at informing prospective employees of different employer's policies.

Question 7: To what extent do you believe that a job applicant's decision on whether to apply for a job would depend on the publication of the information mentioned above?

17. AXA believe that to some extent a job applicant's decision is dependent on the publication of family-related leave and pay policies and flexible working policies.
18. If one considers the benefit of flexible working, As highlighted in a recent [report](#) from Timewise, 87% of all full-time employees either work flexibly already, or say they want to. Although many of those that wish to work flexibly do so for reasons such as work-life balance, AXA also recognise that for a number of individuals, such as those with caring responsibilities, the ability to work flexibly is essential.

A requirement to report or a voluntary approach?

Question 8: How effective do you believe a voluntary approach to encourage greater transparency about an organisation's approach to flexible working and family-related leave and pay (e.g. through the Gender Pay Gap Reporting Portal) might be in providing information about employers' policies?

19. AXA believe that a voluntary approach to encourage greater transparency would be fairly effective. In the insurance sector the trade association, the Association of British Insurers, has recently begun an approach that allows member firms to voluntarily disclose information on employer policies to improve reporting and transparency across the industry. These types of voluntary strategies can be measured to determine whether they are effective at encouraging greater transparency.



Question 9: How effective do you believe creating a facility on the Gender Pay Gap Reporting Portal on GOV.UK to record details about an organisation's policies on flexible working and family related leave and pay would be:

- a) To provide a central point of information for employees or prospective employees?**
- b) To let employers record the information as a part of the annual cycle of Gender Pay Gap Reporting?**

20. AXA believe that creating a facility on the Gender Pay Gap Reporting Portal would not be very effective as the process would duplicate the work many employers are already undertaking in their action plans that accompany the reporting process.

Question 10: How effective do you believe it might be to encourage employers to set out how they are using greater transparency about their employment policies as part of their gender pay gap action plans?

21. AXA believe that extending Gender Pay Gap reporting in this way would be fairly effective. AXA is already doing this as part of the accompanying narrative to our Gender Pay Gap reporting.

Question 11: Do you agree that it would make sense to enforce a reporting requirement of this kind in the same way as Gender Pay Gap Reporting (i.e. a requirement to provide this information as part of the Gender Pay Gap reporting process)?

22. AXA is neither in agreement or disagreement regarding enforcing a reporting requirement. However, AXA believe that including information regarding employer policies as part of the Gender Pay Gap reporting process may be most effective when included in the accompanying narrative. Around 50% of large employers already voluntarily supplement their Gender Pay Gap information with a narrative or an action plan, considering the aim of the approach is driving cultural change, focusing more on the accompanying narrative may be a more effective strategy.

A requirement to say whether jobs may be open to flexible working in the advert

Question 12: Thinking about the balance between what it is practical to provide in a short job advert and what is useful to a candidate, which of the following is the best option (please select one)?

23. AXA believe the best option is a simple statement. In July, AXA started to use the simple statement 'Happy to talk flexible working' in job advertisements where it was feasible for the role to be carried out flexibly. The reason we chose a simple statement is that 'flexible working' can be interpreted in a number of different ways. At AXA, we also ensure that we maximise the flexible working opportunities available by consistently asking every hiring manager whether the role they are hiring for can be carried out on a flexible basis.
24. AXA consider flexible working to be extremely important to the success of any business as it allows access to a much larger talent pool, improves work-life balance for employees and increases productivity. Research from sources including the [CIPD](#), [Acas](#) and the [AAT](#) provide evidence of these benefits. As discussed elsewhere in this consultation response, a large majority of the UK workforce has a strong preference for flexible working, therefore, a company which did not provide this option may miss out on a wealth of talent.



Question 13: If a requirement was introduced to state in job adverts whether flexible working may be available or not:

- a) Who might the enforcement power sit with? Please describe.**
- b) What should be the process for reporting a breach? Please describe.**
- c) What should be the penalty for a breach? Please describe.**

- 25. AXA's recruitment policy already states whether flexible working is possible for all roles that we advertise, and therefore we would prefer a voluntary approach or an approach linked to the Gender Pay Gap Reporting Portal.
- 26. If a requirement was introduced, we would encourage the Government to learn from initiatives such as Gender Pay Gap reporting to inform the details of enforcement and handling breaches.

Question 14: If a requirement to provide a link to your flexible working policy on the Gender Pay Gap Reporting Portal was introduced, do you agree that it would be helpful also to ask employers to record whether they had advertised jobs as open to flexible working?

- 27. AXA does agree that this approach would be helpful. The proposal to record jobs advertised as flexible working policies provides a link between flexible policies and the Gender Pay Gap and will ultimately, promote transparency in this area. Flexible working is an important component of ensuring women can return to work and continue to move up the ladder to senior roles. Therefore, AXA believe it makes sense for this link to be reflected in the Gender Pay Gap reporting process.
- 28. Moreover, reporting the number of roles advertised within the process of Gender Pay Gap reporting is achievable and would highlight another area where companies can set a measurable target.

If you need to get in touch regarding the information in this submission, please get in touch with Public Affairs Executive, Jonathon Murphy, at jonathon.murphy@axa-uk.co.uk or on 07866032309.