

Research Article

Acknowledging and Overcoming Gender Wage Gap in the European Union: A Close Examination of Sweden and France

Avrupa Birliği'nde Cinsiyete Dayalı Ücret Farklarını Tanımak ve Üstesinden Gelmek: İsveç ve Fransa Derinlemesine İncelemesi

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Abstract

One of the measurable indicators of inequality between female and male employees is considered as gender wage gap. Although there are governments that have developed policies to overcome injustice in getting different levels of wages for the same amount of work, gender wage gap does exist in the European Union (EU) with different proportions. To reveal the current gender wage gap situation, the precautions that were taken to handle this significant problem, reports, statistics, and policies were examined and compared in this paper. First the gender wage gap ratios and policies to handle this matter in the EU were presented, following that gender wage gap issue in Sweden and France was closely examined. In the discussion part, new implementation and policy suggestions were mentioned. The analysis of the international data and comparison of the two countries reveal that, gender wage gap appears with huge numbers even in the most developed countries in the EU.

Keywords: Gender, Gender Wage Gap Inequality Discrimination, European Union

Öz

Kadın ve erkek çalışanlar arasındaki eşitsizliğin ölçülebilir göstergelerinden biri de cinsiyete dayalı farklı ücretlendirme olarak değerlendirilmektedir. Aynı miktarda işin karşılığı olarak cinsiyete dayalı farklı düzeylerde ücret alma konusundaki eşitsizliğin üstesinden gelmek için politikalar geliştirmekte olan hükümetler olsa da Avrupa Birliği'nde (AB) farklı oranlarda cinsiyetler arası ücret farkı halen mevcuttur. Bu çalışmada, cinsiyetler arası ücret farkı sorunun ortaya konması hedeflenmiş ve bu önemli sorunu çözmek için alınan önlemler, raporlar, istatistikler ve politikalar incelenmiş ve karşılaştırılmıştır. Çalışmada AB'de cinsiyetler arası ücret farkı oranları ve bu sorunu çözmeyi hedefleyen politikalar sunulduktan sonra, İsveç'teki ve Fransa'daki cinsiyetler arası ücret farkı detaylı incelenmiştir. Çalışmanın tartışma ve sonuç bölümünde ise yeni uygulama ve politika önerilerinden bahsedilmiştir. Uluslararası verilerin incelenmesi ve iki ülkenin karşılaştırması göstermektedir ki cinsiyetlerarası ücret farkı AB içerisindeki gelişmiş ülkelerde bile büyük rakamsal farklılıklarla varlığını sürdürmektedir.

Anahtar Kelimeler: Cinsiyet, Cinsiyetler arası ücret farkı, Eşitsizlik, Ayrımcılık, Avrupa Birliği

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1. Introduction

Gender discrimination appears in various forms in business all over the world. Glass ceiling, glass cliff and glass elevator are different forms of inequality in labour markets in almost every country regardless of their level of development or economic and political position in the world. European Parliament states that, gender pay gap means the difference between the average hourly earnings of employed women and men, which is based on wages paid directly to employees before taxes. Although the equal pay for equal work principle was already introduced in the Treaty of Rome in 1957, the gap between working women and men wages still does exist (European Parliament, 2020). Equal pay is not only a matter of justice, but also a matter of ethics, necessity, and human rights.

As it was stated above women in European Union (EU) countries are not as present in the labour market as men. Although there are many changes in the labour market because of economy, politics, and environment... etc. the gender pay gap in the EU stands at 14.1% and has just changed minimally over the last decade (European Commission, 2020).

France is one of the countries that was closely analysed in this paper because even though gender equality and wage gap have been in the heart of many legal framework, since the 1946 Constitution itself, the issue is still present. Although gender wage gap has been reduced within years, but the issue still occurs in several sectors and especially at the senior management levels, where women have been paid lower initial wages than men. Another reason to closely examine France is the French government's latest introduction of "equal pay index" which is designed to correct and sanction companies that do not comply with the necessary engagements and requirements in 2019. Furthermore, because the law forces companies to publish wage-based information either in companies' premises or on web sites, this method provides a good example of transparency and increases the expectations of gender wage equality in the following years.

The reason why Sweden was also closely analysed in this paper has two folds. On the one hand, Sweden is known as the country giving importance to gender equality since it is a welfare state. Although Sweden is an egalitarian society that meets economic efficiency and equity, the gender pay gap is still an issue in Sweden. On the other hand, Sweden is a member of the EU having the highest women employment ratio to population. Besides, the gap between female and male employment ratios to the population in Sweden is relatively lower than most of the EU Members. In other words, Sweden is a good application example within the EU countries in shrinking the wage gap between female and male employees.

In this paper wage gap issue in the EU will be examined and the wage gap issue in Sweden and France will be compared and closely analysed. Following these parts. The implementations and procedures to overcome gender wage gap in the EU, Sweden and France will be reviewed in this paper. In discussion part of this paper, some recommendations will be mentioned to minimize the gap between female and male employee wages.

2. Method

As it was defined by Esser and Vliegenthart (2017, p.2) "comparative analysis enhances the understanding of one's own society by placing its familiar structures and routines against those of other systems (understanding); comparison heightens our awareness of other systems, cultures, and patterns of thinking and acting". Comparative analysis in social sciences is about to understand the causes in events or relationships by gathering different variations in several kinds of variables (Pickvance: 2005). Comparison is a scientific method which is used in a comparative research for contrasting two or more cases to demonstrate the similarities and differences between the cases based on a specific fact or a certain aspect (Azarian, 2011). In this paper it was aimed to reveal gender wage gap issue in the EU and to do so in a better and clear way two of the most developed EU countries were selected to be compared from a gender equality perspective. Hence, this study first will examine the general wage gap issue in the EU and following that, wage gap

issue and the implementations to aim to overcome the same issue in France and Sweden will be compared and summarised.

3. The Wage Gap Issue in Europe

The gender wage gap issue has been studied for a number of decades; however, the issue remains a field of active research. Although there are regulations that aim to seek equality in business, discrimination against women still exists especially in economic inequality, including income, unemployment and occupational distribution (Andersen, 1988). The gender pay gap measures the difference between the average wages of female and male employees. The gender pay gap is a measure of women's position in economy in comparison to men. The gender pay gap is the result of the social and economic factors that combine to decrease women's earning capacity over their career (Australian Government, 2021).

The gender wage gap is a measure of what women are paid relative to men. It is commonly calculated by dividing women's wages by men's wages, and this ratio is often expressed as a percent, or in currency terms. The difference in earnings between men and women is also sometimes described in terms of how much less women make than men for the same job (EPI, 2021).

Male and female wage statistics were revealed by the International Labour Organization (ILO) and the Organisation for Economic Co-operation and Development (OECD) reports. Atay and Kuzulu (2019) developed the table below from ILO 2018, OECD 2014-2018 and ILOSTAT statistics. The countries that were taken into consideration are Turkey and European Union countries.

Table 1. Women Employment and Wage Gap Ratios

| Country | Employment to population ratio women (ILO, 2018) % | Employment to population ratio men (ILO, 2018) % | Female share of employment in senior and middle management (ILO, 2018) % | Gender wage gap (2014-2018) (OECD, 2019) % |
|----------------|--|--|--|--|
| Turkey | 29.4 | 65.7 | 16.3 | 6.9 |
| Austria | 53.3 | 63.7 | 28.9 | 15.4 |
| Belgium | 46.8 | 55.3 | 33.5 | 3.7 |
| Bulgaria | 46.9 | 58.4 | 39.5 | 4.1 |
| Croatia | 41.3 | 53.0 | 26.1 | - |
| Czech Republic | 51.3 | 67.5 | 26.6 | 15.1 |
| Denmark | 55.4 | 63.4 | 27.0 | 5.3 |
| Estonia | 54.3 | 67.4 | 33.2 | 28.3 |
| Finland | 51.8 | 58.5 | 32.0 | 17.7 |
| France | 46.9 | 54.9 | 34.5 | 9.9 |

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|----------------|------|------|------|------|
| Germany | 54.3 | 64.3 | 28.6 | 16.2 |
| Greece | 33.6 | 50.8 | 30.5 | 4.5 |
| Hungary | 46.8 | 63.5 | 37.1 | 9.4 |
| Ireland | 52.9 | 64.6 | 33.5 | 5.9 |
| Italy | 36.3 | 53.6 | 23.2 | 5.6 |
| Latvia | 52.2 | 62.6 | 43.2 | 21.1 |
| Lithuania | 53.5 | 63.0 | 38.2 | 12.5 |
| Luxembourg | 52.5 | 60.5 | 16.1 | 3.4 |
| Malta | 47.9 | 67.5 | 27.6 | 9.0 |
| Netherlands | 56.8 | 67.0 | 24.8 | 14.1 |
| Poland | 46.6 | 62.5 | 39.5 | 9.4 |
| Portugal | 50.4 | 60.2 | 32.2 | 14.8 |
| Romania | 44.4 | 61.9 | 30.1 | 1.5 |
| Slovakia | 48.6 | 63.7 | 30.4 | 15.0 |
| Slovenia | 50.7 | 61.0 | 38.2 | 5.0 |
| Spain | 43.5 | 55.0 | 31.9 | 11.5 |
| Sweden | 66.3 | 70.7 | 39.4 | 7.3 |
| United Kingdom | 55.7 | 65.6 | 34.2 | 16.4 |

Source: Adopted from Atay and Kuzulu (2019).

Table 1 indicates that employed women population ratios are lower than men population ratios in employment. In some countries women employment rates notably differ from men employment rates. Turkey is one of the countries that has a significant difference (36.3%) between the numbers of women (29.4%) and men (65.7%) who are employed. Apart from the apparent difference between two genders, Turkey holds the lowest women employment ratio to population amongst European Union countries. The highest women employment ratio to population occurs in Sweden by 66.3%. In addition to that the gap between women and men employment ratios to population is relatively lower than most of the countries (4.4%).

OECD (2019) statistics show the most and least significant wage gap between women and men employees in Europe. According to this, the biggest gender wage gap occurs in Estonia with 28.3%. On the contrary, the lowest gender wage gap ratio appears in Romania with 1.5%. When the maximum and minimum numbers are compared, it is found that Turkey relatively stands closer to the countries with minimum ratio with its 6.9% gender wage gap. Most of the countries that were evaluated for this paper hold more than 10% wage gap between genders.

According to the Eurostat latest available data (February 2020), men's gross hourly earnings were on average 14.8 % above women's gross hourly earnings in 2018 in the 27 European Union countries and 15.9% in the 19 Euro Area countries. In other words, we can say that women work two months without remuneration per year compared to men (European Commission, 2020). There is a significant variety across the gender pay gaps ranging from 3.0 % in Romania to 22.7% in Estonia. The gender pay gap is generally much higher particularly for older women however the situation is different across the countries, mainly because current equality measures were not existing for women who started working before these measures entered into force. According to Eurobarometer surveys, only 26% of Europeans know that they have in their country legal guarantee of equal pay for equal work (Eurobarometer, 2017).

When we look at the sectorial situation in wage gaps, we notice that the sectors with the highest gender pay gaps are financial and insurance activities which were higher than in the business economy in all EU countries in 2018 except for Spain. In 2018, the gender pay gap in financial and insurance activities varied from 18.3% in Spain and Denmark to 39.0 % in Czechia. Within the business economy, the highest gender pay gap was recorded in Germany (24.7%) and the lowest in Sweden (8.7%). It is also worth noting that gender pay gaps were higher in the private sector compared to the public sector in many EU member states. In 2018, the gender pay gap varied in the private sector from 6.1% in Croatia to 22.7% in Germany, and in the public sector from -6.7% in Cyprus to 19.3% in Czechia (Eurostat, 2020).

Table 2. Gender Pay Gap in Public and Private Sectors in 2018

| Country | Public | Private |
|-------------|--------|---------|
| Belgium (1) | -0.3 | 9.1 |
| Bulgaria | 15.3 | 12.5 |
| Czechia | 19.3 | 21.9 |
| Denmark | 11.9 | 14.3 |
| Germany (1) | 12.8 | 22.7 |
| Spain | 13.1 | 18.3 |
| Croatia | 8.2 | 6.1 |
| Cyprus | -6.7 | 22.5 |
| Latvia (1) | 13.4 | 10.7 |
| Lithuania | 14.1 | 14.2 |
| Hungary | 14.1 | 11.5 |
| Netherlands | 12.2 | 20.7 |
| Poland | 3.8 | 16.6 |
| Portugal | 13.3 | 22.4 |
| Romania (2) | 0.9 | 9.4 |
| Slovenia | 11.9 | 8.5 |
| Slovakia | 14.8 | 20.2 |
| Finland (1) | 18.2 | 17.3 |

| | | |
|------------------------|------|------|
| Sweden | 9.4 | 10.6 |
| United Kingdom (1) (3) | 21.2 | 21.3 |
| Iceland | 9.9 | 16.3 |
| Norway | 8.0 | 16.7 |

Source: Adopted from Eurostat (2020).

(1) Provisional data (2) Estimated (3) Estimated by Eurostat.

4. Findings

4.1. Gender Wage Gap in Sweden: Facts and Figures

Sweden is known as the country giving importance to gender equality since it is a welfare state, which means that Sweden endorses working families, supports parental leave, and encourages the gender equality in legal, political and cultural means. Although Sweden is an egalitarian society which meets economic efficiency and equity, pay gap is still a problem in Sweden (Roine and Waldenström, 2008).

In the last OECD Economic Surveys country report of Sweden, the OECD defines Sweden as ‘‘a strong knowledge-based economy, well integrated in global value chains, which ensures high standards of living, well-being, wage and gender equality, as well as a high environmental quality to its inhabitants’’ (OECD, 2019, p. 10). Moreover, according to World Economic Forum ranks, Sweden has not been lower than fourth amongst 150 countries since 2006 in terms of the gap between women and men based on the data in health, education, economy and politics (Sweden, 2019).

Although the equality between women and men in Sweden are rising year by year economically; however, there has still been a pay gap. That is why, the pay gap is always on the top of gender equality agenda of Sweden (Sweden, 2019).

The reason why Sweden should be examined from gender gap point of view is that the gender pay gap in Sweden is decreasing year by year based on the statistics given by the Eurostat. For instance, while the gender wage gap was 17.8% in 2007, this percentage decreased to 12.1 in 2018 (Eurostat, 2019). Although men still earn more than women in Sweden, the pay gap is decreasing slowly since female workers’ wages have increased faster than male workers’ wages in order to cover the deficit between the wages during last 20 years (The Local, 2019).

In terms of the hourly and monthly earnings, first, the discrepancy in gross average hourly earnings of women and men in Sweden is 12.3%, which is under the average of the EU, which is 16%. It is good but not the best since Sweden is still behind a wage gap of 5% of Luxembourg, Italy and Romania (Savage, 2019). Second, based on 2016 statistics, while average monthly salary for women is 88%, it is 95.5% for men. According to data published by the Statista Research Department, in 2018, the average salary for women per month is 25.000 SEK, while male workers in the same class earn 28.500 SEK as average salary per month (Sweden, 2019).

When examining the pay differences between women and men in Sweden, it is found that the differences, first of all, depend on the profession and the sector. For instance, the pay difference is the biggest in the county councils while it is the smallest within the blue-collar workers (Sweden, 2019).

Moreover, finding job in science and technology fields is also an issue. The reasons why women encounter with difficulties in finding a job in these fields are preferences, social norms and stereotypes. Women need to be supported to find jobs in science and technology areas by not only cooperating with schools and trade associations, civil society groups and the business community but also by increasing networking (OECD, 2015). The encouragement of finding jobs in science

and technology areas could increase the number of women skilled workers, decrease the contribution to the diversity, support further gender equality and decrease the wage gap between men and women since jobs in science and technology areas offer higher wages and social status (OECD, 2019).

Another issue in Sweden's gender wage gap is that the comparisons are usually based on full-time wages. Since women working part time are not included in the statistics, unequal wages could not be determined clearly. For the same reason, the Swedish Trade Union Confederation (LO) gives recommendations for equal wages for equal working hours and ignores the value discrimination (Eurofound, 2015).

There is also a difference between public and private sector regarding the gender wage gap in Sweden. In the public realm, Sweden takes a long step towards success and the number of women having management positions is higher than men. In terms of politics, the percentage of women members of the Swedish parliament is 46. However, researchers focusing on gender studies claim that women mostly prefer a career in public sector in comparison to men. Since public sector offers less wages than the private sector, thereof, wage gap between men and women increases in Sweden. Due to the same reason, very talented women cannot find top positions in private sector. However, the reason why women prefer to work in public sector is not clear. It is assumed that men can find better management positions in technology and science sectors since these sectors are dominated by male gender while women find management positions in caregiving sector easier than men. It is also claimed that this demonstrates the patriarchy in the system. Besides, in Sweden, among two genders, women prefer part time work for doing housework and caring elderly parents more than men (Savage, 2019).

To sum up, currently, the occupational segregation is still a serious obstacle in gender pay gap of Sweden (Swedish National Mediation Office, 2020). As understood from the key findings European Parliament published in 2015, women are much more integrated into the Swedish labor market than men but the number of women working part-time is much greater than men. However, the Swedish labor market is still segregated too much since women mostly prefer public sector while men prefer the private sector. Within this scheme, therefore, the Gender Pay Gap changes based on the sector. (European Parliament, 2015).

4.2. Gender Wage Gap in France: Facts and Figures

In 2012 the gap between men and women monthly salary was 24.5% in average, of which 10.9% was due to a less working time such as part-time working, while 13.6% was due to facts such as education and experience differences (Bozio, Dormont and García-Peñalosa, 2014, p. 4). The latest available data for wage gap in France is announced by APEC, Eurostat and French Institute for Statistics (INSEE), the figures belong to 2019.

Based on the French Association for the Employment of Managers (APEC) 2020 data, (L'Agence de l'Association pour l'Emploi des Cadres) the wage gap between men and women in 2018 was 16%, of which 8% covers the gap related to equal work. The report also indicates that men attend more often higher trainings which allow them to receive higher remunerations and that men in "executive" task are older than women and have more responsibilities, which also explain in part the pay differences (APEC, 2020). While wage gap between executive men and executive women for equal work is 7% in companies with more than 1000 workers, it reaches 10% in companies with less than 20 employees. The gender-based wage gap is 9% for companies employing between 20 and 99 workers, while this rate is 8% in companies with employees between 100 and 999.

Another important indicator is that male managers under 30 earn 5% more than women while entering the labour market. Therefore, we can say that the gap starts from the beginning and deepens even more within years. While male managers' salaries under 30 increase by 20.000 Euros until they get over 50, female managers' salaries increase by only 10.000 Euros in the same period of time (Belhout, 2020).

If we have a look to wage gap differences among the regions in France, we can see that the gap varies significantly in some cities and districts. According to INSEE, in districts with more than 2000 habitants, the greatest wage gap is recorded in Cap d'Ail, which has less than 5000 habitants and is located close to Monte-Carlo; women earn two times less than men in average. In the top five locations registered in gender wage gap in France, two villages of the city of Lyon are listed and there are three cities in the region of Yvelines. In the region of Bretagne, women earn more than 50% less than men in the districts of Larmor-Plage, Saint-Briac-sur-Mer, Saint-Coulomb, Saint-Grégoire and Ploubalzanec (Le Telegramme, 2020).

According to the Eurostat latest data, the wage-gap between men and women is close to the APEC figures, it is calculated as 15.5% for 2018 (Eurostat, 2020, p.1-2). The wage gap according to ages in France is given in table 2.

Table 3. Gender Pay Gap in France by Age in 2018

| Under 25 | 25-34 | 35-44 | 45-54 | 55-64 | 65 Years + |
|----------|-------|-------|-------|-------|------------|
| -3,6 | 8,6 | 13,0 | 19,1 | 21.4 | 29.2 |

Source: Adopted from Eurostat (2020).

As we can see from the table 3, the gender pay gap is growing with ages. The gap starts with the rate of 8,6% between 25-34 ages and it rises continuously with the ages, reaches 29,2% for those who are above 65 years old.

Table 4. Wage Gap Between men and Women Managers in France

| | Gap in Equal Work Profile | Overall Gap | Annual Wage Average of Men Managers in 2018 (in Euros) | Annual Wage Average of Women Managers in 2018 (in Euros) |
|---|------------------------------------|-------------|--|---|
| Global Population | 8,0 % | 15,6 % | 52 000 | 45 000 |
| Under 30 years old | 3,0 % | 5,3 % | 40 000 | 38 000 |
| 30-39 years old | 4,5 % | 6,7 % | 48 000 | 45 000 |
| 40 – 49 years old | 8,1 % | 12,0 % | 56 000 | 50 000 |
| Above 50 years old | 13,2 % | 25,0 % | 60 000 | 48 000 |
| Commercial, marketing | 11,0 % | 19,6 % | 55 000 | 46 000 |
| Communication, Creation | 8,0 % | 20,3 % | 48 100 | 40 000 |
| Company Management | 21,3 % | 50,0 % | 75 000 | 50 000 |
| Studies, Research and Development | 4,5 % | 12,2 % | 47 000 | 41 895 |
| Management, Finance, Administration | 10,5 % | 19,6 % | 55 000 | 46 000 |

| | | | | |
|---|--------|--------|--------|--------|
| Computer Science | 4,7 % | 8,7 % | 50 000 | 46 000 |
| Industrial Production – Works and Cites | 5,4 % | 20,9 % | 55 000 | 45 500 |
| Human Resources and Training | 9,1 % | 10,0 % | 49 500 | 45 000 |
| Health, Social and Culture | 11,8 % | 12,5 % | 45 000 | 40 000 |
| Technical Services | 5,5 % | 8,7 % | 50 000 | 46 000 |
| Industry | 7,7 % | 10,0 % | 55 000 | 50 000 |
| Construction | 3,1 % | 10,6 % | 50 000 | 45 220 |
| Trade Services | 9,3 % | 19,6 % | 55 000 | 46 000 |
| | 8,3 % | 11,1 % | 50 000 | 45 000 |

Source: Adopted from Apec (2020, p.10).

Table 4 shows that the gender pay gap in France in 2018, which is 15,6% of which 8% is registered for equal works between men and women. The difference in the annual salaries is growing along years, whit a peak for women above 50 who earn 48 000 Euros against men who earn 60 000 Euros per year. We can also see from this table that the gender pay gap varies according to sectors, where the lowest gaps are registered in the construction and studies, research and development, whereas the highest gaps are recorded in company managements, which means in senior posts such as managers and executives. These rates are given for equal works. When we look at the overall pay gap, the biggest gap is still registered in company managers with around 50% of pay difference, and with the lowest gaps in computer sciences and technical services.

5. How to Overcome Gender Wage Gap

Although there is not an explicit recipe to overcome gender pay gap, there has been some actions taken and plans that were made to minimize inequality between working women and men. The European Parliament has adopted a resolution to narrow the gender wage gap in January 2020. The aim of the European Parliament is to take measures on pay transparency and gender wage gap. The resolution calls for setting targets for EU countries to reduce the gender wage gap over the following five years; investing in early childhood education and care services. In addition to these, the resolutions include investing in family-friendly working arrangements to ensure women's equal participation in the labour market, promoting vocational training and lifelong learning for women, in particular entrepreneurship and digital education for girls from an early age (European Parliament, 2020).

5.1. How to Overcome Gender Wage Gap in the EU

There are several EU Actions that aim to overcome the gender wage gap. In this section, the actions will be examined and summarised.

1975 Directive on Equal Pay for Work of an Equal Value and the 2006 Consolidated Directive

The European Union has developed various tools and launched different initiatives to fight with the important issue of gender-based wage gaps in the EU countries. The '1975 Directive on Equal Pay for Work of an Equal Value' covers pay discrimination This Directive and three other directives regarding equal treatment have been included in a single Directive in 2006 (European Commission, 2006). The EU follows and supports member states to implement the Directive 2006/54/EC on equal pay (European Commission, 2020). Besides these directives, the EU launched 'Strategy for Equality', covering the years of 2010 and 2015.

Strategy for Equality Between Men and Women, 2010-2015

The Strategy for equality between men and women sets out actions in five areas such as the economy and labour market, equal pay, equality in senior positions, tackling gender violence, and promoting equality beyond the EU. (European Commission, 2010, p.8).

EU Action Plan 2017-2019

The Commission also adopted the “EU Action Plan 2017-2019” with the aim of tackling the gender pay gap in November 2017 (European Commission, 2017, p.2); its action points are scattered under the following 8 targets:

1. Ameliorate the implementation of the equal pay principle,
2. Combatting discriminations in occupations and sectors,
3. Breaking the glass ceiling: addressing vertical discrimination,
4. Fighting the care penalty,
5. Higher valorising women's responsibilities, skills and efforts,
6. Exposing stereotypes and inequalities,
7. Notifying and warning gender pay gaps and
8. Developing partnerships to fight gender pay gaps.

Council of Europe Gender Equality Strategy 2018-2023

Besides the actions of the European Commission, we can also name the Council of Europe that has taken steps to fight with “Gender equality” issues in general. The Council of Europe established the “Gender Equality Commission” (GEC) to fight the gap between international commitments and the case of reality of women in Europe. The Commission’s members are appointed by member states, they provide consultation, guidance, and support to other bodies of the Council of Europe and to EU member states (Council of Europe, 2020). The Gender Equality Commission supports overall the application of the six objectives that are set out in the Gender Equality Strategy 2018-2023 of the Council. The 2018-2023 period will be focusing on six strategic areas as the following (Council of Europe, 2018, p.15):

- Blocking and fighting gender-based stereotypes and sexism,
- Combating and preventing domestic violence and violence against women,
- Ensuring equal access of women to justice,
- Providing a balanced participation of women against men in political and public decision-making,
- Defending the rights of migrant, refugee and asylum-seeking women and girls, and
- Accomplishing gender mainstreaming in all measures and policies.

5.1.1. Actions Taken by EU Countries at National Level

Member states have also developed and put some national programs, directives, and other encouraging measures into effect to solve gender- based wage gap issues at individual level. For instance, to raise awareness on the wage gap issue, Belgium was the first country to organize an “Equal Pay Day” on November 4th in 2005. The overall target of the campaign was to mobilise and influence policymakers, since then, the EU Equal Pay Day is being organized each year.

Today the event is celebrated in 12 EU countries¹ and the United Kingdom. Many countries have formed commissions to inquire gender pay gaps (European Commission, 2019, p.9-40). For example:

- In Norway, the government formed an Equal Pay Commission which makes recommendations with the aim of reducing gender pay gaps in 2008. Among the Commission's recommendations, an equal pay fund was established to correct gender pay gaps and has been applied through the 2010.
- In Belgium, the government published an annual gender pay gap report since 2006 to expose wage differences between men and women. Afterwards, a national agreement took place to assure that all job classifications would be gender neutral by 2016.
- In Sweden, according to the 2008 Discrimination Act, if companies employ 25 or more persons, they must prepare a pay survey every three years to prevent, alert and solve unjustified gaps. They also need to prepare adequate employment terms and conditions and provide an action plan for equal pay.
- In Ireland, companies have been assisted by the national equality body to carry out equality inspections and action plans.
- In Slovakia, the National Labour Inspectorate executed inspections on equal access to employment and equal pay at local level with their regional offices.

Apart from raising awareness activities and inspection projects in which Bulgarian and Estonian governments also took place, other initiatives such as measuring tools have also been used by Poland, Germany, Luxembourg, and Switzerland. In Poland, the government put an application free of charge for employers to use, to detect and to measure pay gaps in their companies. Germany established an audit system and a pay calculator called Logib-D. It identifies gender pay gaps in the pay structures of the companies. It also provides consultancy services to analysing and cancel gender pay gaps. Luxembourg and Switzerland also use this online tool "Logib".

Regarding examples of certification and reporting obligations, we can mention Iceland where companies with more than 25 employees must obtain a certification proving equal pay for work for equal work regardless of the gender.

In France, businesses employing more than 50 persons must produce a 'Gender Equality Index' and develop an action plan to eliminate the identified gaps, otherwise they will face financial sanctions (European Commission, 2019, p.58).

5.2. How to Overcome Gender Wage Gap in Sweden

Today, the occupational segregation is still a serious obstacle in gender pay gap of Sweden (Swedish National Mediation Office, 2020). Based on the report published by the Swedish National Mediation Agency (MI) in 2015, the occupation is still the most important variable for explaining the wage gap. Moreover, the largest wage gap is between white-collar workers in the private sector and the smallest wage gap is between municipal workers (Eurofound, 2015).

If mentioned what Sweden has done for overcoming the gender wage gap, first of all, historically, Swedish laws move ahead in conformity with the international law while legislating against discrimination especially in the realm of gender equality. For instance, Sweden accepted the legislation envisaging the equal wage among male workers and female workers for equal work in the public sector in 1948. However, the ratification of International Labor Organization Convention in 1951 and 1952 resulted in debates in Sweden since equal wage and discrimination, employment and occupation parts of both Conventions were criticized by the Swedish parliament. The reason why the Parliament was against the ratification was that equal wage and discrimination

¹ These countries are Austria, Belgium, Cyprus, Czechia, Germany, Estonia, France, the Netherlands, Slovakia, Portugal, Spain, and Sweden.

on employment and occupation parts of both Conventions were against the self-regulation principle in the labor market. As a result of the efforts of the Swedish Trade Union Confederation (LO) and The Swedish Employers Association (SAF), it was agreed that all wage disparities would be regulated step by step in 5 years period. However, these efforts did not solve the pay disparity problems between male and female workers (Carlson, 2017).

During 1960s and 70s, the gender wage gap decreased since the social partners signed collective agreements referring to a solidarity wage policy (Löfström, 2014). LO also followed the similar path to close the wage gap between women and men. Besides, in 1970s, gender equality campaigns and an increase in the number of female workers, who also became economically free, changed women in Sweden. As a result, women employment increased in Sweden (Carlson, 2017). However, segregation of occupation and hereupon the pay differences were still high between male and female workers in Sweden during the 1970s (Statistics Sweden, 2018).

In 2000s, LO turned to be a feminist organization; however, it would not be enough for overcoming the gender wage gap. Today, LO's main target is to solve the structural problems against the gender wage gap by taking men and women dominated occupation areas into account and adjusted the wages between women and men until 2028 (Nyberg, 2019, p.6).

Two good practice examples supported Sweden's efforts to overcome the wage gap between women and men employees: The Million Study 2008 and the Unionen Report 2017. The Million Study 2008 aimed to follow the employers if they apply the Gender Equality Act's regulation in terms of surveys. The final report was published in 2008 with 548 employers and their 703000 employees. As a result, 44% of employers ameliorated the wage differences and this amelioration affected 0.7% of the employees. According to the report, 90% of employees were female. Besides, one third of 703000 employees declared that better measures are needed than wage adjustment for equality of wages between men and women. The Unionen Report 2017 is a report published by a union established for overcoming the gender wage gap between white collar workers in the private sector. The Unionen Reports have been published since 2009. The latest report, which includes the interviews on telephone with approximately 1.000 union club representatives, was published in 2017. Based on the results, wage adjustment was necessary for women mostly (Nyberg, 2019).

Based on the 2008 Discrimination Act that came into effect on 1 January 2009 in Sweden, employers must check gender pay gap conditions once in the end of every three years (Carlson, 2017). The 2008 Discrimination Act was amended in 2017 and now, employers should check gender pay gap conditions annually by working in cooperation with the employees (Nyberg, 2019).

The annual check via pay surveys has both advantages and disadvantages. On one hand, the first disadvantage is that yearly basis surveys lead to much paperwork. Second and most important one is that frequency of surveys does not necessarily affect the gender wage gap between women and men. On the other hand, first advantage is that more frequent survey means more guarantee for the employees. Second, yearly basis surveys put pressure on the employers for paying much more to the employees since measures for minding the gender wage gap need continuity (Nyberg, 2019).

In conclusion, although the amendments are important for providing better conditions, they are not enough for solving the pay inequity. The labor unions as the main negotiators for pay issues through the collective agreements also spend efforts to minimize the occupational segregation. Not only the labor unions but also all employers and the government in Sweden agree that the gender wage gap is an issue to handle; however, they disagree with the way to close it. If all parties could take a joint action, value discrimination could be overcome via consensus (Eurofund, 2015).

5.3. How to Overcome Gender Wage Gap in France

The issue of gender equality and gender pay gap has been in the centre of many acts and decrees in France since the Constitution itself in fact. There are many provisions put in force to address the inequalities and to eliminate them. In this section, the legal framework of gender equality embedded in the French law and the facts and figures relative to gender pay gap in France will be mentioned.

The article three of the preamble of the French Constitution 1946 states that: “the law guarantees women in all areas equal rights with men” (Conseil Constitutionnel, 1946). The Act of December 22nd, 1972 establishes equal pay between women and men and affirms the principle of equal pay “for equal work or work of equal value”. Article L1132-1 of the French Labour Code prohibits difference in pay between men and women (Légifrance, 1972).

The Act entitled “Roudy Act” of 13th July 1983 is the first French law concerning professional equality, it enforces equality in the workplace by accentuating general principles of non-discrimination between workers because of their gender either in terms of recruitment, training, promotion or remuneration. The Act defines indeed the notion of “work of equal value” by stating the following (Légifrance, 1983): “Are considered equal in value jobs that require employees of a comparable set of professional knowledge embodied in a title, degree or professional practice, capacity resulting from the experience, responsibility and physical or moral tasks.”

Finally, the article L. 432-3-1 of the Act also requires companies to prepare a written report annually on the comparative situation of women’s and men’s general conditions of employment and training in companies (LégiFrance, 2008).

On the other hand, the Act called “Génisson Act” of May 9th, 2001, with its article L. 132-12 encourages the practice of remedial measures to solve the inequalities noted in conditions of access to employment, training, and career development and with regard to employment and working conditions (Haut Conseil à l’Egalité entre les Femmes et les Hommes, 2020).

The Act of March 23rd, 2006 on Equal Pay strengthened the “Génisson Act” regarding equal pay between men and women by attempting to eliminate the wage gap, facilitating the articulation between work, personal life and family life, access to learning and vocational training. The 2006 Act on Equal Pay also requires companies to report on salaries and plans to close gender pay gaps (Légifrance, 2006).

The administrative decree of January 8th, 2019: Creation and Annual Publication of the Equal Pay Index

With the 2019 Decree, an equal pay index is created. The aim of the equal pay index is to oblige companies to achieve results in closing gender pay gaps. In France, companies must report and publish their information regarding gender-based pay gaps, in the “equal pay index”. If their equal pay index is below a certain level, they must implement corrective measures.

If companies do not prepare, publish, and bring remedial measures concerning wage gaps in their workplace, they would receive sanctions. Companies that employ more than 50 persons are obliged to implement the equal pay index; the decree provides them a period of three years once they reach these new commitments (Bénard, Jomier and Ghoreychi, 2019). The equal pay index comprises some indicators which count for points out of 100 total score. In companies with 50 to 250 employees, the equal pay index considers four indicators (Ministère de l’Economie des Finances et de la Relance, 2019), and there are five indicators for companies with more than 250 employees. Based on the equal pay grid, companies must publish their equal pay grades on their website or through any other means, each year, no later than on 1 March of the following year. Otherwise up to 1% of their total payroll can be financially fined.

6. Discussion and Further Recommendations

Women's integration in the economy is vital because it can increase productivity, reduce poverty, help raise more conscious generations and can help ensure social and sustainable development. Sustainable economic growth at the regional and global level, depends on the full use of qualifications and abilities of women and their participation in the workforce (Karlilar & Kiral, 2019) and providing equal pay for both genders. Despite the numerous and various legal frameworks and tools used in some developed countries and in the EU, it is still obvious that gender-based wage gap for equal work still exists and that the gaps in some regions, countries and sectors are quite significant. This brings us to question the efficiency of these tools. In this section of the paper, it is aimed to suggest new mechanisms to overcome gender wage gap in the EU, Sweden, and France.

It may be suggested that one of the main reasons behind gender wage gap is women underrepresentation in leadership. The number of women in more strategic roles in companies and governments would help to balance the wages of female and male employees. In addition to that, the cultural reasons leading to gender wage gap should be taken into consideration. This way of thinking could change the mind sets of people from various cultural backgrounds and could overcome the problem of getting less wage for the same job only because of gender.

A policy recommendation is for all European countries, to be implemented each year under a sort of 'Celebration and EU Reward' which would act as a prestige tool and motivate all EU members to act and guide their companies to follow wage gap diminutions and thus correct all measures which enforce wage gaps in their countries and companies. This celebration could be held by the European Commission under the name of 'NO GAP TROPHY' every year, thus become an institutionalised event covering all EU countries. The event may include different prizes and categories covering both public and private sectors also introducing a sectorial reward which would push all sectors to be more active and competitive in terms of closing their wage gaps and announcing it through the EU channels.

Sweden, as a Scandinavian state, always aims to develop social policies. One of the most prominent policy of Sweden is to reach the gender equality within the country. However, even in Sweden, the gender wage gap needs to shrink since the occupational segregation is still a serious obstacle in gender pay gap of Sweden. What Sweden can do to shrink the wage gap between female and male workers is, first, to improve both vertical and horizontal occupational segregation which appears as the most prominent problems in gender wage gap of Sweden. To ameliorate the horizontal occupational segregation, female and male workers in Sweden must have similar opportunities in finding same occupations. Regarding the decreasing vertical occupational segregation, both women and men must have the chance to reach similar career opportunities.

While developing policies for covering wage inequality between men and women, Sweden could support women's entrepreneurship via policy tools to shrink the gender gap.

Since gender wage gap problem is also an issue socially constructed, it is also important to reach the gender equality at workplaces and therefore change the perception on sexism in the long term. For instance, in Sweden, childcare and elder people's caring are still attributed to the women and the government needs to develop a policy to change this perception.

Furthermore, all employers, trade unions and the government must take a joint action against the gender wage gap since the gender wage gap does not occur due to one party only. In other words, the gender wage gap in Sweden exists since employers provide the job opportunities by ignoring the gender equality, the labor unions settle the collective agreements which are not enough to provide the wage equality between women and men; and the Swedish government serves to the public sector and cannot designate the wages. However, all parties must contribute to shrink the gender wage gap indirectly. For instance, the Swedish government could make necessary

structural changes in the Swedish social policy or initiating programs supporting women to be able to take much more part in the working life.

For the case of France, it could be said that even though gender equity and wage gaps have long been coded and in force, since the French Constitution of 1946, the latest decree of 2019 is still very new. Therefore, it is needed some more years to observe and measure the improvements that may result from this new index tool. However, having exposed the general situation of wage gap both in France and in all EU countries, it could be clearly stated that there is a need for additional tools and incentives to be put in place and implemented, as the existing ones did not suffice to solve the problem in remarkable levels.

Having explained that wage gaps differ especially between public and private sector, also between sectors and the size of companies, two folded actions and incentives are recommended: the first being held at national levels, and the second being held at the European level.

The first national policy recommendation for France and for all countries, is to publish publicly at national level, companies that have the highest levels of wage gap. Even though companies must report their pay gaps data since 2019 in France, this information can be made public through state institutions. Thus, companies would be more willing to close their gender wage gaps and avoid being pointed out as the “bad example” in their work sphere. Another tool that could be implemented at national level is in form of financial incentives from governments. For example, companies with the highest wage gap levels can be rewarded with a ‘partial tax exemption’ or with a ‘financial incentive’ to boost their gender equity policies until there is no wage gap left in any companies.

In the paper the examination and comparison of the EU, France and Sweden reveals that female employees face the injustice of getting paid less than male employees for the same job. The percentages of gender wage gap differ in various sectors and countries. Although there are policies that were developed to overcome the gender pay gap, the issue still does exist. Hence new policies must be formulated, and reasonable precautions must be taken to equalise female and male employee wages for the same amount of work.

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Araştırma Makalesi

Acknowledging and Overcoming Gender Wage Gap in the European Union: A Close Examination of Sweden and France

Avrupa Birliği'nde Cinsiyete Dayalı Ücret Farklarını Tanımak ve Üstesinden Gelmek: İsveç ve Fransa Derinlemesine İncelemesi

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Genişletilmiş Özet

1. Giriş

Cinsiyet ayrımcılığı, iş dünyasında çeşitli biçimlerde karşılaşılan ve tüm dünyada var olan bir sorundur. Cam tavan, cam uçurum veya cam asansör, hemen hemen her ülkenin işgücü piyasalarında olan, ülkelerin kalkınma düzeylerine, ekonomik ve politik konumlarına bakılmaksızın ortaya çıkabilen farklı eşitsizlik biçimleridir. Avrupa Parlamentosu, cinsiyete dayalı ücret ayrımcılığının, çalışan kadınlarla erkeklerin ortalama saatlik kazançları arasındaki fark anlamına geldiğini belirtmektedir. Bu durum, doğrudan çalışanlara vergilerden önce ödenen ücretlere bağlıdır. Eşit işe eşit ücret ilkesi 1957'de Roma Antlaşması'nda zaten getirilmiş olsa da çalışan kadınlarla erkeklerin ücretleri arasındaki uçurum hala varlığını sürdürmektedir (Avrupa Parlamentosu, 2020). Eşit ücret yalnızca bir adalet meselesi değil, aynı zamanda bir etik, gereklilik ve insan hakları meselesidir. Bu çalışmanın amacı, AB'deki cinsiyete dayalı ücret ayrımcılığı konusu inceleyerek, İsveç ve Fransa'daki cinsiyete dayalı ücret ayrımcılığı karşılaştırmak ve yakından analiz etmektir. Bunun yanı sıra, AB, İsveç ve Fransa'da cinsiyete dayalı ücret ayrımcılığını ortadan kaldırmaya yönelik uygulamalar ve prosedürler bu çalışmada gözden geçirilecektir. Çalışmanın tartışma bölümünde ise, kadın ve erkek çalışanların ücretleri arasındaki farkı en aza indirmek için bazı önerilerden bahsedilecektir.

2. Yöntem

Esser ve Vliegthart (2017, s.2) tarafından tanımlandığı gibi, “karşılaştırmalı analiz, tanıdık yapı ve rutinleri diğer sistemler ile karşılaştırarak araştırmacının kendi toplumunun yapısını daha iyi anlamasını sağlar, karşılaştırma, diğer sistemler, kültürler ve düşünce biçimleri ve davranış kalıpları hakkındaki farkındalığımızı artırmaktadır”.

Bu çalışmanın amacı AB'deki cinsiyetler arası ücret eşitsizliğini gün yüzüne çıkarmak; bunu daha iyi ve daha net bir biçimde yapabilmek için de en gelişmiş AB üye ülkelerinden ikisi Fransa ve İsveç'i cinsiyet eşitliği bağlamında karşılaştırmaktır. Dolayısıyla bu çalışmada

AB'deki ücret eşitsizliği genel olarak değerlendirildikten sonra hem Fransa'da hem de İsveç'te ücret eşitsizliğine değinilecek ve farklı iki ülkenin aynı sorunun üstesinden gelmek için ne tür uygulamalar yaptığı karşılaştırılacak ve de özetlenecektir.

3. Avrupa'da Cinsiyetler Arası Ücret Farkları Sorunu

Erkek ve kadın ücret istatistikleri Uluslararası Çalışma Örgütü (ILO) ve Ekonomik İş birliği ve Kalkınma Örgütü (OECD) raporları tarafından periyodik olarak ölçülmekte ve açıklanmaktadır. Bazı ülkelerde kadın istihdam oranları, erkeklerin istihdam oranlarından önemli ölçüde düşüktür. Türkiye, istihdam edilen kadın (%29,4) ve erkek (%65,7) sayıları arasında ciddi oranda (%36,3) fark görülen ülkelerden biridir. Türkiye, iki cinsiyet arasındaki bariz farkın dışında, Avrupa Birliği ülkeleri arasında kadın istihdamının nüfusa oranının en düşük olduğu ülkedir. Kadın istihdamının nüfusa oranı en yüksek olan ülke %66,3 ile İsveç olarak görülmektedir. Buna ek olarak, İsveç'te kadın ve erkek istihdamının nüfusa oranı arasındaki fark, diğer ülkelerin çoğundan (%4,4) daha düşüktür.

Cinsiyetler arası ücret farklarında sektörel duruma baktığımızda, 2018 yılında İspanya hariç tüm AB ülkelerinde daha yüksek cinsiyet ücret eşitsizliğinin olduğu sektörlerin finans ve sigorta faaliyetleri olduğu görülmektedir. 2018 yılında, finans ve sigorta faaliyetlerinde cinsiyetler arası ücret farkı İspanya ve Danimarka'da %18,3'ten Çekya'da %39,0'a kadar çıkmaktadır. İş piyasasında, cinsiyete dayalı ücret farkı en yüksek Almanya'da (%24,7) ve en düşük İsveç'te (%8,7) kaydedilmiştir. Ayrıca, birçok AB üye ülkesinde kamu sektörüne kıyasla özel sektörde cinsiyete dayalı ücret farklarının daha yüksek olduğunu belirtmekte fayda vardır. 2018 yılında, cinsiyete dayalı ücret farkı özel sektörde Hırvatistan'da %6,1, Almanya'da %22,7 ve kamu sektöründe Kıbrıs'ta %6,7 ve Çekya'da %19,3 olarak tespit edilmiştir (Eurostat, 2020).

4. Bulgular

İsveç'te kadın erkek istihdam eşitliği ekonomik olarak yıldan yıla artıyor olsa da; hala bir ücret eşitsizliği mevcuttur. Bu nedenle, ücret eşitsizliği her zaman İsveç'in cinsiyet eşitliği gündeminin en üst sıralarında yer almaktadır (İsveç, 2019).

İsveç'te cinsiyete dayalı ücret farkı Eurostat tarafından verilen istatistiklere göre yıldan yıla azaldığı görülmektedir. Örneğin cinsiyete dayalı ücret farkı 2007'de %17,8 iken bu oran 2018'de 12,1'e gerilemiştir (Eurostat, 2019). İsveç'te erkekler hala kadınlardan daha fazla kazansa da son 20 yılda ücretler arasındaki açığı kapatmak için kadın işçilerin ücretleri erkek işçilerin ücretlerinden daha hızlı arttığı için cinsiyetler arası ücret farkı yavaş yavaş azalmaktadır (The Local, 2019).

Özetlemek gerekirse, mesleki ayrımcılık bugün hala İsveç'teki cinsiyetler arası ücret farkının önündeki ciddi bir engeldir (İsveç Ulusal Arbuluculuk Ofisi, 2020). 2015 yılında Avrupa Parlamentosu tarafından yayınlanan raporlardan da anlaşıldığı üzere, kadınlar İsveç işgücü piyasasına erkeklerden çok daha fazla entegre olmuşlardır ancak yarı zamanlı çalışan kadınların sayısı erkeklerden çok daha fazladır. Bununla beraber, İsveç işgücü piyasası hala çok fazla ayrılmış durumda çünkü kadınlar çoğunlukla kamu sektörünü tercih ederken erkekler özel sektörü tercih etmektedir. Dolayısıyla, "Cinsiyete Dayalı Ücret Farkı" sektöre göre değişmektedir. (Avrupa Parlamentosu, 2015).

Fransız Yöneticileri İstihdam Derneği (APEC) 2020 verilerine göre, (L'Agence de l'Association pour l'Emploi des Cadres) 2018'de erkekler ve kadınlar arasındaki ücret farkı %16 idi ve bunun %8'i eşit işe ilişkin ücret farkıdır. Bu rapor ayrıca, erkeklerin daha yüksek ücret almalarına olanak tanıyan daha yüksek eğitimlere katıldığını ve "yönetici" görevindeki erkeklerin kadınlardan daha kıdemli ve daha fazla sorumluluk sahibi olduğunu ve bu da kısmen ücret farklılıklarını açıkladığını belirtmektedir (APEC, 2020). 1000'den fazla çalışanı olan şirketlerde yönetici erkekler ile yönetici kadınlar arasındaki ücret farkı %7 iken, 20'den az çalışanı olan şirketlerde

%10'a ulaşmaktadır. Cinsiyete dayalı ücret farkı, 20 ile 99 arasında işçi çalıştıran şirketlerde %9 iken, 100 ile 999 arasında çalışanı olan şirketlerde bu oran %8'dir.

5. Tartışma

Bazı gelişmiş ülkelerde ve AB'de kullanılan çok sayıda yasal çerçeve ve önlemlere rağmen, eşit işe yönelik cinsiyete dayalı ücret uçurumunun hala var olduğu ve özellikle bazı bölgeler, ülkeler ve sektörlerdeki cinsiyete dayalı ücret farkının oldukça dikkat çekici olduğu açıktır. Bu durum, yasal önlemlerin verimliliğini sorgulamamıza yol açmaktadır. Makalenin son bölümünde, AB, İsveç ve Fransa'da cinsiyete dayalı ücret uçurumunun üstesinden gelmek için yeni mekanizmalar önerilmektedir.

Bu çalışmada, AB, Fransa ve İsveç'teki cinsiyete dayalı ücret ayrımcılığına dair rakamların incelenmesi ve karşılaştırılması, kadın çalışanların aynı iş için erkek çalışanlara göre daha az ücret alma adaletsizliğiyle karşı karşıya olduğunu ortaya koymaktadır. Cinsiyete dayalı ücret farkının yüzdeleri çeşitli sektör ve ülkelerde farklılık göstermektedir. Cinsiyete dayalı ücret açığının üstesinden gelmek için geliştirilmiş politikalar olsa da bu sorun hala varlığını sürdürmektedir. Bu nedenle yeni politikalar belirlenmeli ve aynı miktarda iş için kadın ve erkek çalışan ücretlerini eşitlemek amaçlı makul önlemler alınmalıdır.