



Consultation on Pay Equity Regulations
Document prepared by the Professional Institute of the Public Service of Canada
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Summary of the Institute's position

Passing the *Pay Equity Act* in December 2018 was a historic turning point in the fight against systemic gender-based discrimination and pay disparity between men and women in public and private workplaces under federal jurisdiction. The goal of the long-awaited proactive pay equity regime is essentially to guarantee that workers in predominantly female and male jobs receive equal pay for work of equal value.

Although the *Pay Equity Act* was passed nearly two years ago, it has not yet come into force. Implementing the Act was conditional on the passage of regulations that would more clearly define employers' obligations and better specify the complex technical details for calculating salary adjustments.

Since the first draft was published, the Professional Institute of the Public Service of Canada (PIPSC) has been studying the proposed regulations to formulate appropriate recommendations that would improve their content and help the *Pay Equity Act* come into force as soon as possible. The Institute is pleased to submit to you a set of proposed amendments to the draft pay equity regulations. Our proposals, detailed below, aim to improve transparency through access to documents in the pay equity process in general. They also endeavour to better define the posting requirements and time limits for applications and notices to the Pay Equity Commission. We also suggested improvements to the way salary adjustments are calculated and rules for maintaining and updating the pay equity plan. We suggested including specific definitions of key concepts in the job evaluation process as well as a new typical job type (engineer) that proxies can use in the absence of male job classes.

Our proposals are based on our knowledge of the specific challenges that provincial pay equity regimes face, as well as our strong desire to avoid future obstacles and conflicts that could delay or prevent pay equity in public and private organizations under federal jurisdiction.

Lastly, we would like to express our great concern for non-unionized female workers in small organizations who do not have access to assistance from specialized advisors or adequate resources to

better understand and assert their rights under the *Pay Equity Act*. Our concern also extends to the female workers in precarious and part-time jobs who are traditionally victims of discrimination in terms of pay equity and benefits. The current regulations on pay equity does not include any specific provision to protect these workers or guarantee them equal pay for work of equal value.

A handwritten signature in black ink, appearing to read 'Debi Daviau', with a stylized, cursive script.

Debi Daviau

President

Professional Institute of the Public Service of Canada