

March 2016

BHA submission to the follow-up Gender Pay Gap consultation

Dear Gender Pay Gap Team,

The British Hospitality Association represents the hotel, restaurant and catering industry.

We have no modifications to propose to the draft Regulations. In our September 2015 response to the original consultation, we raised our concern that the high proportion of part-time hospitality workers, with women more likely to be part-timers than men, could distort any metric based on annual earnings.

We were grateful to have the opportunity to discuss these concerns with officials and we are pleased to note that the metric of pay per hour has been adopted in the draft regulations.

The hospitality industry does have considerable fluctuations in the workforce throughout the year, but we do not have any particular difficulty with the pay period which includes 30 April.

We take it that the definition of pay will exclude non-contractual payments made to employees through troncs/service charge systems and we are content with this.

I confirm that we have no objection to this response being made publicly available.

Yours faithfully,

Martin Couchman OBE

Deputy Chief Executive

British Hospitality Association

Updated March 2016

*This information is provided by the British Hospitality Association. The content is provided for general information only and must not be used for giving legal or other professional advice. Whilst every care has been taken to ensure the accuracy of content, the authors accept no responsibility for loss or consequential loss occasioned to any person acting or refraining from action as a result of any statement in it.