

OPSG

OCCUPATIONAL PENSIONS STAKEHOLDER GROUP

Advice on practices to reduce
the gender gap in pension

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CONTENTS

1. Introduction and purpose	2
2. Causes of the gender gap in pensions	4
2.1 Factors related to employment history	5
2.2 Factors related to the pension system	6
3. Specific practices with an impact on the gender pension gap in occupational pensions	8
3.1. Pension entitlement for parental leave	9
3.2. Transfer of pension entitlement between spouses	10
3.3. Waiver of insurance premiums during parental leave	10
3.4. Pension Information	11
3.5. Actuarial elements	11
3.6. Survivor’s pension	12
3.7. Auto-enrolment	12
3.7. Other initiatives	13
4. Conclusion	14
5. Recommendations	15
5.1 Recommendations to the European Commission	15
5.2 Recommendations to EU Member States	15
5.3 Recommendations to EIOPA	16
5.4 Recommendations to IORP providers	16
5.5 Recommendations to employers and social partners	17

1. INTRODUCTION AND PURPOSE

The gender gap in pensions, the difference in retirement income between men and women, is a major issue and is increasingly subject to discussions by policymakers, analysts, suppliers, advocates and political representatives. There are already numerous reports and analyses that recognize the unequal situation that exists between men and women with respect to their retirement incomes. Although these reports generally focus on 1st pillar pensions, there is a growing focus on 2nd and 3rd pillar pensions. This new focus is necessary due to the rising role of occupational pensions in the retirement income mix and falling replacement rates in the 1st pillar. Several of these reports have sought to identify the causes of this inequality and many outline proposals for actions and changes in behaviour which could help to narrow the gap. The High-Level Expert Group on Pensions (HLG) has also commented on the gender gap in its report and several resolutions and conclusions from the European Parliament and the Council call for a reduction/closure of the pension gender gap.¹

To contribute to the discourse around these reports and analyses, the OPSG resolved to provide an depiction as to what has occurred in and complementary to the domain of occupational pensions in the respective Member States represented in OPSG. Thus, the purpose of this document is to highlight the interventions and developments that have occurred in recent decades and their impact on the gender gap in pensions. These interventions offer a menu of mechanisms that policymakers can explore further with their counterparts in other Member States to review their viability and potential impact in their respective environments, taking into account insights and lessons learned from other States. These examples may also prompt reflection that inspires further innovation with respect to tackling inequities, through the investigation of the design underpinning the interventions and exploring new configurations that combine one or more existing initiatives with additional or substitute variables.

The European Commission has provided further information on the initiatives included in its Work Programme in the domain of gender equality. An initiative on the gender pay gap and pay transparency will be one of the focus areas for the European Gender Equality Strategy 2020-2025.²

¹ [Poverty : a gender perspective \(2016\)](#) ; [Need for an EU strategy to end and prevent the gender pension gap \(2017\)](#); [Combating inequalities as a lever to boost job creation and growth \(2017\)](#); [Gender Equality and taxation policies in the EU \(2019\)](#). 'Equal income opportunities for women and men: Closing the gender gap in pensions', 04 June 2015.

² For example the EU Action Plan on Gender Equality and Women Empowerment in External Relations for 2021-2025 (non-legislative, Q4 2020) and European Gender Equality Strategy (non-legislative, Q1 2020), followed by binding pay transparency measures (legislative, incl. impact assessment, Article 157 TFEU, Q4 2020).

OPSG primarily wants to inspire and provide examples on how different methods and instruments can decrease the gender gap in pensions rather than explaining the reasons behind the existence of it. To this end, this document will highlight some constructive national initiatives that have resulted in positive outcomes and under which conditions these initiatives delivered results. For contextualisation, the principal reasons for the gap are outlined in the narrative below. In addition, in appendix 1, we seek to illustrate in a simple manner the events which typically can occur over an individual's life cycle or life course that can have a major bearing on the outcome of women's retirement income.

2. CAUSES OF THE GENDER GAP IN PENSIONS

The gender gap in pensions is well known and has been described in several reports and analyses during recent years.³ These reports show that the gender gap in pensions ranges between approximately 2 percent and 47 percent across EU member states. On average, the gap is more than 35 percent for pensioners in the EU aged between 65-79. The pension gap is in general considerably larger than the pay gap and neither fluctuate very much over time. Where pensions are derived from funded schemes, women's lower income rates and delayed entry to the schemes both contribute to the gap as it slows the pace of fund accumulation. This means that one must consider why these lower contribution rates exist and what causes the delays in making contributions over time.

The fact of the gender gap in pension is not disputed and the reasons for the existence and size of it are mainly determined by factors related to the employment history of individuals and the design of the pension system. Regarding occupational pensions, unequal coverage ratios of male and female workers by occupational pensions can further emphasise the gap of statutory pension systems.

However, some research papers have shown that the gender gap still exists in member states despite taking into consideration factors such as employment history etc. This suggests that other factors might explain why there is a behavioural bias obstructing women from catching up in terms of occupational pension.

Privatisation of pensions can lead – *ceteris paribus* - to more inequality since 1st pillar pensions are more equal than 2nd pillar pensions; and 2nd pillar pensions are more equal than 3rd pillar pensions. This is due to the different enrolment mechanism which are more inclusive and universal in the 1st pillar compared to the second pillar and also in the 2nd pillar compared to the 3rd pillar.

Occupational pensions were traditionally designed to close the pension gap, which was defined as the gap between income before and after retirement. High-income earners pension gaps are often high due to income ceilings in first pillar pensions. Contribution rates for occupational pensions are traditionally not declining, but progressive. This aspect systematically widens the gender pension

³ For example: OECD WPPP "Assessment of the gender pension gap and its drivers" May 2019, European Commission- Pension adequacy report 2018, European Parliament briefing on "The gender gap in pensions in the EU" July 2019, European Commission 2018 Report on equality between women and men in the EU. European Parliament "The gender pension gap: differences between mothers and women without children" Study for the FEMM committee 2016, Tinios, Bettio and Betti "[Men, Women and Pensions](#)" Study for the European Commission, 2015; European Institute for Gender Equality, "[Gender gap in pensions in the EU](#)" Research note to the Latvian Presidency, 2015., European Commission for Employment, Social Affairs & Inclusion, "Work-life balance for all: Best practice example from EU Member States, 2019.

gap since women often have lower incomes than men and therefore – from a relative point of view – a smaller pension gap (before and after retirement).

2.1 FACTORS RELATED TO EMPLOYMENT HISTORY

The following factors related to the employment history of the individual can have an impact on the gender gap in pensions

- a. The number of years in employment (i.e. excluding time spent for care responsibilities that relate to parenthood: having parents and being parents, and education). 15% of inactive women are so because of care reasons, while this is only the case for 1.4% of inactive men⁴.
- b. The intensity of employment (i.e. part-time) – while men spend on average 40 hours per week in employment, women spend on average 36 hours. In total 31.3 % of women compared to 8.7% of men⁵ have part-time employment.
- c. The type of employment contract. On average 12.7% of women work in temporary contracts compared to 10.7% of men; temporary contracts often do not entail the same level of benefits, including access to occupational pensions, that open-ended contracts include⁶.
- d. The employees' remuneration (salary and bonus).
- e. The choice of education.
- f. The sector in which individuals are employed (i.e. public & private, patterns of employment in particular sectors).
- g. The statutory, voluntary and conventional rules governing social protection of certain professions, including access to occupational pensions.

In addition, women are still paid less than men for doing jobs of equal or similar value. Where an employment category is comprised predominantly of female workers, there is a tendency for lower levels of income to prevail i.e. “female occupations” generally having lower salaries. The gender pay gap (and therefore the gender gap in pension) is also higher in some sectors than in other, for example in financial and insurance activities compared to the business economy as a whole, or in the private sector compared to the public sector⁷. Women also tend to pursue university degrees

⁴ European Institute for Gender Equality (EIGE, “[What lies behind the Gender Pay Gap?](#)” v Gender Statistics Database. Accessed on 14/02/2020.

⁵ Ibid.

⁶ Ibid.

⁷ Eurostat February 2020 data: https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics

that are longer and that result in lower income than men or to be employed in occupations in sectors without adequate occupational pension plans (segregation and stereotypes).

2.2 FACTORS RELATED TO THE PENSION SYSTEM

The pension system can be used to mitigate gender differences in pensions. The following factors related to the pension system can have an impact (increase/decrease) on the gender gap in pensions.

- a. Career break compensation and insurance solutions
- b. Pension redistribution
- c. Pension indexation (higher income-higher contribution rates)
- d. Retirement age difference
- e. Differentiated compensation level in occupational pensions schemes
- f. The existence and extent of survivor's pensions, as women have on average a higher life expectancy than men and are thus more likely to outlive their partner if they are married.

If the pension system grants pension rights during a period of care, e.g. child care, the pension gender gap will decrease. Economically this means that either the State and/or employers fund contributions for some interval during the provision of care by employees or grant additional pension credits when employees with career breaks reach retirement age. Of course, if fathers were to provide the same extent of childcare as mothers, this could mean that the gap could also decrease. However, in (mainly female-headed) single parent households, such choices may not exist. In two-parent households the gender pay gap is often the main reason for the fact that the mother takes time off her career, it is economically motivated in the absence of adequate early childcare and adequate remuneration for care leave periods.

Pension systems with some sort of guarantee that offer proportionately higher pensions for low-income individuals or pension adjustments, in accordance with inflation will also (positively) affect the pension gap between men and women. Thus, if pension schemes provided for a higher rate of replacement income for those on lower income levels, this would help reduce the gap in retirement, as more women than men earn lower incomes. One might take the view that this could be a quicker way to close the gap for currently working-age women as it does not rely on closing the pay gap which in turn has shown only a slow rate of change in many jurisdictions for women who are already in retirement or just entering it.

The retirement age may have an impact on the pension gender gap since it increases the number of years in employment if women could "catch up" later in life.

Occupational pension schemes with a higher contribution level for higher incomes will have a direct effect and will increase the gender gap in pensions since men tend to have higher salaries than women⁸. This is likely to hold for employees retiring over the next –10-20 years. Thus, differentials between *executive* and *shop floor* pension scheme benefits will skew retirement income levels towards higher paid men. In this aspect it is worth commenting on the growing interest of ESG in the broader finance sector. In large companies, failure to provide equal opportunities and foster diversity along the organizational hierarchy may become subject of scrutiny as ESG factors grow traction among investors in their investment analysis and allocation of capital. This is not necessarily limited to large companies, but to any entity seeking capital or finance.

⁸ OECD, Pensions at a glance 2017

3. SPECIFIC PRACTICES WITH AN IMPACT ON THE GENDER PENSION GAP IN OCCUPATIONAL PENSIONS

The causes of the gender gap in pensions are known and have been analysed during the last few years, not only on EU level but also in separate member states. Since labour markets, pension systems and social security systems differ between member states, the instruments used to reduce the gap vary. There are several measures that can be expected to have a positive effect.

The OPSG do not believe that there is a magic wand that can be deployed but that there is a role for selected interventions which can contribute to the reduction of the gender gap in pension. These can for example be removing barriers to making contributions (automatic enrolment, pension scheme or product for part time work or for self-employment in family businesses), flexible work practices that are mindful of care responsibilities for the young or the old , sharing benefits (in household partnerships that are sustained or that break up) or maintaining some level of contributions during short term withdrawals from the workforce.

OPSG has decided to contribute and add value to the pension gender gap challenge by sharing knowledge of the current situation and “good practices” of measures taken in member states to reduce national unequal pension schemes based on gender. OPSG will also share some thoughts of factors that could at least have an indirect positive effect on the unequal pension situation to be further explored.

These measures are grouped under the following headings:

- Pension entitlement during parental leave
- Transfer of pension entitlement between partners in a household
- Waiver of premium insurance during parental leave
- Actuarial elements
- Pension information
- Shared pension rights between spouses
- Survivor’s pension
- Other initiatives

3.1. PENSION ENTITLEMENT FOR PARENTAL LEAVE

The retirement pension system in some member states and some occupational pension schemes contain rules compensating for parental leave and time spent with small children. The effect on the gender gap depends on the length of this pension entitlement and the income basis on which it is calculated. There are examples below how pension entitlements for parental leave are devised in different European countries.

Since 1985, there have been systems of assimilated periods for the accrual of pension rights during periods of career breaks in **Belgium**. This measure was introduced to ensure that those who pause their careers to take care of a child or pursue an education would still accrue a first pillar pension. This measure does not only apply for the care of children, but also in a few different cases, such as a family member, who is seriously ill. There is a time credit system, which allows an individual a maximum of 51 months to care for a child and still retain pension rights. Rights to occupational pensions are maintained during leave for time-credit, but the accrual is halted temporarily.

In **Denmark**, several collective agreements stipulate that the employer continues paying contributions towards occupational pension entitlements during parental, maternity, pregnancy and paternity leaves.

Recently, in **Croatia**, a legislative amendment was passed and entered into force on 1 January 2019, which aims to decrease the gender pension gap. The amendment will increase the amount of pension (1st pillar) for women or men who have stayed at home and raised children by adding six months to the total amount of seniority for each child. This length of service is added after the retirement pension requirements are fulfilled.

Similarly, in **Ireland**, a number of initiatives have been taken in the last 20 years. To create a better society, the Department of Justice and Equality states in the Irish National Strategy for Women and Girls 2017-2020 that *“with the aim of ensuring that pension policy takes account of the women’s differing work patterns, future pension policy reforms will be gender proofed to assess their impact on women as well as men.”*

To this end, the Irish government introduced a home caring periods scheme in 2018. This scheme addresses the deficit in contributions that existed as a result of individuals, though primarily women, from taking time out of paid employment/the labour market to provide care to family members. Qualifying individuals must have the equivalent of 520 actual paid weekly contributions by the time of retirement in order to benefit from the additional notional or deemed contributions that will be provided by the State.

In **Lithuania**, the government has taken measures to address the gender pension gap by, for example, ensuring that those who interrupt their careers to care for children under the age of 3 still

accrue pension rights. There are several conditions that must be fulfilled to be eligible for this insurance coverage provided by the State. One of these conditions is that the parent does not have socially insured income.

In **Norway**, persons caring at home for children, elderly people, disabled etc. (mostly women) earn pension benefit points which result in higher pension benefits in the decumulation phase on retirement.

In **Spain**, periods with interrupted pension contributions 9 months before the birth of a child and during the six following years will be recognised as contributory years towards social security, even in the case of the termination of an employment relationship, be they continuous or discontinuous. The maximum of recognised periods are nine months per child (and a total maximum of 5 years for all children). Additionally, statutory pensions are increased by a percentage depending on the number of children; 5% for two children, 3% for three, 15% for four or more, for women retiring from 2016 onwards.

In **Sweden**, parents of young children can have pension entitlement rights based on a pensionable amount⁹ calculated for the child's first four years and based on the income that the parent received the year before the child's birth.

3.2. TRANSFER OF PENSION ENTITLEMENT BETWEEN SPOUSES

In some member states, there is an option to transfer part of the retirement pension entitlement between spouses to improve individual pension cover for spouses with low income. The effect on the gender gap is in direct relation to the amount that can be transferred.

In **Sweden**, the transfer is carried out annually and consists of the pension entitlement called *premium pension*¹⁰ (1st pillar), for the whole calendar year. It is usually the husband who transfers his pension entitlement to his wife.

3.3. WAIVER OF INSURANCE PREMIUMS DURING PARENTAL LEAVE

In some Member States' occupational pension schemes, measures are taken to help reducing the gender pension gap. One example of this is a waiver of insurance premiums that is included in the pension scheme and will pay the premiums for time spent on parental leave.

⁹ Pensionable amount is based on the income and has a maximum. Incomes over that amount will not entitle to pension compensation.

¹⁰ See chapter 4.

In **Norway**, pension premiums are paid to the state on real income, but there is a roof on pension benefits, i.e. high-income individuals contribute to low-income individuals' pension benefits. This is mostly benefitting women.

In **Sweden**, there is a maximum for this insurance coverage for parental leave of 13 months in many pension schemes (parental leave is of 480 days – about 16 months - to be split between both parents). This greatly contributes to reducing the gender gap as women commonly take the main part of the parental leave.

3.4. PENSION INFORMATION

In **Sweden** some of the largest insurance companies providing occupational pension products have provided information campaigns aiming at informing and educating women (and men) on the gender gap in pension and the result of different choices during the career and life course.¹¹ Information is fundamental for conscious choices.

3.5. ACTUARIAL ELEMENTS

In **Norway, Sweden and Germany**, adjustments for longevity is gender neutral, which favours women who have a longer life expectancy.

The Test-Achats ruling¹², banning the differentiation between men and women in the calculation of premiums and benefits in life insurances in the private sector, does not directly apply to the occupational pensions sector, which are considered part of social protection and exempt from the application of the Gender Equality Directive¹³. However, it may have had an influence: Member States may have chosen to apply the provisions to the directive also to occupational pensions, or it may have influenced the social acceptability of gender as an actuarial factor to set insurance premiums.

Because of this ECJ decision so-called "unisex" gender-neutral tariffs were obligatorily introduced for life-insurers in **Germany**. Though the NCA BaFin in January 2013 declared that the ECJ judgement does not apply to occupational pensions, even not to life-insurance based

¹¹ "Deltidsfällan" (The part-time trap), Alecta, <https://www.alecta.se/globalassets/dokument/rapporter/alecta-deltidsrapport-260417>, "Lika arbete.-olika pension" (Same work- different pension) 2017, Skandia <https://www.skandia.se/globalassets/pdf/press-och-media/rapporter-och-debatt/lika-arbete-olika-pension>, 2020.

¹² European Court of Justice, C-236/09 Association Belge des Consommateurs Test-Achats and Others, of 1 March 2011.

¹³ Directive 2006/54/EC of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast).

"Pensionskassen", there is evidence that most "Pensionskassen" and "Pensionsfonds" have adopted unisex tariffs since December 2012 for new concluded contracts. There are even cases of "Pensionskassen" which have changed already existing contracts a posteriori.

The effect of the transition from defined-benefit to defined-contributions pensions has a gender impact as well: where defined-benefit pensions could offer the same returns to men and women in terms of interest rates by moving life-expectancy risks from the beneficiary to the pension provider, defined-contribution pensions automatically maintain the differences in returns on investment because of these actuarial differences, unless the accrued defined-contribution pension is invested into an annuity product upon retirement.

3.6. SURVIVOR'S PENSION

As female life expectancy is on average higher than male life expectancy¹⁴, the likelihood of women in a partnership with a man to outlive their partner is high. Therefore, survivors' pensions are mainly benefitting widows.

Member States can extend a spouse's pension rights, either in full or in part, to the surviving spouse. In some Member States, occupational pension regulations allow for the establishment of a death insurance as part of the occupational pension or the transfer of accrued assets to the surviving spouse/the heir in the event of death of the beneficiary.

3.7. AUTO-ENROLMENT

In the **United Kingdom**, auto-enrolment into occupational pensions has been established by regulation for jobs above a salary level of UK£10,000. The regulation stipulates that employers must enrol employees in occupational pension schemes unless employees specifically opt out of them. Given many women are working on small incomes, this has a double impact on the gender pension gap: for women working above the salary threshold, it opens access to an occupational pension and increases coverage ratios. For women below the threshold, no access to occupational pensions is granted. It must be said that the contributions to occupational pensions are taken out of the employees' salaries, so low-wage earners (below an income of 11,500 GBP) who are below the threshold for taxable income, have to pay their contribution fully, while workers above this threshold, receive tax benefits for their contributions. Thus, this policy does not prevent the difficulty of low-wage earners having insufficient savings capacity to contribute to a pension.

¹⁴ In 2017, life expectancy at age 65 was 18.1 years for men vs. 21.4 years for women in the EU28 (Eurostat, tps00026)

3.7. OTHER INITIATIVES

In **Belgium**, your family situation can affect your pension (*“a family allowance”*). To benefit from the family allowance, you must be married. Legal cohabitation does not entitle you to a family allowance.

In 2014, **Ireland** extended the coverage of the state pension (pillar 1) to the spouses or civil partners of self-employed persons. This scheme allows for the inclusion in the social insurance payments and benefits system of those who assist in the business of their self-employed spouse/civil partner performing the same or ancillary tasks, but who are not a business partner or an employee. In addition, part time workers’ pension coverage was increased in 2001 to address the non-participation of part time workers in employer sponsored pension schemes.

4. CONCLUSION

Most efforts to decrease the pension gap between men and women have so far been taken in the 1st pillar, but the differences between member states are still very large. The OPSG wants to encourage more progress in the 2nd pillar where different pension schemes can and should provide for arrangements aimed at reducing the pension gap.

This could also help men and women to plan for career paths or for care-periods, not only by deciding who should take a career-break, but also to decide to compensate for the pause in the pension accrual period. Occupational pensions products that allow for transfer of pensions contribution or entitlements to between spouses on certain conditions could be explored. Information efforts should be made to make sure that individuals (men and women) understand the effect different options during their life course has on their retirement incomes and to make conscious and informed choices. Further it can be predicted that the composition of female retirees will alter over the decades ahead: more single women, more women without children, and more separated and divorced women with and without children. Pension policy needs to acknowledge this demographic changes.

This report provides a synopsis of some Member States' policies that are being pursued across the European Union with respect to the gender gap in pensions. In doing so, it acknowledges national competences in this domain and recognises the social and cultural dimensions that frame it. It recognises the research and analysis that is being undertaken by others and offers a range of recommendations, which we believe will contribute to further progress being made, based on a sense of a collective desire among stakeholders to improve the financial and social outcomes achieved by women on retirement.

5. RECOMMENDATIONS

5.1 RECOMMENDATIONS TO THE EUROPEAN COMMISSION

- Include data on gender pay differences as well as company policies with a gender impact as mandatory information to be published in non-financial reporting during the planned revision of Directive 2014/95/EU on non-financial and diversity information by certain large undertakings and groups.
- Calculate the gender impact of proposed or enacted pension reforms as part of the policy monitoring under the European Semester and in the regular Pension Adequacy Reports.
- Undertake a survey about the coverage by occupational pensions and gender differences in coverage and characteristics of occupational pension schemes.
- Implement transparency by regular reporting on the gender pension gap in member states.

5.2 RECOMMENDATIONS TO EU MEMBER STATES

- Prioritise the removal of those factors which most exacerbate the gap and the activation of those policy measures which would contribute most to closing it.
- Identify the factors at national level which sustain the pension gap by organising peer reviews of the European Social Protection Committee on the gender pension gap.
- Benchmark the national pension system against other Member States of similar size and economic development with a view to isolating the domestic causes of the gender gap and developing a suite of possible policy measures which could contribute to its closure.
- Establish and preserve solidarity mechanisms that allow for pension credits for career breaks linked to leave for reasons of child care or care to a family member in need for care and assistance.
- Establish the same obligations and rights about pensions in part-time and fixed-term employment contracts than for open-ended full-time contracts.
- Encourage social partners to increase the occupational pensions coverage ratios of workers, especially through enhanced social dialogue with professions, employment cohorts and sectors that have predominantly female workforces.

- Promote research across the pension pillars into the national and comparative dimensions of the evolving gender gap in pensions and the factors which expand, sustain and reduce it, involving national stakeholders where possible.
- Review laws and regulations related to divorce to ensure pension savings are an integral part of divorce settlements.

5.3 RECOMMENDATIONS TO EIOPA

- Incorporate the gender dimension of pension schemes and systems into the ESG framework for pension schemes, suppliers and risk impact factors.
- Adopt the gender dimension of financial services as a theme with the EBA and ESMA for a future European Consumer Day.
- Include the gender gap in pensions as part of an annual stakeholder conference hosted by EIOPA.

5.4 RECOMMENDATIONS TO IORP PROVIDERS

- Examine the design of pension schemes with a view to incorporating features and mechanisms that would narrow the gap.
- Promote design research which would explicitly address gap narrowing dimension within pension products and schemes.
- Educate and inform on the reasons for the gender gap in pension and help families to plan further, not only for the parental leave period, but also for the consequences that the choice to take a greater part of the childcare will have in the future pension payment for the parent who takes a break in the working career. Increased awareness will promote the dialogue between spouses to transfer savings to reduce the gender gap.
- Engage in dialogue with pension stakeholders including professional bodies to highlight the scale of the issue and stimulate the generation of creative responses to its solution over time.
- Examine the possibility in pension plans of incorporating the choice to transfer part of occupational pension savings (DC) or entitlement (DB) between spouses due to parental leave.

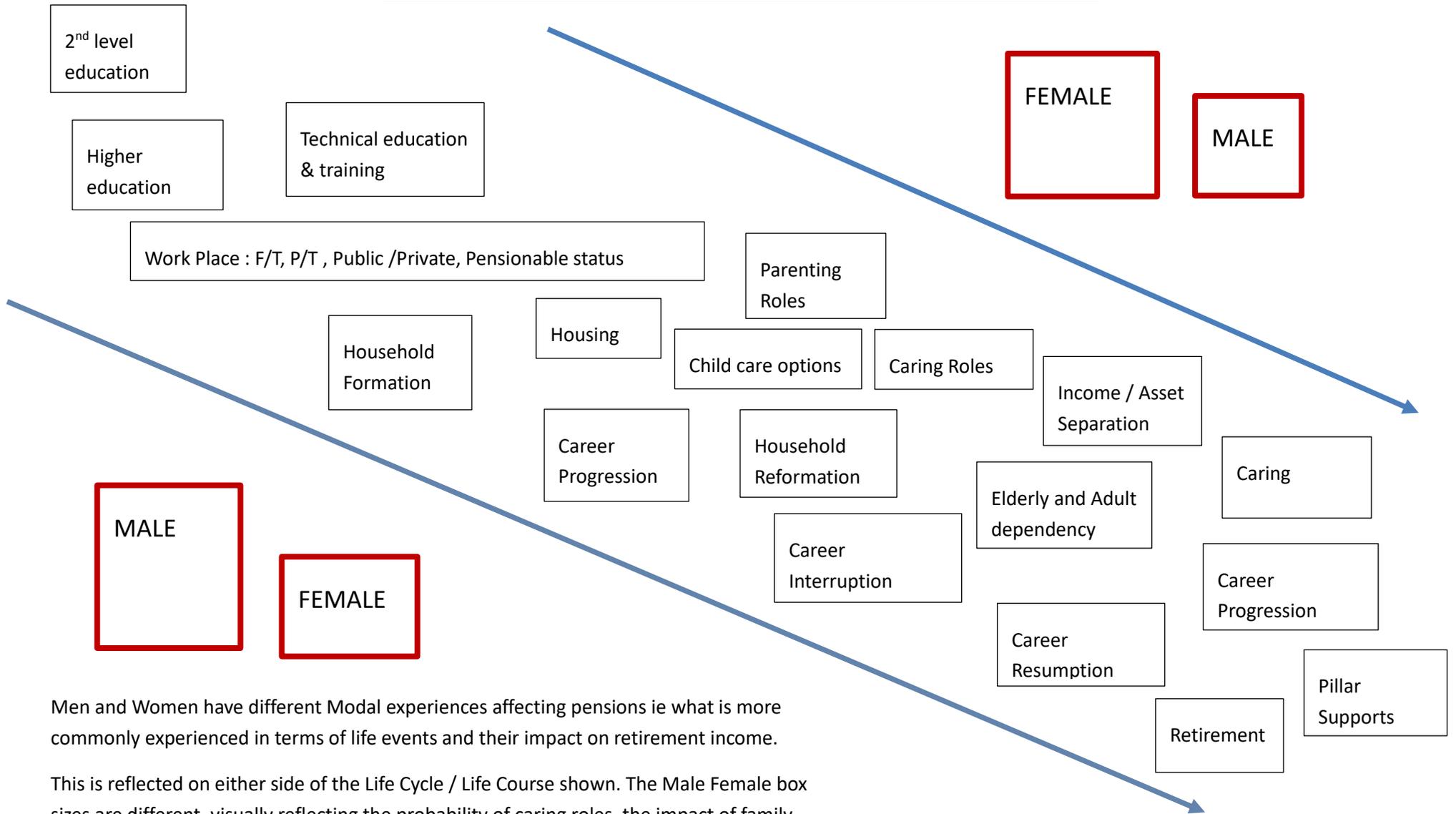
5.5 RECOMMENDATIONS TO EMPLOYERS AND SOCIAL PARTNERS

Many topics around the gender pension gap belong to product design. Hence the addressees for improving product design are also those for narrowing the gender pension gap.

- The social dialogue should include the gender pension gap in the 2nd pillar.
- The product should be designed in a way to avoid as far as possible (unjustified) gender pension gaps.

Appendix 1

A Simplified Life Cycle – Life Course : The Journey and The Events



Men and Women have different Modal experiences affecting pensions ie what is more commonly experienced in terms of life events and their impact on retirement income.

This is reflected on either side of the Life Cycle / Life Course shown. The Male Female box sizes are different, visually reflecting the probability of caring roles, the impact of family breakdown etc on the retirement outcome.

Turning Points and Critical Factors influencing retirement income provision

- Education Provision & Opportunity
- Career choice and employment availability
- Pay and Salary rates with resulting income level
- Collective Agreements
- Income and Career progression and Interruption
- Entry and continuity in labour market participation.
- Amount and patterns of contributions: Employer/ Employee/State
- Contribution Timing
- Availability and access to child care support system

