

Single Equality Scheme

Chwarae Teg Consultation Response

6th June 2008

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Introduction

Chwarae Teg promotes supports and develops the role of women in the Welsh economy. We do this by raising awareness of the positive contribution of women to the Welsh economy, and sensitising government strategy and policy to the barriers confronting women who wish to fully participate in the labour market and economic development programmes. We are funded by the Welsh Assembly Government to provide expert advice to Ministers and policymakers on these matters.

The persistency of occupational segregation, the over representation of women amongst the working poor, the under utilisation of women's skills, the gender pay gap, the lack of women in senior and management level positions and the limited number of women in decision making roles presents a challenge to Welsh policy and practice.

Chwarae Teg also designs and manages significant projects that support women's participation in, and the development of, the Welsh economy. This includes working with women entrepreneurs on business starts and managing early stage enterprises, and providing pre-employment training for economically inactive women in their communities. We also work directly with employers and training providers to support the design of gender sensitive employment and training programmes.

Given this remit, we will concentrate on these policy areas in this consultation response.

Consultation Response

There is much to be celebrated in the aims, ambitions and mechanisms now brought together to support mainstreaming equality and human rights in the proposed Single Equality Scheme (SES). Since the introduction of the original statutory equality duty, and its interpretation as a requirement to *promote* equality for *all*, the National Assembly, Welsh Assembly Government, Wales Local Government Unit, public service providers and equality partners have all contributed to trying to find ways to embed equality at the heart of policymaking. Chwarae Teg welcomes the SES as a

potential significant step forward in bringing the duty 'alive'. In particular, Chwarae Teg welcomes the promise of the following aims and mechanisms outlined in the scheme:

- The commitment to an integrated approach to equality and human rights, and to use these principles/tools to design targeted services
- The commitment to exceed the negative rights offered by an anti-discrimination, 'six strand' approach to equality, by aiming instead for a positive approach to promoting equality on these bases
- The commitment to make solutions to inequalities effective by working cross-strand, and multi-strand, and discovering intersectionality
- The commitment to embed equality in the business planning cycle and in departmental action plans
- The commitment to measurable equality outcomes
- The commitment and actions undertaken to improve the equalities evidence base including the *Equalities Evidence Project* and the *Data Asset Register*
- Leadership commitment from Ministers and Department Directors who will take responsibility for the equality aspects of the High Level Statements
- The public engagement and involvement mechanisms
- The engagement of people with both public service delivery and equality expertise on the External Advisory Panel

The scheme also highlights interesting developments that Chwarae Teg would like to know more about, namely the review by EcAD highlighting the socio-economic disadvantages experienced by equality groups, and the use made thus far of the Equalities Evidence Base by DCELLS.

Suggested Improvements

The scheme is ambitious, and sets out for the first time how work will be taken forward across all departments. However, we understand that this is a work in progress - hence the welcome opportunity to take part in the focus groups for the SES. There is clearly much work to be done before an action plan is developed on the basis of the principles outlined in the consultation document. In the meantime,

we offer the following observations to assist with ensuring the aims of the scheme are carried through in practice:

The Evidence Base

There have been recent improvements in the availability of data for the equalities evidence base. However, this data does not appear to have influenced recent strategies and policies sent for consultation even though they have been through the *Inclusive Policy Making* methodology. For example, recent evidence from the Women's Gender Budget Group (2006), the Fawcett Society and that given in the Chwarae Teg consultation response to *Communities Next* all shows that tackling child poverty relies on addressing women's poverty.¹ Yet the strategy makes no mention of the need to tackle women's low pay, the need to gender sensitise employment programmes (particularly but not only those aimed at lone mothers), the loss of employment that working women experience because of a lack of flexible working options/affordable childcare after having a child, or that women experience disproportionately the burden of providing unpaid care in the working age population which results in their being particularly vulnerable to losing attachment to the labour market.

These factors in combination lead to women's over-representation amongst the working poor, the poorest in all age groups and within minority groups. Data is available to evidence these issues but a gender perspective must be brought to analysis. In our experience policies which appear to be gender neutral are usually gender blind – that is they maintain current gender privileges and disadvantages.

The direct result of this lack of attention to the evidence of girls' and women's economic disadvantage is an absence of specific measures to address their particular learning, skills, training, career development, flexible working and

¹ Women's Gender Budget Group (2005) *Women's and Children's Poverty: Making the Links*, London: WGBG. Link to Press Association review of new Fawcett Society research <http://ukpress.google.com/article/ALeqM5jHYSzelhHgvBqPiBS3nl9C-MvaVg>

enterprise development needs within *Skills that Work for Wales, Learning Pathways 14 -19*, and the *Welsh Minister's Business Scheme*.²

To be successful, the proposed Single Equality Scheme will need mechanisms to ensure that equalities evidence is considered **before** policies are developed. In accordance with the principles of gender mainstreaming (given legal status in the duty of Amsterdam 1997), which provided the basis upon which Wales' statutory duty to promote equality was conceived, and under which the principles of 'mainstreaming equality' are extended to all, the gender, and in this context, equalities, perspective should inform policy at the outset. This is not a retrospective 'checking' process for new or existing policies - that mechanism is 'policy proofing'.

Promoting equality puts the inequalities evidence first so that it can inform the creation of strategies, policies and practices that embody best equality and diversity practice at their core. For example, attention to gender information at the inception of policy making will enable the creation of truly gender sensitive strategies which will benefit both men and women.

The good intentions of the SES may be lost and objectives missed unless the IPM methodology is applied at the beginning of the policymaking process. It is also important that equalities evidence is better incorporated when the IPM is used at the 'proofing' stage. Unfortunately, Chwarae Teg finds that proposals in *Communities Next, Skills that Work for Wales, Learning Pathways 14 -19*, and the *Welsh Minister's Business Scheme* rarely 'add women in' let alone begin to tackle economic inactivity, skills shortages and child poverty from a gender perspective. We believe that consideration of our findings in relation to those strategies could significantly help to improve their success, and we would welcome an opportunity to share these in the action planning stage for the SES.

² These consultation responses have now been submitted to the respective departments responsible for the strategies. Copies, which contain detailed evidence of the gender inequalities that should be addressed within each strategy can be obtained from Trish Chalk, Chwarae Teg: Trish.Chalk@chwaraeteg.org

Cross-strand working

From a gender perspective there is much to be gained from cross-strand, multi-strand or intersectional working, as women are over represented amongst the disadvantaged in all social groupings. In working to address these inequalities, Chwarae Teg suggests we should avoid the pitfall of adding up potential multiple inequalities, the 'fabled black, disabled, lesbian' as somewhat unkindly described in the Equalities Review 2007:64, in an attempt to raise individuals up a discrimination hierarchy.

We should instead consider interlocking material inequalities and solutions. For example, the research commissioned by the Welsh Assembly Government and Equalities and Human Rights Commission, '*Integrating the promotion of equality and human rights*' (Parken and Young 2007), examined the material inequalities faced by all equality strands – in a 'multi-strand' approach to promoting equality. Through further disaggregating Census 2001 data, the research identified that although roughly equal numbers of men and women provide unpaid adult dependent care, in the working age population two thirds of carers were women. The research also showed that the majority of care overall is provided by older people (men provide more care as they age), and that for these people, and those with a disability, gender and age were factors in whether someone became a carer, for how long, and for how many hours a week they provided unpaid care.³

This richer understanding of who cares and when, led to the identification of an intersectional remedy. Advocates for gender, age and disability all agreed that better access to flexible working, and the ability to combine work and care in regard to welfare benefits, would assist women, older and disabled carers. The availability of flexible working was viewed as key to combating the poverty, isolation and poorer health that can result from being an unpaid carer.

³ Parken, A., and Young, H. (2007) *Integrating the promotion of equality and human rights for all*, unpublished, report for Welsh Assembly Government and Equality and Human Rights Commission. Copies from EHRD, WAG.

In summary, Chwarae Teg welcomes the SES commitment to cross-strand working but to make it successful, the following will be required:

- meaningful data analysis skills
- effective methods for the members of the SES External Advisory Panel and Steering Group to work collaboratively with policymakers and equality advocates from all strands. Chwarae Teg acknowledges that the Equality and Human Rights Division has already begun to consider how to establish and facilitate such interactive working methods (Parken and Young 2008).⁴

In this context, it is also important to recognise that qualitative research techniques are often the only way to reach an in-depth understanding of how material inequalities intersect in people's everyday lives (Parken and Young 2007). Good qualitative research should not be undervalued simply because it is not quantitative and/or positivist in methodology. Voices and stories provide insights for making change by addressing the how and why of inequality.

High Level Outcomes

We understand the importance of the commitment from each Directorate of WAG to publishing high level statements on their broad objectives. Our response below concentrates on those policy areas closest to Chwarae Teg's objectives. Prior to the submission of this response we will have had the opportunity to further discuss our suggestions at the planned SES focus groups accompanying this consultation.

We note that although the SES consultation document makes a commitment to moving beyond listing activities towards including measurable outcomes at section 4.2 (page 10) the high level commitments are not yet accompanied by benchmarks and measurable outcomes. Similarly, the list of equality reports at section 6.2 (page 18), cannot be said to be benchmarks. In creating an action plan for the SES, benchmarks and outcome measures will need to be identified, via analysis of each

⁴ Parken, A., and Young, H. (2008) *Facilitating Cross-strand working*, Equality and Human Rights Division, Cardiff: WAG <http://new.wales.gov.uk/topics/equality/research/facilitating/?lang=en>

policy field from an equalities and human rights perspective (Parken and Young 2007). We suggest this is through an investigation of the methods for producing equality indicators based on experience of establishing gender equality indicators. A range of literature is available to support this work.

Overall, we are concerned that the terminology throughout the high level statements, by being restricted to 'under-represented' groups, may be leading to, or be the result of, an assumption that gender inequalities have been addressed. Further, there needs to be recognition of the differing nature of the inequalities by strand, to provide for effective cross-strand/multi-strand working.

In respect of gender, we must keep in view the ways, in which it is a social and economic construction, affecting the life chances and choices of every member of the population. However, crucially within the category of social division called gender, women form the majority but are most affected by discrimination and disadvantage in employment.

The already significant body of work undertaken to address gender inequality in Wales, by the National Assembly and Welsh Assembly Government, including the recommendations of the Mainstreaming Review and outcomes of the Mainstreaming Task and Finish Group, should be carried forward.

High Level Statements

We have considered the high level statements most relevant to Chwarae Teg's objectives and provide our suggestions for the further incorporation of a gender dimension below:

Department	Statement and Outcome	Response
Department for Children, Education, Lifelong Learning and Skills	<p><i>To promote the well-being of all children and young people.</i></p> <p>Outcome: 'To ensure the best start for all young children, including those from under-represented groups.'</p>	<p>The UK Government has accepted the Women and Work Commission's (2006) finding that part of the 'best start in life' includes early teaching and learning practices which will help girls and boys avoid gender segregation, in education and employment. The Early Years Foundation Stage will support teachers to 'avoid gender stereotyping in early years settings' (Department for Communities and Local Government, 2006:10).⁵</p> <p>We suggest that all the High level statements in relation to education in Wales should include specific reference to tackling gender segregation and desired outcomes.</p>
	<p><i>Lead the contribution that the Welsh post-16 education and training system makes towards wider economic participation and fulfilled</i></p>	<p>Instead of restricting the goal to addressing under-representation, the use of the term '<i>disadvantaged</i>' might have allowed for inclusion of women and girls in relation to learning and training. Although women are under-represented, as are men, in many academic and skills areas, occupational segregation, wastage of their knowledge and skills due to</p>

⁵ Department for Communities and Local Government, Government action Plan, Implementing the recommendations of the Women and Work Commission', London: DCLG. http://www.equalities.gov.uk/publications/wwc_govtactionplan_sept06.pdf

	<p><i>individuals.</i></p> <p>Outcome: Increase opportunity for employment among <i>under-represented groups</i>.</p> <p>Outcome: Encourage under-represented groups to consider careers within occupational sectors which remain persistently segregated.</p>	<p>lack of flexible working, and low pay, results in loss to the economy, and individual under fulfilment. These inequalities are further evidenced in Chwarae Teg's response to <i>Skills that Work for Wales</i>.</p> <p>We welcome the mention of segregated occupations, and look forward to working with WAG to address the labour market disadvantage that persistent gender segregation creates.</p> <p>Within this outcome there should also be strategies for addressing accessibility to education for lone parents. We hope that the proposed <i>Learner Travel Measure (LCO)</i>, and the proposal for <i>Small Business Rate Relief</i> for childminding business, may assist in this regard.</p>
	<p>Promote inclusion, reduce disadvantage and tackle poverty of educational opportunity.</p> <p>Outcomes:</p> <ul style="list-style-type: none"> • Mitigate financial barriers to enable access to learning post 16, including for <i>under-represented groups</i>. • Widen access to education, particularly for <i>under-represented groups</i>. 	<p>Again gender inequalities must be considered in the action plan. Under-representation in relation to 'groups' seems to suggest that gender is not to be addressed within these aims.</p>

<p>Constitutional Affairs, Equality and Communications Department</p>	<p><i>To encourage evidence-based policy making</i> Outcomes:</p> <ul style="list-style-type: none"> • Policy makers using the ‘inclusive policy making methodology’ as an integral part of policy making. • Models of best practice in consultation and engagement developed and put into use. • An evidence base developed across key policy areas and used in the Inclusive Policy Making methodology. 	<p>We applaud these statements and the desired outcomes, and understand that the Scheme is a work in progress. We hope that the recommendations that we have made throughout, regarding the use of the equalities evidence base, will help with effective implementation.</p>
<p>Department for the Economy and Transport and cross-departmental plans</p>	<p><i>High Level Statement: Deliver a truly accessible business support service across Wales that takes account of the needs of all equalities groups.</i></p> <p>Outcomes: Increase the rate of economic participation amongst ethnic minorities, disabled people, women and lone parents in Wales.</p>	<p>Chwarae Teg notes where women have been mentioned particularly, business support, and safety in relation to public transport. They may also be inferred within regeneration and economic activity. The aspects of policy which address them should be made specific, as should the interrelationship between gender, age, ethnicity, sexuality and disability in these desired outcomes.</p> <p>Wales is committed to increasing economic activity, employment and entrepreneurship for women, disabled, minority ethnic and older workers through its contribution to the UK’s National Reform Programme under the European Employment Strategy (EES). The UK plan has an objective of an 80% overall employment rate. This can only be met if strategies reflect the employment support and welfare needs of people in these categories of social and economic disadvantage. It would be</p>

	<p>Increase the amount of people from under-represented groups accessing mainstream business support.</p>	<p>helpful if these targets, and related actions, featured in the High Level Statement for DET.</p> <p>The trend for women to move from employment to self employment is growing. Between 2001 and 2005 the rate increased from 28.8 to 34.5 of all those moving to self employment from employment (Harding 2006)⁶. In addition:</p> <p style="padding-left: 40px;">Women are more likely to move from <i>unemployment to self-employment</i>, with one in five women, compared to one in fifteen men making this transition. Therefore, on entering self-employment from unemployment, women make a more immediate contribution to GDP and there is less economic displacement (SBS Promoting Female Entrepreneurship, March 2005, cited in Association of Chartered Certified Accountants June 2005, policy paper).</p> <p>However, overall in Wales there are only 40,000 self employed women compared to 114,000 men. Besides being the key to growth in business starts, women are the main resource for future employment in Wales. Addressing their economic inactivity (34 per cent are economically inactive), their underemployment (42 per cent of employed women are contracted on a part time basis in Wales), and the continuing pay disparity (£90 a week in gross average earnings between women and men), would bring immense benefit to the economy of Wales.⁷</p>
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⁶ Harding, R (2006) *The State of Women's Enterprises in the UK*, Prowess: London

⁷ References for this paragraph are: *Annual Population Survey: Employment Status of those of working age by local authority*. Year ending 30 June 2007 (Stats Wales table 00339), and *Quarterly Labour Force Survey, Activity and Employment Rates, seasonally adjusted, UK centres (NS)*, for the period November to 2007 to June 2008. Viewed at Stats Wales, 20/3/08.

	<p>The development of a single, robust and consistent equality monitoring system for business support.</p>	<p>The importance of the contribution of female entrepreneurship to the growth in entrepreneurship in the Wales economy was noted by the Global Entrepreneurship Monitor (GEM) in 2005. Three out of four new start-ups were women-led businesses, and yet women represent less than a quarter of those accessing business support services in England (Harding 2006).</p> <p>Regrettably figures for the (differently organised) business support services in Wales are not gender disaggregated and thus could not be included for comparison in Harding's report (2006). Also of concern is the observation of the most recent GEM report (2007) that only one third of Wales' early stage entrepreneurs are women, showing a decline on previous years.⁸</p> <p>Commissioning of data informed by equalities knowledge will be needed for the IPM to create policy that promotes equality and for robust monitoring and indicators.</p>
	<p>Improve the integration of social, economic and environmental considerations into regeneration.</p> <p>Outcomes: Reflect the different mix of regeneration needs for all</p>	<p>To ensure women are included within this statement, and in order that WAG might meet both EES and Child Poverty targets, the regeneration and employment portfolios should be closely connected. The Women's Gender Budget Group (2005), investigation into women's and children's poverty concluded that:</p> <p><i>Women's earnings - in both two and lone parent families - can play a crucial role in keeping their families out of poverty. To that end, any strategy that relies on paid work as the main</i></p>

⁸ National Entrepreneurship Observatory for Wales (2007) *Global Entrepreneurship Monitor: Wales Report*: NEO: Glamorgan

	<p>equalities groups.</p>	<p>route out of poverty therefore <i>has to be explicitly gendered</i>.</p> <p>This means that it has to include <i>actions to address women's disadvantaged labour market position</i> and the various obstacles faced by low income mothers who want to take up paid work (2005:iii).</p> <p>Actions must include but exceed those focused on lone parents within <i>Communities Next</i>. The <i>Communities Next</i> strategy is based on household data, and tends to assume an equal distribution of resources within families but this is not the case. For couples where the woman is 'looking after family and home', an analysis of individual incomes provided by the DWP, reveals that ninety per cent of total family income comes from the individual income of men, and only eight per cent from the individual income of women, half of this from benefits (DWP: 2006).⁹ In 2004/5, for thirty nine per cent of couples, less than a quarter of total family income came from the individual incomes of women. Thus we should not allow the term dual-earner households to infer equal earnings.</p> <p>Around half of those paid less than £7 per hour are part time workers - an overwhelming number of whom are women (Annual Survey of Hours and Earnings 2007, ONS: updated December 2007).. Mean total incomes are higher for men than for women in all economic status</p>
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⁹ The full report DWP (2006) Gender and Individual Income Report for the Women and Equality Unit can be found at: http://www.womenandequalityunit.gov.uk/indiv_incomes/report2006.pdf

Although not without its methodological issues, the data is robust and includes gender disaggregated data for Wales.

	<p>Improve opportunities to accommodate new and improved employment, and help reduce unemployment and economic inactivity.</p>	<p>groups (employed, economically inactive, and retired). Within couple households in Wales, men's total individual income is more than twice that of women. This means that very few women have financial independence (the amount necessary per week to maintain an independent household by earnings), and there can be no assumption about how couple households share their resources between themselves or with their children.</p> <p>Women within low income families face barriers to entering work because of the burden of care, lack of provision to retrain or up-skill, lack of flexible working, and cost of childcare. The DET action plans to reduce barriers to economic activity and employment, and to encourage entrepreneurship, must be gender reflexive.</p> <p>See Chwarae Teg's consultation response to <i>Communities Next, Welsh Minister's Business Scheme</i> and <i>Skills that work for Wales</i>, for more information.</p>
<p>Department for Social Justice and Local Government</p>	<p>Promoting Social Justice by reducing the effects of poverty on children in Wales. Outcomes: Increase the profile of child poverty across the Welsh public sector ensuring that resources and policies are focussed on the needs of children from low income families, particularly those facing particular disadvantages such as disability and certain ethnic minority groups.</p>	<p>Currently the High Level Statements in relation to child poverty do not reflect the effect of gender on the distribution of resources. See above for links with DET plans, and Chwarae Teg's response to <i>Communities Next</i>.</p> <p>To address the child poverty and financial inclusion outcomes in the SJLG plan, and those related to economic activity and employment within DET, action plans need to cross-cut with social care policy and actions.</p> <p>For example, the Department for Health and Social Service's High Level Statement, refers to ensuring carers know their rights. However, the <i>Carers Strategy for Wales Action Plan (2007)</i> includes commitment to ensuring that carers are 'able to access employment, education and</p>

	<p>Attainment of the cross-cutting Child Poverty targets set out in 'Eradicating Child Poverty in Wales: Measuring Success, Oct 2006'.</p> <p>Increase the number of lone parents in Wales accessing and progressing in the labour market. Based on Labour Force Survey data from the last 3 years the current Wales rate for lone parent employment is 56.6 per cent.</p>	<p>leisure opportunities' (p16), and 'are not disadvantaged as a consequence of fulfilling their caring responsibilities'.</p> <p>As the need for informal care increases due to our higher survival rates from terminal illness, an increase in those living with LTLLIs and the ageing demographic, women will be increasingly caught between the competing demands of an economy that needs them in employment, and a social care system that is reliant on their unpaid work. The childcare strategy is also vital to support this component. Chwarae Teg suggests an urgent need to review the current incompatibility of the care and employment agendas, and the SES should include a cross-departmental campaign, which aims to make flexible working 'the norm' and to achieve consensus on removing rigid working practices.</p>
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Concluding Remarks

Chwarae Teg acknowledges the ambition and initiative behind the Single Equality Scheme and recognises it as a potentially highly significant step forward in embedding equality perspectives throughout policy aims and outcomes. It also has the potential to facilitate cross-strand and cross-departmental approaches to addressing inequalities.

We hope that our consultation response will be viewed as it is intended; an attempt to provide evidence based, constructive observations, in order to assist with integrating a gender perspective into action planning. We will be pleased to assist departments with their planning and establishing outcome measurements.