Engender response to the Scottish Government consultation on Scotland's National Transport Strategy

INTRODUCTION

Engender welcomes this opportunity to respond to the Scottish Government's consultation on its National Transport Strategy. The use of Scotland's transport systems is highly gendered. Women are the majority of public transport users, and the minority of drivers and cyclists. Women also tend to make more complex and frequent journeys due to caring responsibilities and working patterns.[1] Scotland's current transport systems, however, do not reflect the different needs of women.

Public transport has been predominantly designed to serve commuters who work core business hours on weekdays, with routes running between suburbs and urban centres in a radial fashion. These services benefit men more than women, who are more likely to need a range of orbital transport routes, and timetables that fit with unpaid care work and part-time employment.[2] This has significant cost and time implications, especially in the context of cuts to women's social security and increasingly precarious work, and steep hikes in fares across privatised services. Lack of accessibility on public transport is another gender equality issue, affecting the mobility and isolation of women who care for young children and disabled people.[3] Fears about safety also influence women's decisions around travel. Women cite public transport as a 'hotspot' for gendered abuse and sexual harassment and raise concerns about poorly-staffed services and termini, as well as services that are poorly connected, especially at night.[4]

Many women in Scotland also face multiple disadvantages when accessing transport. The needs of BME, disabled, LGBT, older, younger, pregnant and rural women, women

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[1] OECD (2018) Understanding urban travel behaviour by gender for efficient and equitable transport policies
[2] Greed (2019) Are we still not there yet? Moving along the gender highway, chapter in Scholten and Joelsson (eds) Integrating gender into transport planning: from one to many tracks; Transport Innovation Gender Observatory Project
[3] McCarthy et al (2016) Factors influencing travel mode choice among families with young children (0-4): A review of the literature
[4] Government Office for Science (2018) Inequalities in Mobility and Access in the UK, 2017-2040

of different faiths, women with insecure immigration status, and unpaid carers should all be taken into account in transport policy.

Finally, management of Scotland's transport sector is overwhelmingly dominated by men. In 2017, only one of sixteen transport authorities, public companies and regional transport partnerships was led by a woman.[5] This may also contribute to the disparity between the transport needs of women, and Scotland's transport priorities.

As a feminist policy and advocacy organisation, Engender's ambition is for a Scotland where women's political, economic and social equality with men is realised. As such, this response focuses primarily on the priority of 'promotes equality' and associated outcomes, with cross-cutting references to 'a prosperous economy' and 'health and well-being'.

Question 1: Is the vision that is set out for the National Transport Strategy the right Vision for transport policy over the next 20 years?

> *Vision: We will have a sustainable, inclusive and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors.*

This vision includes a number of appropriate aims. It does not, however, fully reflect the priorities which underpin it. Of the four stated priorities, 'promoting equality' is one of two which will be afforded "greater focus" in the strategy, yet equality is not included in the vision. Overlap exists between equality, inclusion, accessibility, and the notion of fairness. However, to achieve positive outcomes for groups disadvantaged by the current transport system, such as women, **the principle of equality must be explicitly embedded within the overarching vision.**

For instance:

> "We will have a sustainable, inclusive and accessible transport system, which helps to deliver a healthier, more equal and more prosperous Scotland for communities, businesses and visitors."

It is also essential that the concepts set out in the vision are defined within the strategy. For instance, it must be clear to those responsible for its delivery what is meant by 'fairer', and whether 'communities' is intended to mean people in general, geographic locations, or groups of people, such as women or disabled people.

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[5] Engender (2017) Sex and Power in Scotland 2017

Question 2a: Are the Priorities and Outcomes that the Strategy is trying to achieve the right Priorities and Outcomes for transport policy over the next 20 years?

Priorities: promotes equality; takes climate action; helps our economy prosper; improves our health and wellbeing

Equality priority

We welcome the high-level priority to focus on equality. However, 'promoting' equality falls short of the duty to "advance equality of opportunity and outcome, including the protected characteristics," as is subsequently set out in the text.

Whilst duties to advance equality and eliminate discrimination are clearly set out in law,[6] the concept of promoting equality is ill-defined and we are unaware of any examples where its use as a high-level goal has led to positive change for women. Indeed, nine years on, the public sector equality duty itself has had limited impacts,[7] reflecting the complexity of the task at hand.

Therefore, **we recommend that the priority is amended to read "advance equality and non-discrimination"**. This would significantly improve the prospects of the NTS2 achieving positive outcomes for equalities groups. For clarity, the full description of the strategy's definition of equality (both protected characteristics and socio-economic inequality) should be moved to the top of this section.

Equality outcomes

*The three **equality outcomes** are: will provide fair access to the services we need; will be easy to use for all; will be affordable for all.*

Public transport has been predominantly designed to serve commuters who work from 9am-5pm on weekdays, with routes running between suburbs and urban centres in a radial fashion. These services benefit men more than women, who are more likely to need a range of orbital transport routes, and timetables that fit with unpaid care work and part-time employment.[8] This has significant cost and time implications, especially in the context of cuts to women's social security and increasingly precarious work, and

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[6] The public sector equality duty under the Equality Act, and the Scottish specific duties that underpin it

[7] Engender (2017) The socio-economic duty: a consultation; equality sector response, September 2017 (this is a joint response between Inclusion Scotland, Close the Gap, Engender, CRER, Equality Network, LGBT Youth Scotland, Scottish Women's Aid, Scottish Women's Convention, Stonewall Scotland, and Health and Social Care Alliance Scotland

[8] Greed (2019) 'Are we still not there yet? Moving along the gender highway', chapter in Scholten and Joelsson (eds) Integrating gender into transport planning: from one to many tracks; Transport Innovation Gender Observatory Project

steep hikes in fares across privatised services. Lack of accessibility on public transport is another gender equality issue, affecting the mobility and isolation of women who care for young children and disabled people. Fears about safety also influence women's decisions around travel.[9] Women cite public transport as a 'hotspot' for gendered abuse and sexual harassment and raise concerns about poorly-staffed services and termini, as well as services that are poorly connected, especially at night.[10]

In order for the transport system to advance (or even promote) equality, radical changes would therefore be needed to the design, implementation and governance of new systems. New services, routes and connections would have to be developed, with gender equality as a key design standard.

Whilst the existing outcomes do not preclude the possibility of such systemic change in decision-making and resource allocation, nor do they reflect the challenges the strategy subsequently sets out in terms of gender inequality. Instead, they infer tinkering with existing infrastructure to make it more accessible.

The first outcome (fair access to the services we need) could be interpreted to mean new services that serve the needs of the entire population. The emphasis, however, is on fair access, and the strategy does not include assessment of travel needs for different groups. It therefore appears to be weighted towards improving accessibility on existing services. Either way, this must be made clear.

We recommend that outcome 1 is amended to read '**our transport system will provide services that serve the needs of all**'. At the very least (in line with comments above regarding ambiguous language), we recommend that this is amended to read 'our transport system will provide **equal** (rather than fair) access to services we need'.

The point about fair or equal access could be collapsed into outcome 2 (will be easy to use for all). We recommend that outcome 2 is amended to read **'our transport system will provide equal access to services and be easy to use for all'**.

Question 2b. Are some of these Priorities and Outcomes more important than others or are they equally important?

Equality is a cross-cutting issue that must be taken into account across all decision-making and resource allocation related to transport. It is therefore inherent to the success of other priorities.

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[9] McCarthy et al (2016) Factors influencing travel mode choice among families with young children (0-4): A review of the literature
[10] Engender workshops

Women's disadvantaged access to the labour market, and therefore prospects for economic prosperity, is mediated through transport options. To understand the implications of this, a broad gendered analysis of women's employment must be applied, including: occupational segregation; the extreme demands of unpaid care and the social care system; a violence against women and girls perspective; and intersectional concerns that include the particular labour market issues faced by BME women, disabled women, older and younger women, LGBT women, women with insecure immigration status and women in rural areas.

Women's health and wellbeing is compromised by lesser access to income, power, safety and 'spare' time compared with men. Transport that better serves the needs of women as unpaid carers, as part-time workers, as time-poor activists and volunteers, as survivors of gender-based violence and sexual assault (and as those whose decisions are affected by the rape culture we live in), and of women with multiple identities, could help to address these inequalities.

Globally, women are also affected disproportionately by climate change,[11] and action to cut Scotland's emissions is therefore in-keeping with Scottish Government's commitments under SDG5[12] on gender equality. In Scotland, the revolution in renewable energy, and other technologies and innovations that will be needed to achieve net-zero emissions, provides a significant opportunity to address occupational segregation in STEM sectors in Scotland.

We therefore agree that advancing (or promoting) equality should be highlighted as one of two priorities that have 'greater focus' in NTS2, along with the evident need to take urgent action on climate change.

Intersectional approach

Of course, similar interactions will exist for other equalities groups. Access to employment and good health, and the impacts and opportunities triggered by climate change are experienced differently by all protected characteristics, and by those facing multiple disadvantages.

In order to be effective, the priority to address equality issues must be implemented using an intersectional approach, which recognises that BME, disabled, LGBT, older, younger, pregnant and rural women, women of different faiths, women with insecure immigration status, and unpaid carers all have different needs. These must be

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[11] UNFCC, Introduction to women and climate change: https://unfccc.int/gender
[12] United Nations Sustainable Development Goal 5: https://sustainabledevelopment.un.org/sdg5

addressed if barriers to accessible transport are to be tackled and the equality outcomes are to be achieved.

Question 3. Are the Challenges the Strategy highlights in Chapter 3 the key Challenges for transport, or are there others the Strategy should focus on?

Gender mainstreaming

We welcome the inclusion of a section on gender inequality as a challenge for the transport system in Scotland. This is in notable contrast to the first NTS, which merely states in a sentence under Partnership working that:

> "it is essential that […] full account has been taken of the six strands of equalities that the Scottish Government is committed to mainstreaming: race, disability, sex/gender, sexual orientation and faith or religious belief."

It is well worth reflecting on this, to ensure the ambitions of NTS2 in terms of equality are achievable. Gender mainstreaming is indeed essential in achieving better outcomes for women. This means embedding the proactive advancement of equality and non-discrimination at all levels of policymaking, from the principles set out in the overarching vision, **throughout** strategy and guidance documents, policy and project development, and service delivery. It is illogical to assume that one sentence stating that mainstreaming is essential in an 82 page strategy will have any impact.

The ambition to address equality issues is clearly much higher up the agenda in NTS2. However, given the complexity of gender mainstreaming, its reliance on gender competence[13] throughout government departments, the current lack of gender competence in Transport Scotland, and the broad lack of successful practice of gender mainstreaming across Scotland's public bodies, the undertaking at hand must be fully understood and addressed, or else this ambition will become an empty commitment.

As above, equality concerns should therefore not be confined to a statement of intent and dedicated paragraphs about equalities groups. Rather women's equality issues, those for disabled people, and so on, should be integrated throughout the document. There are 21 references to women in the draft NTS2, 18 of which are found within the paragraphs on gender inequality.

Elsewhere, it is encouraging to see a gendered breakdown of statistics within the section on disabled people, but subsequent consideration of disabled women's experiences and the barriers they face is needed to make it meaningful.

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[13] Gender competence is individual and organisational capacity to apply gender analysis to policy or programme development with the aim of advancing gender equality.

The final two references to women are made within the paragraphs on safety and security, which identify that women and disabled people are more likely to experience transport poverty, rely on public transport and feel unsafe in certain situations whilst accessing it. **This is an example of appropriate mainstreaming**; having been flagged within substantive discussion on security at the strategic level, it is more probable that safety issues for women and disabled people will be addressed in the policies that stem from this work.[14] Issues experienced by BME, LGBT, older people and people of different faiths, including Muslim women, however, are less likely to be picked up.

Similarly, the lack of gender mainstreaming throughout the rest of the strategy is a missed opportunity. Each challenge should be scrutinised through the lens of gender. For instance, a gender analysis is detrimentally absent in sections on:

- Poverty and child poverty: e.g. child poverty and women's poverty is inextricably interlinked; the cost of travel passes is prohibitive for many women, especially when travelling with children or others for whom they care

- Social isolation: e.g. women are the majority of older people in need of social care support in the home; unpaid carers[15] experience high levels of social isolation and face major challenges barriers to transport

- Ageing population: e.g. older women in Scotland are the majority of those in pension poverty; lack of adequate toilet facilities on trains and in stations is a barrier to older women's travel

- Scotland's regional differences: e.g. women's paid work is compromised by lesser access to cars and lacking public transport in rural areas; scheduling and connections do not allow straightforward access to health and care services, with enormous impacts on unpaid carers

- Technological advances: e.g. women are disadvantaged by many current technologies, which are designed from male perspectives for male use; innovation is an opportunity to mainstream gender and address occupational segregation in STEM

- Decline in bus use: e.g. women are the majority of bus users and the minority of those contributing to congestion; as reasons for decline are unclear, gendered

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[14] European Institute for Gender Equality (2013) Mainstreaming gender into the policies and programmes of the institutions of the European Union and EU member states: Good practices in gender mainstreaming
[15] Women carers are twice as likely rely on Carer's Allowance as men, twice as likely to give up paid work in order to care, and four times as likely to give up paid work due to multiple caring responsibilities.

analysis should be undertaken to establish what barriers and changes have occurred

- Labour market: e.g. women are more likely to travel to work outside rush hour; women are more likely to hold down more than one 'mini-job'; women juggle paid and unpaid work with implications for travel needs

- Spatial planning: e.g. employment opportunities are often distant from services and amenities that women need for unpaid caring and household management roles

- Health and active travel: women's mental health is affected by higher rates of poverty, including transport poverty; women are less likely to engage in active travel than men, but the Active Travel Taskforce report and Delivery plan do not recognise this.

Such perspectives should be integrated throughout the strategy.

The paragraphs on 'gender inequalities'

As above, we welcome that gender inequality is recognised as a challenge to be overcome within Scotland's transport system. Several critical points are made regarding women's travel patterns, care work, links with the gender pay gap, economic inequality and safety. In addition, we have three key points to make.

Firstly, the strategy states that:

> "Much evidence across the UK and Europe shows that women are constrained by a number of barriers that shape how they travel and their experiences of those journeys."

This is the case and these barriers must be identified and addressed. However, the issue is much broader than 'barriers' that shape travel. Women's transport needs are based on their experiences, choices and gendered lives, and current public transport options do not cater for these realities. It is the systems themselves, not just barriers to existing systems that are constraining. Framing issues simply as barriers runs the risk of a cosmetic rather than systemic focus.

Secondly, a gendered breakdown of the modes of transport women and men use is missing from the analysis. For instance:

- Women are far more reliant on buses than men, who are more likely to travel by train.[16] Available routes and affordability are key reasons for this. Crucially, 54%

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[16] Women's Budget Group (2018) Public transport and gender

of overall expenditure on UK public transport was spent on rail in 2016-17, compared with 8% on 'public transport' including buses.[17]

- Women are less likely to drive and own cars than men.[18] This is partly due to prohibitive costs. £832m was allocated to motorways and trunk roads in the 2018-19 Scottish Budget, compared with £809m on rail services and £269m on concessionary fares and bus services.

- Women are three times less likely to cycle than men (16% of men compared with 5% of women), in part due to concerns about safety and the need to travel with children and/or make multi-purpose journeys.[19]

Discussion of factors that shape women's travel requirements must be accompanied by analysis of how they currently use transport and why.

Lastly, references to intersectionality should be made at this point in the strategy. The issues which disabled women, older or younger women, BME women, women with insecure immigration status, LGBT women, women of different faiths and rural women experience when accessing transport are all distinct.

For instance:

- BME women and women of certain faiths face both racialised and sexualised abuse, which can affect decisions around travel.

- Many women with insecure immigration status are lone parents of small children with extremely limited access to resources. They often need to make journeys outwith their control (e.g. to Home Office appointments) and are particularly impacted by transport poverty.

- As the majority of unpaid carers, women in rural areas are impacted in particular ways by unintegrated services, including ferry timetables, which do not enable straightforward access to health and social care services.

Challenges for different groups of women must be taken into account if interventions to improve gender equality across transport systems in Scotland are to be successful.

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[17] Ibid.

[18] Transport Scotland (2019) Scottish Transport Statistics: 2018 edition

[19] Sustrans (2018) Are we nearly there yet? Exploring gender and active travel

Question 4. Are these the right policies to deliver Priorities and Outcomes of the National Transport Strategy?

We have significant concerns about the policies set out in this strategy,[20] both in terms of the level at which they are pitched and the lack of substantive direction regarding the equality objective. **There is a striking and highly disappointing lack of the type of concrete proposals that would be needed to deliver the priorities and outcomes that head the NTS2.**

The strategy states that these 'policies' are high-level intentions, supported by a suite of 'enablers'. However, this description does not fit with general understanding of those within policy fields, nor the Scottish Government's working definition:

> "A policy is a statement of what the government is trying to achieve and how it will do it. Policies describe the work the Scottish Government is doing to achieve its strategic objectives."[21]

Almost entirely absent across the fourteen policies is any sense of how Transport Scotland envisages its goals will be achieved. Indeed, many of both the 'policies' and even 'enablers' are reworded outcomes, with the added inclusion of broad verbs such as 'support', 'embrace' and 'improve'. Given the degree of challenge involved, others such as 'provide' and 'reduce' are also relatively meaningless without more detail.

This is illustrated by the two statements most explicitly aligned with inequality, the outcomes they are meant to help deliver and certain enablers that support them, which are reproduced side-by-side below.

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[20] Plan our transport system to cope with the effects of climate change; Continue to improve the reliability, safety and resilience of our transport system; Embed the implications for transport in spatial planning and land-use decision making; Integrate policies and infrastructure investment across the transport, energy and digital system; Provide a transport system which enables businesses to be competitive domestically, within the UK and internationally; Provide a high-quality transport system that integrates Scotland and recognises our different geographic needs; Improve the quality and availability of information to enable better transport choices; Embrace transport innovation that positively impacts on our society, environment and economy; Improve and enable the efficient movement of people and goods on our transport system; Provide a transport system that is equally accessible for all; Improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth; Support the transport industry in meeting current and future employment and skills needs; Provide a transport system which promotes and facilitates travel choices which help to improve people's health and wellbeing; Reduce the transport sector's emissions to support our national objectives on air quality and climate change

[21] Scottish Government website: https://www.gov.scot/about/what-the-government-does/ (accessed 18/10/19)

Outcomes	Policy	Enablers
Will provide fair access to services we need	Provide a transport system that is equally accessible for all*	Ensure transport in Scotland is accessible for all
		Identify and remove barriers to public transport connectivity and accessibility within Scotland
Will be easy to use for all		Reduce the negative impacts which transport has on the safety, health and wellbeing of people
	Improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth	Ensure sustainable labour market accessibility to employment locations
Will be affordable for all		Ensure sustainable access to education and training facilities
		Improve sustainable access to healthcare facilities for staff, patients and visitors

* all includes everyone across Scotland but particularly those with protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and people living in poverty

It is extremely difficult to see how the steps highlighted in yellow in the logic model above could be of any assistance to officials tasked with its delivery, or contribute to a theory of change for Scotland's transport system.

Without indicating what strategic approach will be employed to, for instance, reduce emissions, provide an accessible transport system, or improve access to healthcare, the STPR2, Delivery Plan and delivery bodies will not be equipped to deliver the transformational change needed to meet stated goals. **Inequality and the fossil fuel economy are bedrocks of our society. Radical steps must be articulated in this strategy if the transport system is to contribute to Scottish Government's commitments to tackle this.**

Intrinsically, addressing systemic inequalities is extremely difficult to do, requiring clear direction at every level of policymaking if positive outcomes are to be achieved. The EQIA of this strategy describes this "suite of policies and linked policy measures" as an "implementation framework". This is precisely what is needed, but "measures" such as those above fall woefully short of the mark.

Question 4b. Are some of these policies more important than others or are they equally important?

Not applicable, in light of comments above.

Question 5a. Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional (e.g. by Regional Transport Partnerships), or at a local level (e.g. by Local Authorities)?

Concrete direction and commensurate resources must be provided by Transport Scotland, if RTPs and local authorities are to achieve its strategic goals on equality and climate change. This is because of the scale and nature of the challenges associated with entrenched inequality and critical climate breakdown.

Implementation of the public sector equality duty by public bodies at all levels has been patchy and inadequate, and outcomes for gender equality have therefore been extremely limited. Given that this is in a context where organisations are legally required to deliver a suite of specific actions, this demonstrates the need for clear, national direction on equality issues.

5b. Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on?

Broadly, we fully support community involvement in decisions that affect them. Within this, however, there are a number of gendered considerations to take into account. Barriers to women's participation in community forums and decision-making include:

- Meeting times that are inaccessible for unpaid carers and older people (the majority of whom are women), and women with young children

- Locations that are inaccessible for disabled women (whose needs can differ from those of disabled men's), BME women and women from different faith groups

- Traditional meeting formats which can be intimidating in the context of gendered power dynamics, including bullying behaviour

- Lack of women-only spaces, which are particularly vital for victim-survivors of domestic abuse and sexual violence, and women from certain ethnic or faith communities

- Time-consuming processes, and lack of travel expenses or other remuneration; women are particularly poor in time and resources compared with men.

Equalities experts should be consulted, and full gender and wider equalities impact assessment applied to any plans for community input to transport planning in Scotland.

6. Does the National Transport Strategy address the needs of transport users across Scotland, including citizens and businesses located in different parts of the country?

No. In order to address the needs of transport users across Scotland, full equality analysis would need to be undertaken. The needs of women in rural areas, for instance, are different to men in the same communities. The needs of women in suburbs of Scotland's towns and cities are different to those of many male counterparts in those areas.

A draft outcome for greater equality is that transport provides 'fair access to the services we need.' However, this is not accompanied by discussion of, or even reference to, thorough needs assessment of different groups across Scotland and the concrete changes this would result in.

7a. What aspects of the transport system work well at the moment?

There is nothing systemic about the current transport system that specifically works well for women. In order for that to be the case, services and systems would have to be designed with women and women's equality in mind.

This is because the origins of existing systems, and default decision-making that has since followed in the same mould, favours men.

7b. What practical actions would you like to see the National Transport Strategy take to encourage and promote these?

Not applicable

Question 8a. What aspects of the transport system do not work well at the moment?

The following comments are based on Engender workshops and focus groups that contributed to our Gender Matters Roadmap,[22] and evidence to the United Nations CEDAW[23] committee's last examination of the UK on women's rights.

In these and other engagement events across Scotland, transport was universally raised as an issue in women's lives. The following key themes emerged:

- **Bus services are unreliable and incompatible with women's paid and unpaid work**. Women are the majority of bus users and part-time workers. Yet services are still premised on the male breadwinner model of full-time working, and do not reflect the needs of women caring for relatives or children. Connections between communities and health, leisure or education services remain poor in many areas. Women in Aberdeen and South of Scotland were particularly vocal about poor bus services, with respective regards to unreliability (including as a result of poor conditions for workers, necessitating strike action) and limited services, and plans to cancel services on Sundays and after 6pm.

- **Services are inaccessible and issues can be ongoing for years**. One participant from the East Neuk of Fife was unable to access evening classes or rely on bus travel for other reasons, due to a broken ramp on one of only two buses on her route. A similar concern was raised about wheelchair access to bus services in Orkney. Lack of waiting facilities is also a barrier cited by disabled women. In Edinburgh, lack of space to accommodate wheelchairs and buggies on buses was recently raised by councillors, following public complaints.

- **Lack of integrated services in rural areas.** This has a particular impact on women with caring responsibilities, in terms of both convenience and expense. Accessing health, social care, leisure and education services can be extremely time-consuming and expensive, especially when travel by ferry is involved. Women in Dumfries and Galloway were particularly concerned about the lack of integrated services in their area.

- **Women are concerned about safety in relation to train travel**, as demonstrated by the Keep the Guards campaign, which responded to proposals for driver-only trains. Disabled women at Engender workshops also report lack of assistance in stations as a key security issue, which undermines their access to train travel.

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[22] Gender Matters Roadmap: https://gendermatters.engender.org.uk/
[23] Convention on the Elimination of all forms of Discrimination Against Women

Question 8b. What practical actions would you like to see the National Transport Strategy take to improve these?

To improve access to transport for women, the NTS2 should stipulate robust gender mainstreaming throughout all transport planning and operations, and gender budget analysis of investment in road-use, public transport and active travel. Mainstreaming initiatives must include outreach to different groups of women stakeholders, involving consultation with disabled, BME, LGBT, older, younger, refugee and migrant women, women in rural and deprived areas, and unpaid carers,[24] as well as other available evidence about different women's needs.

Regulation and procurement for public transport franchises should subsequently work to increase routes and services between and within local areas, address safety issues, improve service standards and tackle rising costs.

Question 9. Chapter 6 of the Strategy sets out immediate actions the Scottish Government will take in three key areas: Increasing Accountability; Strengthening Evidence; and Managing Demand. Is there anything you would like to say about these actions?

There are gendered implications across all three of these areas.

Increased accountability

Increased accountability and improved governance will not benefit women unless specific measures regarding gender equality are put in place. Management of Scotland's transport sector is overwhelmingly dominated by men; in 2017, only one of Scotland's sixteen transport authorities, public companies and regional transport partnerships was led by a woman.[25] Alongside the fact that the sector more broadly is male-dominated, this will contribute to the disparity between the transport needs of women, and Scotland's transport priorities. **Women's perspectives are simply missing from decision-making around transport in Scotland.** With regards to the four actions identified for Scottish Government, therefore:

- The Transport Strategy Delivery Board should be gender-balanced.

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[24] Equalities experts should be consulted during development of outreach activities; see also our response to question 5b.
[25] Engender (2017) Sex and Power in Scotland 2017

- The Transport Citizens' Panels must also have an equal gender split and be organised with accessibility for different groups of women in mind. This includes times and locations that allow disabled women, women of different faiths, low-income women, unpaid carers and women with young children to attend. The ability to take part virtually, to contribute outwith standard meeting formats that may be intimidating, and to join women-only panels should be explored. Participants should be remunerated for their time.

- Development of new transport governance arrangements should also address these and other barriers to women's participation in decision-making.

- Work to continue business engagement should include gender analysis of current practice (women's entrepreneurship and participation in the private sector is shaped very differently to men's) and robust gender impact assessment of related policy development.

Strengthening evidence

It is vital that all new evidence-gathering initiatives are well gendered. Lack of diverse perspectives in this field, both qualitative and quantitative, is at the root of inequalities in transport and subsequent poor solutions to address them. Therefore, monitoring and evaluation must include indicators on gender, and new analytical approaches to interrogate data must include intersectional gender analysis.

We welcome the commitment to build on work to deliver equalities duties. This must start with the understanding that, to date, such attempts have been exceptionally poor. Transport Scotland must seek to build gender competence, mainstream gender and other equalities in its operations, and to transform the approach to meeting equalities duties across the sector.

Managing Demand

The process to embed the Sustainable Travel Hierarchy must include robust gender analysis. It is welcome that review of the Scottish Transport Appraisal Guidance and investment decision-making processes is expected to strengthen the capture of equalities impacts. However, without rigorous methodology (that includes all protected characteristics as well as income inequality), this will become a baseless assumption with no positive equality outcomes.

It is extremely disappointing that advancing equality is not listed as a consideration in the Sustainable Investment Hierarchy. This completely undermines all preceding

ambition regarding equality set out in this strategy. Promoting equality is meant to be one of two main priorities for NTS2. This becomes meaningless if it is not also a key priority in budgetary decision-making. **Priorities must be funded.**

Question 10. Is there anything else you would like to say about the National Transport Strategy?

Finally, we would like to comment on the EQIA that accompanies this strategy. Indeed, it is striking that whilst four questions are dedicated to the Strategic Environmental Assessment, views are not being sought on the EQIA. This is surprising in a context where, nominally, promoting equality has been prioritised so highly. Detailed comment on the EQIA is outwith the scope of this consultation response, however the following points should be taken into account in any future equalities impact assessment related to the process.

Purpose of an EQIA

Equality Impact Assessments should critically engage with gendered issues such as those set out in this consultation response, to ensure that the legislation, policy or programme in question proactively advances equality, as well as non-discrimination against those with protected characteristics.

The NTS2 EQIA does not achieve this. Indeed, it is difficult to ascertain what purpose it aims to serve. The main point made with regard to substantive equality analysis is that this will be undertaken when the Delivery Plan is developed, due to the high-level nature of the strategy.

This, of course, will be vital. However, it misses the point that this EQIA should inform content of the NTS2, and not respond to it. This is reflected in statements such as:

> "the EQIA necessarily focuses on […] highlighting linkages between proposed NTS2 components and equalities issues rather than on assessing specific impacts from the implementation of individual components of the document."

Assumptions

Introductory comments to the EQIA include:

> "Reflecting the high level and strategic purpose of the document, all components of the Draft NTS2 have been **designed to apply universally rather than to target specific demographic groups.** Improvements to the transport system and the resulting improvements in equality, climate sustainability, inclusive growth, and health and well-being **can be expected to impact all people in Scotland**" (our emphasis)

This kind of 'trickle down' assumption is regularly made in policymaking and is entirely false. Untargeted improvements cannot "be expected to impact all people in Scotland".

Meanwhile, the EQIA assessment checklist concludes that the strategy will have positive impacts on eliminating unlawful discrimination, advancing equality of opportunity, and promoting good relations between men and women, because:

> "It is noted that the NTS2 identifies the need to tackle gender inequalities as a key challenge. **This provides a positive framework which will allow interventions to be designed** around eliminating such unlawful discrimination harassment and victimisation."

> "The strategy **will establish a positive framework which will allow interventions to be designed** around advancing the equality of opportunity of women."

> "The strategy **will establish a positive framework which will allow interventions to be designed** around promoting such positive relations." (our emphasis)

Again, these conclusions are based on a set of illogical presumptions, with big gaps where assumed effective policies will emerge. It is this kind of inadequate approach to equalities that led to the need for legal duties under the Equality Act.

Undifferentiated analysis

Reference to "different demographic groups" (e.g. with regards to transport costs, and access to healthcare) or "groups who face existing structural disadvantages including disabled people, women and ethnic minorities" (e.g. with regards to employment, poverty, and crime) is meaningless without supporting analysis that draws out links with transport for each demographic individually.

Evidence on women and transport

The evidence on the protected characteristic of sex is exceptionally poor. Under 'evidence gathered', three random facts on women's inequality (one of which dates from 2014-15) are presented, with no reference to transport. The conclusion drawn, under 'data gaps identified and action taken', is "there is ample data to suggest" that gender inequality exists, but that linkages between such inequalities and transport is limited. Scottish Government's own statistics on gender and travel are not quoted, nor any information from the body of research, evidence and analysis of women's experiences of transport systems, from the UK and more widely. Intersectionality is not referenced.

In contrast, the section on gender inequality in Chapter 3 of the NTS2, refers to some of the issues explored in the literature on women and transport. Once more, this demonstrates that this EQIA did not inform development of the NTS2, but rather has been undertaken subsequently or in parallel as a tick-box exercise.

CONCLUSION

The NTS2 has placed the desire for increased equality at the heart of its ambitions, however positive equality outcomes will not be achieved unless it also sets out a much stronger steer with regards to policy. The expectation that the second Strategic Transports Project Review and subsequent Delivery Plan will be able to deliver 'policies' such as "provide a transport that is equally accessible for all", backed up by policy 'enablers' such as "ensure transport is accessible for all" is unrealistic.

The public sector equality duty itself has delivered very limited positive equality outcomes, in a context where a set of specific actions are required by law. To achieve the strategic objective of improving equality in Scotland's transport system, concrete proposals must be embedded in the NTS2.

Investment in equality issues is crucial, and it is extremely disappointing that this is not reflected in the Sustainable Investment Strategy set out in Chapter 6. This should be rectified.

Finally, in addition to clear policy direction and a commitment to properly resource its priorities, the NTS2 should stipulate robust gender mainstreaming and gender budget analysis throughout all transport planning, operations and investment.

FOR FURTHER INFORMATION
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ABOUT US
Engender is a membership organisation working on feminist agendas in Scotland and Europe, to increase women's power and influence and to make visible the impact of sexism on women, men and society. We provide support to individuals, organisations and institutions who seek to achieve gender equality and justice.