



Engender response to the consultation on the Scottish Government's Equally Safe Delivery Plan

1. INTRODUCTION

Engender welcomes the opportunity to comment on the *Equally Safe* draft delivery plan.

As a women's equality policy and advocacy organization, we have joined sister organisations in the violence against women sector in warmly welcoming the broad approach of *Equally Safe*. This bold document of ambition firmly locates the causal story for men's violence against women in women's inequality.

Reducing women's inequality in Scotland is a substantive and long-term project, and the time horizon of the current delivery plan means that it only covers the first phase of the work. This response is intended to recognize that constraint, and to be positive and constructive. It commits Engender to participating in the work of enabling the ambition of *Equally Safe* to be realized. Our shared goal is safety for women and girls in Scotland, and consequently their autonomy and the capacity to participate fully in their families, communities, workplaces, and in public life.

We have not commented on every aspect of the delivery plan, but on those areas where our particular concerns and areas of work mean we are likely to be raising concerns that are outside the scope of other organisations. We endorse the submissions to this consultation response of Scottish Women's Aid and Rape Crisis Scotland.

2. TOP-LEVEL ISSUES

We recognize the considerable challenge of creating a delivery plan that will commit Scotland to a programme of action to reduce women's inequality with men, and which will provide support services, an adequate criminal justice

response, and early interventions that cut across all groups of women and all forms of violence against women and girls.

There are some areas around which we see a particular need for further thinking and development of the delivery plan to ensure clarity of purpose across a wide range of actors and stakeholders in Scotland. These are:

1. **Increasing relevance and buy-in across the public sector.** The bulk of activity within the delivery plan has been designated as Scottish Government's, with some specific actions to be delivered by third sector organisations and specialist agencies. Although Scottish Government will necessarily play a leadership role across many domains of activity, this does not reflect the balance of action necessary to bring about women's equality. All of the public bodies in Scotland will require to act with purpose, and commit resources if the goals of *Equally Safe* are to be realized. This will include acting in their role as employers, and to change attitudes within their workforce, as well as in their function as service providers.
2. **Gendering activity.** *Equally Safe* is premised on the notion that violence against women and girls can be prevented if women and girls' equality is brought about. We entirely endorse this approach. However, some of the activity included in the delivery plan does not entirely reflect this analysis or our best evidence about what works. For example, the MVP programme is included in the delivery plan, but not the Rape Crisis Scotland work in schools around consent. Some activity is unduly tentative, including action on gender equality and employment.
3. **All women and all forms of violence against women and girls.** The delivery plan is patchy in its response to different forms of violence against women, and different groups of women.
4. **Resourcing.** There is a contrast between the justice workstream, which is resourced with a welcome £20m investment in services and programme development, and other workstreams. The primary prevention workstream activity predominantly consists of work in train already. Although it is useful to link conceptually gender equality activity and violence against women, it is disappointing that minimal additional activity has been included in the delivery plan.

3. CROSS CUTTING ACTIONS

A human rights framework

We welcome the commitment to delivering upon the content of the Istanbul Convention, and to urging UK Government to make progress towards ratification. This has long been a call of Engender's.

The Human Rights Act has enabled women who have experienced rape to challenge failures to adequately investigate this in England. We welcome continued Scottish Government divergence from the position being taken by UK Government on the value of the Human Rights Act, and note that the European Convention on Human Rights is foundational to Scottish Parliament and Scottish Government's action. Also welcome are the delivery plan's commitments to capacity building for women in peace-building and post-conflict states, and links with the Scottish National Action Plan on Human Rights.

However, although human rights and women's equality and rights are obviously and profoundly linked, there is currently limited support for gendered human rights work in Scotland. Engender raises funds to enable it to participate in some UN processes, and is an important link between these and the rest of the women's sector, but the institutional and process underpinnings seen in the children's sector are missing from the women's sector. We are also aware that the Human Rights Consortium Scotland, which is a coalition of third sector organisations in Scotland, does not receive Scottish Government support. Consequently, although enthusiasm for instruments such as the Istanbul Convention is high, capacity for most of the women's sector to engage with women's human rights is fragile and conditional. Human rights are in a marginal space in many women's organisations.

In order for human rights to be a driver of ending violence against women, we would like to see a commitment to developing processes and institutions that can more effectively enable the progressive realisation of women's rights. This may include processes that would require Scottish Government to act on the concluding observations of the next CEDAW examination, for example.

All women

Engender shares Scottish Government's commitment to working intersectionally around women's equality. We are concerned that the 'all

women' section does not include sufficient activity to ensure that an intersectional approach is mainstreamed across *Equally Safe*.

Accountability

We warmly welcome the creation of a gender equality index for Scotland, and propose that it be linked to gender-sensitive outcomes within the National Performance Framework.

4. PRIORITIES ONE THROUGH FOUR

In order to see substantive progress over time against the indicators set out in the forthcoming gender equality index for Scotland, the resources of the public sector in Scotland will require to be oriented towards women's and girls' equality. Capacity will need to be built within Scottish Government and agencies, within public bodies, and within third sector organisations to increase gender competence. Public bodies will need to increase their facility with applying a gender lens to policy and programme development, and develop substantially more competence in understanding gender, women's equality, and violence against women specifically. This is an urgent need if *Equally Safe* is to succeed.

Creating an enabling environment for this work also involves thinking about the equalities architecture more broadly. There is some consensus around the extent to which the public sector equality duty, intended to drive gender mainstreaming, has fallen short of its ambitions. A number of evaluations of the duty will be undertaken this year, and provide additional illustration and analysis of the extent to which mainstreaming has only found the most tentative purchase within the Scottish public sector. Engender will be working with Close the Gap and Scottish Women's Aid on our own analysis, and will also contribute to the Equality and Human Rights Commission's and Scottish Government's. From Engender's perspective now, despite political leadership on women's equality at the Scotland level, there is a widespread and systemic failure to grasp the challenge of mainstreaming across public authorities. Women's equality within the public sector has largely stalled as a result.

The inclusion of an action in the delivery plan to 'improve understanding of gender in policy making' is to be welcomed, but we see the twin challenges of capacity building and entrenching gender mainstreaming within all public bodies in Scotland as critical to the delivery of *Equally Safe*.

We are not commenting in detail on the text of each item within the delivery plan, but have pulled out several specific additional or strengthened areas of activity that we see as vital to the success of the delivery plan. These are:

1. Incorporation of gender budget analysis within the Scottish budget and local authority budget processes. Scotland has taken a leadership position within the UK with its equality budget statement, but is slipping behind other European nations¹ in not further developing this into an authentic gender budget analysis approach.
2. Establishment of a cross-directorate structure within Scottish Government to drive the work of *Equally Safe* forward, to ensure co-ordination and policy coherence across a wide range of policy domains;
3. Creation of an *Equally Safe* chartermark programme for public sector employers, building on the work of Close the Gap, Zero Tolerance, and Engender;
4. Commitment to a national 'equal pay' strategy, designed to close the gender gaps in women's and men's employment, as recommended by Engender, Close the Gap, and the recent inquiry by the Scottish Parliament's Economy, Jobs, and Fair Work Committee²; and
5. Requesting sufficient transfers of power to enable the Scottish Parliament to legislate around quotas to increase women's political representation.

For Further Information

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About Engender

Engender has a vision for a Scotland in which women and men have equal opportunities in life, equal access to resources and power, and are equally safe and secure from harm. Engender is a feminist organisation that has worked in Scotland for 20 years to advance equality between women and men.

¹ Sheila Quinn (2016) *Europe: A survey of gender budgeting efforts* IMF Working Paper

² Economy, Jobs, and Fair Work Committee (June 2016) *No small change: The economic potential of closing the gender pay gap* Scottish Parliament