



Engender and Close the Gap

Response to the consultation on European Structural and Investment Funds 2014 – 2020 Programmes

1.0 Introduction

This is a joint submission from **Engender** and **Close the Gap**.

Engender is a membership organisation that works in Scotland to facilitate women's economic, political, and cultural equality. It is Scotland's link to the European Women's Lobby, through membership of the national co-ordination, the UK Joint Committee on Women. It has expertise in working with public authorities on meeting the requirements of the public sector equality duty (PSED).

Close the Gap works across Scotland to address the causes of the gender pay gap, including occupational segregation. It is a partnership organisation, and partners include Scottish Government, Scottish Enterprise, Highlands and Islands Enterprise, Skills Development Scotland, Equality and Human Rights Commission, and the Scottish Trades Union Congress. It houses the Women in Renewable Energy Scotland network, and is a centre of expertise on women's experience of the labour market.

2.0 Questions

This section sets out our joint responses to the questions in the consultation paper.

Question 3: Do you think the new proposals will have a positive or negative impact on the protected characteristics and wider issues of inclusion and participation?

It is very likely that they will have a negative impact on women.

Equality impact assessment

Although an equality impact assessment is described as "being conducted" on page 26 of the consultation paper, there is no detail around this. Engender and Close the Gap are two of the three organisations in Scotland that have a national remit and work specifically on gender equality and economic development, the labour market, and skills. Neither Engender

nor Close the Gap has been consulted on the EQIA, and is not aware of any consultation that has taken place with other national equalities organisations.

In the absence of other information, we conclude that a robust EQIA has not taken place, and that the impact on women of the future funds has not yet been assessed. As women have a different, worse experience of the labour market and national training programmes, we think it is likely that unreflective programme design will disbenefit women when compared with men.

We are concerned that an EQIA process has not been done as part of the development of the programme. EQIA should not be a post hoc rationalisation exercise, but should contribute substantively and substantially to the development of the subject of the assessment.

It should also be noted that EQIA is a legal requirement, as one of the obligations that Scottish Government has under the public sector equality duty set out in the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012.

We would urge the Scottish Government to undertake a robust EQIA as a matter of urgency.

Gendered policy areas within the consultation paper

The consultation paper makes a glancing reference to women's different experience of the labour market on page five, in a list of additional issues from respondents to an earlier consultation, which includes: "A recognition of importance of parents/women's employment opportunities and reflection in increased awareness in importance of childcare provision including school aged children."

It is not clear what this relates to, but we assume that it is the well-evidenced position that childcare provision will facilitate labour market participation by women who have primary childcare responsibilities. This would, of course, include the 92 per cent of lone parents who are women¹.

Childcare is again referred to on page thirteen, in a list of interventions under the title "Labour market mobility". While some types of childcare provision may enhance allocative efficiency, and enable women to take up paid work further from home or in contexts in which part-time work is not possible, the relationship between these ideas in the consultation paper is not clearly set out.

We are therefore unable to say whether the proposed shape of possible interventions is helpful or unhelpful.

Gendered policy areas that are not treated as gendered within the consultation paper

¹<http://www.gro-scotland.gov.uk/press/2013/census-2011-release-2c.html> General Register Office for Scotland bulletin published 18 December 2013, retrieved 22 January 2014

The Scottish Government, in the *Equality Statement* attached to the Budget, describes women's labour market participation as a significant inequality in Scotland in 2013. Despite some political focus, including the very welcome Women's Employment Summit convened by the First Minister in September 2012, stark gendered inequalities in the labour market persist.

The recent inquiry into women and work undertaken by the Equal Opportunities Committee of the Scottish Parliament has rehearsed a familiar set of statistics. Boys and girls remain obstinately divided in their Higher subject choice. Ten years of focus by the gender policy community on segregation in the Modern Apprenticeship programme has yielded no shift in non-traditional framework participation rates. There have been no changes in a decade in the percentages of women and men working part-time.

Engender and Close the Gap were both among organisations who predicted that the post-recession labour market in Scotland would be inhospitable to women. We anticipated that the labour shed in the public sector would be part of structural shifts in public sector employment, and that jobs lost by women would not quickly return. Recent briefing by the Women in Scotland's Economy research centre² suggests that this is the case. The UK's Commission for Employment and Skills has suggested that men's employment will grow in Scotland over the next decade, while women's employment remains static³.

The Scottish Government has established a number of mechanisms to inform itself on the experiences of women in the labour market, including a Ministerial Advisory Group on women and work. Its expressions of political commitment to ameliorating women's inequality are noted. It is therefore disappointing to see a disconnect between an acknowledgment of the differential impact of spending decisions on women and men in the *Equality Statement*, and gender-blind spending proposals in the consultation document.

Indicators of women's inequality clearly describe progress as stagnant, and warn of widening inequalities as a result of "welfare reform" and other regressive measures introduced by the UK Government. Spending across the future funding programmes that are related to economic development and employment, including education and skills, must be gender-sensitive if they are to militate against women's and girls' inequality. Spending on SME development must ensure that female entrepreneurs' specific needs are met, for example. Spending on key economic sectors like renewable energy must tackle gendered occupational segregation in the sector. The intransigence of inequality calls for an increase in the quality of gender mainstreaming, itself a frustrated ambition of the horizontal themes, and meaningful steps to ensure that future funds prevent and tackle labour market inequalities, and do not entrench them. The gender-blind spending programmes set out in

² Campbell, J., Ross, S., and A. McKay (October 2013) *Scotland and the Great Recession: An Analysis of the Gender Impact* Glasgow Caledonian University: Glasgow

³ Owen, D. (August 2012) *Employment & Skills: Working Futures Report for Scotland* UKCES: London

the consultation document around enterprise, economic development, education and skills, will not achieve this aim.

Question 4: If you think there will be a negative impact on the protected characteristics or inclusion and participation please provide suggestions as to what could be done differently to diminish this impact.

Equality impact assessment

We are concerned that an EQIA process has not been done as part of the development of the programme. EQIA should not be a post hoc rationalisation exercise, but should contribute substantively and substantially to the development of the subject of the assessment.

It should also be noted that EQIA is a legal requirement, as one of the obligations that Scottish Government has under the public sector equality duty set out in the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012.

We would urge the Scottish Government to undertake a robust EQIA as a matter of urgency.

Horizontal themes

On page seven on the consultation paper, in a list of issues that require to be addressed, is a reference to horizontal themes.

Horizontal themes were not as seriously treated in 2007-13 as mainstreaming them should have ensured. Horizontal themes should continue to have a dual approach (mainstreamed and specific projects) and should be considered both as part of planning the programmes and of assessing any applications.

There is no evidence that horizontal themes were mainstreamed within the 2007-13 programmes, by our understanding of the term. We agree that gender equality, and equality more broadly, should be facilitated by taking a horizontal (mainstreaming) approach, as well as by funding vertical projects.

The commitment to this approach on page 26 of the consultation paper is to be welcomed, but the paper does not provide any detail with regard to how this is to be achieved. There was a widespread, if tacit, understanding that the projects funded under the 2007-13 programmes would not stand or fall on the quality of the horizontal themes elements of their application. A step change is required from existing superficial assessment and compliance practices, if the possibility of a horizontal themes approach is to be realised. Equalities mainstreaming within the programmes will deliver better outcomes, both for protected groups, but also with regard to the core aims of the projects seeking funding.

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**Emma Ritch
Executive Director
Engender**

**Anna Ritchie Allan
Project Manager
Close the Gap**