

## Consultation Response: Welsh Government’s Strategic Equality Objectives 2020-2024

Please return this form to reach the Welsh Government no later than **19 November 2019**.

The email address for responses or queries is:  
[StrategicEqualityPlanObjectives2020@gov.wales](mailto:StrategicEqualityPlanObjectives2020@gov.wales)

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### About WEN Wales:

WEN Wales is a representative women’s network<sup>1</sup> and human rights organisation. Our Vision is a transformed Wales, free from gender discrimination. We call for a Wales where all women and men have equal authority & opportunity to shape society and their own lives.

*WEN Wales attended the Welsh Government consultation meeting in Cardiff on 12<sup>th</sup> November 2019 and has been to several other consultation events over the past few months. This consultation has been written following discussions with other equalities and women’s rights organisations that are part of the TSPC Gender Network.*

### Question 1: Do you agree with the proposed draft Equality Objectives in Chapter 5?

WEN Wales largely agrees with the draft Equalities Objectives laid out in Chapter 5 and we are glad to see the direction of travel from the previous SEP to those mapped in this consultation, which are more focused than the previous aims and objectives. We are particularly pleased to see alignment of the Gender Equality Review with Long-term Aim 4. However, we do have suggestions and comments regarding the Aims and Objectives laid out in this consultation.

Regarding each Equality Objectives, we offer the following considerations:

- 1. Aim 1:** We believe the wording of this objective is unclear. Instead, we suggest

<sup>1</sup> Over 1300 individual members and organisational members, including women’s rights and allied organisations from across the third sector, academia, international and national NGOs.

this be adjusted to the ‘Elimination of inequality in order to reduce poverty.’ We would hope that an aspirational aim would be to reduce and eliminate poverty altogether. We suggest an objective such as “We will half poverty rates by 2024”. We do not believe that the current aspiration to ‘improve outcomes’ is appropriately focused or unambiguous enough to be a measurable objective that can make a difference in people’s lives. There is an opportunity to break the cycle of deprivation.

Through this objective, WEN Wales calls on Welsh Government to meaningfully mitigate the impact of welfare reform and austerity, as well as the economic impact of Brexit, which we know has had a disproportionately devastating effect on women and their children’s lives. We support the concerns of other members of the Cross Party Group on Poverty around the lack of Minister on Poverty and call for a specific strategy that addresses the ways in which Welsh Government can act to reduce and eliminate poverty in Wales.

2. **Aim 2:** We believe that WG Equality Objective 2 should not just focus on the completion of the investigations in this area by 2024 but should also include the strengthening of the current provision in the meantime, with interim objectives with specific outcomes marked across the next four years.

Conversations with Welsh Government officials suggested that the commencement of socio-economic duties will be part of this interim work. This needs to be clarified. We are also aware that this Aim involves the work to look at aligning the Welsh legislation to current policy and the potential incorporation of UN conventions such as the UN Convention on the Rights of Persons with Disabilities (CRPD) and UN Convention on the Elimination of all forms of Discrimination against Women (CEDAW). We think this should be explicitly stated.

In light of Brexit and the potential weakening of Human Rights legislation across the UK, WEN Wales welcomes Welsh Government’s consideration of a Human Rights Bill for Wales to safeguard the human rights of the people of Wales, as the protections offered by the European Union are lost.

**Aim 3:** Regarding Long-term Aim 3 we ask Welsh Government to consider how the use of gender pay gap data and the collection and use of other pay gaps such as the Black, Asian and Minority Ethnic (BAME) pay gap and the disability pay gap might inform the actions of this objective and enhance the possible success of achieving this goal. The Gender Equality Review’s proposed gender/equality mainstreaming approach would fit in with this aim.

In addition, while the aim here suggests the inclusion of ‘experts by experience’ this does not appear to be reflected in the current objective.

We appreciate that the Welsh Government is yet to respond officially to the Gender Equality Review but hope that the official response to the review and Welsh Government's commitments inform the work of developing the SEP going forward.

The use of the term "all public services" does not reflect the devolved/non-devolved nature of the different public services. For example, the criminal justice system or policing are non-devolved and can be seen as acting at odds to devolved public services with regards to equalities protections. This wording should be amended to better reflect the powers and limitations the Welsh Government has in this regard.

While Aim 8 commits to Welsh Government becoming an 'exemplar' employer with regards to equalities, we hope that the Welsh Government would also encourage the devolved public sector to do likewise and use its influence on the non-devolved public sector also.

- 3. Aim 4:** We are pleased to see that this has been aligned to the Gender Equality Review. However, the objective states "we will begin to deliver the visions and principles of the Gender Equality Review." While we appreciate the Welsh Government's response to the Gender Equality Review is yet to be published, this objective is weak and extremely vague. We strongly recommend that the objective is significantly strengthened based on the commitments that Welsh Government outlines in the response to the Gender Equality Review. This objective should outline where Welsh Government intends to be by 2024 in terms of achieving gender equality with some clear objectives, for example, gender pay gap halved; 50:50 gender equality balance on public boards by 2024.

While WEN Wales supports the adoption of feminist principles, some women of colour have voiced that they feel isolated by the term 'feminism', which has been seen as a movement that has historically isolated non-white women. Welsh Government must ensure that gender equality is achieved for all women.

In partnership with Oxfam Cymru, WEN Wales has produced a Feminist Scorecard for Welsh Government regarding becoming a feminist government and the key actions that we believe as still outstanding, released in April 2019.<sup>2</sup> An update to this document will be published in early 2020. We believe that this report should be considered alongside the Gender Equality Review documents and with Our Manifesto for Gender Equality and Women's Rights, published in 2018.<sup>3</sup>

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<sup>2</sup> <http://www.wenwales.org.uk/wp-content/uploads/Feminist-Scorecard-Report-2019-English-Final.pdf>

<sup>3</sup> [http://www.wenwales.org.uk/wp-content/uploads/LR\\_11509-WEN-Manifesto-20pp-A4-English.pdf](http://www.wenwales.org.uk/wp-content/uploads/LR_11509-WEN-Manifesto-20pp-A4-English.pdf)

4. **Aim 5:** We believe that Long-term Aim 5 does not match WG Equality Objective 5. The aim calls for the elimination of identity-based abuse, harassment, hate crime and bullying. However, the Objective 5 states that “we will ensure victims who experience abuse, harassment, hate crime or bullying as a result of having one or more protected characteristics have access to advice and support to live without fear and abuse.” While we support this as an objective it does nothing to eliminate these behaviours as there is no preventative element and aims instead to provide support once these abuses have occurred. The objective must therefore be stronger and set out how hate crime will be eliminated.
5. **Aim 6:** We hope that objective 6 can go further than the development of a framework by 2024 and will also include measurable actions within the next four years. This amendment is similar to that of objective 2.
6. **Aim 7:** WEN Wales would like to see an action around achieving 50:50 gender equality for Assembly Members and in local government, with much more diversity than the current make-up of the political institutions in Wales. This should be one of the objectives. For example, Electoral Reform Society Cymru research<sup>4</sup> showed that no current Assembly Members identify as disabled and there has never been a BME woman Assembly Member in Wales.

We also feel that while this is a relatively easily measurable objective, it should be seen in a wider context and actions need to be broader than just getting women into prominent public positions. A figure that sets a target for women to take public and political positions but does not account for the reasons that women are either not putting themselves forward or not continuing long political or public careers, due to violence against women that they are subjected to, including abhorrent levels of grotesque online abuse does little to address the issue or advance equalities now and into the future. The current general election has seen many experienced women Members of Parliament and former Ministers stepping down because they have not been adequately protected from the misogynistic abuse that they receive, often on a daily basis.<sup>5</sup>

WEN Wales runs a mentoring scheme to encourage women to advance in their political and public careers and over the course of the last two years, it has been clear that we have a responsibility to warn women that the current climate for women putting their heads above the parapet is not just an act of bravery but also an act of stepping into an unsafe environment. Anecdotally, women have been told by police officers that forces are unable to deal with the sheer volume of online abuse and hate-crime experienced on the internet and in person. An extreme case of the dangers that women face is the murder of the Member of

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<sup>4</sup> <https://www.electoral-reform.org.uk/wp-content/uploads/2018/07/New-Voices.pdf>

<sup>5</sup> <https://www.theguardian.com/politics/2019/oct/31/diane-abbott-speaks-out-on-online-abuse-as-female-mps-step-down>

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Parliament for Batley and Spen Jo Cox, in 2016. Little has changed since then to ensure that public and political life is a safer space for women to inhabit. This inability to increase safety for women and girls in this sphere essentially disempowers half of the population and endangers those women who choose to step into public appointment and political life, despite the safety risks. It should be noted that Black, Asian and minority ethnic women in the public eye are subjected to both misogyny and racism. It is no coincidence that in the general election 2017, Diane Abbott MP reportedly received almost half of all online abuse targeted at women MPs during the election period.<sup>6</sup>

7. **Aim 8:** Regarding objective 8, there is some strong work in the Gender Equality Review that we believe will support this aim and objective. The current objective is not SMART and needs to explicitly state by how much it will increase diversity.

**Question 2: Do you think there are any areas of inequality that are not addressed by draft Equality Objectives and that are of particular importance to you?**

There are six areas WEN Wales and our coalition are working on. We feel all should be covered by the SEP as they are key areas of working to ensure we increase gender equality and women's rights in Wales. These areas are:

1. **Diverse and gender equal representation and leadership in political and public life:** where it is both desirable and safe for women to participate in such roles and where receiving daily death threats and abuse is not normalised, but rather reduced and eliminated (see above for more on Aim & Objective 7)
2. **All forms of violence against women must stop:** realising the potential of the VAWDASV Act
3. **Fair finances:** ensuring that women are not financially disadvantaged, whether through taxation, gender pay gap, government policies and are able to live independent lives
4. **Caring responsibilities are valued:** financially valued as well as respected ('valued') for its importance to the foundation and function of our society – and caring responsibilities shared equally between women and men
5. **Global women's rights are protected and enhanced:** in Wales and sit alongside Wales' global responsibilities

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<sup>6</sup> <https://www.theguardian.com/politics/2017/sep/05/diane-abbott-more-abused-than-any-other-mps-during-election>

- 6. Tackling gender health inequalities:** women’s health is not compromised through lack of data, research or gender-responsive healthcare and that women’s reproductive rights are taken seriously and invested in

**Question 3: Are there any emerging trends / issues / evidence regarding inequality in Wales that you feel should be addressed as a priority?**

Areas that need considerably more attention and investment, in order to achieve gender equality are:

- **Violence against women and girls, including online abuse are eliminated**
- **Sustainability of the violence against women sector**
- **Welsh Government’s childcare offer must be extended to all new mothers in Wales, not just those who are already working and shared-parental leave should be encouraged**
- **Welsh Government must meaningfully mitigate the terrible impact of austerity and welfare reform, which has devastated women’s lives throughout Wales**
- **Brexit-related uncertainty and potential threat to and roll back of women’s rights**
- **Societal hostility towards people with protected characteristics, such as emerging trends of islamophobia, transphobia, homophobia, racism etc. which have increased exponentially in recent years**
- **The Access to Elected Office funding should not only be available to persons with disabilities but also include other groups who need help to gain access to elected office**

**Question 4: What are your thoughts regarding the approach of developing Equality Objectives that contribute to longer term, aspirational aims?**

The longer term, aspirational focus of the objectives is helpful. The proposed aims and objectives will take time to fully achieve, so WEN Wales is glad that this has been recognised and goes beyond 2024. We are however wary that aspirational goals may not have short term achievable outcomes within the 2020-2024 time frame. Long term change for the future also requires shorter term investment now. Aspirational objectives set now should be assessed every year and reported against in the future to allow for changes as and when they are needed.

**Question 5: Do you agree with the intended approach to develop a small number of key actions under each Objective, linked to the 6 domains in Is Wales Fairer? 2018, as**



## **exemplars to demonstrate how the objectives will be achieved?**

The alignment of the key actions of each objective to the 6 domains of “Is Wales Fairer?” seems to limit the potential scope of the SEP. As the number of key actions is likely to be small, it is very important that each key action is appropriate and aligns correctly with both aim and objective.

In discussion with other equalities organisations that make up the TSPC gender network, it was felt that it was unnecessarily narrowing and restrictive to focus on only exemplar activities in the six domains of ‘Is Wales Fairer’. The proposal to not include all Welsh Government’s activities relevant to each objective, or to collate this information into one central place makes both following progress and scrutinising developments in advancements in equalities in Wales very difficult. It restricts the ability of external, third sector organisations from seeing the progressive work that the Welsh Government is and will carry out, as well as muddying the waters with regards to our ability to lobby for improvements in areas where more could be done.

### **Question 6: Do you agree with the intention to continue to align Equality and Inclusion funding with the Strategic Equality Objectives?**

As the organisation currently funded by the Equality and Inclusion Grant under the Gender stream, WEN Wales believes that aligning this funding with the Strategic Equality Objectives is beneficial and we are glad to see that the gender-related aim – aim 4 – already aligns directly with the Gender Equality Review, which WEN Wales has been involved with over the last few years.

While the Strategic Equalities Objectives focus on aspirational, long-term goals, it should be acknowledged that the Equality and Inclusion Grant period is relatively brief and therefore goals and objectives for the grant should be short-to-medium term goals that align with the overall Strategic Equalities Objectives.

Equalities objectives intersect and there is a clear link between many of the areas in the eight Aims and Objectives. WEN Wales’ work sits in many of the aims and would ward against the alignment of the Strategic Equality Objectives artificially siloing WEN Wales’ work into Aim 4 without appreciating the gendered nature of the other aims and objectives.

As the Equality and Inclusion Funding Programme projects will continue until 31<sup>st</sup> March 2021, we are aware that the next round of funding will be awarded under the current Welsh Government – to commence on 1<sup>st</sup> April 2021, with the majority of delivery contracted after the 2021 Assembly elections, and under the next Welsh Government. This creates potential uncertainty if the next Welsh Government has diverging views on how equality and inclusion funding should be awarded and delivered on during the next Assembly term.

**Question 9: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

One of the difficulties in responding to this document is that it does not contain the detail of the actions that Welsh Government will take. While we can agree in principle that it is a good idea to have a small number of actions that will make a measurable difference in people's lives in Wales over the next four years, we do not yet know that action to comment further. It is not currently clear whether there will be any opportunity to comment on or scrutinise the actions prior to the publishing of the final document in April 2020. WEN Wales believes that the document would suffer in quality if this step was missed out and would likely limit the positive impact that the SEP could have over the next few years.

While we support using a SMART method to deliver measurable actions, it is unclear what the approach or methodology for this would be. Without further detail, it's not possible to comment on or improve this process.

We believe that protected characteristics need to be explicitly named within the document. We also note that the Equality Act 2010 will be ten years old by the time this SEP is adopted. It would therefore be worth considering how developments in equality advancements in the decade since the Act can also be incorporated into this document.

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WEN Wales thanks Welsh Government for the opportunity to input into this consultation. If you would like any further feedback, please do get in touch via [hilary@wenwales.org.uk](mailto:hilary@wenwales.org.uk)