

## CONSULTATION RESPONSE FORM

**Question 1** - The table in part 5 provides an overview of the proposals under each of the EU 2020 headings – Smart, Sustainable and Inclusive – matched against the relevant thematic objective and investment priorities. Do you think the investment priorities are the most appropriate ones for the activity suggested?

Analysis from an equalities perspective of key employment, skills, training and inclusion issues has not been central to the development of proposals to date. This is despite the abundant research evidence and commentary on inequality across the core policy areas supported by funding from the European Union, and the legislative requirement to subject policy and spending proposals to equality impact assessment during the development process.

Among this research evidence are consistent findings on the enduring failure of the Modern Apprenticeship programme in Scotland to ensure access and progression for women overall, for women and men in non-traditional and non-stereotype occupational areas, and for disabled people and ethnic minorities. The Scottish Women's Budget Group (SWBG) has consistently highlighted concerns about apprenticeships in successive responses to the Scottish Government and to the Scottish Parliament, including their 2013 Inquiry into Women and Work<sup>1</sup>. Equality and Human Rights Commission research in 2013 revealed the extensive and poor record of the MA programme in recruiting and retaining disabled and ethnic minority participants, in addition to the gender bias of the programme routes and outcomes.

These key strands appear to be absent as priorities in the proposals for the ESI programmes 2014-2020, and therefore are a significant omission and cause for concern.

**Question 2** – Section 6 sets out the linkages between Structural, Rural and Fisheries Funds as well as linkages to other EU Funding Programmes. We would welcome stakeholder comments on these linkages in order to help us develop this thinking further

What is the linkage between the Funds and Horizon 2020 and Erasmus+?

How will development of programmes, projects and practice within the ESI Fund framework in Scotland draw upon and demonstrate commitment to equality policy drivers from the European Commission and other EU Institutions?

**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?

The absence of an Equality Impact Assessment (EQIA) on these proposals is a significant omission and clearly undermines the ability for external stakeholders to answer this question.

The document acknowledges the legislative requirement on the Scottish Government under

<sup>1</sup> [http://www.scottish.parliament.uk/S4\\_EqualOpportunitiesCommittee/Reports/eoR-13-04w.pdf](http://www.scottish.parliament.uk/S4_EqualOpportunitiesCommittee/Reports/eoR-13-04w.pdf)

the Public Sector Equality Duty to subject proposals to an EQIA but then does not offer evidence of how that EQIA is being conducted and how analysis has been used to inform the proposals. As it stands, the consultation document contains no details on proposals to address disadvantage, discrimination, and differential experience for different groups of people in accessing training, work, childcare, and other support to access employment or self-employment. On this basis it is difficult to provide a substantive answer to the consultation question as there is no programme content to discuss.

Section 5 states that proposals to address poverty and social inclusion are “under development”. Furthermore, the consultation states issues raised from stakeholders and to be addressed in the content of the programmes include questions on

How the ESI funds will be invested to reduce inequalities such as health, income, employment, social and educational

A recognition of importance of parents/women’s employment opportunities and reflection in increased awareness in importance of childcare provision including school aged children;

However, specific proposals to address these concerns are either absent or “under development” in the consultation document. Is this as a result of their complexity (real and perceived) or because these concerns are regarded as of secondary importance, rather than central to the shape, content and resourcing of the ESI Funds? How will the Scottish Government consult further on proposals addressing “community, family, and household interventions” that are currently absent. It is imperative that the development process integrate effective and robust analysis by equality characteristic, and especially that at the household level there is effective gender analysis of household characteristics, income levels, etc. Analysis by the Scottish Government has demonstrated the highly negative impact on women of changes in the welfare and taxation systems by the UK Government.<sup>2</sup>

Given the absence of any evidence that could reflect an understanding of the dynamics of inequality or a commitment to advance equality, it is possible that the proposals will have little impact on redressing inequality or advancing equality and be a lost opportunity. It is clear that an EQIA has not been undertaken and has not informed the development of proposals to date. This suggests that the EQIA process is regarded by as a post-hoc analysis of programme decisions, rather than an integral part of the policy development, appraisal and resource allocation process. The evidence from this consultation, reinforces the findings of recent research for the Scottish Government that reveal the extent to which equalities analysis and the process and practice of mainstreaming equality has been lost in the management of the Structural Funds by the Scottish Government.

The top line proposals presented in the consultation document demonstrate little understanding or cognisance of different experiences of un/employment, financial and social exclusion, access to training and skills development and the differential usage of infrastructure by different groups. For example, proposals 6 + 7 on transport do not reflect the ways in which different people, such as older people, carers, parents and carers of young children etc., use public transport and how their needs might be met.

**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.

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<sup>2</sup> <http://www.scotland.gov.uk/Resource/0043/00432337.pdf>

- Full equality impact analysis, integrated into the development process.
- Utilisation of the breadth and depth of research available from a range of external and internal sources including the analytical resources of the Scottish Government's own Analytical Services Division and the Equality Evidence Website.

**Question 5** - Please provide your views for improving the process for design, procurement, delivery, monitoring and evaluation to strengthen delivery of sustainable development.

- Ensure the involvement of community stakeholders and equality organisations in the management and governance of Strategic Development Partnerships.
- Ensure that structures and procedures for the SDPs include requirements for all partners and parties to demonstrate operational practice and analysis across equalities characteristics. This should be additional to compliance with the equalities legislation and the Public Sector Equality Duties which should be regarded as the minimum standard. Without effective engagement in the PSEDs and the transformative potential of robust EQIAs informing programmes, there is a strong risk that their effectiveness will be undermined.

**Question 6** – Do you have any further comments on the proposals outlined in this document?

It is unclear and unexplained why an Equality Impact Assessment would be conducted separately from the process of formulating the proposals set out on the consultation document.

There appears to be little overlap between the Scottish Government's commitment to advance equality as stated in successive Draft Budgets and Equality Budget Statements, in addition to statements from Ministers, and the proposals set out in the consultation. There is further lack of alignment between the equality indicators and outcomes set out in the National Performance Framework, supporting the progress of the Government Economic Strategy. SWBG are on record to the Scottish Government and Scottish Parliament<sup>3</sup> on the need for an integrated approach to policy development and resource allocation across all policy areas, particularly economic and labour market development.

Further information on the research and submissions referenced is available from the Scottish Women's Budget Group, Equality and Human Rights Commission, Women in Scotland's Economy Research Centre, Close the Gap, and Engender.

In previous ESI Programmes Scotland was regarded as pioneering in its approach to the

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<sup>3</sup> [http://www.scottish.parliament.uk/S4\\_FinanceCommittee/Scottish\\_Womens\\_Budget\\_Group\\_web.pdf](http://www.scottish.parliament.uk/S4_FinanceCommittee/Scottish_Womens_Budget_Group_web.pdf)

advancement of equality and to integrating a process of equality mainstreaming in programme and project design, management and delivery. Recent research<sup>4</sup> published by the Scottish Government has revealed there is little evidence of this practice remaining; a finding reinforced by the absence of equality analysis or proposals for integrating equality in the development and management of the new programmes.

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<sup>4</sup> Campbell et al. (2013) *The Legacy of Gender Mainstreaming within the Scottish Structural Funds Programme 2007-2013 Final Report*, Women in Scotland's Economy Research Centre, <http://www.scotland.gov.uk/Resource/0043/00434671.pdf>