

Equality Commission: Response to draft Delivery plan for Indicator 17 (economic inactivity rate excluding students), Indicator 32 (employment rate of 16-64 year olds by deprivation quintile) and Indicator 33 (% of people working part time who would like to work more hours).

- 1.1 In January 2016, the Equality Commission ('the Commission') highlighted¹ priority issues and recommendations to be advanced through the Programme for Government (PfG) and Budget. In our July 2016 response to the Programme for Government Framework consultation², the Commission reiterated that the PfG should include actions to:
- support women's economic participation, including through access to appropriate, accessible and affordable childcare;
 - address the exploitation of migrant workers and the concentration of some minority ethnic workers in low paid employment;
 - support people with disabilities to access and remain in the workplace
 - ensure training and programmes to enable people to access and, progress in, work are accessible and inclusive for all.
- 1.2 We note that the PfG is to be supported by an updated Investment Strategy; a revised Economic Strategy, as well as a new Social Strategy. We note that the Executive is proposing to consult and engage on these draft Strategies. We wish to see our specific PfG recommendations advanced through the Programme for Government and these Strategies. The work of government generally should ensure the mainstreaming of equality of opportunity and good relations in the key outcomes to be achieved over the 2016-21 mandate.
- 1.3 The following considers the delivery plan content (version downloaded on 19 December 2016) against the key inequalities and policy priorities highlighted by the Commission in January 2016.
- 1.4 We hope that this information, in tandem with our response to the consultation on the draft PfG³, will be of assistance in the further development of the delivery plan.

¹ [ECNI \(2016\), Equality Commission recommendations for the 2016-19 Programme for Government \(PfG\) and Budget \(first published January 2016, refined May 2016\)](#) .

² [ECNI \(July 2016\) PfG Framework - Full Response](#)

³ [ECNI \(2016\), Response to the Executive's consultation on a draft Programme for Government 2016-21](#)

We recommend the further development of actions to support women's economic participation, including through childcare.

- 1.5 We note that the draft delivery plan for Indicators 16, 18 and 34 identifies that specific groups, such as women, have significantly lower employment rates than others⁴. We accordingly welcome the commitment to target the gender (and age) profile of specific groups with lower employment rates under the '*Enabling Success*' Strategy⁵. We also welcome the commitment in the draft delivery plan for Indicators 16, 18 and 34 to support female entrepreneurship through introducing a new women's programme.
- 1.6 We particularly welcome the focus in the draft delivery plan for Indicators 17, 32 and 33 on reducing economic inactivity for people with caring responsibilities, and the focus on reducing underemployment which the draft delivery plan states is most likely to impact on women (as well as younger workers). We consider that such actions have the potential to advance equality of opportunity, aligned to key recommendations as set out in our published *Gender Equality Policy Priorities and Recommendations*⁶. In line with these recommendations, we recommend specific actions aimed at reducing the economic inactivity of women; particularly in light of the fact that there are significantly more women in Northern Ireland economically inactive than unemployed⁷.
- 1.7 We note that there are a range of measures aimed at targeting those who are economically inactive. We are concerned that there is no clear indication that some of these will specifically adopt a gender sensitive approach to identifying key actions. Further, we are concerned that there is also no specific mention of actions aimed at addressing the concentration of women in low paid, part-time employment⁸ or mitigating the impact on gender equality of rebalancing the economy; nor to promoting flexible working or to encouraging men and women to share family roles / responsibilities⁹. We recommend that these points are addressed via a revised delivery plan and the final PfG.
- 1.8 We also note there is no reference in the draft PfG or the draft delivery plans, to taking action to eliminating occupational and industrial segregation experienced by men and women within the labour market. Whilst we welcome a range of initiatives by the former Department for Employment and Learning, in conjunction with the Commission, on improving the gender balance in Science Technology,

⁴Younger and older workers, as well as those living in certain geographical areas, are also identified as having significantly lower employment rates than others. See draft delivery plan for Indicators 16, 18 and 34. Also the draft PfG identifies care leavers as requiring particular support in training and employment (and education).

⁵ DEL & DETI (2015) '[Enabling Success'- Supporting the transition from economic inactivity to employment](#)

⁶ See ECNI (Nov 2016) [Gender Equality Policy Priorities and Recommendations](#)

⁷ There are an estimated 16,000 women unemployed in NI compared to 178,000 women aged 16-64 economically inactive. See NIRSA (2016), [Women in Northern Ireland 2016](#)

⁸ Whilst there is a reference to the fact that part –time underemployment is likely to impact on women compared to men, there is no specific reference to addressing their concentration of women in part –time work that is low paid.

⁹ See ECNI [Gender Equality Policy Priorities and Recommendations](#) for further details on our recommendations aimed at promoting gender equality in employment. These include eliminating occupational and industrial segregation – for example, increasing the representation of women in Science Technology, Engineering and Maths (STEM) related professions.

Engineering and Maths (STEM), including the development of a STEM Charter¹⁰, we note that there are no specific references to progressing this work in the draft delivery plan or the PfG. We recommend that this is addressed.

- 1.9 As regards childcare, we welcome that access to affordable childcare is highlighted as a barrier to increased employability for lone parents and families on low incomes (with a particular impact on women). We note, however, that the draft delivery plan considers lack of access to childcare a '*personal circumstance*' and there is no reference to it as a structural barrier to employment. We consider that the enhanced and improved childcare provision can provide not only for the child, but also for those with childcare responsibilities – with particular potential to support and maximise economic participation¹¹.
- 1.10 Whilst there is a reference to giving further consideration to proposals to expand childcare¹², as well as a commitment to provide better access to childcare provision for disabled children through the Childcare Strategy¹³, we are concerned that there is a lack of specific actions to deliver a comprehensive strategy and actions for appropriate, accessible and affordable childcare as recommended by the Commission – including to maximise the economic participation of parents and carers.
- 1.11 We recommend that the above actions are addressed in the delivery plan and final PfG.

We recommend actions to address the exploitation of migrant workers and the concentration of some minority ethnic workers in low paid employment.

- 1.12 We note that there are no specific actions aimed at tackling the concentration of some minority ethnic workers in low paid employment in the draft delivery plan. We also note that, whilst there is a reference to tackling modern slavery in the draft delivery plan for Indicator 1, actions aligned to this are not clear, and there thus appear to be no specific reference or actions to tackling the exploitation of migrant workers.
- 1.13 The Commission's formal investigation into the *Role of the Recruitment Sector in the Employment of Migrant Workers*¹⁴ (2010) found evidence of exploitation of migrant workers in Northern Ireland and revealed that despite a considerable body of legislation governing the sector, not all recruitment agencies worked within these

¹⁰See ECNI [STEM](#)

¹¹ ECNI (2013) [Maximising the Economic Participation of those with childcare responsibilities, Summary](#).

¹² There is a commitment to explore the feasibility (with DE) to extend free childcare provision available to working parents for up to 38 weeks per child for 3 / 4 years old. There is also a reference to the fact that "*the impact of childcare on employability will also be addressed, at least in part, by Universal Credit, which will pay up to 85% of childcare costs to lone parents and couples (where both members are in work).*" In addition, it states: "*To ensure that work pays, under Universal Credit claimants can work less than 16 hours and still receive support with the cost of childcare, in contrast to current rules*".

¹³ There is a commitment to "work with our colleagues in Education and Universal Credit regarding childcare and the implementation of the Childcare Strategy in order to provide better access to childcare for parents of children with disabilities and children of parents who have disabilities".

¹⁴ ECNI (2010) [Role of the Recruitment Sector in the Employment of Migrant Workers](#)

legislative terms and barriers to equality of opportunity existed for those who used their services.

- 1.14 We recommend that actions to address these recommendations are included in the delivery plan and the final PfG

We recommend commitments to support disabled people into employment are underpinned by effective action measures and resources.

- 1.15 We welcome the commitments to take a range of measures to support disabled people to access employment, including through the ‘*Enabling Success*’ Strategy^{15 16}, as well as to upskill disabled people and to support them in further / higher education¹⁷.
- 1.16 We consider that there is further potential for the delivery plan to underpin these commitments by setting out specific actions, and associated resources, including as regards the *Disability Employment Strategy*¹⁸.

We recommend the inclusion of actions designed to ensure training and programmes to enable people to get into or stay in work that are accessible and inclusive for all.

- 1.17 We note that there are a number of planned interventions¹⁹ designed to improve the overall employment rate and to target all people who are economically inactive (including disabled people and those with caring responsibilities). There is also a focus on supporting care leavers in training and employment (and education).
- 1.18 From the detail available, it is not clear if actions will be taken generally to ensure that training and programmes are accessible and inclusive for all, across the Section 75 categories. We recommend, with regards to improving economic participation, the inclusion of actions so as to ensure that work-related training and programmes are accessible and inclusive for all, across the Section 75 categories. This includes addressing the particular barriers faced by discrete Section 75 groups in accessing and remaining in work, and taking positive action, where

¹⁵ DEL & DETI (2015) [‘Enabling Success’- Supporting the transition from economic inactivity to employment](#)

¹⁶ There are commitments to: introduce job trails for those who are not sure about what they can and cannot do in the context of their health condition and work; to trial direct access to occupational health support to a small number of GPs aimed at young adults with mental health conditions; to support people living with cancer with a focus on work support, finances, health and wellbeing. There is a commitment to “explore support options that will enable more young people with disabilities to access pre-employment, educational and vocational programmes”; to “implement the Employment Strategy for people with a disability to create a pathway that will help more young adults move into work”; to “ensure that disabled people who are economically inactive are, where possible, helped back into the labour market”

¹⁷ There is an action to “Identify the main barriers which inhibit different groups of learners from participating in provision “relating to further education. which includes a focus on young people and disabled people and those experiencing economic inactivity

¹⁸ Department for Communities (2016): [‘Supporting Equality Through Inclusive Employment – An Employment Strategy for People with Disabilities’](#).

¹⁹ For example, a *Work, Health and Wellbeing Framework* to support people to find work and support employers to fill jobs.

appropriate²⁰. Positive action may involve, for example, encouraging members of an under-represented group to seek employment in a particular workplace, or helping them to gain skills or qualifications through the provision of occupational training²¹.

We recommended additional actions aimed at challenging prejudicial attitudes, behaviour and discrimination in the workplace.

Whilst there is a focus in the draft delivery plan for Indicator 42 on challenging attitudes to disabled people in the employment sector, in general there is an absence of wider actions to challenge prejudicial attitudes and behaviour in the workplace.

- 1.19 For example, there appears to be no reference in the delivery plan or the PfG to challenging prejudicial attitudes or negative stereotypes in the workplace experienced by other individuals/ groups covered by the Section 75 categories; for example, Lesbian, Gay, Bisexual (LGB) people, transgender people, older people, minority ethnic communities, and women (including negative attitudes towards pregnant employees and working mothers).
- 1.20 We recommend additional actions in the delivery plan and in the PfG aimed at removing barriers to accessing, and remaining in, employment that are experienced by individuals/ groups covered by the Section 75 categories. This should include actions across the PfG aimed at challenging prejudicial attitudes and behaviour in the workplace, reducing discrimination, and tackling barriers in employment experienced by individuals/ groups across the Section 75 categories.
- 1.21 By way of assistance, the Commission has set out a series of specific recommendations aimed at promoting equality of opportunity in the workplace for a range of individuals/ groups covered by the Section 75 categories²².
- 1.22 We also consider that there is potential for the PfG and delivery plans to convey key next actions in ongoing work - for example, we do not see reference to work currently being taking forward by the Department of Communities to develop a Strategy, including an action plan, on eliminating differences in the pay of male and female employees; or to the introduction in 2017 of new employer gender pay reporting requirements under Employment (NI) Act 2016.

²⁰ For further information on taking positive action in employment see ECNI (2016) [Guide on Outreach Positive Action](#)

²¹ Ibid.

²² See, for example, ECNI specific recommendations on as outlined in the following publications: ECNI (2016) [Full Report: Gender Equality Policy Priorities and Recommendations](#) ECNI (2014) Full Report: [Race Equality Policy Priorities and Recommendations](#) and ECNI (2014) [NI 'Parallel' Jurisdictional Report](#), Working Paper at p28 (published with NIRHC in our joint role as 'Independent Mechanism for Northern Ireland' under the UNCRPD).

We recommend that all relevant PfG indicators are tracked for the impact across Section 75 categories; and that gaps in equality data are addressed.

- 1.23 We continue to recommend that all relevant PfG indicators are not only tracked in aggregate but also for the impact on individuals from each of the Section 75 categories.
- 1.24 We note, for example, that Indicator 17 (*Economic inactivity rate excluding students*) does not collect data on the grounds of sexual orientation or racial group²³.
- 1.25 Where robust data for any given indicator is not currently available across all Section 75 grounds, we recommend that further work should be progressed at the earliest possible opportunity to address these issues, including through a timetabled data development agenda.

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²³ See NISRA PfG Framework Measurement Annexes