

THE PUBLIC SECTOR EQUALITY DUTY

- ANALYSIS OF SUPPORTING EVIDENCE

Kate Clayton-Hathway

Oxford Brookes Centre for Diversity Policy Research and Practice



“ [there is] a very positive story to be told about the PSED and ... it makes a real difference where it matters on the ground”¹

© Centre for Diversity Policy Research and Practice,
Oxford Brookes University.
All rights reserved October 2013

1	Introduction and background.....	3
2	Evidence of impact.....	4
2.1	Evaluating the previous duties	4
2.2	The impact of the single duty	8
2.3	Responses to the Public Sector Equality Duty Review – evidence of impact.....	10
2.4	Responses to the Public Sector Equality Duty Review – additional feedback.....	13
3	Reflection and conclusions	15
4	References	17

¹ Citizens Advice Bureau (2013), Public Sector Equality Duty: Submission to Government Equalities Office Review, p5

1 Introduction and background

The following report considers a range of research, evidence of impact and change in practice resulting from the Public Sector Equality Duty.

The current duty was enacted under Section 149 of The Equality Act 2010, which harmonised existing equalities legislation, drawing the previous Race, Disability and Gender Equality Duties into one. The single duty covers nine protected characteristics of: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The duty, introduced on 5th April 2011,² was broadly welcomed by equalities practitioners with some recognition that 'harmonising up' the legislation to cover all 'strands' clarified responsibilities and supported the implementation of more widespread equality initiatives, in employment as well as service provision. However, at the same time concerns were raised that some strands, such as gender, would no longer be seen as a high priority and be subsumed by a single duty. Others feared that protection would be hierarchical, with newer strands seen as less important than the old ones. Additional concerns were voiced regarding the 'tensions' between different strands, and the failure to account for the complexity of intersections (Harding and Peel, 2007, in Colgan and Wright, 2011; Conley and Page, 2010; Colgan and Wright, 2011).

Changes to the specific duties in particular have given cause for concern. These duties within the earlier legislation provided detailed guidance on steps required to have due regard to equality. This included equal opportunities monitoring, developing written equality schemes and consulting on those schemes. The new duties, it is argued, have been weakened as they place only two obligations on public authorities: to publish equality information about service users and the workforce (where over 150 employees) and to set at least one equality objective (Russell et al, 2010; Stephenson and Harrison 2011; TUC, 2013). Some have argued, though, that the new single duty is less onerous and more realistic, allowing a focus on priority areas and the ability to make a difference where it is most needed underpinned by the requirement to justify priorities with an evidence base (Russell et al, 2010; Johnstone and Godwin, 2013).

Fears were exacerbated by the review of the PSED, brought forward by the government from 2015 to 2013 as part of a 'Red-tape Challenge'. This review focused on how well-understood the PSED and guidance are, its costs and benefits, how organisations are managing legal risk and ensuring compliance and what changes, if any, would ensure better equality outcomes. The final report was delivered on 6th September 2013 (Government Equalities Office Independent Steering Committee, 2013). A range of submissions to the review have expressed concern at its timing so soon after implementation of the duty, and the impact this had on the quality of evidence available. Furthermore, at the time of the review there had been little opportunity to share good practice in the newer aspects of the duty, such as sexual orientation, or mainstream past good practice from existing equality

² The revised specific duties were enacted in September 2011. The reduction from previous requirements was intended to address coalition government concerns about burdens and bureaucracy.

schemes. Other concerns were raised around the process of the review, for example, the short turnaround time for evidence submission and the composition of the review steering group (Rubenstein, 2013), which included mainly senior public sector figures and little third-sector involvement so, it was argued, the “voices of those ... intended to benefit from the equality duty” [are] not being heard (Moon, 2013, p10).

The following report draws on a meta-study of material showing evidence of the impact in the workplace and on service provision which are directly attributable to the duty. It incorporates material from academic researchers, government sponsored organisations and third-sector organisations, including any submissions to the PSED Review which were in the public domain. Through this our aim is to demonstrate the importance of the duty and its widespread effects, looking firstly at the previous ‘old duties’, then at the new, single duty through evaluation work and submissions to the PSED Review. This project identifies much that is positive in terms of the duty being a force for change, with some clear lessons about what works and areas for improvement.

2 Evidence of impact

2.1 Evaluating the previous duties

Prior to introduction of the single duty, the previous duties were for Race, Disability and Gender.³ A range of material is identifiable which evidences the impact of these.

During 2002, Schneider-Ross conducted a quantitative and qualitative evaluation of the **race equality duty (RED)** across public authorities and educational institutions which included analysis of a random sample of race equality schemes and policies. They identified three levels of responses – those authorities responding well, those with good foundations in place but needing to make progress, and those with a weak response and non-compliance (2002). In a later study, Aspinall and Mitton (2007) identified the impact that ethnic monitoring of benefits claimants under the duty might have in highlighting racial inequality in low pay, low employment and overreliance on benefits. They found that compliance with data requirements on both a local and national basis was “patchy and piecemeal” (p381).

There is much more evidence relating to the success of the **disability equality duty (DED)**. Firstly the Office for Public Management (OPM) produced a small, qualitative study, interviewing government officials involved in equalities (2007). ‘Capturing the value of the DED’ assessed early indicators of success, particularly in developing Disability Equality Schemes. The duty was found to increase the prominence of and focus on disability equality. Inter- and cross- departmental disability equality groups were created to increase engagement with senior management, facilitate direct conversations between disabled people and policy leads, and enable sharing of good practice. One contributor attributed an increase in funding for inclusive design directly to the duty. Collecting data on disability in schools was also prioritised more highly which “would not have happened... so quickly without the Duty” (p28), and direct involvement with disabled people was key in identifying the bullying experienced by disabled children leading to new guidance for schools in logging and dealing with such incidents.

³The Race Equality Duty was introduced under the Race Relations Amendment Act 2000, introduced 2nd April 2001; the Disability Equality Duty under the Disability Discrimination Act 2005, introduced 4th December 2006; and the Gender Equality Duty under the Equality Act 2006, introduced 2nd April 2007.

The focus on disability monitoring required by the duty also helped with identifying gaps in data, with subsequent changes leading to a more developed and joined-up evidence base across government departments. Wider societal benefits included the presentation of information in a more accessible format which helped non-disabled people too, and progress in meeting wider government targets such as a goal of an employment rate of 80% for people with disabilities.

In addition, the OPM, on behalf of the Disability Rights Commission (2007a), specifically looked at benefits to be gained and lessons learned through involving disabled people in developing Disability Equality Schemes. In a survey conducted across local government, HE and FE, health and housing, internal equalities managers and individuals from disabled people's organisations were interviewed to ascertain how such involvement took place in other public organisations. Specific examples of benefits from involving people with disabilities included: reaching other 'minority groups' in an HEI by improving material to include audio, Braille and large print which in turn benefited older and international students; developing policies in a local authority which incorporated a Bangladeshi and Somali population with different experience of disability; providing greater career opportunities for disabled staff through the provision of specific training; disability training for taxi drivers which enabled those with sight impairment to travel with their guide dogs. Finally, respondents felt that involvement, through involving grass roots organisations with a disabled user-led agenda is more meaningful than consultation as it builds trust in public services.

Further research looked at undergraduate students working with learning disabled people to help them engage with principles of inclusive design in the built environment and implement inclusive policy and practice (Peel and Posas, 2009). Beckett (2009) argues that the Disability Equality Duty provided "a new window of opportunity to promote the idea that education has a role to play in changing non-disabled children/young people's attitudes towards disabled people" (p317). Furthermore, McLeod and Green (2009) identified the value of a 'proactive' approach in a university which encouraged students with 'unseen' disabilities such as Asperger syndrome to work with a disability coordinator, assessing needs in advance rather than waiting for crisis intervention. Moreover, Sin and Fong (2010) demonstrate the duty's role to involve disabled children and young people in a wide range of service planning. Finally, Stalker et al (2011) conducted case studies across a range of parents with different impairments and identified increased involvement in the school life of their children, citing a number of examples of schools making adjustments to involve parents with disabilities such as tailoring the method, venue and timing of communications.

Presenting a less positive picture, an ESRC-funded study of schools across England, combining a survey and qualitative interviews with teachers, explored progress made by schools against the DED requirement to take a proactive approach to promoting positive attitudes towards disabled people (Beckett and Buckner 2012). This identified low numbers of schools with Disability Equality Schemes in place, little work on promoting inclusivity and underlined disability's status as a 'poor relation' compared to the promotion of race and gender equality in teaching and learning activities.

A wider qualitative study of the DED by Pearson et al (2011) with frontline workers, staff and service users across a range of public sector organisations found some progress in implementation though great variation between sectors. The involvement of disabled people

was “patchy” and often “tokenistic” (p255), with disparity in some areas such as involvement. For example, there was a lack of understanding that the underlying principle of involvement required evidence of disabled people influencing development rather than simple consultation on a draft policy. There were instances of good practice, however: one Housing Association set up a working group meeting six times a year and provided training for the disabled people involved.

More recently, there are examples of local authorities facilitating a disabled person’s access group to ensure involvement in the development of public facilities, including running panels to advise on design matters in accommodating disabled people’s needs, and training a group of people with disabilities in reading planning documents to involve them in planning for substantial regeneration work. This initiative ensured that inclusive design issues were incorporated at the outset of all projects: a ‘get it right first time’ policy ensuring that access requirements are considered at outset and avoiding expensive retrofitting. Other examples include consultation of people living with HIV in modernising support services; and a dedicated access officer (himself with disabilities) who provides practical advice to the council, such as with access to museum and public buildings (Disability Charities, 2013; EDF, 2013).

The effectiveness of the **gender equality duty (GED)** can often be demonstrated through its use in holding government to account. The Fawcett Society is one organisation which has repeatedly raised concerns about a lack of ‘due regard’ for the impact of policy on gender equality. For example, using quantitative data and fiscal analysis they demonstrated that policies on tax and benefits have disproportionately disadvantaged lone mothers, arguing that the government have failed to pay ‘due regard’ to resulting inequalities. Fawcett eventually filed an application for Judicial Review of the Treasury’s ‘emergency budget’. Though unsuccessful in obtaining the Review, the Treasury pledged a different approach in future, and the surrounding publicity raised awareness about the need to consider differential impact on men and women across the public sector (Sands, 2011; The Fawcett Society, 2012, 2013). The TUC also suggest that Fawcett’s high-profile challenge may have led to the formal assessment, launched November 2010, of the extent to which the Treasury met its obligations, carried out by the EHRC under powers granted by Section 31 of the Equality Act 2006 (TUC, 2011). In addition, subsequent budgetary and spending announcements, for example in March 2011, were accompanied by EIAs, albeit that these were deemed inadequate by campaigning groups (Annesley, 2012).

In addition, the duty has been used to mount a number of successful legal challenges to making cuts to public services or cessation of funding for voluntary or community organisations because of a failure to comply with equality duties, including Southall Black Sisters’ successful challenge of Ealing Council over funding cuts for minority ethnic women’s domestic violence services.⁴ The Women’s Budget Group have contributed to the debate, by calling the government to account for failing to meet the duty, particularly in their failure to conduct gender impact assessments of successive budgets (2010; 2011), and to critique the impact assessments which have been completed (2013, 2013a).

Further evaluation of the duties was carried out when ECHR contracted Ipsos MORI to conduct qualitative research into schools in England and Wales’ implementation of the duties

⁴ *R (Kaur and Shah) v London Borough of Ealing* [2008] EWHC 2026 (Admin).

(Bukowski et al, 2011). The study identified examples of positive practice, with a key focus on pupil outcomes. Though finding a 'mixed' picture, they were able to link successful pupil outcomes directly to initiatives implemented under the duties. Action plans which had been developed to address the duties included adapting the curriculum to meet the needs of boys and encouraging pupils to take up non-traditional subjects. Outcomes linked to these actions showed increased participation rates in sporting activity, improved subject attainment, better wellbeing and self-esteem, increased key stage and subject attainment for disabled and ethnic minority pupils, and a reduction in racist incidents.

The work also identified a lack of awareness of the need to challenge disadvantage within schools though work to increase openness and inclusion was more widespread. The requirements of the 'new' PSED were less understood, and schools showed gaps in knowledge such as the need to include disabled pupils in developing equality schemes.

From 2009 a number of assessments and evaluations were carried out which both looked back at the previous duties and, in some cases, looked forward to the single duty. These demonstrated mixed results in terms of the implementation of the duties, though plenty of evidence of impact on public bodies.

During 2009 Schneider-Ross (for the Government Equalities Office - GEO) conducted a quantitative and qualitative study across a wide range of public sector organisations (including local authorities, health bodies and schools), looking at the impact of the existing three duties as identified by equalities practitioners. The research identified the duties as reinforcing and supporting positive cultures which brought equalities into the mainstream often by confronting previously undiscussed issues. Improvements in decision-making and resource allocation, improved outcomes relating to service provision, employment and community relations were also identified.

The research also identified that the duties had increased access to services by disadvantaged groups, improved feedback from service users and reduced disproportionality in service use between different groups. As employers, the practitioners reported improvements in tackling bullying and harassment, staff satisfaction, representation at senior levels and improved retention attributed to increased consultation and initiatives such as flexible working. Furthermore, it showed that only a minority of the authorities considered the duties a burden. The analysis did, however, identify a need for simple explanatory guidance on the duties.

Sclater, (2009, for the EHCR), conducted a review, also with equality practitioners, drawn from a wide range of public authorities including local government, criminal justice, fire and rescue services and central government departments. This work identified positive feedback and overall support, particularly for the specific duties, with elements such as EIAs felt to "provide a framework and focus for action" (p3). This investigation also identified some authorities achieving synergies in the use of resources by aligning requirements for the specific duties with other organisational objectives, for example, using EIAs to successfully achieve both the Equality Standard for Local Government and high ratings from the Audit Commission. The report identifies a wide range of impact including: EIAs identifying improved cancer strategies for BME people and feeding these into health professionals' strategies; progress in redressing gender imbalances in the Mental Health Act Commission

and the adaptation of hospital wards and staff training to introduce a new system for deaf patients.

Less positive, however, was an evaluation of a sample of Strategic Health Authorities and Primary Care Trusts, comprising a desktop review of published and internal materials supported with follow-up interviews. This review found a “significant lack of evidence of implementation and impact” (p7), and concluded that compliance was seen by the authorities and trusts involved as a ‘box ticking’ exercise. Their investigation uncovered a lack of leadership, inadequate planning and tangible priorities and poor levels of equalities reporting in mainstream reports. In addition, the authorities were failing to hold procurement to account for the duties (Focus Consultancy, 2011). As a result of this investigation, it was argued that a “fundamentally different approach” (EHRC, 2011, p2) was needed to meet the new single duty, with emphasis on a strong evidence base across all the protected characteristics, identifying key gaps in information and taking action to fill them; providing guidance, evaluating commissioning bodies and ensuring equality is a key consideration in the process, plus an increased emphasis on the publication of equality information and setting measureable objectives.

In accordance with Sclater’s findings, other public sector equality measures have made a significant contribution to performance under the duty. Conley and Page (2010) found that although the duty is a useful lever for embedding change, some authorities prefer other equality standards. The Equality Framework for Local Government (EFLG), for example, offers the ‘carrot’ of an award rather than the ‘stick’ of legislation. The framework consists of five performance areas including understanding and engaging with local communities, leadership, partnership and organisational commitment and ensures local councils should also be able to demonstrate compliance with the PSED. The NHS Equality Delivery System (EDS) might be seen in a similar light. This was rolled out in July 2011 and is in part a tool to help NHS organisations demonstrate compliance with the duty (although with a wider remit). An independent evaluation of EDS conducted in 2012 showed early evidence of improvement in engagement with local voluntary and community organisations and patient groups, for instance, the deaf and hard of hearing. There was also evidence of increased knowledge and awareness of equality with staff at all levels. Identifying gaps in staff data has led to greater engagement, for instance, North East Ambulance Service established an employee forum to discuss issues such as bullying and harassment to redress the lack of data in this area (Shared Intelligence, 2012). Further examples of good practice include NHS trusts across Airedale, Bradford and Leeds working in partnership with the voluntary and community sectors to improve evidence collection and use this to inform objectives. Reported outcomes are the ability to identify gaps in services, ensure that all local communities are included in strategic planning and meeting the PSED published information requirements in a clear and accessible way (Equal Opportunities Review, 2012, 2012a).

2.2 The impact of the single duty

At the time of this study, some evaluation work has been carried out on the ‘new’ single duty, though this is limited due to the short period since its implementation.

GEO conducted a study of workplace equality, how different organisations vary in their ethos on equality and how they engage with the Equality Act. This showed widespread engagement with legislation and increased awareness of equality issues in the workplace. A further report focussed on the awareness of the Act and its impact on practice, finding that

public sector organisations displayed higher levels of both general and detailed awareness of requirements around equality issues including considerations about disability in recruitment. They also had greater experience of using positive action and addressing under-representation of minority ethnic employees than the private and voluntary sectors (although the research did not seek to directly attribute this to the PSED) (GEO 2012; 2012a).

Furthermore, Equal Opportunities Review (2012a; 2012b) provided evidence of organisational change through good practice examples of initiatives which reach beyond the statutory requirements, for example:

- **Genesis Housing Association** has produced an equality scheme focusing on gender, transgender, age, sexual orientation, ethnic origin (including caste and race), disability and faith. Other authorities such as Harrow Council and Lancashire Care Foundation Trust have maintained single equality schemes to ensure they comply with the PSED.
- **The Crown Prosecution Service, Imperial College London and Harrow Council** have continued to produce equality impact assessments (EIAs) because of their effectiveness for fair decision-making.
- **The Open University** included characteristics beyond those necessary such as students living in low socio-economic areas and “caring responsibilities” in their equality plan.
- **Cornwall Council** developed a set of county-wide, shared equality objectives co-designed and owned with organisations across Cornwall’s public and voluntary sector and developed through extensive consultation.

There are few published examples yet available on the impact of these initiatives, though Johnstone and Godwin (2013) report that there has been beneficial impact from many organisations’ work.

The EHRC also conducted an assessment focussing on public authorities’ compliance with the specific duty to publish equality information (2012). Though there is no prescribed process for authorities to assess the impact of their policies and practices, EHRC argue that the collation of data as a robust evidence base is a key underpinning principle in meeting the duty. Their report found that around half were fulfilling the requirement to publish equality information on staff and service users in April 2012, and were more likely to publish information on staff than service users. Many, though, were partially meeting the new requirements by publishing on either staff or service users, with six percent failing to meet their legal obligations. There was significant variance in implementation within sectors – probation and police services performed particularly well with the NHS and national organisations the worst. The report also identified some detail of the duty’s impact on organisational practices, including:

- **Staffordshire and West Midlands Probation Trust** which has identified gaps in the staff information on protected characteristics they collect in relation to sexual orientation, religion or belief and gender reassignment, updating their internal forms and with plans to report on these to comply with the specific duty.
- **The London Borough of Harrow** published extensive information on its general population as well as actual service users, disaggregated by protected characteristics

where possible. This has helped the council develop specific and measurable equality objectives, such as increasing “the proportion of users who say that their cultural and religious needs are being met to above 86%, by March 2013” (p37).

- **Derbyshire Police** publish demographic data disaggregated by all protected characteristics (except maternity and pregnancy), in addition to information on actual users, for example, around stop and search, victims of crime and domestic abuse. Along with ‘Working Towards’ information this allows them to identify trends over specific periods, helping with planning and response to changing demands.

2.3 Responses to the Public Sector Equality Duty Review – evidence of impact

Analysis of submissions to this review provides a wealth of evidence of the impact of the duty.

The TUC (2013), based on their work with large numbers of public sector employees, point to both improved employment and service delivery outcomes for many people with disabilities. They contend that interventions for disabled workers such as the spreading of costs for ‘reasonable adjustments’ and the maintenance of lifts to access the workplace have benefited disabled employees, whilst improved accessibility on public transport, better disabled access and audio loops in public buildings lead to a more positive experience for service users.

Furthermore, Stonewall's (2013) experience of working with over 400 public sector organisations shows the duty as helpful in introducing or improving policies, practices and procedures relating to sexual orientation, with some authorities beginning work before the Act was implemented in anticipation of the duty. In particular, the duty has been useful for holding public bodies to account for their performance. Stonewall provide a range of case studies demonstrating the usefulness of the duty, including:

- **Brighton and Hove City Council** –formed a steering group from a number of schools to develop a model equality policy, set equality objectives and develop a toolkit; ran workshops on tackling homophobic bullying; began monitoring schools' compliance with the duty and encouraged LGB parents to participate in school governing bodies.
- **Bury Council** - produced a simplified process for analysing EIAs of services, policies and practices which were mainstreamed throughout the council. The analysis conducted for the council's review of its library services identified a positive impact on LGB people due to its collection of LGB books.
- **Cardiff University** - held an engagement event with staff and students to establish its equality objectives; identified through workshops issues such as a lack of awareness of support for LGB staff and students and incidents of homophobic bullying; developed a LGBT working group and action plan which led to a specific campaign dealing with homophobic language in the athletic union and encouraged LGB participation in sport.
- **Nottinghamshire Healthcare** - Updated its Procurement Policy in 2010 in anticipation of the duty requiring contractors to train all staff in equality and diversity, assess the impact of their practices and collect and report on equality monitoring data, inclusive of sexual orientation at all levels to Board level.
- **Oxleas NHS Foundation Trust** - introduced monitoring data on sexual orientation of service users to support LGB health needs, which identified an existing lack of

confidence amongst staff about asking users to disclose their sexual orientation. This led to building an e-learning package for staff which gives guidance on sensitive questioning, covers why monitoring is important, raises awareness about LGB health inequalities and helps develop services as welcoming environments for LGB people.

- **Tower Hamlets** - based on experience of promoting good relations between people of different groups, developed further work on tackling high-profile incidents of homophobia building a partnership of public and community sector organisations to act together and challenge those who promote hate. Additionally funded a conference on Faith Communities and Homophobia, undertaking significant outreach work and involving a wide range of faith communities.

In assessing another 'new' equality strand, an Age UK survey (2013) found that 93% of LAs had published one or more equality objectives on their website in compliance with the duty and 67% had published objectives specifically referring to one or more protected characteristics: 88% specifically referred to age making this the most commonly referred to characteristic. Feedback from their survey also featured the London Borough of Bexley which invited Age UK to contribute to a Single Equalities Panel in 2011 to advise them on the duty, with the authority re-writing its Ageing Well Peer Review action plan as a result to make it more user-friendly and action-focused.

A number of submissions to the PSED review demonstrate the importance of a 'designed right the first time' approach to prevent legal challenges and save litigation costs. Evidence is cited, for example the case of *Gorry*⁵ which challenged criteria for sharing a room under 'bedroom tax' provisions finding these did not properly incorporate the needs of disabled children. This may have been avoided by paying due regard and considering such provisions at outset (CAB, 2013). Age UK (2013) support this idea, maintaining that their research and initial feedback show the PSED driving improvement in decision-making and that when working well mitigating the risk of litigation. Justice (2013) also uphold this argument, citing *Hunt v North Somerset Council*⁶ where the local authority was assisted during a Judicial Review by an equalities training programme for senior officers and councillors.

Others point to missed opportunities for a proper assessment of equality as evidence of the need for the duty. Police Federation for England and Wales (PFEW), for example, introduce examples of policies which were enacted then later found to be discriminatory. These include a fitness test during recruitment which disadvantaged women, and the use of 'Stop and Search' powers being used unfairly on black and minority ethnic people. These policies might have been avoided if undergoing a full EIA (PFEW, 2013). They argue that not accounting for equality when developing policy "is significantly more expensive and time consuming than trying to get it right after the event" (p6). Removing the duty will not prevent legal challenges if service providers do not provide services to fit people's needs.

Data collection and monitoring requirements have also been demonstrated as impactful, through supporting transparency and accountability and as a basis for improving policies and decisions. The Office of the Children's Commissioner (OCC), for example, show that data

⁵ *Gorry v SSWP* [2012] EWCA Civ 629, which found that the size criteria used for determining housing benefit, in the light of removal of the spare room subsidy (commonly known as the 'bedroom tax') discriminated unlawfully against disabled children who are unable to share a room because of their disability.

⁶ *R (Aaron Hunt) v North Somerset Council* [2012] EWHC 1928 (Admin), which found against a group who had challenged cuts to local youth services.

relating to exclusions has helped understanding of exclusion within the school system (2013). CAB (2013) cite an authority using equalities data to monitor increasing numbers of homelessness applications from women which led to a change in provision previously aimed at men. In a further example, Merseyside Fire and Rescue Authority (MFRA) used statistics on age and deprivation to map those at greater risk from fire. They identified that older people are particularly vulnerable to fire as well as other factors such as mobility and sensory difficulties, and targeted prevention and protection resources for those at greatest risk leading to a significant reduction in fires in the home in this area (EDF, 2013).

Desktop research by Insted Consultancy (2013) showed excellent practice of building on data collection in education. One respondent in their study reports on the factual information about its students' makeup according to the protected characteristics; conducts a discussion for each asking what they are doing to eliminate discrimination, advance equality of opportunity and foster good relations; looks at impact, and what next steps should be, involving all staff and key stakeholders in discussion. They further highlight areas for special attention and set measurable targets, for example, "to achieve a 40% reduction in prejudice related behaviour, in relation to homophobia, racism and religious stereotyping over 2012-13 and 2013-14" (p10).

There is a range of examples of organisations using the duty to support service users' needs, including working with Great Ormond Street Hospital in London to assist a client with a disabled child in being rehoused to meet the child's access needs. Another ensured translation services for a client with poor English undergoing medical examination in line with the duty to eliminate discrimination and promote equality. Still another maintained a mentoring service for young BME prisoners (CAB, 2013; DLA, 2013).

Unison (2013) draw further on good practice evidence from the NHS as examples of the duty's impact, including the involvement of diverse patient-commissioning boards in NHS Leicester City; and the involvement of executive board members as equality leaders in NHS North East. In addition, they cite a TUC/Labour Research Department⁷ survey which highlighted positive outcomes of the duty. Examples of this include Newcastle City Council, where enhanced monitoring and information gathering in the housing sector has ensured more vulnerable people are easier to identify and help, and also assisted in more sensitive procedures for individuals with disabilities.

A further example of the PSED's success in driving an equality and inclusion strategy includes the Olympic Delivery Authority (ODA): delivery partners were subject to the PSED equality objectives such as the use of local SMES, engagement with local communities, and employment targets. Integrating a requirement to improve supplier diversity into ODA's procurement led, for example, to the appointment of a small catering company run by and staffed by visually impaired individuals. The experience and learning are now being put into practice in other major projects such as CrossRail – a cultural change which is a 'legacy' or 'ripple effect' of the PSED (Wright, 2013; REC, 2013).

⁷ The TUC along with the Labour Research Department conducted an online survey in November and December 2012 of trade union workplace representatives and trade union officers of the effectiveness of the former duties and the PSED <http://www.tuc.org.uk/equality/tuc-22115-f0.cfm>, Accessed 1st June 2013.

2.4 Responses to the Public Sector Equality Duty Review – additional feedback

A number of organisations submitting evidence on the duty consider it to be important as both method for advancing equality, and a way of holding public authorities to account: a “framework and catalyst for action” (Disability Charities, 2013, p1). They are clear that the PSED is a prompt to demonstrate commitment to equalities, citing the importance of exploring the different equality strands more thoroughly than might previously be done, and expanding their evidence base through research into these areas to identify specific types of disadvantage, such as a disproportionate effect of welfare cuts on minority ethnic families. The duty has also enabled bodies to be more transparent, facilitating fairer decisions which are less susceptible to change particularly when supported by local data (CAB, 2013; Justice, 2013; OCC, 2013).

Though it is recognised that the duty is not perfect, it is seen to provide an effective cross-cutting framework which offsets the usual functional and fragmented working in public authorities (CAB, 2013). It is also felt to be particularly necessary for tackling persistent and hard-to-shift inequalities which “are so persistent, durable and institutionalised in both formal and informal structures and processes”, that treating people the same way can perpetuate discrimination (The Fawcett Society, 2013b, p11).

The central requirement for ‘due regard’ is regarded as an advantage by some because it is inherently proportional, requiring public bodies to consider equalities in a proportionate way. However, there is also confusion around what this means in practice. Some authorities, it was suggested, consider it is simply to give ‘consideration to equality’ even though case law actually requires more (EDF, 2013). Fawcett (2013a) also raise concerns about the lack of clarity around meaning for ‘due regard’: EHRC guidelines are for public authorities to “consciously consider the need to do the things set out in the general equality duty” (p15), even though, Fawcett argue, understanding is more likely to evolve from case law.⁸

A further defence of the duty is that it provides leverage to protect employee interests, for example, on behalf of low paid women who would be adversely affected by cuts to family-friendly policies (TUC, 2013; Unison, 2013). However, the existing tools to hold authorities to account, such as Judicial Review and the development of case law are costly and time-consuming, and some express concern that FOI requests may become more common as the only means of identifying shortcomings, which will increase rather than reduce bureaucracy (North West BME Policy Forum, 2003).

It was widely felt that confusion about and lack of understanding of the duty has led to variable quality of application. It is also felt, though, that failure for all public authorities to understand and fully meet the PSED is not evidence that it is not working as intended, but that this points to a need for it to be better explained or enforced. The lack of a statutory code of practice cuts in staff and resourcing on equality, for instance, the GEO and EHRC are all perceived as having a negative effect. (DLA, 2013; PFEW, 2013; The Fawcett Society, 2013a, Unison, 2013).

⁸ They cite *R (Brown) v Secretary of State for Work & Pensions* [2008] EWHC 3158 (Admin) which has set out clear guidance on what organisations must do to have ‘due regards, for example, to be aware of their responsibilities under the duty, make sure they have adequate evidence, consciously and actively consider the relevant matters, do this before and at the time a decision is taken, not after the event, etc (The Fawcett Society, 2013, p15).

Further technical guidance is widely requested. Unison (2013) draw on evidence from the EHRC/Ipsos Mori research on schools, supporting their contention that where the duty has been ineffective, it has been a result of a lack of authoritative guidance. Though many schools are identified as taking effective action on equalities, this is not always systematic and evidence-based in the way it needs to be to meet the duty. Furthermore, as EHRC technical guidance and non-statutory guidance on implementation are non-statutory, there is concern that these have less impact: both modification and clarity of the guidance is called for. This lack of understanding is not confined to the education sector, with other authorities requesting statutory guidance (PFEW, 2013). The Race Equality Commission (2013) further stresses the need for good quality guidance and strong leadership, especially for "authorities who are tying themselves up in knots and those who are not doing what they should" (p14).

Sectoral-based provision has been highlighted as a way to ensure the duty meets the different needs of diverse organisations. Suggestions include an increased role for inspectorates, such as Ofsted, the Chief Inspector of Prisons or the OCC plus sectoral-specific statutory and non-statutory guidance (DLA, 2013; Insted Consultancy, 2013). Concern is also expressed about the limited role of inspectorates and regulatory bodies such as the EHRC (REC, 2013).

Widespread comment regarding the weakening of the specific duties includes the Fawcett Society (2013a) arguing that the less prescriptive nature has led to less adequate gender analysis and less attention to mainstreaming gender equality. They cite the original GED which imposed a clear legislative obligation to adopt a substantive or outcomes-based equality approach, and perceive the current duty as a regression from the GED. As public bodies are no longer required to develop equality objectives for each protected characteristic, it is argued, there is no guarantee that action will be taken on individual strands. CAB (2013) agree that a reframing of the specific duties, means the acceptable threshold for compliance appears to be "a moving and diminishing target" (p5), where some public bodies "felt little compunction to pay any regard (let alone due regard)" (p5).

The TUC (2013) also found evidence that a failure to make 'involvement' a specific duty is a retrograde step, exacerbated by the cuts to services which have combined to reduce the input of disadvantaged groups, for example, for people with disabilities (Disability Charities, 2013; Unison, 2013).

Little evidence has been available in relation to the cost of the PSED, with a cost/benefit analysis difficult at such an early stage because of the lack of a substantive longitudinal evidence base of economic or social impact (particularly on the newer protected characteristics) (OCC, 2013). Others argue that costs should be measured against the cost of *not having* a PSED, citing Government Equality Strategy figures that failing to use the talents of people from ethnic minorities costs around £8.6bn per annum or that violence against women costs £37.6bn per annum.⁹ The Fawcett Society (2013a) believe there are too many bodies of different sizes to be able to stipulate the cost, though figures obtained from an NHS Trust identify that without the duty there would be an impact via recruitment and training costs, because of the effect on morale and motivation, legal costs in managing disciplinary cases and loss of revenue through services being less accessible.

⁹ The Equality Strategy – Building a Fairer Britain, HM Government, December 2010, p.8, cited in DLA submission 2013.

Some see the lack of specific duties for procurement in particular as problematic, identifying the 'double benefit' of equality in procurement, both in securing the services, works or goods to best meet an authority's needs and also the improvement in the approach to equality by providers (Disability Charities, 2013; DLA, 2013). The improvement of employment and business opportunities for protected groups in extending the supply chain to BME groups is also identified (REC, 2013).

3 Reflection and conclusions

At an organisational level, those authorities which successfully implemented the duty demonstrate a number of factors in common. Firstly, visible, committed and coordinated **leadership** is shown as the factor which predominates across the successful organisations, from individual headteachers through to senior management in large public bodies. Particular successes are evident where senior leadership takes an active role such as board members acting as equality leads, or direct reporting in to a senior management team. Leadership at a high level within the organisation is a critical success factor for overseeing and facilitating operational and cultural change, as well as its 'emblematic' value, sending strong messages about the priority of equalities.

Equalities expertise also plays a significant role, with some organisations appointing 'champions' or dedicated officers charged with a specific equalities remit. Commitment from staff with an understanding of how the duty works is seen as extremely important, though it is recognised that many organisations have cut staff in this area due to budgetary constraints. Aligned with the need for expertise is a commitment to **training**, which a number of organisations have demonstrated as key in the success of rolling out equalities initiatives at all levels, including for panels of voluntary experts.

Consultation and engagement are identified as crucial for the success of equality initiatives, with levels of involvement ranging from consultation with service users on final drafts through to equalities groups forming expert panels and becoming involved in decision-making. There is more demonstrable success of impact around disability than the other strands, which may be attributable to high levels of engagement of disability groups when the DED required their 'involvement' and not simply 'consultation'.

Using **data collection and monitoring** to form a **strong evidence base** has also been identified as the basis for successful initiatives. Analysis showed many examples of good practice in data collection, supported in some cases by examples of how this has been used to improve the outcomes of diverse groups. There are fewer instances, however, of these being used to set **measurable goals**, though setting baselines and working towards improved targets are a key feature of many success stories. Moving forward, such data offers an opportunity for authorities to identify strengths, weaknesses and gaps in provision and develop their initiatives accordingly.

Our review of evidence showed other aspects which were positive. It demonstrated wider societal benefits, for example, initiatives reaching beyond the groups for which they were intended, such as the extension of the format of information for people with disabilities helping others including older people or those for whom English is an additional language. Research involving the DED has also demonstrated progress towards government targets,

such as increasing employment for people with disabilities, and involvement was shown to increase trust in public services. The duty is also seen to increase transparency, and allow authorities to demonstrate fairness in their decision-making.

At an organisational level, there are synergies with other equality measures such as the Equality Framework for Local Government and overlap with other regulatory requirements including Ofsted inspections. Working on equalities can therefore help authorities achieve across a number of areas of service delivery. Furthermore, the duty supports a 'designed right the first time' approach for both policy and facilities, helping avoid the cost of rectification or potential litigation risks.

Throughout the evidence for the duty we identified, however, there were consistent points which were less positive. There is inconsistent application of and commitment to the duty. Earlier reports showed patchy implementation of both the previous duties and the later, single duty across and within sectors. Whilst some authorities are going 'above and beyond' the requirements of the duty, others simply see it as a 'tick-box' exercise. Poor standards of implementation are often attributed to poor leadership, poor or inconsistent guidance and lack of resource. The evidence also shows a lack of understanding of some basic principles such as the 'due regard' standard. Research findings and evidence submitted for the PSED review consistently identified a need for simple guidance, which has yet to be delivered. In addition, concerns have been raised around enforcement, particularly in the light of cuts to resources such as the Government Equalities Office and the Equality and Human Rights Commission. At the time of writing, there is a consultation on reform of the Judicial Review process including 'suitable alternatives' to solve disputes over the PSED.¹⁰

Despite all of these difficulties, we have identified a wide range of evidence and examples of positive impact on organisational procedures and processes including data collection and monitoring, establishing measureable equality targets, producing toolkits and e-learning packages, training staff and diverse groups, the rolling out of these through commissioning and procurement practices plus much evidence of consultation and engagement.

There is, though, less evidence of the impact 'on the ground', from the viewpoint of employees and service users and the changes to their life experiences. Our analysis is based on a meta-study¹¹ which ran in parallel to the GEO Public Sector Equality Duty Review, and it drew on a similar (though wider) evidence base. The Review findings cited a lack of 'hard evidence' to support the duty's success, which we agree with in part, due to the lack of this 'on the ground' data. The next review of the duty will be in three years' time, which will allow the space for organisations to embed the duty and share good practice. This is something we aim to explore over the coming three years, using the evidence herein as our starting point.

**The Centre for Diversity Policy Research and Practice
Oxford Brookes University
October 2013**

¹⁰ Judicial Review: proposals for further reform, <https://consult.justice.gov.uk/digital-communications/judicial-review>, Accessed 23 September 2013.

¹¹ The Public Sector Equality Duty. Empirical Evidence Base, (2013), available at <http://www.brookes.ac.uk/services/hr/cdprp/>

4. References

- Age UK (2013). *Submission to PSED Review*. Available at: <http://www.edf.org.uk/blog/?p=22172> (Accessed: 1st June 2013).
- Annesley, C. (2012). Campaigning against the Cuts: Gender Equality Movements in Tough Times. *Political Quarterly* 83 (1), pp.19-23.
- Aspinall, P. and Mitton, L. (2007). Are English local authorities' practices on housing and council tax benefit administration meeting race equality requirements? *Critical Social Policy* 27 (3), pp.381-414.
- Beckett, A. E. (2009). "Challenging Disabling Attitudes, Building an Inclusive Society": Considering the Role of Education in Encouraging Non-Disabled Children to Develop Positive Attitudes towards Disabled People. *British Journal of Sociology of Education* 30 (3), pp.317-329.
- Beckett, A. E. and Buckner, L. (2012). Promoting positive attitudes towards disabled people: definition of, rationale and prospects for anti-disablist education. *British Journal of Sociology of Education* 33 (6), pp.873-891.
- Bukowski, G., Roberts, H., Fraser, J., Johnson, F. and Ipsos MORI (2011). *The Equality Duties and Schools*. Equality and Human Rights Commission. Available at: http://www.equalityhumanrights.com/uploaded_files/research/rr70_equality_duties_and_schools.pdf (Accessed: 1st May 2013).
- Citizens Advice Bureau (CAB) (2013). *Public Sector Equality Duty: Submission to Government Equalities Office Review*. Available at: <http://www.edf.org.uk/blog/?p=22172> (Accessed: 1st June 2013).
- Colgan, F. and Wright, T. (2011). Lesbian, Gay and Bisexual Equality in a Modernizing Public Sector 1997-2010: Opportunities and Threats. *GENDER WORK AND ORGANIZATION* 18 (5), pp.548-570.
- Conley, H. and Page, M. (2010). The Gender Equality Duty in Local Government: The Prospects for Integration. *Industrial Law Journal* 39 (3), pp.321-325.
- Disability Charities (2013). *Submission to PSED Review*. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/85104/disability-charities-consortium.pdf (Accessed: 2nd June 2013).
- Equal Opportunities Review (2012). Implementing the new public sector equality duty. *Equal Opportunities Review* June 2012 (225).
- Equal Opportunities Review (2012a). Implementing the new public sector equality duty 2. *Equal Opportunities Review* July 2012 (226).
- Equality and Diversity Forum (EDF) (2013). *Equality and Diversity Forum Submission to the Government's Equality Duty Review*. Available at: <http://www.edf.org.uk/blog/?p=22172> (Accessed: 26th April 2013).
- Equality and Human Rights Commission (EHRC) (2011). *The Public Sector Equality Duty: a way forward for the health sector*. Available at: http://www.equalityhumanrights.com/uploaded_files/EqualityAct/PSED/health_policy_web.pdf (Accessed: 15th May 2013).
- Equality and Human Rights Commission (EHRC) (2012). *Publishing equality information: Commitment, engagement and transparency (Assessment of public authorities'*

implementation of the specific duty to publish equality information). Available at: http://www.equalityhumanrights.com/uploaded_files/PSD/publishing_equality_information_final.pdf (Accessed: 1st May 2013).

Focus Consultancy (Widger, T., Prosser, S, Rogers, S, Hutton, C) (2011). *The performance of the health sector in meeting the Public Sector Equality Duties: moving towards effective equality outcomes*. Equality and Human Rights Commission. Available at: http://www.equalityhumanrights.com/uploaded_files/research/psed_health.pdf (Accessed: 17th May 2013).

Government Equalities Office - Independent Steering Committee (2013). *Review of the Public Sector Equality Duty: Report of the Independent Steering Group*. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/237194/Review_of_the_Public_Sector_Equality_Duty_by_the_Independent_Steering_Group.pdf (Accessed: 6th September 2013).

Government Equalities Office (GEO) (2012). *Evaluation of the Implementation of the Equality Act 2010: Report I – Organisational Approaches to Equality*. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/78432/Eval_of_Equality_Act_Report1.PDF (Accessed: 1st June 2013).

Government Equalities Office (GEO) (2012a). *Evaluation of the Implementation of the Equality Act 2010: Report II – Awareness and Impact of the Equality Act*. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/78434/Eval_of_Equality_Act_Report2.PDF (Accessed: 1st June 2013).

Insted Consultancy (2013). *Reviewing the public sector equality duty*. Available at: <http://www.insted.co.uk/psed-review.pdf> (Accessed: 1st June 2013).

Johnstone, S. and Godwin, K. (2013). Implementing the Public Sector Equality Duty. *Equal Opportunities Review* May 2013 (234).

Justice (2013). *Response to Government Equalities Office "Call for Evidence"*. Available at: <http://www.justice.org.uk/data/files/resources/345/JUSTICE-PSSED-Review-Submission-230413-FINAL.pdf> (Accessed: 14th May 2013).

MacLeod, A. and Green, S. (2009). Beyond the books: case study of a collaborative and holistic support model for university students with Asperger syndrome. *Studies in Higher Education* 34 (6), pp.631-646.

Moon, G. (2013). A review of the public sector equality duty. *Equal Opportunities Review* May 2013 (234).

NatCen Social Research (2013). *Views and experiences of the Public Sector Equality Duty (PSED). Qualitative research to inform the review*. London: Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/237200/PSED_Revised_Report_Final_030913_-_FINAL.PDF (Accessed: 6th September 2013).

North West BME Policy Forum (2013). *North West BME Policy Forum submission in response to the public sector Equality Duty: reducing bureaucracy policy review paper*. Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/85726/one-north-west.pdf (Accessed: 14th May 2013).

Office for Public Management (OPM) (2007). *Capturing the value of the DED*. The Disability Rights Commission. Available at: <http://www.equalityhumanrights.com> (Accessed: 30th August 2013).

Office for Public Management (OPM) (2007a). *Involvement for Real Equality. The benefits for public services of involving disabled people*. The Disability Rights Commission. Available at: <http://www.equalityhumanrights.com> (Accessed: 30th August 2013).

- Office of the Children's Commissioner (2013). *Response to the government's Equality Duty Review*. Available at:
http://www.childrenscommissioner.gov.uk/content/publications/content_448 (Accessed: 14th May 2013).
- Pearson, C., Watson, N., Stalker, K., Lerpiniere, J., Paterson, K. and Ferrie, J. (2011). Don't get involved: an examination of how public sector organisations in England are involving disabled people in the Disability Equality Duty. *Disability & Society* 26 (3), pp.255-268.
- Peel, D. and Posas, P. (2009). Promoting disability equality and inclusive learning in planning education. *Innovations in Education & Teaching International* 46 (2), pp.227-235.
- Police Federation of England and Wales (PFEW) (2013). *Submission to the consultation on the Public Sector Equality Duty*. Available at:
http://www.polfed.org/documents/PFEW_consultation_response_PSED_120413.pdf
(Accessed: 14th May 2013).
- Rubenstein, M. (2013). Will turkeys vote for Christmas? *Equal Opportunities Review* February 2013 (233).
- Russell, H., Lepine, E., Newman, I., Dickinson, S., Meegan, R., Lawrence, R., Luanaigh, A., Swift, J., Grimshaw, L. and Chapman, R. (2010). *The role of Local Strategic Partnerships and Local Area Agreements in promoting equalities*. *Research Report 63*. Available at:
http://www.equalityhumanrights.com/uploaded_files/research/research_report_63.pdf
(Accessed: 30th August 2013).
- Sands, D. (2011). *Single Mothers: Singled Out*. London: The Fawcett Society.
- Schneider-Ross (2002). *Towards Racial Equality: An evaluation of the public duty to promote race equality and good race relations in England and Wales*. The Commission for Racial Equality. Available at:
http://www.equalityhumanrights.com/uploaded_files/EqualityAct/PSED/research_doc_towards_racial_equality.pdf (Accessed: 1st June 2013).
- Schneider-Ross (2009). *Equality Duties: Assessing the Cost & Cost Effectiveness of the Specific Race, Disability & Gender Equality Duties*. The Government Equalities Office. Available at:
http://www.equalityhumanrights.com/uploaded_files/EqualityAct/PSED/geo_schneider_ross_research_2009.pdf (Accessed: 14th May 2013).
- Sclater, E. (2009). *Making practice happen: Practitioners' views on the most effective specific equality duties*. Equality and Human Rights Commission. Available at:
<http://www.equalityhumanrights.com> (Accessed: 1st June 2013).
- Shared Intelligence (2012). *Evaluation of the Equality Delivery System (EDS) for the NHS. Phase one: Final Report*. NHS Equality and Diversity Council. Available at:
<http://www.uhb.nhs.uk/Downloads/pdf/EdsEvaluationPhaseOneFinalReport.pdf> (Accessed: 1st June 2013).
- Sin, C. and Fong, J. (2010). Commissioning research, promoting equality: reflections on the Disability Rights Commission's experiences of involving disabled children and young people. *Children's Geographies* 8 (1), pp.35-50.
- Stalker, K., Brunner, R., Maguire, R. and Mitchell, J. (2011). Tackling the barriers to disabled parents' involvement in their children's education. *Educational Review* 63 (2), pp.233-250.
- Stephenson, M. A. and Harrison, J. (2011). Unravelling Equality: The Impact of the United Kingdom's Spending Cuts on Women. *POLITICAL QUARTERLY* 82 (4), pp.645-650.
- Stonewall (2013). *Stonewall response to the Public Sector Equality Duty Review*. Available at:
http://www.stonewall.org.uk/what_we_do/research_and_policy/equality_act_2010/8726.asp
(Accessed: 14th May 2013).

The Discrimination Law Association (DLA) (2013). *Submission to the Review of the Public Sector Equality Duty Call for Evidence*. Available at: <http://www.edf.org.uk/blog/wp-content/uploads/2013/04/DLA-submission-PSED-Review.pdf> (Accessed: 14th May 2013).

The Fawcett Society (2012). *The Impact of Austerity on Women. Fawcett Society Policy Briefing: March 2012*. Available at: <http://www.fawcettsociety.org.uk/wp-content/uploads/2013/02/The-Impact-of-Austerity-on-Women-19th-March-2012.pdf> (Accessed: 1st July 2013).

The Fawcett Society (2013). *The changing labour market: delivering for women, delivering for growth*. Available at: <http://www.fawcettsociety.org.uk/wp-content/uploads/2013/04/Fawcett-The-changing-labour-market.pdf> (Accessed: 1st July 2013).

The Fawcett Society (2013a). *The Fawcett Society's Policy Submission to the Review of the Public Sector Equality Duty*. Available at: <http://www.fawcettsociety.org.uk/wp-content/uploads/2013/04/Fawcett-submission-to-Review-of-the-Public-Sector-Equality-Duty-April-2013.pdf> (Accessed: 1st June 2013).

The Race Equality Commission (REC) (2013). *Submission to the Review of the Public Sector Equality Duty*. Available at: http://www.voice4change-england.co.uk/webfm_send/191 (Accessed: 14th May 2013).

TUC (2011). *The Gender Impact of the Cuts - a year on*. Available at: <http://www.tuc.org.uk/extras/genderimpactofthecuts.pdf> (Accessed: 15th May 2013).

TUC (2013). *Response to the public sector Equality Duty review*. Available at: <http://www.tuc.org.uk/equality/tuc-22115-f0.cfm> (Accessed: 15th May 2013).

UNISON (2013). *Unison Public Sector Equality Duty Review. UNISON response to government call for evidence*. Available at: <http://www.edf.org.uk/blog/?p=22172> (Accessed: 17th May 2013).

Women's Budget Group (WBG) (2010). *Budget Analysis July 2010: The Coalition Budget Fails the Gender Equality Test. A 'Maid Marion' Tax Could Help It Pass*. Available at: http://wbg.org.uk/documents/WBG_Budget_Analysis_Press_Release_July_2010.pdf (Accessed: 14th May 2013).

Women's Budget Group (WBG) (2011). *The Impact on Women of the Budget 2011*. Available at: http://www.wbg.org.uk/index_7_282363355.pdf (Accessed: 14th May 2013).

Women's Budget Group (WBG) (2013). *The Impact on Women of Budget 2013. A budget for inequality and recession*. Available at: http://wbg.org.uk/pdfs/0-WBG_Budget-Analysis_2013.pdf (Accessed: 14th May 2013).

Women's Budget Group (WBG) (2013a). *Women's Budget Group further comments on Budget 2013*. Available at: (Accessed: 14th May 2013).

Wright, T. (2013). *Submission of evidence to government review of the Public Sector Equality Duty*. Centre for Research in Equality and Diversity. Available at: <http://www.edf.org.uk/blog/?p=22172> (Accessed: 1st June 2013).