

Proposal for a public duty to promote gender equality.

February 2005

Purpose and intended effect of measure

The objective

1. The overall aim of the duty will be to encourage public bodies (as employers and/or service providers) to take a proactive approach to the different needs of women and men.
2. The proposed legislation would introduce a general duty on public bodies in Great Britain to promote gender equality when exercising functions; certain sections of the public sector would have additional requirements imposed on them through specific duties. While there are some differences in the frameworks of the duty for the options explored below, there is a strong common base.
3. The general duty would require all public bodies (unless exempt), when exercising their functions, to have due regard to:
 - the need to eliminate unlawful discrimination; and
 - the need to promote equality of opportunity between women and men.
4. Public bodies, listed in the relevant secondary legislation (to be laid at a later date), will also be subject to a specific duty to promote gender equality. The exact obligations under a specific duty vary between the various options explored below. Whichever option is considered, the specific duty will impose a requirement upon a public authority to take specified actions in order to ensure it is fully compliant with the overall general duty. Many public bodies (central Government, local Government, NHS institutions, etc) are likely to be covered by the specific duties. Those not covered would tend to be smaller public authorities for whom specific action is not thought proportionate to their operational capacity.

Background

5. At present the 1975 Sex Discrimination Act only applies to public bodies in relation to employment, education and the provision of some

goods, functions and services. However, their policy, decision-making and administrative functions and service delivery to the extent that it falls outside the Act's definitions, are not covered.

Risk assessment (or the case for intervention)

6. The case for intervention through a gender duty complements other policies that aim to reduce discrimination on the grounds of gender and promote equality of opportunity between men and women. There are well established policy goals of ensuring that the provision of services by public authorities meets the different needs of men and women; of seeking to close the gender pay gap; and of ensuring that gender inequalities are reduced in public sector employment with a view to producing a well equipped workforce for the future.

7. Public Services: In spite of the existence of codes of practice, many men and women suffer from services that are designed to a 'one-size-fits-all' model which does not look at different needs.¹

8. For example:

- The majority of frontline users of health and education services are women. Men are sometimes reluctant to use public services which they see as irrelevant to their needs. Meeting these different needs is therefore an important part of delivering better services.
- Women are the main users of public transport, and they use transport at different times, in different ways and for different reasons from men, both to get to work, and to access services, childcare and food shopping. These different needs are not always recognised.

9. The design and delivery of services could also benefit considerably from greater analysis of the gender differences in user needs. For example, there are significant differences in women's and men's health needs and behaviour, shaped by both biological and social factors, which do not currently figure in high level health policy targets. (Promoting Gender Equality in Health, Doyal, Payne and Cameron, EOC, 2003) To illustrate this, while women are more susceptible to lung cancer, more men die of the disease. The reason is that they seek medical intervention at a late stage in the process and lose out on life-saving procedures.

10. Systemic change is required in many parts of the public sector if the needs of staff and customers are to be adequately met. For a number of years, Government has encouraged the mainstreaming of gender into policies and services across the public sector, and is

¹ In 2002 the Audit Commission found that, "although the majority of local councils have some kind of equality and diversity policy, it is rarely translated into strategy and even more rarely into action plans with challenging targets."

currently pursuing this through Public Service Agreements, but progress has been slow. Furthermore there is potential for the public sector to influence the private sector through its procurement activities.

11. Pay: Although there has been a narrowing of the pay gap since the 1970s, the average hourly earnings of women was still 82% of men's in 2003 for full-time workers and only 60% for those women who work part-time compared to full time male workers.² And, in spite of the fact that women make up 70% of the public sector workforce only 25 per cent of senior civil servants are female, and just 30 per cent of Grade 6/7 staff were female. There exists a pay gap of 10% in the public sector³ amongst those who work full-time. This gap may well continue to close, but experience has shown that this could take considerable time.

12. There are many reasons for the pay gap, both in the public and private sector, including career choices, opportunities to take on various types of work, discrimination and discontinuity of work to take on caring responsibilities. Tackling these needs more than a legislative approach that concentrates on discrimination. A gender duty would start to address some of these root causes both in the provision of services and through their role as an employer.

13. Career choices and skills: Although evidence shows that girls are now performing better academically than boys, this is not mirrored in the positions they achieve within the workforce. Women's employment opportunities continue to be constrained by subject choices made at school. Evidence suggests that subject choices are influenced by gender in all levels of education. There are currently stark differences in the gender split for modern apprenticeships, with women accounting for almost 90% of Advanced Modern Apprenticeships (AMAs) starts in travel services and hairdressing, and men accounting for over 98% of AMAs in construction, electrotechnical, engineering, plumbing and the motor industry (and 95% in engineering). 98% of AMAs in early years care and education are taken up by women and 88% of health and social care AMAs.⁴

14. This is particularly evident for those taking non-graduate qualifications but also occurs amongst undergraduates, for example only 12% of those accepted to take engineering as a degree in 2003 were women.⁵ Few people choose subjects that they associate with the opposite sex and in doing this certain paths of employment are immediately closed down. Some schools have developed schemes specifically to support boys' learning, but many boys and girls are still going into stereotyped jobs, resulting in lower pay for women and skills

² Source: Office of national Statistics

³ Source: New Earnings survey and Civil Service statistics of permanent staff in post in April 2002.

⁴ Equal Opportunities Commission, "Facts about women and men in Great Britain," data sourced from the Learning and Skills Council.

⁵ UCAS

shortages for employers. Awareness needs to be increased, of the importance of education and career choices, and the implications for long term earning potential.

15. Currently around two thirds of women in employment work in either 'public administration, education and health' or 'distribution, hotels and catering'. By comparison, men's employment is more evenly spread across the industrial sectors.⁶ Women are also less likely to work as managers or senior officials than men – just 10% of all women in employment compared to 18% of men.⁷ This gendered segregation of the workforce is termed occupational segregation and disproportionately affects women who are typically concentrated in more junior positions within lower paying employment sectors. Occupational segregation is one of the main reasons for the pay gap between men and women and has also been identified as a factor behind the skills shortages currently affecting various industry sectors. In 2003 50% of hard-to-fill vacancies were caused by skills-related problems.⁸ The sectors experiencing the highest skills vacancies were correspondingly those in which women were poorly represented. An example is construction where women constitute only 1% of the skilled workforce.⁹

16. Discrimination: In 2003/04 there were 22,134 applications to Employment Tribunals in Great Britain which covered the jurisdictions of discrimination or equal pay.¹⁰ While the public sector accounts for 18% of all employment tribunal cases, it accounts for 27% of sex discrimination cases.¹¹ However, it's worth noting that 37% of all female employees work for the public sector, relative to just 20% of male employees.¹² Both the high level of discrimination cases and the concentration in the public sector, point to the need for policies aimed at the public sector as an employer to take a more pro-active approach to solving this issue and to influencing the private sector where it can.

17. Opportunities: Women make up the vast majority of part-time workers (81%), and tend to be concentrated in certain occupations - such as wholesale and retail, education, health and social work. 44% of all female employees work part-time; but in the wholesale, retail and motor trade sector and the hotel and restaurant sector the share is 59%, in education it is 47%, and in health and social work it is 46%. These sectors combined employ 56% of all female employees.¹³ Some employers

⁶ Labour Force Survey (Spring 2004)

⁷ WEU Gender Briefing (April 2004)

⁸ National Employer Skills survey 2003: Key Findings, prepared for Learning & Skills Council, by Institute for Employment Research, University of Warwick

⁹ Equal Opportunities Commission ,Report of phase 1 of the investigation into Gender Segregation and Modern Apprenticeships, May 2004

¹⁰ See The Employment Tribunal Service annual report and accounts 2003-04

¹¹ Source: The Survey of Employment Tribunal Applications (SETA) 2003

¹² Source: Labour Force Survey, Spring 2004, Office for National Statistics.

¹³ Source: ONS Labour Force Survey, Spring 2003.)

view part-time workers less favourably when considering promotions or access to training opportunities, which disproportionately affects the progression of women in the workplace. Opportunities for part-time work at a senior level are also limited, as are opportunities to work flexibly; the latter can deter women from applying for senior posts and make it more difficult for men in such posts to share childcare responsibilities. In 2003 only 27% of women and 18% of men who were employed had some form of flexible working arrangement.¹⁴

18. Caring responsibilities: Lack of childcare support has a huge impact on women's ability to access employment and services, yet public service providers and employers seldom take this into account. A recent EOC survey found that almost four out of every ten mothers and over one in ten fathers had left a job or been unable to take a job because of their parenting responsibilities; this also applied to nearly one in four carers.¹⁵ In 2003 there were just over a million places with childminders, full day care, or out of school clubs, relative to almost 4.7 million children under the age of eight.¹⁶ This can lead to a larger proportion of female employees taking long career breaks, or working part-time than would otherwise be the case.¹⁷

19. The ageing population will lead to a shift in caring responsibilities towards the elderly, and employers will have to adjust to an ageing, and possibly shrinking, workforce. This, in conjunction with skill shortages, strengthens the case for employers to be more proactive in promoting equality and developing their staff and retaining experienced personnel. The provision of more flexible working conditions will help employers to attract and retain more staff. This would be particularly important in sectors likely to come under increased pressure with an ageing population, such as healthcare services where there is a concentration of female workers.

20. The existence of race and disability public duties, pose an additional risk that gender becomes downgraded as an issue for public sector bodies. More recently the Audit Commission have identified the race duty as 'the key driver of activity to address race equality across the public sector' (Journey to Race Equality 2004, p42). The gender duty should provide a similar impetus to action.

¹⁴ Equal Opportunities Commission, "Facts about women and men in Great Britain 2004," data sourced from the Labour Force Survey Spring 2002 dataset revised March 2004

¹⁵ There is also evidence from forthcoming EOC research in this area that some women have also been obliged to change jobs or to accept lower pay and responsibilities on returning to work after maternity leave, in order to access flexible working.

¹⁶ Equal Opportunities Commission, "Facts about women and men in Great Britain."

¹⁷ "The impact of women's position in the labour market on pay and implications for UK productivity," Walby et al, November 2002, suggests that 25% of women currently working part-time would be prepared to increase their working hours to full-time in response to either better pay, or more flexible working hours and conditions.

Options

Option 1

21. This approach has some similarities with the current race and prospective disability public duties but couched to focus mainly on outcomes. The onus would be on authorities themselves to identify areas of their policies and practices that require improvement in relation to gender and set specific objectives. All public bodies will have to comply with a general duty, and many will have to comply with specific duties. Public bodies would be encouraged, but not obliged, to take account of relevant targets set at national or sectoral level, when seeking to comply with the duty.
22. Specific duties will encourage bodies to consider how they can fulfil their duties to eliminate unlawful discrimination against women and men, and promote equality of opportunity in relation to them. It is in taking action to be compliant with specific duties that there is a significant difference between this option and the model under the race duty (and a similar model under option 2). As the requirements below indicate this option would be far less-resource intensive and more focussed on outcomes than the race duty model and option 2. Under option 1, public bodies would be required to undertake the following in order to be compliant with specific duties:
 - Publish an action plan showing its gender equality priorities and targeted outcomes in relation to service users, employees;
 - take positive action to achieve these goals and make annual reports on progress on their outcomes (this could be part of a general annual report);
 - conduct gender impact assessments for legislation and major, relevant employment/policy/service developments, and have due regard to their outcomes.
23. Authorities will be required to review and update their action plans every three years.
24. This model has the benefit of being procedurally similar in legislative terms to the race and disability duties (i.e. general & specific duties), which public authorities are already familiar with. This may allow them to align the various schemes with greater ease and at less cost. This would also give public authorities greater freedom and flexibility in identifying areas or issues that need to be addressed to improve equality between men and women. This approach would be likely to deliver larger benefits than option 2; it will generate rapid, measurable progress towards gender equality through the requirement to demonstrate progress towards parallel non-statutory high level targets, while giving

individual authorities the freedom to develop an action plan that best addresses the key gender equality problems for each authority.

Option 2

25. This option outlines a similar duty which is designed and implemented in the same way as the public duty to promote race equality. Although this would share some elements with option 1 (the general duty would be the same), the specific duties would be more focused on processes, which public authorities must satisfy rather than focussed on outcomes. This model would impose a number of prescriptive specific duties on public authorities – with separate duties for general functions and employment. A typical authority would be expected to perform the following:

- set out the methodology which it would use to assess the impact of its existing and proposed policies and services on women and men and how they will be consulted;
- produce a gender equality scheme laying out its:
 - methodology;
 - areas identified as creating or suffering from inequality;
 - findings of consultation;
 - actions to be taken to address identified areas of inequality;
 - and arrangements the authority will put in place to gather the evidence necessary to track its progress in fulfilling its general duties.
- Develop detailed monitoring systems to assess the effects of training, management systems and disciplinary and grievance procedures
- Authorities would have to report on progress every year.
- conduct gender impact assessments for legislation and major, relevant employment/policy/service developments, and have due regard to their outcomes.

26. Authorities will be required to review and update their action plans every three years.

27. Again, this would be identical to the race duty, and therefore public authorities would be familiar with how it operates. However the general view held by public authorities of all varieties is that the race duty model is overly bureaucratic, process-driven and resource-intensive. Although this approach makes clear what authorities must do in order to be compliant, it does not allow for

much flexibility for authorities to comply with the duty in a manner which (i) suits their needs and situation; and (ii) leads to clear outcomes and hence a culture change.

Option 3

28. This would involve doing nothing. Efforts to improve the practices and services of the public sector in relation to gender would continue through existing mechanisms. Progress towards eliminating gender inequality will be slow, as experience shows that voluntary schemes suffer from slow and partial take-up. Some progress has been made with the local Government Equalities Standard but recent assessments have shown that many authorities direct the majority of their resources towards statutory duties.

29. Similarly, while voluntary schemes can have a high initial take-up rate, actual progress thereafter can be limited. For example, the Improvement and Development Agency's database showed that in 2002 only 45% of local authorities looked at gender equality issues as part of Best Value reviews, only 22% took gender considerations into account when setting targets and plans, and only 12% took gender issues into consideration in contract and partnership arrangements involving external bodies.

Costs and benefits

30. In estimating the costs associated with the public sector gender duty, we have drawn on the experiences of the Commission for Racial Equality (CRE) in drawing up the Race Equality Duty, the Greater London Authority (GLA) in implementing their gender equality scheme, and feedback from stakeholders complying with the Race Duty. It should be noted that the gender duty model outlined under option 1 is designed to be less resource intensive to implement and comply with than the race duty.

Sectors affected by the General Duty

31. The Race Relations (Amendment) Act 2000 placed a general duty on approximately 43,000 public authorities to promote race equality.¹⁸ We will use this figure to inform our estimate of the total cost to the public sector of an equivalent duty to promote gender equality. Where we have more detailed information on the type of authority, we have used it to form more accurate estimates of the cost implications of a

¹⁸ <http://www.homeoffice.gov.uk/comrace/race/raceact/dutyfaq.html>

gender duty. The table below shows a detailed breakdown of the numbers of public authorities by type.

1. Detailed breakdown of public authorities

	Number
¹⁹ Central government	70
Local authorities	410
Schools	23,000
Higher education institutions	131
Further education institutions	400
Strategic health authorities	46
Secondary care trusts	289
Primary Care organisations	327
Unitary trusts	28
Others	18,299
Total	43,000

Sources: Office of National Statistics, the Employers' Organisation for Local Government, the Department for Education and Skills and the Institute of Healthcare Management

32. When estimating costs to the public sector we have assumed that all public authorities are compliant with the gender duty. If this were not the case it is possible that they may be subject to judicial review, although none have been taken to date in relation to the race duty.

The majority of costs associated with the gender duty are likely to arise from specific duties upon bodies. Secondary legislation laying out the scope and detail of specific duties is still to be developed. It is therefore not possible at this stage to detail exactly which bodies will be affected and what they will be required to do. Nevertheless, we have endeavoured to estimate costs to authorities for which we can assume specific duties will apply. An more accurate estimate of the impact of the specific duties will be presented in a Full RIA to be developed through consultation.

33. The general duty of the gender duty will apply to those bodies undertaking functions of a definite public nature. While this will largely capture public authorities it may also apply to certain functions of private bodies if they are of an express public nature. Specific duties will not apply to private bodies. The impact upon business is assessed later in this document.

Benefits

34. The duty could help public authorities make more rapid and steady progress in achieving gender equality, contributing to more

¹⁹ Race duty legislation suggests that are approximately 50 bodies which could be considered central government, and 20 Ministers of the Crown.

informed decision making and ensuring that policies are properly targeted.

35. The duty should also encourage more openness and transparency in policy-making, for example by requiring authorities to produce gender impact assessments for key policy areas. This requirement, in conjunction with specific duties to develop action plans to meet gender equality obligations and report on progress, would help raise the profile of gender equality issues in terms of employment practices and service delivery, which is likely to lead to more rapid progress towards gender equality.

36. The public will benefit from improved access to high-quality, modern services which better meet their needs. For example, one of the outcomes of the Greater London Authority (GLA) Gender Equality Scheme was an increase in the number of night buses and improved security on public transport. Other examples would be improved access to public services outside the hours of 9-5pm, and improved childcare facilities in terms of affordability and accessibility.

37. The requirement to meet gender equality obligations in the workplace will benefit employers in terms of a more balanced workforce, attracting and retaining more able staff. By also meeting the different needs of women and men in the workplace, employers will also benefit from a better use of those resources who will be valued and respected. Better job matching using an increased pool of talent, accompanied by management practices that ensure that employee skills are properly developed and effectively deployed, will raise productivity.

38. More flexible work practices for men and women will also improve performance by raising staff morale and, home-working could reduce the amount of office space required. Flexible working may enable the authority to offer public services outside of "typical" working hours, a diverse staff mix could help the public sector to better meet the needs of its customers, and more content staff could raise customer satisfaction. For example, the Borough of Telford and Wrekin have recognised the difficulties that many parents and carers face and have therefore designed policies to support people with caring responsibilities. Their innovations have reduced staff turnover (3% compared to an average of 10% of councils across England), created a loyal workforce and reduced recruitment costs.²⁰ Costs of recruiting new staff are around £4,200.²¹

39. There would also be benefits to the economy in terms of encouraging more women to remain in the workplace, and to progress to senior posts, raising the aspirations of other women. By monitoring human resource data by gender, and making managers more informed

²⁰ EOC Research.

²¹ Source: CIPD; average over three years

of their gender duty obligations, this should help to narrow the pay-gap in the wider public sector.²²

40. Improving gender equality in education and access to apprenticeships and training will help to correct skill shortages in the economy which will also assist in narrowing the pay gap. The National Employers Skills Survey 2003 (NESS) found that at any one time, there are over a quarter of a million job vacancies that are hard-to-fill, and 135,000 which cannot be filled because of skill-shortages in the labour market. It reported that the major impact of skills vacancies on businesses are; increased workload for current employees, customer service difficulties, and loss of business due to sector skill vacancies.

Costs

One-off implementation costs

Cost to CEHR

41. Developing the duty would require the proposed Commission for Equality and Human Rights to consult widely, determine obligations and possibly targets, and produce guidance, training advice, and monitoring toolkits for public authorities. The CRE spent 18 months on preparing for implementing the statutory race equality duty, including a six-month consultation period. Based on their staffing requirements during this 18-month period, and feedback from the Greater London Authority in implementing their Gender Equality Scheme, we estimate that the one-off implementation costs for the CEHR would be between £415,000 and £655,000²³. Over 85 per cent of this total will comprise of staffing costs,²⁴ the remainder reflects the approximate cost of consultation and

²² Since the DTI made gender equality a key objective, the proportion of women in DTI senior civil service posts has increased from 21.6% in April 2000 to 31% in June 2004, relative to a 2005 target of 35%

²³ However, if the duty was to come into effect before the CEHR starts its business, these costs would fall to the EOC.

²⁴ Staff costs are based on information provided by the CRE in terms of the number of staff of varying grades working on implementing the duty for race equality. We have assumed two executive officers and 2 higher executive officers work on the duty over a period of 18 months, on a salary of £21,940 and £26,378 respectively. Between two thirds and all of one middle manager's time, on a salary of £45,800, and between one third and two thirds of an HEO level lawyer and a Range 10 lawyer's time, on respective salaries of £26,378 and £45,800. We have assumed that two communications staff of the same range as the legal staff mentioned above work on the duty, with the HEO spending half, to all of their time on the duty, and the Range 10 spending between a third and two thirds of their time on the duty. We have also allowed for one Grade 5/6 on a salary of £54,000 spending 25-50% of their time on the duty. All salaries have been increased by 30% to allow for non-wage costs.

publishing information.²⁵

Costs to public authorities in general

42. Costs would be incurred in reading the guidelines for those authorities to which only the general duty applies. Based on 15 minutes of a personnel manager's/equality co-ordinator's time to read the new guidelines,²⁶ we estimate that the general duty will cost these authorities between £279,000 and £285,000.

43. For public bodies covered by specific duties under options 1 or 2 there will be some one-off up-front costs. The amount of a personnel manager's/equality co-ordinator's time and designated member of staff's time spent on reading the legislation, consultation, and drawing up a scheme, varies according to the type of authority, with smaller authorities spending relatively less time. For example, central government spend 6-7 months, and local authorities spend 4-6 months. In calculating these staff costs we have taken the average earnings per hour of such an individual, assumed they work an 8-hour day, and multiplied this by 1.3 to take into account non-wage costs.²⁷

44. We have used ranges to estimate the time spent and associated cost, utilising anecdotal evidence associated with the implementation of the race duty. The one-off implementation costs associated with option 2 are higher because the process-orientated approach of the race duty model is more resource-intensive, and the consultation costs are higher, owing to the specific requirement to consult and report back.

45. Below we estimate costs to a range of authorities of complying with the gender duty. As already explained the coverage and scope of the specific duties is not yet known. Nevertheless, efforts have been made to estimate the costs to various public bodies in complying with what the specific duties could entail.

Costs to smaller authorities

46. Education Institutions: efforts will be made to mainstream the implementation of the gender duty within schools and other education institutions with other policies having a bearing on equality. We have

²⁵ Greater London Authority spent approximately £3000 on consultation when developing their Gender Equality Scheme. We estimate that approximately £30,000-£75,000 would be spent by CEHR on consultation and £10,000-£20,000 on producing guidance.

²⁶ The average hourly earnings of a Personnel, training and industrial relations manager, excluding overtime, are £21.75, New Earnings Survey 2003. We have increased this by 30% to take into account the non-wage costs = £28.28. Based on 15 minutes reading time for schools, and 90-95% of 'other public authorities' ie. 39,469 to 40,384 public authorities; $(39,469 * (28.28/4)) = £279,000$, and $(40,384 * (28.28/4)) = £285,000$.

²⁷ The average hourly earnings of a Personnel/equality co-ordinator, training and industrial relations manager, excluding overtime, are £21.75, New Earnings Survey 2003. We have increased this by 30% to take into account the non-wage costs = £28.28.

yet to determine what if any specific requirements there should be for these bodies. Once agreed, any additional one-off costs can be estimated.

47. Other Health Authorities: (primary care organisations, unitary trusts, and secondary care trusts.) We have assumed that health authorities (excluding Strategic Health Authorities which are included under local authorities) will spend a similar amount of time to Higher Education and Further Education institutions on implementation. The one-off implementation cost is estimated at £0.6-£1 million under option 1 and £0.7-£1.2 million under option 2.²⁸

48. Other Authorities: we have assumed that 5-10% of authorities in this category (915 to 1830 authorities) will have to comply with specific duties. Under option 1 we expect a personnel manager/equality co-ordinator to spend 2.5 days on reading legislation and putting a scheme in place, and under option 2 we expect that individual to spend 3 days.²⁹

Larger authorities

49. We have used a slightly different approach for local and central government. Feedback suggests that local authorities had one senior coordinator on an annual salary of approximately £45,500 allowing for non-wage costs³⁰, working on drawing up the race scheme for six months.

50. Local authorities: costs are based on a senior coordinator spending 5 months under option 1, and 6 months under option 2, reading legislation, consulting, and drawing up a plan. The consultation cost is also higher under option 2 to reflect the specific duty to consult.³¹ Ranges have also been adopted under each option to reflect the fact that some local authorities may already meet some of the specific duties or have some of the necessary processes already underway; we assume that between 10-33% of local authorities already have the essentials for a gender equality plan in place.³² Scaling these costs up across 410 local

²⁸ A local authority said they had an Equalities Officer on a salary of £35,000, which adjusted for non-wage costs amounts to £45,500. $((45,500/12)*0.25)*644$ authorities) = £0.6 million, $((45,500/12)*0.4)*644$ = £1 million. For option 2 a range of 0.3 of a month and 0.5 of a month are assumed, producing an implementation cost of £0.7-£1.2 million.

²⁹ Cost per day is £28.28 x 8 hours=£226. The total cost these authorities is therefore; $(£226 \times 2.5 \times 915)$ to $(£226 \times 2.5 \times 1830)$ under option 1: £0.5-£1 million and $(£226 \times 3 \times 515)$ to $(£226 \times 3 \times 1030)$ under option 2: £0.6-£1.2 million.

³⁰ Senior coordinator salary of £35,000, increased by 30% to allow for non-wage costs.

³¹ The Greater London Authority spent approximately £3000 consulting with four focus groups when drawing up their Gender Equality Scheme. We have used this as the upper limit of our range under option 1 (£1500-£3000) and as the midpoint of our range under option 2 (£2000-£4000.)

³² The Improvement and Development Agency Best Value Database: indicated that 44% of local authorities take gender considerations into account in consultation, though those with a scheme in place is likely to be lower, and we are including Strategic Health Authorities, thus we assume 33% as our upper range. 12% of authorities took gender

authorities and 46 Strategic Health Authorities, implies a one-off implementation cost of £6.5 million to £9.2 million under option 1 and £7.8 million to £11.2 million under option 2.³³

51. Central government: costs are based on a senior coordinator spending 6 months under option 1, and 7 months under option 2, reading legislation, consulting, and drawing up a plan. The consultation cost is also higher under option 2 to reflect the specific duty to consult.³⁴ Ranges have also been adopted under each option to reflect the fact that some central government organisations may already meet some of the specific duties or have some of the necessary processes already underway. While we believe the majority of central government bodies will be considering gender equality at some level we assume that 10-25%³⁵ would have the essentials for a gender equality plan in place and comply with the specific duties. Scaling these costs up across 70 central government bodies produces a one-off implementation cost of £1.3-£1.8 million under option 1 and £1.6 million-£2.1 million under option 2.³⁶

52. Table 2 shows that the total one-off implementation cost to public authorities is expected to be between £11 million and £15 million under option 1, and between £13 million and £19 million under option 2.

considerations into account with regard to contract or partnership arrangements, adding in Strategic Health Authorities, we have adopted 10% as our lower range.

³³ If 5 months of a senior coordinator's time is taken; $((45,500/12)*5)*(456*0.66)=£5.8$ million to $((45,500/12)*5)*(456*0.9)=£7.8$ million. (Substitute 5 months with 6 months for option 2.) In addition there is a consultation cost of £0.7 to £1.4 million under option 1, and £0.9 and £1.8 million under option 2. In both cases we assume that all authorities will have to conduct a specific consultation prior to drawing up their action plan.

³⁴ The Greater London Authority spent approximately £3000 consulting with four focus groups when drawing up their Gender Equality Scheme. We have adopted a range of £2,000-£5000 for option 1 and a range of £3,000-£6,000 for option 2.

³⁵ Improvement and Development Agency: Best Value Database suggests 22% of local authorities are considering gender when setting improvement targets and plans, and 12% consider gender equality in contract and partnership arrangements. We have assumed a range of 10-25% for central government bodies.

³⁶ If 6 months of a senior coordinator's time is taken; $((45,500/12)*6)*(70*0.75)=£1.3$ million to $((45,500/12)*6)*70=£1.8$ million. (Substitute 6 months with 7 months for option 2.) In addition there is a consultation cost of £0.1 to £0.3 million under option 1, and £0.2 and £0.4 million under option 2. In both cases we assume that all authorities will have to conduct a specific consultation prior to drawing up their action plan.

2. Total one-off implementation costs to public authorities (£ million)

	Option 1		Option 2	
	Low range (£)	High range (£)	Low range (£)	High range (£)
CEHR	0.4	0.7	0.4	0.7
General Duty	0.28	0.29	0.28	0.29
Specific Duty				
Local Authorities	6.5	9.2	7.8	11.2
Health Authorities	0.6	1.0	0.7	1.2
Central Government	1.3	1.8	1.6	2.1
Others	0.5	1.0	0.6	1.2
Total	9.2	13.9	11.5	16.7

53. There will also be a one-off cost to business of adapting to the gender duty, which has been estimated at between £0.8 million and £1.7 million (see cost to business section, paragraph 79.)

Ongoing implementation costs

54. There will be ongoing implementation costs to public authorities subject to additional requirements such as the requirement to produce action plans every three years and to report on progress against the plan on an annual basis. This will necessitate the ongoing collection and monitoring of gender data in terms of employment, training, and service delivery. We also anticipate that some of central government and some local authorities will commission research/surveys to inform the action plan. Central government and local authorities (the latter includes Local Education Authorities and Strategic Health Authorities) will also be required to produce gender impact assessments for key policy changes that could impact upon gender equality.

Producing an action plan

55. Authorities will identify their own gender equality priorities, through ongoing monitoring activity and analysis of this data against targets outlined in the action plan. Progress against targets is reported on an annual basis, and the action plan itself is revised every 3 years. Option 2 will take up more of a personnel manager/equality co-ordinator and administrative officer's time because of the process requirements involved. We anticipate that the annual reporting back will involve reporting data from the past year, which is required to assess progress against the existing action plan and inform the revised version. We therefore spread our cost estimates associated with the plan over three years.

Costs to smaller authorities

56. Education Institutions: there may be additional reporting requirements upon schools and other education bodies but it is likely these will be mainstreamed in other procedures. The associated costs

are considered to be small, but will be estimated once these requirements have been agreed.

57. Other health Authorities: we have assumed that these authorities (primary care organisations, unitary trusts, and secondary care trusts) will have the same staff time requirements as Higher Education and Further Education institutions associated with the action plan. The one-off implementation cost is estimated at £0.1 million under option 1 and £0.2 million under option 2.³⁷

58. Other Authorities: we have assumed that 5-10% of authorities in this category (915 to 1830 authorities) will have to comply with specific duties. We assume the same staff requirements as for health authorities under option 1; namely 1 day of personnel manager/equality co-ordinator time, 1.5 days of administrative office time and 1.5 days of research officer time. We expect the small percentage of 'other' authorities that are subject to the specific duty to have limited staff resource time, therefore allowing just half a day extra of personnel manager's/equality co-ordinator's time under option 2. The annual implementation costs are estimated at £0.18-£0.35 million under option 1 and £0.2 to £0.4 million under option 2.³⁸

Costs to larger authorities

59. Local authorities: we anticipate that local authorities would have a personnel, training, or industrial relations manager drawing up the plan and coordinating input from a statistician/researcher and an administrative assistant over a period of 2 days under option 1, and 4 days under option 2. We have estimated that 2 days of an administrative assistant's time is required under option 1 and 2.5 days under option 2. Two days of a statistician or researcher's time are involved under both option 1 and 2. We assume that 0-20% of local authorities are already gathering and monitoring gender data, or could easily incorporate this into processes set up as a result of the race duty. Indeed some may already set gender equality targets and monitor progress towards these goals.³⁹

³⁷ Under option 1: (1 day of a personnel manager's/equality co-ordinator's time: (£28.28*8*644) + 1.5 days of an administrative officer's time (£11.06*8*1.5*644) + 1.5 days of researcher's time (£18.15*8*1.5*644))/3 = £0.1 million. Substitute 1 day of personnel time with 2 days and 1.5 days of administrative officer time with 2 days for option 2.

³⁸ Under option 1: (1 day of a personnel manager's/equality co-ordinator's time: (£28.28*8*515) to (£28.28*8*1030) + 1.5 days of an administrative officer's time (£11.06*8*1.5*515) to (£11.06*8*1.5*1030) + 1.5 days of researcher's time (£18.15*8*1.5*515) to (£18.15*8*1.5*1030))/3 = £0.1-£0.2 million. Substitute 1 day of personnel time with 1.5 days for option 2.

³⁹ Improvement and Development Agency: Best Value Database suggests 22% of local authorities are considering gender when setting improvement targets and plans.

60. We also anticipate that that 25-50% of local authorities commission research for the purpose of developing their action plan at a cost of £15000, or spread over 3 years £5000 per annum. Combining research costs with staffing costs associated with the action plan (applying the same methodology as in footnote ⁴¹, but for a range of 0-20% of 456 local authorities) produces an annual cost which rounds to £0.6 million-£1.2 million under both options 1 and 2.

61. Local authorities will also be required to produce gender impact assessments for major changes that are likely to have a gender impact. We assume there will be 3 changes a year requiring a gender impact assessment, with the researcher spending between half a day to a full day on each under both option 1 and option 2. In both instances we assume that the researcher is able to draw on the existing gender evidence base.⁴⁰ We estimate that this will cost local authorities between £0.1 and £0.2 million, which when combined with the annual cost stated above, produces an annual implementation cost for local authorities of between £0.7 million and £1.4 million.

62. Central government: we anticipate that central government would have a personnel, training, or industrial relations manager drawing up the plan and coordinating input from a statistician/researcher and an administrative assistant over a period of 2 days under option 1 and 4 days under option 2. We have estimated that 2 days of an administrative assistant's time is required under option 1 and 2.5 days under option 2. Two days of a statistician or researcher's time are involved under both option 1 and 2. We assume that 10-25% of central government bodies either already have an action plan in place, or are already setting gender equality targets and monitoring progress towards these goals; several central government authorities are already gathering and monitoring gender data, or could easily incorporate this into processes set up as a result of the race duty.⁴¹

63. We also anticipate that that 25-50% of central government bodies commission research for the purposes of developing their action plan a cost of £15000, or spread over 3 years £5000 per annum. Combining research costs with staffing costs associated with the action plan (applying the same methodology as in footnote 41, but for a range of 75-90% of 70 central government bodies) produces an annual cost which rounds to £0.1 million-£0.2 million under options 1 and 2. Here we assume that 10-25% of central government bodies are already gathering and monitoring gender data, or could easily incorporate this into

⁴⁰ The average hourly earnings of a researcher, excluding overtime, are £13.96, New Earnings Survey 2003. We have increased this by 30% to take into account the non-wage costs = £18.15. $(£18.15 * 4 * 456) * 3$ to $(£18.15 * 8 * 456) * 3 = £0.1$ million to £0.2 million.

⁴¹ Improvement and Development Agency: Best Value Database suggests 22% of local authorities are considering gender when setting improvement targets and plans, and 12% consider gender equality in contract and partnership arrangements. We have assumed a range of 10-25% for central government bodies.

processes set up as a result of the race duty. Indeed some may already set gender equality targets and monitor progress towards these goals.

64. Central government will also be required to produce gender impact assessments for major policy changes that are likely to have a gender impact. Equality considerations already form part of the Regulatory Impact Assessments that accompany policy proposals. Gender Impact Assessments will only be necessary where a major change is being considered which would have an obvious gender impact. We estimate that each central government authority could have 1-3 such cases a year, with a researcher spending approximately a day on each. We assume that the researcher is able to draw on the existing gender evidence base. We estimate that this will cost central government authorities between £0.01 and £0.03 million⁴², which when combined with the annual cost stated above, produces an annual implementation cost for central government of between £0.1 million and £0.2 million under both option 1 and option 2.

65. Table 3 shows that the annual implementation cost to public authorities subject to specific duties is expected to be between around £1.1 million and £2.1 million under option 1 and between £1.2 million and £2.2 million under option 2.

3. Total ongoing implementation costs to public authorities subject to specific duties

Action plans: and associated monitoring and reporting back	Option 1		Option 2	
	Low range (£)	High range (£)	Low range (£)	High range (£)
Local Authorities	0.7	1.4	0.7	1.4
Health authorities	0.1	0.1	0.2	0.2
Central Government	0.09	0.21	0.1	0.22
Others	0.18	0.35	0.2	0.4
Total	1.1	2.1	1.2	2.2

66. The total ongoing implementation cost to business has been estimated at between £1.2 million and £2.4 million per year (see costs to business section, paragraphs 82 and 85.)

⁴² The average hourly earnings of a researcher, excluding overtime, are £13.96, New Earnings Survey 2003. We have increased this by 30% to take into account the non-wage costs = £18.15. (£18.15*8*70) to (£18.15*8*70)*3 = £0.01 million to £0.03 million.

Policy costs

Cost to CEHR

67. The CEHR would have to incur the cost of providing information and guidance on an ongoing basis - including giving hands-on guidance. We estimate that this will cost CEHR between £10,000 and £12,000 per annum, which includes some telephone guidance.⁴³

68. CEHR would also need to monitor compliance. The CRE have 25 staff involved in visiting local authorities to aid compliance. We assume that a similar number will be needed to monitor the gender duty. If annual staff wages are about £35,000 for each member of staff,⁴⁴ £45,500 after allowing for non-wage costs. Under option 1 which is less process-focused, we estimate that 8-10 officials will be required to monitor compliance with the gender duty, at a cost of £0.36 million-£0.46 million. Under option 2, we estimate that 16-20 officials will be required to monitor compliance with the gender duty, at a cost of £0.73 million-£0.91 million.⁴⁵ In both instances we assume there are some efficiency gains from combining compliance-monitoring activities across equality strands.

Cost to public authorities

69. The coordinating public authorities receiving information from the CEHR are expected to disseminate this information to authorities within their remit at an arbitrary cost of £500 per annum. When applied to the 526 authorities receiving such information⁴⁶ this produces an annual cost of £263,000.

70. Public authorities will also have to undergo some regular training activities. Feedback suggests that this can be done at fairly low cost, by incorporating gender equality into a section of the authority's website or employee handbook. This could also be done at a centralised level and filtered down where appropriate. There may be a small amount of specific training for managers in terms of employment practices, and also front-line staff, which is carried out through a series of meetings.

⁴³ Evidence provided from the local government equality standard has informed this estimate, which has been scaled up by 25%-50% to cover all local authorities, strategic health authorities, central government authorities.

⁴⁴ Equivalent salary to that of a senior coordinator or a quality assurance manager, increased by 30% to reflect non-wage costs = £45,500.

⁴⁵ Under option 1 we estimate that 8-10 such officials would have responsibility for monitoring compliance with the gender duty: (8*45500) to (10*45500) = £0.36 million to £0.46 million. Under option 2, which is more process-focused we assume that 16-20 such officials would be involved in monitoring compliance. We are still allowing for some efficiency gains from monitoring compliance across equality strands, relative to CRE staff requirement.

⁴⁶ Central government (70) + local authorities (410) + Strategic Health Authorities (46) = 526

This would build on the processes already created in response to the introduction of the public duty to promote race equality.

71. Table 4 shows that the annual policy cost to public authorities is expected to be between £0.6 million and £0.7 million under option 1 and between £1 million and £1.2 million under option 2.

4. Total ongoing policy costs to public authorities

	Option 1		Option 2	
	Low range (£)	High range (£)	Low range (£)	High range (£)
CEHR provision of guidance	0.01	0.01	0.01	0.01
Central and local government disseminating information	0.26	0.26	0.26	0.26
CEHR checking compliance	0.36	0.46	0.7	0.9
Total	0.6	0.7	1.0	1.2

Costs to business

72. The general duty of the gender duty will apply to those bodies undertaking functions of a definite public nature. While this will largely capture public authorities it may also apply to certain functions of private bodies if they are of an express public nature. Private bodies of this kind will not be subject to specific duties.

73. Gender equality requirements on private contractors would most likely be clearly set out in the contractual arrangements with the public body concerned. This would include a condition that they meet certain gender equality standards either when working on the public authority's premises or when coming into contact with the authority's staff or the public. If certain gender equality service requirements have been agreed with the contractor as part of the project, contractual clauses will reinforce agreed obligations and contributions from both parties (as would always be the case with regard to specific deliverables included in a contract.)

74. In addition where gender equality is deemed a core requirement (usually when contractors come into direct contact with the public) of the procurement, the public body could ask the contractor for additional supporting evidence of good practice, and they would ensure that their requirements in terms of evidence were proportionate to the scale of contract and its relevance to gender equality, and to the size and experience of contractor.

75. There would therefore be a cost to contractors, which would generally be proportionate to their size, with additional costs for the small proportion of contractors coming into direct contact with the public. Where gender equality is a core requirement of the contract (ie. where the function is of an express public nature), one would expect this

to be built into the contract from the outset, as with any other contractual deliverable.

76. We have identified the industry sectors that typically have a heavy concentration of contractors within them, and estimated the number of small firms (10-49 employees) that could be affected. Only some of these would be contractors to the public sector, and equally there will be some contractors to the public sector in other industry sectors. We have made the cautious assumption that 25%-50% of these firms are contractors to the public sector, and to allow for the existence of contractors in sectors that we haven't considered. On this basis, we estimate that approximately 5,000-10,000 small firms will be affected. This has informed the estimated costs to business under paragraphs 82 and 85.

5. Estimate of small businesses affected.

Industry Sector	Employers with 10+ employees	Employers with 50+ employees
Canteens and catering	665	140
Computer hardware consultancy	150	25
Computer software consultancy	3,165	650
Maintenance: office, accounting and computing equipment	220	55
Cleaning	2350	750
Construction (exc. Equipment rental)	16,005	1,975
Investigation and Security Services	920	285
Sewage and refuse disposal, sanitation and similar activities	465	85
Total	23,940	3,965
Number of small firms (10-50 employees) in these sectors		19,975
Assume 25-50% small firms are contracting to public sector		4,994-9,988

Source: Small Business Service – small and medium enterprise statistics 2003

One-off implementation costs.

77. We assume that each of these small firms will spend 15 minutes reading the guidance⁴⁷ at a cost of between £35,000 and £71,000.

78. On the basis that the employers with 50 or more employees within these sectors (991-1983 employers) are more likely to be contractors to the public sector, we assume that 25% of these firms already have gender equality measures in place, or can easily adapt practices put in place as a result of the race duty. These firms are estimated to spend 3

⁴⁷ The average hourly earnings of a Personnel, training and industrial relations manager, excluding overtime, are £21.75, New Earnings Survey 2003. We have increased this by 30% to take into account the non-wage costs = £28.28. Based on 15 minutes reading time for 5000-1000 firms; $(4994 * (28.28/4)) = £35,300$, and $(9988 * (28.28/4)) = £70,600$.

days reviewing the necessary procedures and practices and gender equality guidelines at a cost of between £0.5 million and £1 million.⁴⁸

79. Requirements on contractors coming into direct contact with the public will be greater. We assume that 3% of the 5,000-10,000 firms identified in the table above may come into direct contact with the public. We anticipate that these firms will need to amend any leaflets or information they make available to the public to reflect gender equality values. On the basis that this costs each firm in the region of £2000, these firms will incur a one-off implementation cost of £0.3 to £0.6 million.⁴⁹

80. The total one-off cost to business of adapting to the gender duty has been estimated at between £0.8 million and £1.7 million.⁵⁰

Ongoing implementation costs

81. Of the medium to large firms discussed in paragraph 80, we again assuming that 25% already have gender equality monitoring in place. The remainder are expected to spend 1.5 days each year on monitoring and assessing gender equality data. We estimate that this will cost between £0.25 million and £0.5 million.⁵¹ In addition we anticipate that these firms will spend in the region of £250 updating their website and annual report with the latest data and assessment at a total cost of between £186,000 and £372,000.⁵²

82. We estimate that the 3% of firms coming into direct contact with the public (150-300 firms) will need to complete an annual customer satisfaction questionnaire at an estimated cost of £5000. This produces an ongoing cost of between £0.75 million and £1.5 million.

83. The total ongoing cost to business has been estimated at between £1.2 million and £2.4 million per year.⁵³

⁴⁸ The average hourly earnings of a Personnel, training and industrial relations manager, excluding overtime, are £21.75, New Earnings Survey 2003. We have increased this by 30% to take into account the non-wage costs = £28.28. Assuming each firm spends 3 days on introducing the necessary gender equality monitoring procedures and guidelines on gender equality for HR, we estimate this will cost between; $(£28.28*8*3)*(0.75*991) = £504,497$ and $(£28.28*8*3)*(0.75*1983) = £1$ million.

⁴⁹ $(0.03*4994)*2000 = £299,625$ and $(0.03*9988)*2000 = £599,250$

⁵⁰ Transitional cost for all contractors = £35,000-£7000. Transitional cost for 75% of medium and large firms = £0.5-£1 million. Transitional cost for firms coming into direct contact with the public = £0.3-£0.6 million.

⁵¹ $991 \text{ firms} * 0.75 = 743$, $1983 \text{ firms} * 0.75 = 1487$. Based on a personnel managers earnings, allowing for non-wage costs, of £28.28, spending 12 hours, $(12*28.28)*743 = £252,248$. Apply this to 1487 firms produces a total cost of £504,497.

⁵² $(£200*743) = £185,859$. $(£200*1487) = £371,719$.

⁵³ Ongoing cost for all contractors: 1.5 days management time at £23.21 for 4,994-9,988 businesses = £1.4-£2.8 million; Ongoing cost for medium and large firms disseminating information on a website and in annual report: £186,000-£372,000; Ongoing for firms

Small Firms' Impact Test

84. As is the case for the current Welsh Assembly's Equality Duty, guidance would make clear that public authorities should not impose unnecessary barriers to public sector markets. This suggests costs to contractors would generally be proportionate to their size.

85. SBS SME statistics show that there are a total of 19,975 firms with 10-49 employees in the industry sectors identified in the table above as typically having a large concentration of contractors.

86. Only some of these would be contractors to the public sector, and equally there will be some contractors to the public sector in other industry sectors. We have assumed a generous range of 25-50% to be applied to this total, to reflect the uncertainty over the number of contractors in the sectors we have considered, and to allow for the existence of contractors in sectors that we haven't considered. This has informed the estimated costs to business under paragraphs 82 and 85.

Equity and Fairness

87. There is evidence that women are most likely to suffer gender discrimination; 92% of sex discrimination cases promulgated in the year to March 2003 involved women, women will therefore benefit disproportionately from the legislation. However, there will be benefits men who have caring responsibilities, and men taking advantage of more flexible working practices, or more accessible services. Both males and females will benefit from gender equality improvements in education and equal access to training/ apprenticeship opportunities. A Race Impact Assessment will be conducted as the specific duties are developed and consultation undertaken.

Competition Assessment

88. The legislation, if fully implemented, is likely to lead to an increase over time in female participation rates through such measures as the provision of more flexible work practices and reducing gender discrimination in career progression and pay decisions. This should enhance overall competition in the labour market because gender would no longer act as a filter in terms of access to training, apprenticeships or promotion opportunities. We have applied the filter test and have not identified any sectors where competition between private sector firms would be adversely affected by the duty, once the fixed cost of implementing a gender equality scheme has been accounted for. Private sector firms without a gender equality scheme in place may lose out to those who already have a scheme in place. But the costs involved to ensure basic compliance are not such that they would act as a barrier to entry for private contractors.

coming into direct contact with the public – annual customer satisfaction survey : £0.75-£1.5 million.

Enforcement and Sanctions

89. The CEHR would be able to issue a compliance notice against any public authority that it is satisfied has failed to comply with its specific duties. This would require the public authority to comply with the duty concerned and also to provide information to the Commission within 28 days of the steps that have been taken. It would also require the public authority to give the CEHR other information to verify that the duty has been complied with. The CEHR will be able to apply for a court order requiring a public authority to comply with a requirement of a compliance notice where the CEHR considers that the public authority has not complied with it after three months of the compliance notice being served.

90. There will be no provision for individuals to bring a challenge in a County or Sheriff Court, however judicial review would be available where appropriate in respect of the general duty.

91. The establishment of the Commission for Equality and Human Rights may lead to a widening of powers in this area. Since the introduction of the gender duty is not dependent upon the establishment of the CEHR, the impact of this widening is covered in the RIA for that proposal.

Consultation

92. The following Government departments have been closely consulted during the development of the public duty to promote gender equality: *Department for Work and Pensions; HM Treasury; Number 10; the Scottish Executive; Department for Transport, Cabinet Office, Department for Education and Skills, Department of Health, National Assembly of Wales, Ministry of Defence, Home Office, Department for Constitutional Affairs and Office of the Deputy Prime Minister.*

93. Additionally, we have consulted informally with; *The Greater London Authority, Croydon Council, the Commission for Race Equality, the Equal Opportunities Commission, the Employers' Organisation, and DTI staff.*

94. A full public consultation will be held in 2005 to inform the development of the specific duties.

Monitoring and Review

95. The CEHR will take overall responsibility for monitoring the uptake and effect of the public duty to promote gender equality, and will produce a comprehensive review of the duty every three years. We envisage that this would be a high level review, involving for instance an assessment of changes in employment patterns, and satisfaction with services.

96. As explained earlier, inspectorates would be expected to monitor compliance with the duty. There will be no express duty on them to do so, but as the inspectorates themselves are subject to the duty they

would be expected to incorporate monitoring compliance with the duty into their general inspection regimes. However as inspection regimes are set to become lighter and more targeted much of the monitoring of compliance is likely to stem from the self-assessment conducted by public authorities. Monitoring would probably initially be limited to whether an authority has produced an action plan (if subject to a specific action plan) but would gradually become more focussed on an assessment of the outcomes of action plans.

Summary and recommendation

97. A gender duty adopting the model presented under Option 1 should be introduced. The introduction of such a duty would be expected to improve the activities and policies of public bodies for the benefits of men and women, and assist the development of high-quality, modern public services that are responsive to the needs of their users. This model should lead to at least as effective outcomes for men and women as that proposed under Option 2, but would also be significantly less resource intensive for public bodies.

4. Summary Table of Costs

	Option 1		Option 2	
	Low range (£ million)	High range (£ million)	Low range (£ million)	High range (£ million)
General Duty				
One-off implementation: public sector	0.28	0.29	0.28	0.29
One-off implementation: private sector	0.8	1.7	0.8	1.7
Ongoing implementation: private sector	1.2	2.4	1.2	2.4
Specific Duty and CEHR cost				
One-off implementation: CEHR	0.42	0.66	0.42	0.66
One-off implementation: public sector (excluding CEHR)	8.9	13	10.7	15.7
Ongoing implementation: public sector	1.1	2.1	1.2	2.2
Total one-off Implementation	10.5	15.7	12.2	18.3
Total ongoing implementation	2.3	4.5	2.4	4.6
Total ongoing policy	0.6	0.7	1.0	1.2
Total ongoing per annum	3.0	5.3	3.6	6.0

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