

**A Framework for Fairness:
Proposals for a Single Equality Bill for Great Britain**

Response Form

We welcome your views as part of the consultation. For convenience, this preformatted response form sets out all the questions in the main consultation document. It can also be downloaded from www.communities.gov.uk/index.asp?id=1017165.

Should you wish to use the form, it should be returned, once completed, to:

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The consultation closes on 4 September in 2007. Please let us have your response by that date.

When responding, it would be helpful if you could provide the following information.

Please fill in your name and address, or that of your organisation if relevant. You may withhold this information if you wish, but we will be unable to add your details to our database for future consultation exercises.

Name

Organisation (if applicable)

Address

Postcode

Confidentiality

Under the Code of Practice on Open Government, any response will be made available to the public on request, unless respondents indicate that they wish their views to remain confidential. If you wish your response to remain confidential, please

tick this box and say why. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

I would like my response to remain confidential:

Please say why

You or your organisation

Q(i) In what capacity are you responding?

As an individual (if so, please go to Q1 in the main comments section)

On behalf of an organisation (if so, please go to Q(ii) below)

As an employer (if so, please go to Q(iii) below)

Other (please specify)

Q(ii) Is your organisation
(please tick the boxes that apply to your organisation)

A local authority (including health authority) / organisation

An equality lobby group or body

A statutory body

An organisation representing employers

An organisation representing financial institutions

A professional association

A university

A college of further education

A trade union/staff association

Other – please specify

Charity providing free representation to claimants in employment tribunals.

Q(iii) If responding as an employer, how many people do you employ?

Between 1 and 14 employees

Between 15 and 49 employees

Between 50 and 249 employees

250 employees or more

Q(iv) If responding as an employer please indicate which sector best describes you:

Legal services

Construction and/or building design

Communications

Wholesale and retail trade

Leisure – hotels, restaurants, pubs

Leisure – cinemas, theatres, museums

Leisure – other

Distribution/transport

Financial and/or business services

Electricity, gas and water supply

Advice and/or information services

Public administration

Education/training

Health and social work

Charity/voluntary work

Other (please tick box and specify)

Proposals for a Single Equality Bill for Great Britain

The main consultation document addresses various proposals and options for changing discrimination law in order to create a clearer, more streamlined equality legislative framework, which produces better outcomes for those who currently experience disadvantage. The following questions are reproduced from the main document, in the order and with the same numbering in which they appear there. In addition, you are asked for your comments generally on the estimated provisional costs and benefits, as shown in the Initial Regulatory Impact Assessment and the Equality Impact Assessment.

Part 1 – Simplifying the law

Chapter 1: Simplifying Definitions, Tests and Exceptions and Promoting Compliance

Simplifying Definitions and Tests

Direct Discrimination

Q1 Do you have any comments on our intention to keep the existing requirement for a comparator in direct discrimination claims?

Yes

No

If not, please give your reasons

Discrimination is an essentially comparative concept and FRU agrees that the concept of direct discrimination requires a comparator.

However, FRU's experience is that the search for an actual comparator is often counter-productive. Tribunals and litigants often spend a great deal of time attempting to identify an actual comparator and considering arguments related to particular individuals who may – or may not – be suitable actual comparators.

Much of this is unnecessary. The function of a comparator can be divided into two – wholly distinct categories:

1. The conceptual need to identify a comparator in order that the treatment of the claimant can be judged 'less favourable' to the comparator.
2. The practical need to consider evidence relating to the issues of whether there was less favourable treatment and whether it was on a prohibited ground.

Consideration of actual comparators, or close comparators, is a good way of dealing with evidential issues. For example, if a white person who is otherwise in the same situation as a black claimant, is treated better, that is strong evidence that the treatment of the claimant was discriminatory. Similarly, if the white person is treated the same, that is strong evidence that the treatment was not discriminatory. The closer the situation of this sort of comparator is to the claimant, the stronger the evidence will be.

Actual comparators, however, a very clumsy way of considering the conceptual aspects of comparison. In practice, there is very rarely a precisely appropriate actual comparator.

In all cases, the conceptual requirement for a comparator can be met by considering a hypothetical comparator.

For these reasons, FRU believes that it would be useful for the legislation to stress the distinction between the different functions of the comparator and for the conceptual function to be met by a hypothetical comparator in all cases.

This could be done by an express provision that the comparator for the purposes of considering less favourable treatment be hypothetical and a second provision, for the avoidance of doubt, that any actual comparators have evidential value.

Q2 Do you have any comments on our proposal to replace the separate definitions of discrimination in Part 3 of the Disability Discrimination Act with a single definition?

Yes

No

Please provide:

The current system is overly complex, to no real advantage in practice.

Q3 Do you agree that we should largely keep the existing approach in relation to discrimination on the basis of perception and association, except for an extension to protect against discrimination on the grounds of association with transsexual people?

Yes

No



Please provide:

If is wrong to discriminate directly, then it is equally wrong to discriminate on the basis of perception and association.

Furthermore, it is inequitable for there to be protection against discrimination through perception / association in respect of race, religion and sexual orientation, but not disability.

In particular, FRU is concerned with the lack of protection to those who suffer discrimination as a result of an employer's perception of them having a disability. We have dealt with a number of cases in which employees have suffered because their employer has taken the view that a particular health issue made them unsuitable employees. In fact, on examination of the facts, the employee was not sufficiently ill to be considered disabled. As a result, they were not protected under the DDA, even though their comparative good health made it clear the employer's decision was based entirely on prejudice.

FRU supports the extension to protect against discrimination on the grounds of association with transsexual people.

Indirect Discrimination

Q4 Do you agree with our proposal to extend indirect discrimination to cover gender reassignment but not explicitly introduce it to disability discrimination law?

Yes



No



Please say why:

FRU agrees that indirect discrimination should be extended to gender reassignment. We also agree that indirect discrimination is not a helpful tool in dealing with disability discrimination. Disability discrimination lacks the relatively homogenous groups that make indirect discrimination workable.

Definition of indirect discrimination

Q5 Do you agree with our proposal to harmonise the definition of indirect discrimination where it applies across the protected grounds?

Yes



No

Please say why:

The current different definitions make the law confusing and difficult, as well as creating disparity of protection for different groups.

Differing definition also create particular problems in cases where there has been discrimination on multiple grounds, where it is difficult to reconcile the differently applicable tests.

Objective Justification

Q6 Do you agree with our proposal to harmonise the objective justification test?

Yes

No

Please say why:

Justification of disability discrimination

Q7 Do you agree that there should be a single test of objective justification for disability discrimination in employment and vocational training, goods, facilities and services, housing, education, private clubs and public functions?

Yes

No

The threshold for reasonable adjustments

Q8 Do you have any comments on our proposal to establish a single threshold for the point at which the duty to make adjustments is triggered?

Yes

No

Please provide:

Victimisation

Q9 Do you agree that the approach to victimisation in discrimination law should be aligned with the employment law approach?

Yes

No

Please say why:

FRU does not have experience outside employment law, but has found the 'but for' approach to victimisation to be practical and useful within the employment context.

Simplifying Exceptions

Genuine occupational requirement test

Q10 Do you agree that a genuine occupational requirement test should be introduced for all grounds of discrimination, with the exception of disability (where it is not necessary)?

Yes

No

Please say why:

There are a very small number of roles where there is a real occupational requirement and therefore exceptions must be retained. A single test will simplify the law.

Q11 Do you think there is a need to retain any of the genuine occupational qualifications listed in the Sex Discrimination and Race Relations Acts?

Yes

No

If so please explain why:

A statutory list on top of a general genuine occupational requirement exception is likely to complicate, rather than simplify the law, and make the exception more difficult to understand.

The genuine occupational qualifications will remain exceptions under the genuine occupational requirement and do not require further protection.

Genuine service requirement test

Q12 Do you support or oppose the introduction of a genuine service requirement test for differentiation in the provision of goods, facilities or services, housing and the exercise of public functions?

Support

Oppose

Please give your reasons and examples of what it might cover:

N/A

Specific Exceptions

Q13 Do you agree with the proposal for a unified approach where exceptions apply to more than one protected ground, where this is appropriate?

Yes

No

Please give your reasons:

Q14 Do you have any comments on our proposals for retaining the specific exceptions set out in Table 1 in Annex A?

Yes

No

Please provide

These issues do not relate to FRU's work and FRU has no institutional view on them.

Q15 Do you agree that the exceptions listed in Table 2 in Annex A should be removed?

Yes

No

If not, please explain why.

Q16 Is there any need to return an exception to allow insurers to treat people differently on the grounds of sexual orientation, where supported by sound actuarial evidence, beyond the end of 2008?

Yes

No

If yes, what should this seek to achieve and why:

Chapter 2: Public Functions

Q17 Do you agree that there would be benefits in adopting a harmonised approach to the goods, facilities and services and public functions provisions are structured across all protected grounds?

Yes

No

Please say why:

Q18 Do you think the exceptions could be streamlined in this area or do you think that there are any exceptions that should apply to public authorities that it would not be appropriate to apply to the provision of goods, facilities or services by private bodies?

Yes

No

Please say why:

Chapter 3: Equal Pay

Q19 Do you agree that the distinction should be retained?

Yes

No

Please say why

Q20 Do you consider there are further areas of the law of equal pay developed by case law, which it would be helpful to codify?

Yes

No

Please give details of these areas of legislation and any case law relevant to these

Q21 Do you have further suggestions on how we could simplify equal pay legislation or make it easier to work in practice?

Yes

No

Please provide further information on how equal pay legislation could be simplified to make it easier to work in practice.

Equal pay is an inevitably complex and difficult issue. The most effective way of making it easier to work in practice is to ensure that parties have access to good advice and competent representation.

Q22 Do you agree that allowing the use of hypothetical comparators would be unlikely to give any benefit in practice.

Yes

No

Please explain

There is considerable benefit to allowing claimants to rely on hypothetical comparators. In particular it deals with two current areas of injustice:

- Segregated occupations – where employees are prevented from bringing equal pay claims because there is no appropriate actual comparator. This is common in occupations which have historically been predominately female staffed. This is increasingly a problem in contracting out situations, because a single employer may employ workers doing only a single type of work, preventing actual comparisons being made.
- Disproportionately unequal pay – pay injustice is not restricted to situation in which women are paid lower pay for equivalent work. There are also circumstances in which women are paid the same as men, but do more valuable work and those where women do less valuable work, but are paid disproportionately less.

The current law does not address these issues, hypothetical comparators would.

Part 2: More effective law

Chapter 4: Balancing Measures

Q23 What evidence is there of the extent to which the current “positive action” provisions are being used? Do you consider that the current provisions limit the actions that employers and others would like to take?

Q24 Do you agree that it would be helpful for organisations seeking to make progress towards their goals of tackling under-representation and disadvantage to be able to use a wider range of voluntary balancing measures?

Yes

No

Please explain:

Q25 Do you agree that measures to meet special needs in relation to education, training or welfare or any ancillary benefits should be permitted in respect of all protected groups?

Yes

No

Please explain why:

Q26 Do you agree with these proposals for issuing of guidance by the Commission for Equality and Human Rights, but that the Commission should not have a role approving positive action programmes?

Yes

No

Please explain why:

The CEHR has the power to issue guidance and codes of practice, and we would expect them to exercise this in relation to positive action programmes – particularly if the scope of these schemes was extended.

We agree that it would not be useful for the CEHR to approve schemes. As well as placing considerable burdens on the commission who's efforts would be better focused elsewhere, it would be likely to discourage take-up of positive action schemes.

Q27 Do you agree that we should have a power to continue the operation of the current provision beyond 2015, if this is still necessary and proportionate?

Yes

No

Please explain why:

Q28 Do you agree that we should widen the scope of voluntary positive measures for political parties to target the selection of candidates beyond gender?

Yes

No

Please explain:

Chapter 5: Public Sector Equality Duties

Q29 Do you agree that the race, disability and gender duties should be replaced by a single duty on public authorities to promote race, disability and gender equality?

Yes

No

Please state your reasons:

Q30 Do you agree that it would be helpful to provide a clear statement of the purpose of a single public sector duty which public authorities should use as a foundation for taking action to promote equality and good relations?

Yes

No

Please state your reasons:

Q31 Do you agree with the four areas set out in the proposed statement of purpose?

Yes

No

If not, please give your reasons and any alternative suggestions.

Q32 Do you think that the proposed statement of purpose adequately captures the need for work to build good relations and promote positive attitudes within and between groups and underpins efforts to build integration and cohesion?

Yes

No

If not, please give your reasons and any alternative suggestions:

Q33 Do you agree that a single public sector equality duty should require public authorities to identify priority race, disability and gender equality objectives and take proportionate action towards their achievement?

Yes

No

If not, please give your reasons and any alternative suggestions:

Q34 Do you agree that public authorities should be required to review their priority equality objectives at least every 3 years?

Yes

No

If not please give your reasons and alternative suggestions

Q35 Would it be helpful for strategic equality outcomes to be set by the appropriate national Government?

Yes

No

If so, what would be an appropriate way of doing this?

Q36 We would welcome views on the proposed new approach to supporting effective performance of a single public sector equality duty by requiring proportionate action towards the achievement of priority equality objectives, and on the four key principles we have identified. Do you prefer this approach, or an extension of the type of specific duties adopted so far in the race, disability and gender equality duties? Please give your reasons.

Q37 If you prefer an extension of the type of specific duties adopted so far in the race, disability and gender equality duties, which elements of the specific duties do you think should be retained for a single public sector equality duty and why?

Q38 Do you think that the proposed single public sector equality duty should apply to all public authorities?

Yes

No

If not, please say how you think it should be targeted and give your reasons.

Q39 Do you think that a single public sector duty should be extended to cover:

a) age Yes No

a) sexual orientation; and/or Yes No

b) religion or belief; Yes No

Please state your reasons, including examples of the types of disadvantage you believe are experienced by people because of their age, sexual orientation or religion or belief which could be addressed effectively through such a duty.

Q40 Might there be disadvantages in extending the duty to any of these groups?

Yes

No

If so please give examples

Q41 Over what timescale do you think a single public sector duty and any extensions to it should be implemented to ensure we have learned as much as possible from recently introduced duties on disability and gender?

Q42 Do you think public authorities should be given the option to implement any new approach in advance of it becoming a legal requirement, enabling these authorities who have already taken an integrated approach to build on existing work?

Yes

No

Please explain:

Enforcements of Public Sector Duties

Q43 Do you think that there should be a single enforcement mechanism for the proposed single equality duty, enabling the commission for Equality and Human Rights to issue a compliance notice with or without an assessment, as appropriate in the circumstances, enforceable in the county court or Sheriff's court in Scotland?

Yes

No

If not, please give your reasons

Public Service Inspectorate

Q44 What do you think should be the role of the public service inspectorates in assessing compliance with public sector equality duties?

Q45 What issues would you like to see included in practical guidance on how public sector procurement can be used to achieve equality outcomes in the delivery of public services by the private sector, whilst ensuring that the guidance works well for business?

Chapter 6: Promoting good equality practice in the private sector

Q46 Do you think that an “Equality Standard” would be beneficial to businesses, employees and customers?

Yes

No

Please give reasons for your answers

The Equality Standard appears, in essence, to be much the same as the existing and expected Codes of Practice. It is more likely to confuse than assist.

An accredited scheme might be of some small value, but is more likely to absorb resources that would be better spent elsewhere. Those organisations that would be interested in and take up such a scheme are those who already engage with equalities issues and seek to implement best practice. The primary need is to encourage those organisations and individuals who have not engage with this issue to do so.

If yes, would you prefer an accredited or a non-accredited good practice and compliance tool?

Accredited

Non-accredited

Q47 We would welcome your suggestions for other ways in which good equality practice could be encouraged and embedded in the private sector

Good equality practice should be promoted and employers / providers should be educated about their responsibilities and the benefits of best practice.

However, a vital part of this effort must be that individuals who are discriminated against have an effective remedy. Without the knowledge that discrimination will lead to civil liability, many employers / providers will simply ignore their duties – and reputable employers / providers will find themselves undercut by those

breaking the rules for short-term gain.

In the vast majority of cases, access to an effective remedy requires good legal advice.

FRU is extremely concerned about the recent and proposed changes to the Legal Services Commissions funding of discrimination cases. The effect, if not the intent has been and will be to dramatically cut the amount of work that firms and law centres working under LSC funding can do in this area.

FRU is particularly aware that there is no realistic prospect of this advice and representation being provided by the voluntary sector. Our work, and that of similar organisations, can only ever address a small percentage of the total need.

Chapter 7: Effective dispute resolution

Promoting Early Resolution of Disputes

Q48 Can you suggest ways in which Alternative Dispute Resolution could be used more effectively or widely to resolve discrimination disputes in the field of goods, facilities, services, premises and the exercise of public functions?

Q49 Can you suggest ways in which the role of Ombudsmen might be used more effectively to resolve discrimination disputes?

Improving the handling of Discrimination Cases in the Courts

Q50 Do you have any views on our proposals for enhancing discrimination expertise in the county and sheriff courts?

Disability Discrimination Education Cases in Scotland

Q51 Do you think that the powers of the Additional Support Needs Tribunals for Scotland should be extended to include consideration of disability discrimination cases in education?

Multiple Discrimination

Q52 Can you provide us with evidence illustrating any difficulties of gaining legal redress in cases of multiple discrimination?

FRU does have experience of running multiple discrimination cases. They are considerably more complex and difficult to run than cases relating to a single protected ground. This means that it is more difficult to gain redress in practice, although there is not a gap in legal protection.

Some of these difficulties are intrinsic to multiple discrimination cases, since the multiplicity of grounds means that that evidence is more complex than it might otherwise be. This is particularly the case in terms of selecting an appropriate comparator, and we believe that a move to a hypothetical comparator (described at Q 1) would assist in this. However, we have also experienced difficulties when tribunals and respondents have been confused about the extent and the manner in which individuals have been protected. We have also found that advice agencies and individuals are confused in this area.

Q53 Are there particular issues you would want to see addressed in relation to multiple discrimination claims?

An express provision in the Equality Act that multiple discrimination is covered would clarify the issue.

Part 3 – Modernising the law

Chapter 8: The grounds of discrimination

Disability

Q54 Do you have any comments on whether we should remove the list of 'capacities' from the definition of disability?

Yes

No

Please provide:

The list of 'capacities' should be removed, since it leads to confusion and to an unnecessary narrow approach to the question of disability status.

A similar list might be useful as part of guidance or in a Code of Practice.

Q55 Do you have any comments on our approach to addressing the needs of parents and carers?

Yes

No

Please provide:

FRU believes that there is a need to make carers a protected class for the purposes of discrimination, with the same protection offered to other groups. The existing provisions are not, in practice sufficient to protect carers. The right to request flexible working is primarily a procedural right and does not require an employer to act reasonable in providing flexible working.

Furthermore, in many cases carers are protected by discrimination law, through the indirect sex discrimination rules. It is undesirable for carers to need to rely on this provision. It is confusing for employers and carers, who find it difficult to understand their rights and obligations. It also leaves male carers, in the same position as female colleagues with less legal protection.

The right to request flexible working for non-disabled children and dependents currently does not apply to children between 6 and 18. This should be remedied.

Married Persons and Civil Partners

Q56 Do you consider that the protection for married persons and civil partners is still needed in the absence of a "marriage bar" in employment?

Yes

No

Please give your reasons for supporting/opposing its removal?

Genetic Predisposition

Q57 Do you agree that there is no current justification for legislating to prohibit genetic predisposition discrimination?

Yes

No

Please say why:

FRU has yet to encounter a case in which legislation prohibiting genetic predisposition discrimination would have been applicable and is not aware of this being a significant issue in practice at this time.

We do expect this to change as technology develops. We believe that appropriate legislation will soon be necessary. It is in the best interests of all parties to the issue that this legislation be brought in before genetic predisposition discrimination becomes widespread.

Chapter 9: Age discrimination

Q58 What instances of unfair age discrimination outside the workplace against people of any age, are you aware of?

Please give details of any examples below:

Q59 Is legislation the most appropriate and proportionate way of tackling harmful age discrimination?

Yes

No

What would be the likely costs of legislation?

Q60 Do you have any views on how, if we decide to legislate, we can target the legislation to avoid unintended consequences and disproportionate burdens on both public and private sectors?

Yes

No

Please give details below:

Q61 Do you have any comments on any of the issues which would arise with a legislative approach to tackling age discrimination?

Yes

No

Please provide:

Chapter 10: Gender reassignment

Q62 Do you agree that we should prohibit discrimination on the grounds of gender reassignment in the exercise of public functions?

Yes

No

What are your reasons for supporting/opposing this?

Q63 Do you agree that it is unnecessary to include school pupils and education in any extension to protect on the grounds of gender reassignment?

Yes

No

What are your reasons for supporting/opposing this?

Q64 Are there any circumstances in which you consider that it is necessary for organised religions to treat people differently on grounds of gender reassignment?

Yes

No

Please explain what they are:

Q65 Do you agree that we should retain the existing definition of gender reassignment?

Yes

No

Please say why:

Chapter 11: Pregnancy and maternity

Q66 Do you agree that we should make less favourable treatment of a woman on grounds of pregnancy and maternity unlawful in the exercise of public functions?

Yes

No

What are your reasons for supporting/opposing this?

Q67 Do you agree that it is neither necessary nor appropriate to extend protection on grounds of pregnancy and maternity to school pupils and education in schools?

Yes

No

Please say why:

Chapter 12: Private clubs and associations

Q68 Do you agree that it is a positive benefit to have clubs which are set up for the purpose of offering the benefits of membership to a particular group, including single sex clubs catering for particular religions or beliefs or age ranges, along with those currently permitted under race, disability and sexual orientation law?

Yes

No

Q69 Do you agree with the proposal to make it unlawful for private clubs with 25 or more members (other than single sex clubs or those set up for members who are a particular religion or belief) to discriminate on grounds of sex and religion or belief?

Yes

No

If you do not, please explain why:

Q70 Do you agree that private clubs with 25 or members should not be permitted to discriminate against guests on the grounds of sex, race, sexual orientation and religion or belief, as is already the case on the grounds of disability?

Yes

No

Please explain:

Q71 Do you think that the law should address unjustified age discrimination by private clubs with 25 or more members (other than those set up to cater for a particular age range) if age discrimination is made unlawful in the provision of goods, facilities and services?

Yes

No

If you do not, please explain why:

Chapter 13 – Improving access to and use of premises for disabled people

Q72 Do you agree with our proposal for requiring disability-related alterations to the common parts of let residential premises?

Yes

No

Please say why:

Chapter 14: Harassment

Q73 Can you provide examples of harassment you think is occurring or could occur on grounds of religion or belief, sexual orientation, age or disability, which would fall outside the existing protections in discrimination and other law?

Please list examples below:

- Third party harassment related to, but not on the basis of, a protected ground.

Q74 Do you think that express statutory protection against harassment on grounds of:

- religion or belief;
- sexual orientation;
- age; and
- disability

should or should not be provided in any of the following:

(a) the provision of goods, facilities and services?

Yes

No

Please say why.

(b) education in schools?

Yes

No

Please say why.

(c) the management or disposal of premises?

Yes

No

Please say why.

(d) the exercise of public functions?

Yes

No

Please say why.

Q75 Were statutory protection against harassment to be extended to one or more of the above grounds in one or more of the above areas, do you think that specific exceptions would be desirable?

Yes

No

If yes, please say why and the types of exceptions, if any, you would like to see in the legislation:

Q76 Do you think that harassment on grounds of religion or belief should be treated differently from the other protected grounds and that a different definition of harassment would be appropriate in this case?

Yes

No

If so, please state your reasons why:

Q77 Do you think there is a valid distinction to be made between harassment in an "open" and in a "closed" environment and that the approach to its prohibition should be differentiated accordingly?

Yes

No

Please say why:

Q78 Do you have any evidence of harassment by third parties in the workplace in relation to protected grounds other than sex? If so do you consider that it should be dealt with in a similar way?

Yes

No

If so, please state your reasons why:

Annex B – Implementing the Gender Directive

Q79 Do you agree with the proposals in Table 1

Yes

No

If not, please give details of those you disagree with and your reasons for doing so.

Q80 Do you have any comments on the likely impact of the Gender Directive's insurance provisions on providers and/or customers of insurance and related financial products?

Yes

No

Please provide:

Q81 Should the ban on differences due to maternity or pregnancy costs be implemented in December 2007 or deferred until December 2009?

December 2007

December 2009

Please explain

Q82 Do you think 'maternity' should be defined for the purposes of the Sex Discrimination Act provisions covering goods, facilities or services and premises?

Yes

No

Please explain how:

Costs and Benefits

Q83 Please let us have your views on the estimate of costs and benefits summarised in the Initial Regulatory Impact Assessment.

Equality Impact Assessment

Q84 Please let us have your views on the Equality Impact Assessment.

Other Comments

Q85 Do you have any other comments about the consultation documents or the consultation exercise itself?

Thank you for completing this response form.