



## **Women's Regional Consortium Response to the Employment (Zero Hours Workers and Banded Weekly Working Hours) Bill**

24<sup>th</sup> February 2022

Dear Committee for the Economy

The Women's Regional Consortium wishes to respond to your call for views on the Employment (Zero Hours Workers and Banded Weekly Working Hours) Bill. We also wish to endorse the response made by the Women's Policy Group of which we are a member. We are unable to provide a full response due to pressure of work but we wish to briefly highlight a number of issues that we feel are important in relation to this Bill.

### **The Women's Regional Consortium**

The Women's Regional Consortium consists of seven established women's sector organisations<sup>1</sup> that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.

The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views,

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<sup>1</sup> The seven groups are as follows: Training for Women Network (TWN) – project lead, Women's Resource and Development Agency (WRDA), Women's Support Network (WSN), Northern Ireland Rural Women's Network (NIRWN), Women's TEC, Women's Centre Derry and Foyle Women's Information Network (FWIN)

needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

### **Deadline for Responses**

We wish to raise concerns about the length of time available to respond to this call for views. While we welcome having the opportunity to respond to this important legislation we have concerns about the process in terms of the tight turnaround for responses with consultees only being given just over three weeks to respond. We appreciate that this is due to the end of the mandate and the Bill being introduced late however this short deadline goes against all existing good practice on consultations: *When government consults it must build a realistic timeframe for the consultation, allowing plenty of time for each stage of the process.*<sup>2</sup>

This call for views came at a time when the women's sector and indeed the wider voluntary and community sector has come under significant pressure with the sheer volume of consultations ongoing. These consultations are significant in terms of their importance and many have particular implications for the women's sector so have required an investment of time and resources to produce detailed responses. These include consultations on a Housing Supply Strategy, Domestic Abuse & Sexual Abuse and Violence Against Women Calls for Evidence and a consultation on Hate Crime legislation to name but a few.

Despite this challenging work environment the timeframe for responses to this Bill was very short and puts significant pressure on an already over-worked and under-resourced voluntary and community sector. With a deadline this short it is impossible to carry out meaningful consultation with women. We would refer the Northern Ireland Assembly to the guidance on consulting with women produced by Women's Regional Consortium members WRDA<sup>3</sup> which advocates making time for accessible face to face engagement.

### **General Comments**

We welcome the aims of the Bill to end the use of zero-hour contracts and making exclusivity terms unenforceable. We believe that the banning of Zero Hours Contracts is necessary because of the lack of security these type of contacts offer employees which can result in difficult working environments and irregular incomes.

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<sup>2</sup> nidirect <https://www.nidirect.gov.uk/articles/public-consultations>

<sup>3</sup> Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017

[https://wrda.net/wpcontent/uploads/2018/10/WRDA\\_WomenAtTheHeartOfPublicConsultation.pdf](https://wrda.net/wpcontent/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf)

Statistics show that people on zero hours contracts are more likely to be young, part-time, women or in full-time education when compared with other people in employment.<sup>4</sup> Single parents (who are mostly women) are twice as likely to have a zero-hours contract as other family types.<sup>5</sup> There are more women employed on zero hours contracts (3.6%) than men (2.8%).<sup>6</sup> These statistics help to show the gendered nature of these contracts.

Research by the Women's Regional Consortium on In-Work Poverty<sup>7</sup> found links between precarity of employment, particularly zero hours contracts, and in-work poverty. Participants in this research underlined the need for stability and security in employment and legislative action prohibiting such contracts. In terms of addressing in-work poverty this research called for work that pays for disadvantaged women so that employment provides a genuine living wage indexed to the actual cost of living.

While it is important to ban these type of contracts it does not deal with other issues in the labour market such as low pay, precarious and involuntary part-time work which give rise to many of the same impacts for employees particularly women.

### **Gendered Issues within the Labour Market**

Systemic and structural inequalities across the labour market mean that women are overrepresented in lower paid and precarious jobs and are more likely to work part-time. This ensures that not only women suffer the consequences of these type of working arrangements but so do their families and communities. We believe that much more needs to be done to protect women, their families and communities from low-paid, precarious and involuntary part-time work which gives rise to many of the same impacts as zero hours contracts.

As previously stated banning zero hours contracts is only one step in a wider process to deal with the issue of precarious employment which is prevalent in Northern Ireland. This is a particular issue for women and there needs to be a range of approaches to tackling the gender segregated labour market which leaves women particularly vulnerable to this type of insecure work. This must involve improving pay and working conditions in precarious sectors, tackling gender stereotypes that embed gender segregation, addressing the lack of affordable, accessible childcare and increasing investment in undervalued sectors such as care.

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<sup>4</sup> EMP17: People in employment on zero hours contracts, Office for National Statistics, August 2020 <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/emp17peopleinemploymentonzerohourscontracts>

<sup>5</sup> Caring without sharing, Gingerbread, November 2020 <https://www.gingerbread.org.uk/wp-content/uploads/2020/11/Gingerbread-Caringwithoutsharing-v3.pdf>

<sup>6</sup> Ibid, Table 3, Gender

<sup>7</sup> In-work Poverty: Women's Perspectives, Women's Regional Consortium, 2018 [InWorkPoverty.pdf](http://InWorkPoverty.pdf) ([womensregionalconsortiumni.org.uk](http://womensregionalconsortiumni.org.uk))

### **Specific Comments on the Bill**

Due to pressure of work we are unable to give detailed comment on each clause of the Bill but we refer the Committee to the Women's Regional Consortium response to the consultation which is available here:

<https://womensregionalconsortiumni.org.uk/wp-content/uploads/2021/04/Dec-2020-Womens-Regional-Consortium-response-to-Zero-Hours-Contract-Bill-Consultation-Issued-by-Jemma-Dolan-MLA.pdf>

If you have any questions about this response please contact Siobhán Harding at [policy@wsn.org.uk](mailto:policy@wsn.org.uk).

Kind regards

*Siobhán Harding*

Siobhán Harding

On behalf of the Women's Regional Consortium