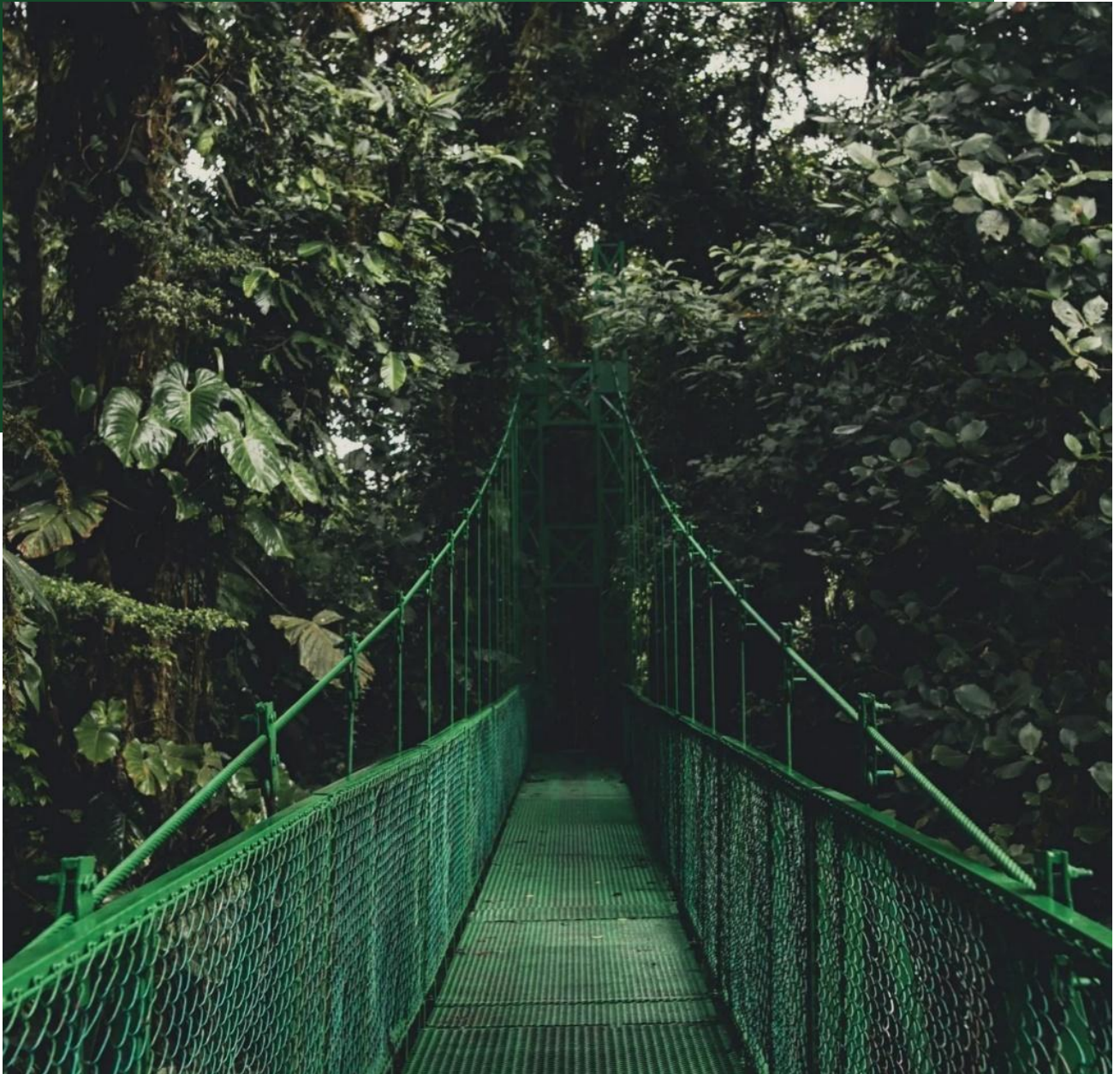


Positive action: An exploration of equity and UK equality law

Discussion paper

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**THE
EQUITY
INDEX**

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DISCLAIMER: *This paper is based on secondary legal research and scholarship and as such should not be taken as official legal advice.*

SUMMARY OF KEY POINTS

Main message: UK-based organisations operating in the global development sector could make more extensive use of the existing positive action provisions under the 2010 UK Equality Act. At the same time, organisations within the sector should advocate for more transformative approaches that promote greater equity in global development.

Introduction and background to the UK Equality Act

- The UK Equality Act, introduced in 2010, brought together nine pieces of primary UK legislation and introduced provisions on positive action. Positive action, which is voluntary, “allows service providers to take action that may involve treating one group more favourably where there is a proportionate way to help members of that group overcome a disadvantage or participate more fully.” (Government Equalities Office, 2010). Positive action is covered in Part 11 Advancement of Equality of the Equality Act, Chapter 2, sections 158 (**general use of positive action**) and 159 (positive action specific to **recruitment and promotion**).
- This paper explores the following **guiding question**: What is the potential for the current positive action framework in the UK to promote greater equity in the development sector?

Argument 1: Positive action provisions are perceived as too vague and too complex to be put into regular practice.

- Research has shown that employers are fearful of using positive action provisions, partly due to the absence of clear legislative tools on how to do so and partly because they are often misunderstood (section 159). This is particularly the case when using positive action for recruitment and promotion. The use of positive action across the development sector appears to be sparse.
- People of Colour and Global South citizens are severely underrepresented in the UK development sector, particularly in senior leadership positions and on boards; having balanced representation should go beyond simply reflecting the composition of UK society especially when organisations are working within contexts where the composition looks very different.
- A potential way to tackle this issue could be to make use of a **genuine occupational requirement (GOR)**, permissible under Schedule 9 of the Equality Act.

Argument 2: The positive action provisions of the Equality Act are limited in their ability to promote bolder approaches to equity, leaving room for further development.

- Determining positive action on a case-by-case basis without being able to set a policy or establish quotas is burdensome and prevents wider-scale change.
- The lack of clarity on the exact meaning of “proportionate means of achieving the aim” (a condition of positive action in the Equality Act) encourages more conservative approaches, side-lining bold or transformative ones which could improve equity in the sector.
- The Equality Act is unable to deal with intersectionality in a meaningful way, as the law still clings to the single-axis model of discrimination law and does not address the lived experiences of those who are discriminated against on multiple grounds.
- There are both alternative models proposed in the literature (including an intersectional approach and applying an ‘anti-stigma’ principle and actors seeking to reform the Equality Act (for instance the Equality Act Review Campaign)).

INTRODUCTION

Guiding question: What is the potential for the current positive action legal framework in the UK to promote greater equity in the global development sector?

Purpose: The purpose of this paper is to explore positive action in the context of the UK-based development organisations. Although it is critical of existing provisions and approaches, it does not advocate for abandoning positive action principles entirely; rather, we encourage greater use of positive action across the sector, while calling for active consideration of the ways in which positive action can be used to encourage more equity-based approaches.

Intended audience: This paper has been written with a sector-wide audience in mind but may be of particular interest to senior and executive leaders within UK development organisations who are exploring ways to use the UK legal framework to advance internal equity.

The Black Lives Matter protests in mid-2020 catalysed a wave of statements of solidarity and promises to promote anti-racism and equity across the UK. This included in the global development sector, where calls to ‘decolonise development’ sat alongside the push for anti-racism and greater equity in a domestic setting (Peace Direct, 2021). Activists campaigning for greater equity have pushed for change over many decades, but the events of 2020 reignited the debate over how to reckon with the UK’s colonial past and achieve racial and broader societal equity. In 2021, the UK International Development Committee in Parliament launched the first ever inquiry focused on racism in the aid sector, which found that “[r]acism manifests in the very structure of international aid; the sector still reflects the power relationships of colonialism” (House of Commons, 2022). However, early assumptions about the ease of using legal tools to actively promote equity at the organisational level, including through fostering more diverse leadership teams and boards, have since given way to more cautious approaches.

Definition of equity in this context: A process of redressing entrenched inequalities and historical injustices to achieve equality of outcomes and social justice (The Equity Index, 2021a). For more context on definitions, see our briefing note [here](#).

BACKGROUND TO POSITIVE ACTION

Introduction of the UK Equality Act: In 2010, the **Equality Act** brought together nine pieces of primary UK legislation and introduced provisions on positive action, in part given the recognition at the time that the laws replaced by the Act were more limited than what was permissible in EU law. The Act covers the following **protected characteristics**: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. When applied in practice, however, the UK/EU approach to positive action is still “largely tentative” (Davies and Robison, 2016: p.88). Progress on promoting equity through positive action has therefore been limited, despite long recognition of the need to take more targeted action to tackle entrenched inequalities.

What is positive action? Positive action is covered in Part 11 Advancement of Equality of the Equality Act, Chapter 2, **sections 158 and 159**. Positive action, which is voluntary, “allows service providers to take action that may involve treating one group more favourably where this is a proportionate way to help members of that group overcome a disadvantage or participate more fully, or in order to meet needs they have that are different from the population as a whole.” (Government Equalities Office, 2010).

Use of **general positive action (section 158)** must meet specific conditions and be seen as a “proportionate means” of achieving the aims to overcoming or minimising disadvantage. Positive action specific to **recruitment and promotion (section 159)** is subject to similar conditions and can only be used when hiring or promoting if person A is “as qualified” as person B (often referred to as the ‘**tie-break provision**’), and if the employer does not have a policy of treating people with a specific protected characteristic more favourably than people who do not share this characteristic.

KEY POINTS

We put forward two main reasons why positive action has not been widely used to improve equity in the UK development sector.

1. **Positive action provisions can be perceived as overly vague, complicated or contentious, making employers reluctant to apply them in practice;**
2. **Even when used, these provisions are restrictive and could do more to promote equity.**

Although **section 158** on general positive action has a broad focus, seemingly allowing for a wide range of measures that could be undertaken to combat systemic disadvantage and inequity, this is often not the case in practice. The threshold conditions that need to be met for **section 158** are often seen as prohibitive and subject to interpretation. Identifying whether persons who share a protected characteristic suffer a disadvantage, have needs that are different, or have disproportionately low participation in an activity technically rests on an employer’s knowledge of the overall workforce profile rather than “sophisticated statistical proof” (Davies and Robison, 2016: p.89). But this introduces an element of subjectivity and thus uncertainty that ultimately has the effect of decreasing its use. The conditions underpinning **section 159**, focused on preferential treatment in recruitment and promotion, are seen as being even more restrictive. In addition, further progress under even the existing legal framework is limited since positive action is by definition permissive, or voluntary.

The **Public Sector Equality Duty (PSED)** outlined in **section 149** of the Equality Act arguably imposes a much broader and pre-emptive obligation on the public sector to “eliminate discrimination” and “foster good relations” (Equality Act, 2010: 149 (1)). In practice, however, it is hard to assess how frequently this provision is used, and once again it introduces a limitation that any action must only advance equality of *opportunity* (rather than equality of *outcome*) – although the reference to minimising disadvantage could create an entry-point for broader action.

Argument 1: Positive action provisions are seen as too vague (section 158) and too complex (section 159) to be put into regular practice.

- Several scholars have argued that employers are dissuaded from using positive action out of fear of costly litigation by those who are negatively affected or due to the potential for legal liability (Davies and Robison, 2016; Martinez Placencia, 2020). This is fuelled by the **absence of clear**

legislative tools on how to make use of positive action provisions; others concur that the **tie-break provision**, which is found in section 159 of the Act, is “poorly understood” by decision makers and thus often rejected (Manfredi, 2017: p.2), when it could be more widely used.

- In practice, this means that while there is an increasingly wide range of outreach and training initiatives justified by section 158, **use of preferential treatment during recruitment and promotion remains scarce** (Davies and Robison, 2016: p.92). This is even the case for respondents to a survey on positive action who were “clearly well informed regarding the detail and coverage of the legal positive action provisions” (Davies and Robison, 2016: p.97).
- In addition, the **proportionality test** required for using these provisions is a “heavy burden for public and private actors” (Martinez Placencia, 2020: p.86). It requires an assessment of whether a particular positive action measure is proportionate based on the “seriousness of the relevant disadvantage, the extremity of need or under-representation and the availability of other means of countering them” (EA, 2010: para 512).
- **Specific barriers** exist within the **global development sector**, for instance the common, blanket expectation that even entry-level candidates will have a **master’s degree**, which coupled with ‘traditional’ job descriptions that prioritise academic skills over lived experience introduces challenges in creating a fair equal merit assessment.

Data from public data mapping: Private sector organisations can be among the most cautious about adopting positive action provisions, particularly smaller ones that find the requirements especially burdensome. A public equity data mapping conducted by The Equity Index of the main micro, small and medium enterprises (MSMEs) and large companies operating in the development sector revealed a mixed picture (The Equity Index, 2021b).

- Of 36 companies analysed, only one MSME has set a recruitment target for under-represented groups, and only 50% of large companies have done so.
- Only 31% of MSMEs participate in equity-related indices, charters, certification or training programmes, which are permissible under section 158, compared to 80% of large companies.

While some progress is being made, overall, the sector is **not making consistent and bold use of indirect or direct positive action**. This matters because collectively, private sector companies are allocated on average over £1 billion of UK foreign aid per year (House of Commons, 2017).

- The challenge of using such restrictive provisions to improve equity in global development is compounded by the **complexities inherent in the way the sector operates**; this includes discrimination and exclusion based on race and ethnicity, but also in relation to the involvement of Global South citizens.
- There are already **exceptions** within the existing positive action framework, which prove that broader action is possible both in theory and practice. Positive discrimination is already allowed under specific circumstances, as outlined in **Schedule 9** of the Equality Act, where it is **lawful to hire someone on the basis of a protected characteristic** (most often sex or religion) in cases where it is deemed a **genuine occupational requirement** (GOR).
- This could potentially be used to address challenges in the development sector related to hiring People of Colour and Global South citizens, for instance by specifying that specific roles require elements of lived experience of inequity (in accordance with the general principle of ‘nothing for us

without us.’) Once again, however, use of the GOR provision appears to be limited in the sector and subject to much scrutiny to ensure that its use is necessary and proportionate.

What does true representation look like for a global sector?

- The **severe underrepresentation of People of Colour**, particularly in the senior leadership and boards of organisations (ACEVO, 2020), is further exacerbated by the fact that the work of the sector is entirely oriented towards serving populations in the Global South – where groups classified as ‘ethnic minorities’ in the UK form the global majority.
- Having balanced representation in the sector should therefore arguably go beyond simply reflecting the composition of UK society, where based on the latest data 13.8% of the population comes from a “minority ethnic background” (Diversity UK, 2019), by ensuring that people from the Global South are fully represented in decision-making roles.
- There is also the question of the **London balance**, where 40% of the population is classified as having a “minority ethnic background” (Diversity UK, 2019). The vast majority of development organisations are based in London, and yet have fewer People of Colour than both the UK and London average in senior and board roles. The restrictive nature of the tie-break provision thus means that truly diverse and balanced staff teams and boards cannot be achieved using existing measures, especially since nationality is not a protected characteristic under the Equality Act.

Argument 2: The positive action provisions of the Equality Act are limited in their ability to promote bolder approaches to equity, leaving room for further development.

- Having to determine positive action on a **case-by-case basis** without being able to set a policy or establish quotas (through a ‘positive discrimination’ approach) is burdensome and **prevents wider-scale change**. Specifically, the process of determining whether two candidates are “as qualified as each other” under section 159 requires recruiters to undertake a careful ‘equal merit’ assessment, but without clear guidance on how to do so – this is a heavily bureaucratic process, and one that is **unlikely to be fully objective** given that merit is not a value-neutral concept (Manfredi, 2017).
- One of the key restrictions in positive action comes from the need to ensure any initiatives undertaken to remedy disadvantage are a “proportionate means of achieving the aim” (Equality Act, 2010: 158, 2). **Explanatory Notes 511** and **512** of the Equality Act only provide a limited amount of detail on what **proportionality** looks like in practice. This lack of clarity implicitly favours more conservative, limited approaches over bold, transformative ones focused on improving equity through an **equality of outcomes** approach.
- In the global development sector, this conservatism has been prevalent (especially prior to 2020), with **little to no formal recognition** of the **inequities** that UK organisations have perpetuated in their internal and external practices (Martins, 2020; Bond, 2021). To overcome this and promote equity, positive action provisions would have to be interpreted as broadly and stridently as possible.
- However, several scholars have argued that **anti-discrimination law**, which forms the basis of the Equality Act, **limits bolder approaches to equality**, or indeed **societal equity** (O’Cinneide, 2006; Davies and Robison, 2016). It is even less well equipped to address the lack of diversity in development organisations, given the need to consider the link between the UK’s colonial history and underrepresentation in the sector.

- It is also **unable to deal with intersectionality** in a meaningful way. In most cases, the law “still clings resolutely to ‘single-axis’ models of discrimination law and therefore fails to address the lived experience of those who experience discrimination on multiple grounds” (Smith, 2016: p74). In the case of the global development sector, this relates for instance to the intersection of race and nationality (i.e., being of Global South origin).
- In general, the restrictive legal framework around positive action is exacerbated by the broader British context in which equity-based approaches are **hampered by a lack of political will to redress historical injustices**. A recent example comes from the Commission on Race and Ethnic Disparities, appointed in 2020, which found no evidence of institutional racism in its inquiry. The report notes that while the UK is not yet a “post-racial country”, and while “outright racism” does still exist, the UK’s approach should be regarded as a “model for other White-majority countries” (CRED, 2021: p.9). The report was **heavily criticised** by academics and prominent civil society organisations, including the Runnymede Trust, for being blind to the realities of institutional racism in the UK (BBC News, 2021). The report is also blind to the links between slavery, the UK’s colonial history, and racial inequity today, a blindness that has also characterised the development sector.

ALTERNATIVE APPROACHES

Although we have raised concerns about the ability of positive action to foster full equity in the UK development sector, it is the most comprehensive framework that exists and thus should be used more widely, but should also be viewed as a starting point for reform. Alternative approaches that extend frameworks of positive action already exist and can be effectively adopted by organisations to achieve equity – these sit along a spectrum, ranging from making the most out of existing positive action provisions to introducing new approaches. Below are some non-exhaustive examples.

- **Virtuous circle approach:** Manfredi has proposed a ‘**virtuous circle**’ approach specifically focused on closing the gender gap in leadership. This model has several components: setting aspirational targets, adoption of positive action in recruitment and promotion, and adoption of a more inclusive idea of success outside of male norms of leadership (Manfredi, 2017: p.11)
- **Intersectionality:** Adopting an intersectional approach (a significant omission from the Equality Act) would be an important step towards achieving equity and more balanced representation in the global development sector. The ability to apply intersectionality to positive action provisions would allow for more transformative approaches. From a practical perspective, “a legal recognition of intersectionality in discrimination law arguably requires that in assessing discrimination courts *must* examine the structural disadvantages operating in the background” (Smith, 2016: p.84).
- **Anti-stigma principle:** Developed by Iyiola Solanke, this is another approach that seeks to broaden existing anti-discrimination law. It could be used to make “action against discrimination a legal as well as a public health issue,” as well as a “key issue for well-being in general as well as equality in particular” (Solanke, 2017: p.101).

Comprehensive work is already ongoing to review the scope of the Equality Act.

The Equality Act Review Campaign: Founded and managed by Dr Suriyah Bi, the Campaign has conducted a review of the Equality Act 2020 with the aim of amending the legislation. The Review, which began in 2018, was presented as a report on 6 July 2022 in the UK Parliament (Equality Act 12 Years On, 2022). Four methodologies were used to conduct the review: a literature review of research

and discussions regarding reforms of the Act, public consultations taking place between January 2020 and March 2021, semi-structured interviews with individuals who have experienced discrimination, and expert consultations. The *Campaign* recommended six areas of reform for this iteration of the review

1. Strengthening current protected characteristics (based on/rooted in biology);
2. Enforce unratified sections of the Act;
3. Introduce new protected characteristics which are based on sociocultural identity markers (i.e., homelessness, accent)
4. Access to the Act must be protected by way of reconsidering case submission fees and legal aid, which can act as barriers for many;
5. The Act must recognise blind spots (i.e., unregulated employment industries) and ensure that all workers in any size organisation are protected;
6. Extend the application of the act beyond direct and indirect discrimination to include context-based discrimination.

Discussion questions:

- How can development organisations explore the introduction of additional protected characteristics?
- How can development organisations adopt an intersectional approach by recognising individuals' multiple and overlapping identities, capturing and monitoring data and creating cultures of understanding?
- What impact would renaming positive action provisions “public action measures” have on collective rather than individual action to tackle discrimination in the sector?

Recommendation: We encourage all development organisations to research and explore these and other alternative models to promote equity in the context of the sector.

CONCLUDING THOUGHTS

The main **takeaway** we would like to leave you with is that UK-based development organisations do not make full use of existing positive action provisions, especially as they are voluntary. But we also know that more development organisations are taking action: some have decided to make use of the **tie-break provision**, while others have banned all-white recruitment panels. These actions are a good start, but much more could be done.

In conclusion, we do not argue that we should do away with positive action entirely, but rather we note that its current conceptualisation is limited in its ability to promote equity (as opposed to equality of opportunity). As outlined above, different models or approaches, both within and outside the anti-discrimination framework, could move the sector closer to achieving this goal. We are experiencing an unprecedented entry point for reform in global development and must collectively seize this moment before momentum subsides.

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Please write to us if you have any questions, feedback, or anything else that you would like to share.

Alex Martins:

alex@theequityindex.org

Lorriann Robinson:

lorriann@theadvocacyteam.co.uk