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Kate Hepher
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Communities and Local Government
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29th August, 2007

Dear Kate

Thank you for the opportunity to respond to the Green Paper on the Single Equality Bill.

We welcome the proposal to harmonise and streamline the existing legislation and look forward to the launch of the Commission for Equality and human Rights.

While in broad agreement with the proposals in the Green Paper, there are a number of issues that we would like to make specific comment on:

- **Equal Pay:** the legislation is complex in this area, and we would prefer to see a complete overhaul of Equal Pay as a separate exercise to the Single Equality Bill. In particular, we do not support the suggestion that hypothetical comparators be permitted in Equal Pay claims.
- **Single Equality Duty:** we are strongly in support of a single equality duty (covering race, gender and disability) and welcome the proposed approach of setting priority objectives according to need.
- **Combined Multiple Discrimination:** we are not in favour of a move to fully combined multiple discrimination claims
- **Disability:** we are strongly opposed to the removal of the list of capacities, believing rather that the list should be retained and expanded.

Thank you for considering our submission.

Yours sincerely

Mike Cooke
Director of Organisation Development