



**Kate Hepher**  
**Discrimination Law Review Team**  
**Women and Equality Unit**  
**Department for Communities and Local Government**  
**Ashdown House**  
**123 Victoria Street**  
**London SW1E 6DE**  
13 August 2007.

Dear Ms. Hepher,

We are pleased to respond on the consultation paper "*Discrimination Law Review. A Framework for Fairness: Proposals for a Single Equality Bill for Great Britain*", on behalf of UK Coalition Against Poverty

Our suggestion consists of additional paragraphs on social economic policy with respect to the unpaid care work, especially the introduction of the Paid-Unpaid-Work-quote (PUW) as an instrument for national policy. We suggest including these paragraphs in chapter 8, where the needs of parents and carers are addressed. In the annex to this letter we describe the paragraphs we would like to include in the future Single Equality Bill.

We are looking forward to participate in the consultation period in order to further develop and refine this proposal.

Yours sincerely,

A handwritten signature in black ink that reads "Eileen Devaney".

Eileen Devaney  
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**Annex: Additional paragraphs to chapter 8 of consultation paper  
'Discrimination Law Review. A Framework for Fairness: Proposals for a Single  
Equality Bill for Great Britain' of June 2007.**

Social Economic Policy on unpaid care work

- 8.21 In order to assess the vital role of the unpaid care work of parents and carers in our society and to integrate the unpaid work into Governmental Policies, a quote for Paid-Unpaid-Work (PUW-quote) will be introduced in the annual social-economic reports and plans of the government. This PUW-quote expresses the relation between the amount of time spent on paid work in relation to the amount of time spent on unpaid work, as follows:

$$\text{PUW-quote} = \frac{\text{Volume Paid Work}}{\text{Volume of Paid Work} + \text{Volume of Unpaid Work}} \times 100\%$$

The PUW-quote expresses the percentage of the working time that is socially recognized in monetary terms. The PUW-quote enables the government to assess the distribution of paid and unpaid care work between men and women of different ages and backgrounds.

- 8.22 The information on how men and women divide their time between paid and unpaid work is needed to understand the impact of macro policies on the welfare and wellbeing of the population. Therefore the government will mainstream the PUW-quote as a standard policy instrument in order to:
- evaluate the contribution of the unpaid work to human wellbeing, welfare and the National Income,
  - assess how unpaid work complements or substitute paid work and how an increase or decrease of the PUW-quote affects gender relations
  - assess the impact of governmental policies on the unpaid work of men and women of different ages and backgrounds
  - adjust governmental policy in order to prevent that social costs are incommensurate rolled off to the unpaid sector of the economy
  - promote a social balance between the paid and the unpaid sector of economy, especially between paid work and unpaid care for men and women.
- 8.23 Each year a Time Use Survey will be conducted in order to produce actualized information on how people allocate their time between paid work, unpaid work, and leisure time. The methods used for the survey will be the time-diary method, the interview and eventually the observation method. The collection of the data will be disaggregated by sex, age groups, with and without children, income groups, urban and rural groups, or by other subgroups of interest for specific governmental policies. Participation of the population in the collection of data will be encouraged through internet whereby everyone can administer his or her time-diary and calculate his or her own PUW-quote.
- 8.24 Annual Time Use Surveys also allow the development of gender and diversity specific

Time Standards for Unpaid Care Work. Specific interest groups and organisations will be included in the consultative process of establishing the Time Standards of Unpaid Work. These standards enable the government to further develop the provision in the Pension Bill of 2006 for those caring for children and for severely disabled people. On the basis of Time Standards for Unpaid Care Work, the government can identify the persons or population groups that contribute more than the average amount of time spent to unpaid care work in society. Those who contribute more than the average unpaid work per capita, have the right to Care Credits. With these Care Credits the government recognizes the importance of the economic and social contribution of unpaid care work. Care Credits consist of negative tax based on the amount of hours dedicated to unpaid care work above the social average of unpaid care work per capita. Care Credits are a compensation for time spent to unpaid care work and loss of income due to care responsibilities. The beneficiaries are free to choose to receive Care Credits as actual income or as future State Pension entitlement.