



Response to the Scottish Government Consultation on the Draft Energy Strategy and Just Transition Plan

Close the Gap is Scotland's policy advocacy organisation working on women's labour market participation. We have been working with policymakers, employers and unions for more than two decades to influence and enable action that will address the causes of women's labour market inequality.

1. Introduction

Women are vastly under-represented in all energy sectors, which contributes to the inequalities they experience both as workers in energy, and in the wider labour market. Close the Gap has welcomed Scottish Government's ambition to transition to a net zero economy. The climate crisis is the consequence of persistent socioeconomic inequality and injustice¹, and research shows that greater gender equality in society produces lower environmental impacts². However, investing in a greener economy through the creation of green jobs will not necessarily mean a fairer economy for women. Occupational segregation defines Scotland's labour market, with women under-represented in "green jobs". This contributes to Scotland's gender pay gap, women's poverty, and child poverty. Policymaking around a just transition must integrate a gender analysis which takes account of the barriers women face in entering and progressing in male-dominated energy sectors. Without targeted action, current policy focus and investment will have deleterious effect on women's equality by entrenching occupational segregation and the gender pay gap.

Close the Gap welcomes the opportunity to respond to this consultation, and our response focuses on the stark lack of attention given to how gender shapes

¹ Hathaway, J.R. (2020) "Climate change, the intersectional imperative, and the opportunity of the green new deal", *Environmental Communication*, 14(10), 13-22

² Ergas, C., and York, R. (2012) "Women's status and carbon dioxide emissions: A quantitative cross-national analysis", *Social Science Research*, 41(4), 965-976

women's engagement with the economy, women's experiences of working in energy, and the gendered dimensions of a just transition.

2. Answers to questions

Q8: What further advice or support is required to help individuals of all ages, and in particular, individuals who are currently under-represented in the industry enter into or progress in green energy jobs?

An aim of the Draft Energy Strategy and Just Transition Plan is to “equip workers with the skills and opportunities to access good green jobs” but there is a lack of gender analysis that demonstrates an understanding of what this means for women. There is no mention of women, gender or the occupational segregation that characterises energy sectors or green jobs. There are no proposed actions to address women's under-representation, and there is a significant risk that without specific interventions that take account of the gendered barriers to the labour market, women will be left behind. Scottish Government has wider ambitions on women's equality, and a legal requirement under the public sector equality duty to mainstream gender equality in policy development and delivery. The Draft Strategy And Just Transition Plan undermines these ambitions. If women are to enter and progress in green energy jobs, there needs to be explicit actions targeted at the gendered barriers they face.

Gender-sensitive upskilling and reskilling support

Current approaches to upskilling and reskilling are gender-blind, and lack the coherence needed to deliver positive outcomes for women's labour market equality. The Climate Emergency Skills Action Plan³ contains a small number of useful actions on gender-sensitive upskilling and reskilling support which could have supported gender mainstreaming in the design of policy frameworks and interventions. These actions include:

- developing targeted reskilling measures informed by existing barriers experienced by women;
- gathering gender-disaggregated data for all programmes developed as part of the action plan; and

³ Skills Development Scotland (2020) *Climate Emergency Skills Action Plan*, available at: <https://www.skillsdevelopmentscotland.co.uk/media/47336/climate-emergency-skills-action-plan-2020-2025.pdf>

- tackling occupational segregation as a core aim of skills and training programmes.

However, three years into implementation, there is no indication that these actions have been progressed or prioritised in any substantive way. To date, a number of green upskilling and reskilling policy frameworks and programmes have been announced in relation to the Climate Emergency Skills Action Plan, the National Strategy For Economic Transformation, and the 2021/22 Programme for Government. This includes the Green Jobs Fund, the Green Jobs Workforce Academy, and the Lifetime Skills Guarantee. There is little evidence of how the gendered actions in the Climate Emergency Skills Action Plan, or gender equality more broadly, have been meaningfully incorporated into the design of these programmes.

In order to support women to improve their employment options whether that is entering the labour market for the first time, re-entering after time out, or progressing, there is a need to develop gender-sensitive upskilling and reskilling support. Evidence shows that women are less likely to have access to training, particularly women working in low-paid part-time jobs⁴; less likely to undertake training that will enable them to progress or secure a pay rise; and more likely to have to do training in their own time and to contribute towards the cost⁵. Integrating gender in the development of skills and training interventions would give prominence to factors which influence women's access to skills including women's propensity to have a caring role; the need to provide support with childcare and travel costs for women living in poverty; gender norms and stereotyping; occupational segregation; women's experiences of men's violence; the timing and location of skills and training opportunities; and whether any course costs present a gendered financial barrier.

Individual Training Accounts (ITAs) and the Flexible Workforce Development Fund (FWDF) are key Scottish Government skills interventions, however, they are not gendered and there is little evidence that they are enabling women to enter or progress in a green energy job, or address occupational segregation more widely. The ITA offer is £200 towards the cost of a training course, which

⁴ House of Commons Women and Equalities Committee (2016) *Inquiry into the gender pay gap*

⁵ Aldrige, Fiona and Corin Egglestone, (2015) *Learning, Skills and Progression at Work: Analysis from the 2015 adult participation in learning survey*, UK Commission for Employment and Skills

is entirely inadequate to pay for training which enables a woman to reskill to work in a green energy job. The evaluation of FWDF showed that there is no evidence that employers are using the fund to tackle occupational segregation in male-dominated industries⁶. Despite this, there is a heavy reliance on ITAs and FWDF as drivers of change in the skills landscape. The interventions are particularly unlikely to enable women to move from low-paid sectors such as retail into the priority green sectors identified in the Climate Emergency Skills Action Plan. Continued reliance on poorly gendered skills interventions will entrench occupational segregation, widen the gender pay gap, and sustain women's and children's poverty.

Scottish Government's Adult Learning Strategy for Scotland⁷ includes only a marginal reference to the gendered barriers women experience in accessing skills, and there are no actions which specifically engage with gendered patterns of skills acquisition and utilisation. Scottish Government has committed to develop a lifetime skills offer, with targeted upskilling and reskilling for the six priority groups for child poverty. Detail of this offer is yet to be made public but unless it specifically addresses the gender barriers that women on low incomes face in accessing training, it is unlikely to lift women and their families out of poverty.

Skills and training interventions need to integrate a gender analysis, and be designed to take account of women's greater propensity to have caring roles, gender norms stereotyping, and should challenge occupational segregation as a central aim. It is critical that Scottish Government gather intersectional gender-sensitive sex-disaggregated data for all skills programmes and interventions to measure the extent to which policy is addressing or entrenching occupational segregation and women's wider labour market inequality.

Gender-competent employability support

Scottish Government's employability strategy, No One Left Behind (NOLB) is described as "placing people at the centre of the design and delivery of

⁶ Scottish Government (2023) *Evaluation: Flexible Workforce Development Fund*, available at: <https://www.gov.scot/publications/evaluation-flexible-workforce-development-fund-fwdf/documents/>

⁷ Scottish Government (2022) *Adult Learning Strategy for Scotland 2022-2027*, available at: <https://www.gov.scot/publications/adult-learning-strategy-scotland-2022-27/>

employability services”⁸. The NOLB delivery plan acknowledges that women were disproportionately affected by Covid-19, and it notes that “investment in employability will continue to focus on helping those who struggle most in the labour market, with equalities and inclusivity at the centre of all we do.” However the delivery plan does not set out how women’s specific needs will be met. There are no actions or outcomes to deliver gender competent employability support, no actions to centre tackling occupational segregation and women’s concentration in low paid work in employability activity, and no recognition that capacity needs to be built in employability services to deliver change for women.

Generic employability programmes replicate gendered patterns of skills acquisition and employment, entrenching occupational segregation and widening the gender pay gap. Mainstream employability programmes routinely do not take account of women’s caring roles and fail to acknowledge that women’s readiness to work will be impacted by these caring roles.⁹ The job-matching approaches adopted by these programmes are often ineffective as women are funnelled into low-paid, inflexible jobs such as retail and care, which they often inevitably leave as a result of these roles being incompatible with their caring responsibilities and other complexities of their lives. To be effective for women, employability services must take account of occupational segregation, stereotyping and norms around paid and unpaid work, racism and ableism, disabled women’s access needs, women’s childcare roles, and women’s experiences of men’s violence.

Women’s progression in green energy

Women working in green energy face similar barriers to progression as women working in other male-dominated sectors. Although there was optimism that green energy and renewable energy sectors, as relatively new industries, would foster progressive workplace cultures that advance gender equality, instead the male-oriented culture that is evident in traditional energy sectors has been replicated.

⁸ See <https://www.employabilityinScotland.com/policy/no-one-left-behind/>

⁹ Engender (2016) *Unblocking the pipeline: Gender and Employability in Scotland*

Work by Close the Gap in 2015¹⁰ on women in renewables highlighted the long run impact of occupational segregation that could play out in renewables if women's under-representation was not addressed. STEM careers are characterised as a "leaky pipeline", with women detaching at each stage¹¹. The risk of struggling to recruit and retain senior and experienced staff was stressed, and yet there was no substantive action to address occupational segregation. Skills shortages remain a key concern for renewable energy, green energy and wider STEM jobs. It is not coincidental that sectoral skills shortages are correlated with occupational segregation¹².

A combination of factors, including the cultures in male-dominated and private sector companies, means that energy companies are less likely to have workplace policies and practices that support women to balance work and caring responsibilities, like flexible working, and are less likely to feel inclusive to women workers. Research¹³ on women's experiences of working in energy show a wide range of inequalities and discrimination that restricts their employment options, prevents them from progressing into senior roles, and drives their higher attrition rate. This includes wider gender pay gaps; widespread pay discrimination; gendered assumptions about women's suitability for stereotypically male jobs and senior positions; sexism and sexual harassment; and inflexible work. There is a lack of data on the specific experiences of racially minoritised women, disabled women and other women from marginalised communities that work in green energy. Based on wider evidence on labour market experiences¹⁴, it is reasonable to assume that the

¹⁰ Close the Gap (2015) *What policymakers can learn from WIRES*, available at:

https://www.closesthegap.org.uk/content/resources/1480883421_CtG-How-womens-networks-and-mentoring-can-address-occupational-segregation.pdf

¹¹ Royal Society of Edinburgh (2018) *Tapping All Our Talents 2018: A progress review of women in science, technology, engineering and mathematics in Scotland*, available at: <https://rse.org.uk/expert-advice/inquiries/tapping-all-our-talents-2018/>

¹² Close the Gap (2016) *Gender Equality Pays: The economic case for addressing women's labour market inequality*, available at: <https://www.closesthegap.org.uk/content/resources/Gender-Equality-Pays.pdf>

¹³ See for example Close the Gap (2015) *What policymakers can learn from WIRES*, available at:

https://www.closesthegap.org.uk/content/resources/1480883421_CtG-How-womens-networks-and-mentoring-can-address-occupational-segregation.pdf; Close the Gap (2013) *Fixing the Leaky Pipeline: Securing a supply of skills in Scotland's renewable energy sector*, available at:

https://www.closesthegap.org.uk/content/resources/1480883000_CTG-Working-Paper-7---Renewables.pdf;

and International Renewable Energy Agency (2019) *Renewable Energy: A gender perspective*, available at:

<https://www.irena.org/publications/2019/Jan/Renewable-Energy-A-Gender-Perspective>

¹⁴ Close the Gap (2019) *Still Not Visible: Research on BME women's experiences of employment in Scotland*, available at: https://www.closesthegap.org.uk/content/resources/1557499847_Still-Not-Visible.pdf; and Close the Gap (2023) *Submission to the Economy and Fair Work Committee inquiry into the disabled employment*

intersecting and compounding inequalities for racially minoritised women and disabled women are also present in the green energy sector. This underscores the importance of taking an intersectional approach to the energy strategy and just transition plan.

There is therefore a role for Scottish Government and its delivery agencies to influence employer practice on gender equality to tackle workplace cultures that are not inclusive to women. Scottish Government should use procurement powers to strengthen and better gender Fair Work First. Capacity should also be built in employer engagement functions of delivery agencies to persuade green energy companies to take action on gender equality. Necessary employer actions include:

- Conducting an equal pay review and addressing pay inequality where it exists;
- Enabling all staff to work flexibly;
- Having fair and effective reporting procedures in place for sexual harassment, and building capacity in line managers to competently manage reports;
- Demonstrating leadership on tackling the intersections of sexism, racism and ableism;
- Taking positive action measures to recruit more women into roles in which they are under-represented;
- Tackling discrimination and bias in recruitment and progression practice;
- Supporting women to have access to training and development opportunities to enable them to reskill and/or progress; and
- Gathering intersectional data to identify gendered patterns and inequalities facing different groups of women workers.

Q44. Could any of the proposals set out in this strategy unfairly discriminate against any person in Scotland who shares a protected characteristic?

Yes.

Occupational segregation is a central feature of the energy sector and its sub-sectors, and it characterises existing, new and emerging green jobs. Women comprise less than a third (29%) of those working in electricity, gas steam and

gap, available at: <https://www.closesthegap.org.uk/content/resources/Close-the-Gap-submission-to-the-Economy-and-Fair-Work-Committee-disabled-employment-gap-inquiry.pdf>

air conditioning, and less than a fifth (17%) of those working in mining and quarrying¹⁵. By the definition of green jobs adopted by Skills Development Scotland, women account for just 28% of workers in these roles¹⁶. They are also vastly under-represented in the most in-demand green jobs such as engineering where they comprise just 13%¹⁷.

Despite overwhelming evidence of women's under-representation in all energy sectors and green jobs, the draft energy strategy and just transition plan are not gendered. Women are only mentioned once, and that is in reference to funding for a specific project being delivered by Women's Environment Development Network. Gender is not mentioned at all.

The summary report of stakeholder engagement includes actions identified as important to the draft strategy including ensuring "the legal obligation for gender mainstreaming is met within green policymaking" and putting "fair work for women at the heart of efforts to grow green sectors, including within sectoral just transition plans". The report further notes the need to deliver "fair work for women within priority green sectors, enabling women to enter and remain in higher paid priority green sectors" and that "upskilling and reskilling policy, alongside interventions designed to support the just transition, must meet women's needs, and address occupational segregation". There is however no consideration of occupational segregation; the gendered barriers that women face in entering or progressing in the energy sector; and the gendered implications of a just transition on women's equality.

The analysis of the survey of energy workers *Your Job in a Net Zero Scotland*, does not include gender-sensitive data, nor does it include headline data disaggregated by sex. It is therefore not possible to identify gendered differences in sectoral distribution, perceptions around green jobs, trade union membership, pay, workers' views on their own jobs and the future transition. This represents a significant failure to gather and use data about women's and men's views and experiences, and mainstream gender in the development of this policy. It is therefore entirely likely that the proposals, as currently drafted, will entrench occupational segregation and reinforce women's labour market

¹⁵ NOMIS, workforce jobs by industry (SIC 2007) and sex – unadjusted (Dec 2022)

¹⁶ Rubio, Jeisson Cardenes, Chirs Warhurst and Pauline Anderson (2022) *Green Jobs in Scotland: An inclusive approach to definition, measurement and analysis*, Warwick University, available at: https://www.skillsdevelopmentscotland.co.uk/media/49856/green-jobs-in-scotland-report_final-4.pdf

¹⁷ Annual Population Survey – Employment by Occupation (SOC2020) by sex, engineering professionals (Jan 2022 – Dec 2022)

and economic inequality.

Just Transition

Green job creation and increasing green skills are central to Scottish Government's efforts to transition to a net zero economy. However, there has been very little attention paid to the potential impact of the growth in green jobs on women's labour market equality in a just transition. This is despite evidence that "men's jobs" will disproportionately benefit from further investment in green jobs and sectors. The Climate Emergency Skills Action Plan¹⁸ identifies five broad areas of economic activity that are core to the net zero economy. The sectors are heavily male-dominated such as energy, transport, construction, agriculture, and manufacturing. Analysis by Close the Gap found that women account for less than a quarter (22%) of people employed in these priority green sectors in Scotland.¹⁹

Increased policy focus on, and investment in, these male-dominated sectors, without action to tackle occupational segregation, will disbenefit women, worsen women's unemployment and underemployment, widen the gender pay gap, while also exacerbating women's poverty. It is essential that interventions, such as gender-sensitive upskilling and reskilling, are delivered to address the under-representation of women in the priority sectors. This will contribute to the realisation of fair work for women, but there are also wider economic gains. Occupational segregation is correlated with sector skills shortages²⁰, and increasing the number of women entering these sectors is necessary to meet demand for labour.

Although the definition of green jobs adopted by Skills Development Scotland professes to be "inclusive", it is clear that green infrastructure continues to be understood by Scottish Government and its delivery agencies in traditional terms, focused on physical infrastructure such as transport and housing. Caring jobs are low carbon jobs, and work by Dr Jerome De Henau and Professor Sue

¹⁸ Skills Development Scotland (2020) *Climate Emergency Skills Action Plan 2020-2025*, available at: <https://www.skillsdevelopmentscotland.co.uk/media/47336/climate-emergency-skills-action-plan-2020-2025.pdf>

¹⁹ Close the Gap (2021) *Making sure a green economy also works for women*, available at:

<https://www.closesthegap.org.uk/news/blog/making-sure-a-green-economy-also-works-for-women/>

²⁰ Close the Gap (2016) *Gender Equality Pays: The economic case for addressing women's labour market equality in Scotland* available at: <https://www.closesthegap.org.uk/content/resources/Gender-Equality-Pays.pdf>

Himmelweit for UK Women’s Budget Group²¹ finds that investment in the care sector is 30% less polluting than the equivalent investment in construction, and would also produce 2.7 times as many jobs. However, there has been little consideration on the importance of, and opportunities around, implementing large scale investment in all forms of green social infrastructure, including childcare and social care. There is also no mention of the care economy in the Climate Emergency Skills Action Plan²² and the similar omission of the care economy from the National Strategy for Economic Transformation²³ is a critical weakness.

In its initial report²⁴, the second Just Transition Commission highlights the importance of high quality social infrastructure to a just transition, and notes that investment in social infrastructure has many positive multiplier effects including tackling the systemic inequality experienced by women and other marginalised groups. The Commission makes a number of recommendations around investing in social infrastructure including improving terms and conditions of predominantly female social infrastructure workforce.

The realignment of investment in education and training towards green jobs should be coupled with action to ensure that skills policy is informed by evidence on women’s access to skills acquisition, and in-work training and development. Gender-blind skills initiatives entrench the occupational segregation that characterises Scotland’s education and skills pipeline, funnelling women into low-paid, undervalued jobs and sectors. The commitments on Climate Emergency Skills Action Plan on tackling occupational segregation as a core aim of skills and training programmes, promoting inclusive workplace practices, and developing upskilling and reskilling measures informed by barriers faced by women²⁵ should be prioritised for implementation.

²¹ Women’s Budget Group (2020) *A Care-led Recovery from Coronavirus: The case for investment in care as a better post-pandemic economic stimulus than investment in construction*, available at: <https://wbg.org.uk/wp-content/uploads/2020/06/Care-led-recovery-final.pdf>

²² Skills Development Scotland (2020) *Climate Emergency Skills Action Plan*, available at: <https://www.skillsdevelopmentscotland.co.uk/media/47336/climate-emergency-skills-action-plan-2020-2025.pdf>

²³ Scottish Government (2022) *National Strategy for Economic Transformation*, available at: <https://www.gov.scot/publications/scotlands-national-strategy-economic-transformation/documents/>

²⁴ Scottish Government (2022) *Making the Future: Initial report of the 2nd Just Transition Commission*, available at: <https://www.gov.scot/publications/making-future-initial-report-2nd-transition-commission/documents/>

²⁵ Skills Development Scotland (2020) *Climate Emergency Skills Action Plan 2020-2025*, available at: <https://www.skillsdevelopmentscotland.co.uk/media/47336/climate-emergency-skills-action-plan-2020-2025.pdf>

Just transition presents an opportunity to support women into better quality jobs. However the current gender-blind approach is very likely to leave women behind in the green jobs revolution. If women are also to benefit from the just transition, policy development needs to integrate gender, and pay attention to women's experiences of occupational segregation, education and training, and their caring roles. Without this focus, policy around just transition will prevent fair work for women being realised.

Q50: Do you have any views on appropriate indicators and relevant data sources to measure progress towards, and success of, these outcomes.

Improving the range of gender-sensitive, sex-disaggregated and intersectional data used in policymaking, service design and evaluation is a key priority for Close the Gap's advocacy work.²⁶ Gender-sensitive sex-disaggregated data is data that is broken down by sex, so that it is possible to compare and contrast differences between men and women. However, it is not merely about counting women and men, but also about utilising statistics and other information that adequately reflect gendered differences and inequalities in the situation of women and men.²⁷

In the context of women's employment, an example of gender-sensitive sex-disaggregated data would not only present women's employment rate, but also integrate data that reflects why women's experiences of employment are different from men's including, for example, women's greater responsibility for unpaid care and their experiences of men's violence. Gender analysis and use of evidence must pay attention to gendered differences in lived experience. These gendered differences span labour market participation, occupational segregation in education and the labour market, working patterns, unpaid caring responsibilities, discrimination, and access to safety and resources. Intersectional data is important because women are not a homogenous group, and their experiences are shaped by the intersecting and compounding inequalities that they face such as racism and sexism.

The measurement of progress towards just transition outcomes must use a range of intersectional data. In particular, this should include:

²⁶ Close the Gap (2022) *Response to the Scottish Government consultation on the equality evidence strategy 2023-2025*, available at: <https://www.closesthegap.org.uk/content/resources/Close-the-Gap-reponse-to-the-SG-Equality-Evidence-Strategy-Consultation-2023-25.pdf>

²⁷ Engender (2020) *COVID-19: Gathering and using data to ensure that the response integrates women's equality and rights*

- Occupational segregation, by sector and occupation;
- The proportion of women in priority sectors and “green jobs”;
- The outcomes of skills interventions, by sex, sector and occupation;
- Education attainment related to green skills, by sex, subject and level of qualification; and
- Completion rates and labour market outcomes for apprenticeships related to green skills, by framework, level, sex, disability and ethnicity.

Unless a range of intersectional gender-sensitive, sex disaggregated data is collected and analysed it will not be possible to evidence the gains to women’s equality or evaluate the effectiveness of just transition policy.