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Diverse Equality in Europe: The example of the construction sector

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INTRODUCTION

In this paper we examine the definition and nature of gender equality cross-nationally and the obstacles to applying a common integrated framework. It is based on research carried out under a NOW (New Opportunities for Women) programme with partners in Britain, Denmark and Spain, which focused on achieving equality in a highly male-dominated sector - the construction industry. 'Equality' assumed different meanings in the different national contexts and equal opportunities policies varied significantly.

DIFFERENT CONCEPTS OF EQUALITY

Gender equality has long been on the European agenda: the principle of equal treatment was established in the Treaty of Rome in 1957 and since then the concept has been refined through legislation and action programmes. But gender equality on a European scale is far from established and European labour force remains highly gender segregated. A major problem confronting attempts at improvement is the lack of common understanding of 'equality'. Equality has been defined as:

- *Equal treatment*. Originating from the liberal tradition, this is an individual, theoretical and legally defined concept of equality assuming that no gender discrimination should be made (Peters 1996). Its weakness is a disregard for different individual starting positions in society.

- *Equal opportunities* goes beyond the equal treatment principle, addressing the issue of equality from a more factual and collective standpoint (Forbes 1989). Unlike 'equal treatment', it has never been legally defined by the European Commission (EC). It acknowledges the different positions of men and women in society and implies that each be offered an equal starting chance (through, for instance, positive action programmes). But, though concerned with equal access, it does not challenge existing structures or hierarchies.
- *Equality in fact*. Unequal treatment is justified to achieve an 'equal' outcome.
- *Mainstreaming* as a long-term strategic understanding of equality has become the cornerstone of the European Union (EU) equality policy in the late 1990s. 'The essence of the mainstreaming approach is to seek to identify these hidden, unrecognised ways in which systems and structures are biased in favour of men, and to redress the balance.' (Rees 1998)

The fact that these different concepts of equality are used side by side creates confusions¹ that are ultimately contra-active (Barnard 1997; Peters, 1996). Countries differ historically in the importance attached to the different concepts and in the routes taken to implement them. Several models have been developed grouping countries according to social policy and strongly related to the concept of 'gender contracts' (Esping-Anderson, 1990; Lane, 1993; Perrons 1995a and 1995b; Daly 1996; Duncan 1996; Cousins 1998):

¹ These are exemplified in the situation created by the Kalanke ruling of 1995. Here, the European Court of Justice ruled in favour of the liberal concept of equal treatment against positive action in the form of unconditional quota provision. In the subsequent Marshall ruling though it came out in favour of positive action that is 'flexible', not excluding men from the outset.

- The *socio-democratic model*, whereby men and women engage as *equal individuals* on the labour market. It is not, however, left to the individual to enforce this right as government intervention and the degree of regulation are high, with a framework of social provision (such as parental leave) built for men and women. An example is Denmark, with its extensive and centralised approach to equal opportunities and employment policies covering both public and private sectors. Although labour market segregation is not overcome and male roles remain entrenched, the model proves supportive for gender equality, with high female participation rates and low earnings differentials (Newell 1996).
- In the *conservative corporatist model* (for example Germany), the family, not the individual is the central concept. Men and women are not seen as equal individuals but as group players in the labour market. Social policy measures are designed in a collective and centralised way, as in the previous model. This proves beneficial - to a certain degree - for women in terms of gender equality on the labour market, although their position remains subsidiary to that of men.
- In the *southern model* (for example Spain) the family is similarly at the centre of the labour market but, unlike the corporatist model, social policy measures only relate to a core group in a 'privileged labour market' in which women are under represented. Next to this core labour market other substantial but less protected labour markets have formed with an over-representation of women.
- The collective and centralised approach is absent in the *liberal model*, exemplified by the UK, in which individuals are responsible for their position in the labour market. The market must be left to regulate itself, so government involvement is marginal and measures are voluntary. It is more difficult to enforce social rights (such as equality of opportunity) as an individual than in

countries where collectiveness, social policies and responsibilities have been developed (Rubery 1992; Perrons 1994). Gender equality is, therefore, weaker compared with the corporatist and social-democratic models, although some indicators are good (for instance female labour market participation in the UK).

To achieve real equality, EU policies need to address these diverse structures, regimes and gender contracts.

THE NOW PROJECT: WOMEN IN CONSTRUCTION IN EUROPE

The need to heed such differences have been exemplified in the EU equal opportunity action programme NOW, which funds transnational partnership projects for improving the access of women to the labour market. The project described here focused on the construction sector in Britain, Denmark and Spain, a sector that remains uniformly severely male dominated throughout Europe: 1.6 per cent of women in employment work in construction in Europe, 1 per cent in Denmark and Spain and 1.5 per cent in the UK, although significantly higher proportions are found in certain trades, for example painters and decorators in Britain, Denmark and Germany (Eurostat 1996).

The British project involved the participation of three London local authorities and two LLiC (Local Labour in Construction) schemes. An in-depth survey of the tradeswomen in the authorities' building and maintenance departments, or DLOs (Direct Labour Organisations) was used as a basis for designing short training courses (Wall and Clarke 1996). Running parallel, the Danish project aimed at increasing the number of women training as construction managers. In northern

Spain, where small numbers of women had already been trained in construction crafts, the project was to help in their search for employment through further training, whilst a project, based in the south – in Cordoba – provided skilled women with the business skills necessary to run their own enterprises.

Throughout 1996 and 1997 representatives from the projects organised exchange visits with a view to understanding and comparing their respective situations. Each partner also produced a *European Newsletter for Tradeswomen* and the overall project culminated in an evaluation of conditions for women in construction in the three countries, with recommendations for change presented to the European Parliament in Brussels.

Each of the projects in each country had a particular approach to the common theme of creating more opportunities for women in construction, one greatly influenced by the national economic and labour market situation and by the interpretation of equality. Each was also focused on different segments of the construction labour market, those most likely to produce a positive outcome in terms of employment and equal opportunity for the women concerned. In spite of this, the structural obstacles confronted were echoed throughout.

GENDER DISCRIMINATION IN CONSTRUCTION: THE CASE OF BRITAIN

Research for the British project was extensive, involving detailed face-to-face interviews with 46 tradeswomen in three London DLOs, a re-survey a year later of these same women and a postal survey of all DLOs in Britain (Wall and Clarke 1996; Michaelsens et al. 1997).

Women in Construction in Britain

The most severely male-dominated sector in Britain is the construction industry, with 99 per cent of those in employment male. In the private construction sector, only very small proportions of women work in craft and related occupations (0.8 per cent) or in professional occupations (CSO 1997). Several reasons have been given for this: the narrow eligibility criteria of mainstream training (particularly geared at the young, whereas many women enter construction at a later age); lack of child-care facilities; inflexible working structures; and discrimination (HMSO 1994; CIB 1996). Other barriers – more apparent in the private than the public construction sector – include: the existence of informal recruitment networks; the negative attitude of employers; lack of career development; and harassment.

The public construction sector, which is largely composed of the DLOs, was drastically reduced through the establishment of Compulsory Competitive Tendering, which forced competition with private firms. Nevertheless, the DLOs still account for nearly 25 per cent of all directly-employed operatives in the industry and 13 per cent of the repair and maintenance output (Clarke and Wall 1998).

The Impact of Equality Policies

In Britain, the government approach of the last two decades to shaping and implementing equality policies can be described as minimalist, as indicated by the fact that:

- Although the individual right of equality is broadly recognised, legislation to enforce it is minimal. Besides the culture of deregulation, the reason may lie in a

tradition 'where rights are not spelled out and there is a reluctance to use law for this purpose' (Lovenduski 1989). However, two important and instrumental pieces of equality legislation have been produced: the Sex Discrimination Acts of 1975 and 1988 and the Equal Pay Acts of 1970 (not enforced until 1975) and 1984. Britain has not yet ventured into other areas and found elsewhere in the EU (such as childcare), although legislation on the minimum wage, working time, part-time work and parental leave will have a significant impact.

- The Equal Opportunities Commission (EOC) is not part of government but a 'quango', whereas in Denmark or Spain similar equality institutions are part of the central administration. Although the EOC has far reaching legislative and negotiating powers (besides its advisory and educational roles), it has taken a 'convincing' rather than 'enforcing' route. Nevertheless, several initiatives have been successful and equal opportunity is a widely accepted concept in Britain.

Largely because of the market-led rather than social policy approach of the government and the strategy of the EOC, the private sector in Britain has not been at the forefront in the implementation of equal opportunity initiatives. Business initiatives such as Opportunity 2000 have government backing and a broad appeal, but 'figures on employment, equal pay, and the share of women in management all suggest that progress has been patchy or marginal' (Forbes 1996). Innovation has been mainly in terms of training and in local government. In training success in equalising opportunities has been helped by the fact that positive action measures are legally allowed under the Sex Discrimination Act. In local government success is largely attributable to the more interventionist role taken by some Labour controlled

authorities and the increased participation of women and ethnic groups in the local political process (Coyle 1989).

As regards the construction sector, the same pattern emerges. Within the private construction sector initiatives, such as the Latham report, to promote equal opportunities have been of a strictly advisory nature (HMSO, 1994)). In the public construction sector, while equal opportunity policies have been apparent for over ten years, their effectiveness is difficult to gauge. In the 1980s a relatively large number of tradeswomen were clustered in Labour-run Inner London DLOs (266 in seven authorities alone) (Pyke 1989). By 1994, budget restrictions had eradicated both new-build training schemes and adult traineeships, with the result that over two-thirds of the women employed had disappeared (LWAMT Newsletter 1994). In the survey of DLOs in Britain conducted in collaboration with the Association of Direct Labour Organisations (ADLO), successful recruitment and retention of women was analysed (Michielsens et al. 1997). It was found that the presence of a women's unit or equal opportunity office in the local authority did not automatically ensure that the DLO actively recruited or trained women. A significant rise in the female workforce was observable only when these established close links with the DLO and with construction tradeswomen. Other successful encouragement included specific support structures, taking into account that women were entering a male-dominated workforce and undertaking work traditionally seen as a 'man's' job (for instance, information on entry, childcare, support groups, redeployment in case of pregnancy). Such support was variable and largely an urban phenomenon: none of the councils in Wales and Northern Ireland had measures in place to encourage women into

construction, whereas 73 per cent of Metropolitan City Councils, 63 per cent of London Councils and 50 per cent of Scottish Unitary Councils had.

Of the seven most 'successful' authorities in employing women (that is those employing two or more tradeswomen per 100 tradesmen) in their DLOs, the majority provided flexibility in working arrangements and support for pregnant women, were supportive of childcare arrangements, and gave information on entry for women. Most demonstrated links between the women's unit and the DLO, all actively encouraged the recruitment and retention of women, six published guidelines on harassment at work and five circulated guidelines on working alone. Five ran training programmes aimed at women and provided for women-only meetings with elected women representatives. Four had links with women-only training workshops and provided work experience for their trainees. One ran a community training scheme that provided childcare support for adult women trainees and another ran a Taster Day for women.

This suggests that it is the *way* in which equal opportunities policies are interpreted and implemented that results in the successful inclusion of women in the construction workforce. The authorities with the highest number of women employees all implemented targeted recruitment backed up by support and monitoring of women once employed. What is assumed is that it is not enough just to provide equal opportunities, but necessary to go beyond this, given the extreme gender discrimination in the sector. Those authorities that do so are also those that anyway put greater value on the development of their workforces, above all through training schemes. The NOW project in Britain was situated within the framework of these most successful DLOs.

WOMEN IN CONSTRUCTION AND EQUAL OPPORTUNITIES ELSEWHERE

Whilst no detailed survey work was carried out by the Danish and Spanish partners, their research revealed the different concepts of equality applied and the contrasting labour market contexts for achieving equality in construction.

Denmark

A major characteristic of Denmark is that there is less difference between men and women's position on the labour market than in Britain or Spain in terms of activity rates, pay and unemployment (Eurostat, 1995). Although the Danish labour market is characterised by the highest percentage of female employees in Europe – 93 per cent – it remains heavily segregated: skilled women in craft and related occupations constitute only 5.7 per cent of the labour force (Eurostat 1996). The construction industry is male dominated and overwhelmingly private, with 93.6 per cent of all construction employment in private hands (Statistics Denmark 1996). Employment conditions are more highly regulated than in Britain, through the social partners, so that both private and public sectors are similar, including in terms of female employment. However, in certain construction trades such as housepainters the number of women has been rising: female housepainters now constitute 27 per cent of housepainters (Clarke et al. 2000).

It remains a puzzle that – given the high degree of labour market regulation in Denmark, improvements in the social system (for example, childcare and shorter working hours) and the attraction of earning a ‘man’s wage’ – the proportion of women remains so low with the important exception of the painters. One problem is

the difficulty in retaining women. To change this, equality policies are critical and these are firmly in the hands of central government. The Equal Status Council (ESC) – whose members represent women’s organisations, trade unions and employers – promotes equal opportunities between men and women in society and is based in the office of the Prime Minister. The Act on Equal Pay to Men and Women (1976, last amended 1992) together with the Equal Status Act (defining the task of the ESC) and the Act on Equal Treatment of Men and Women (established 1978, last amended 1990) assists the ESC in its task.

Although the private sector labour market is under no obligation to draw up action plans for equal opportunities, the Danish Confederation of Trade Unions and the Danish Employers' Confederation have signed a special agreement on equal opportunities in individual companies, giving private and public sectors an almost identical framework. The Act on Equal Treatment provides that men and women be treated equally in terms of recruitment, transfer, promotion, working conditions, and access to vocational and further training. To ensure genuine equal treatment, no special rules protecting women have been introduced. As a result, due to their different starting position, women have remained automatically discriminated against at sectoral level. To compensate for this, an important amendment of 1990 gave the ESC the power to grant positive action exemptions (Danish Ministry of Foreign Affairs 1994). In recent years, too, adult vocational training schemes and special strategies and measures to integrate women into non-traditional sectors have been established. As in Britain, therefore, this demonstrates that to be successful, it is necessary to go beyond the more ‘passive’ policies in place.

The Danish NOW project exemplifies this. Although women have access to mainstream training in such male-dominated areas as construction architecture, design architecture and civil engineering, formal qualifications do not solve the problem of finding and retaining work. As part of the positive action approach, the Danish project sought to give extra training (as site managers) and support to enhance the chances of these women. The route was therefore identical to the one taken in Britain, although the situation differed. By increasing the number of women in managerial position on site, it was hoped it would become easier for women to gain employment in the construction industry in general. The project was a success, with almost all women trainees securing jobs.

Spain

Female labour market participation in Spain is very low (35 per cent) compared with Denmark and Britain, although the level is understated due to the irregular work of women in the informal economy. Construction is the most heavily segregated sector (EPA 1996). In terms of the professional status of those in employment, Spain differs from the European average, with its high percentage of female employers or self-employed – one in five (Eurostat 1996). This underlines the importance of entrepreneurship in Spanish society and aggravates the difficulty of finding a place as an employee in the labour market.

The major economic concern in Spain is *unemployment*, especially female and long-term unemployment: in 1995 nearly a third of economically active women in Spain were unemployed (the majority long term), the highest female unemployment rate in the EU. Younger women form an especially disadvantaged group: in 1995 the

unemployment rate for women under 25 was 48 per cent (36 per cent for men) and 26 per cent for those over 25 (15 per cent for men), compared with 13 per cent for women under 25 in Britain and 8 per cent in Denmark (Eurostat 1996).

One solution of the Spanish government is a mainstream training and employment initiative, assisted by EU funding. Policy regarding training and employment issues is decided by central (or regional) government, with employers and trade unions as partners. Equal opportunities is also organised centrally through the 'Institute of Women' in the Ministry of Employment and Social Affairs, which places great emphasis on the training of trainers, supporting women during and after training and integrating women's concerns collective bargaining (Lyle 1996). Equal opportunities legislation has been initiated (for example parental leave in 1995) to stimulate women's entry into under-represented positions and positive action plans have been in place since 1988, with a strong focus on stimulating entrepreneurship and women's access to higher hierarchical levels.

The NOW projects in Spain were linked to these initiatives, being connected with regional government mainstream training initiatives funded by the European Social Fund. This training in craft school workshops – in areas most in demand such as construction – was designed specifically for 16-25 year olds. Women were also targeted, but found it more difficult to find employment, so the projects supplied support and extra training. Although this was identical to the objectives in Britain and Denmark, there is an important difference: in Spain *access to* the labour market is the main problem for women, whilst in Britain and Denmark it is rather *segregation*. In Britain and Denmark the projects were in an environment where

equal opportunity policies and the importance of equal treatment had already been initiated (in public construction work, or through regulated private construction work), but this was not the case in Spain. Neither of the Spanish projects was involved with 'core' construction, as this was seen as too difficult to change. Women with construction skills were instead trained further in related trades, such as gardening and archaeology. In Spain the focus of employment policy is not, in the first instance, the issue of equal opportunities for women and men, but resolving the major problem of unemployment and the over-representation of women in the informal market. The NOW projects must be seen in this light; their relation to the construction industry was only secondary.

Different Approaches to Equality

Both Denmark and Spain represent very different approaches to equality, the former traditionally based on equal treatment and the latter on improving employment chances. The focus of attempts to improve the position of women in construction is also totally different, given these distinct labour market contexts. Britain represents yet a third approach, with its stress on opening up equal opportunities. One implication therefore might be that no common transnational approach to combating gender discrimination is possible. However, further consideration suggests that two outstanding common factors did unite the three models: the proportion of women in the sector is similarly low in each case and the obstacles women confront are all remarkably similar, if not the same. This suggests that the focus of a European equality policy should be precisely these obstacles or structural aspects of discrimination.

COMMON OBSTACLES TO IMPROVING EQUALITY

Detailed policy recommendations for improving the position of women in construction in Europe were drawn up from the NOW project, implying some commonality at transnational level (FORUM/NOW 1997). All assume the necessity of going beyond policies installed for both men and women. Thus, even though the concept and pursuance of equal opportunities – and therefore examples of good and bad practice – could not be strictly or uniformly defined and the institutions, regulations and initiatives were very different, policy can be directed at the common obstacles or structural determinants of discrimination in the sector.

Regarding Recruitment, Training and Promotion

Training remains a key obstacle to women entering the sector, irrespective of country. Women are dependent on formal training and qualifications to prove their worth, unlike their male counterparts, who can often rely on more informal networks of recruitment and even, especially in countries like Britain, on learning on the job (Clarke and Wall 1998).

The NOW recommendations drawn up with regard to training reflected this, including: the same school curricula for girls and boys; no limits on age and race; responsive to current demands and future prospects, such as ecological building; mixed and women-only; female trainers; positive action facilities and flexible arrangements (for instance hours); paid and recognised work experience in firms; and encouraging women to come together at transnational level.

Women's Training Centres were an issue of discussion. In the UK, equal opportunities policy has traditionally been very gender specific, including in relation to training. There are currently 12 women-only training centres in Britain, funded partly by the EC. These train adult women on full-time introductory courses, thus providing a starting point for women to enter into the construction industry. The gender-specific method was seen to be effective for women in non-traditional areas:

- the provision of positive female role models (the trainers) allows the trainees to see that it is possible to succeed;
- in a mixed training place women end up with a majority of men, 'All of whom think along with their tutor that she is a joke' (trainer in women-only training centre);
- women can catch up with the male skill level and can get a boost in confidence before going on a mixed course.

In Denmark, in contrast, equal opportunities policies were never gender specific.

Construction training is provided through mainstream institutions of higher education and only indirectly linked to companies in the industry. The route to becoming a tradesperson is to train as an apprentice in a technical school. But within the vocational training programme, 80-90 per cent of apprentices are boys (Nordic Council of Ministers 1994). Women-only introductory courses have therefore now been established, following amendment of the Equal Status Act (Clarke et al. 2000). Nevertheless both the Spanish and Danish groups were sceptical about any developments created in the first instance for women, being eager to be 'equal' to male colleagues. The fear was that special initiatives would marginalise women, making them less likely to have the same chances and opportunities as men. On this

point the principles of equal treatment and equal opportunity through specific measures clashed.

Employment and Working Conditions

Another key area for EU recommendations was employment and working conditions. Just as training is key to women entering industry, so are employment conditions and the wage structure to retaining them. In our survey work it was apparent that the better the conditions with respect to secure employment, stable hours and wages, short travelling time and a safe working environment, the higher the proportion of women to be found and the more likely they were to stay (Wall and Clarke 1996). Recommendations included: good working conditions (environment, safety and hygiene, accident prevention); improved technology to reduce heavy work; equal pay for the same tasks and posts; availability of a place for women to meet; the option to train with another woman or under a female supervisor; the opportunity to work as general site managers; the chance to request leave of absence on good conditions; avoiding isolation of women workers; and placing women in high trade union representative posts.

Most contentious was the question of flexible hours and contracts, reflecting different approaches to equality. For the Spanish and Danish project members, flexible employment (flexible work time, etc.) is not a positive evolution. Women could be marginalised from male colleagues and perceived as not being interested in a full career – assuming, of course, that men would not seek to use the flexible conditions (Newell 1995; Danish ESC 1995). In the UK, in contrast, flexible work

can be considered positive, provided suitable conditions are negotiated between employer and employee.

Some of the sharpest criticisms to emerge related to the role of the unions in establishing better opportunities for women in construction, especially in Britain and Spain. The organisation of the unions is quite different in each country (in Spain they are organised according to political approach, in Denmark to trade and in Britain to industry or trade). The Danish carpenter union, for instance, has a national mixed-sex Equality Committee dealing solely with gender issues whose activities include: providing traineeships in carpentry for women; trying to lower working hours; maternity leave; information about equality legislation; and organising campaigns to incorporate women's demands into the collective bargaining process. Union initiatives in Britain and Spain were less positive: some union representatives were even convinced that the marginal position of women in construction was their own fault; others that women should not work in the construction sector: 'it's bad enough for men.'

DISPARATE EQUALITY AND EUROPE: OPPORTUNITIES AND OBSTACLES

Recognition of disparities in European labour markets and in notions of equality does not pave the way for a unified and equal European labour market. While cultural differences between member states and regions within them are seen as an enrichment, socio-economic differences are potentially harmful and an encouragement to 'social dumping'. The pursuit of economic and social cohesion is therefore a priority policy 'as an expression of Europe-wide solidarity and as a prerequisite for economic efficiency and global competitiveness' (mission statement DGVI). At the level of EU policy, the co-ordination of gender equality has been through:

- EU-wide equal opportunity legislation within the broader social context of employment policy, from the Treaty of Rome in 1957 through a series of directives (for example, regarding equal treatment, Directives 1975/117, 1986/613, 1992/85), recommendations and resolutions (for example positive action – Resolution 84/331; childcare and parental leave – Resolution 1992/241; women in decision making – Resolution 1995/168) to the Amsterdam Treaty (1997). This last included a commitment to equal pay for work of equal value, together with provisions for positive action for 'an underrepresented sex to pursue a vocational activity'.
- Community Action Programmes, under the directorship of DGV, to supplement the effects of employment and equality legislation. The first two (1982-85 and 1986-90) were based on the concept of positive action, while the following two (1991-95 and 1996-2000) increasingly introduced the concept of mainstreaming and integration (Rees 1998). The NOW projects were part of the third Action

Programme, to promote vocational training for women, and are examples of positive action, with a high interest in female entrepreneurship.

In their recommendations the NOW projects revealed a correspondence at a broad structural level that indicated the feasibility of pursuing equality on a European scale. Several obstacles are, nevertheless, apparent, indicative of a broader gap between EU equality policies in theory and in practice. In the last decade the EU's approach has developed in the direction of 'mainstreaming', a long-term strategy that aims to shake the foundations of unequal structures in all fields (Cockburn 1991). But while related policies are long term, they are translated only into short-term actions, so that although claiming to be part of a 'transforming' agenda, only 'tailoring' is achieved (Rees 1998). In relation to the NOW project's mainstreaming potential, it is hampered by:

- *Obstacles in the partner search*

The criteria for entry are not strictly defined by the EC centrally and member States have different selection criteria to reflect national priorities. The programme therefore differs from country to country, although certain eligibility, criteria with the transnational dimension at their centre, have been identical.²

Given different national concepts of equality and equal opportunities and different practices stemming from these, setting up transnational learning, ideas and practices is difficult and time-consuming to achieve. The EU action

² Eligibility criteria:

- A transnational dimension: co-operating with and learning from partner projects in at least one other Member State.
- Stimulate change and innovation in European labour market policies and practices
- Involve local individuals and organisations
- A multiplier effect, ensuring that the results of the projects have as wide an impact as possible
- Complementarity: creating links with other programmes.

programmes stress their importance for arriving - in the long run - at a European standard but practical impediments to this evolving were evident. For example, since there was no initial cross-country co-ordination on selecting partnerships as a whole each country selected projects individually, so that many applications lost their original partners: in the UK some 75 per cent of projects selected ended up needing new partners (DfEE 1996). Many projects had to change their initial transnational plan substantially and construct at short notice new plans with unfamiliar partners. This has a toll on the quality of transnational work, as less compatible partnerships are formed.

- *Time restrictions.* NOW funding is for two years and, since projects need time to learn from each other and to establish good practice, recommendations were only written at the end. To achieve anything further, projects need to build on their recommendations and contacts, yet the only way to continue is to submit another proposal, creating discontinuity and entailing redefinition. At a national level, too, achieving a positive impact takes time.

The widely different concepts of equality evident in the three countries, the difficult process of finding the right partners and the short-term nature of the partnership also influenced the quality of the good practice outcomes. Exchange activities provide a first glimpse of the situation in another country, so that recommendations only skate the surface. To create a real difference in labour market policy, to provide specialist knowledge of good practice, to monitor and use this, it is essential to go beyond to defining general concepts related to, for example, training and employment. This requires a long-term rather than a short-term approach, with projects having the

opportunity to continue, to consolidate routes opened up, and to utilise the
experience and knowledge gained.

CONCLUSIONS

This paper shows the very different concepts of equality applied in Europe, themselves deriving from the different position of women in different societies and how this is inscribed and embedded into employment and training. These differences were brought out in our international evaluation of NOW projects for women in construction in Britain, Denmark and Spain. However, in contradiction to its own 'Mainstreaming' philosophy, the NOW projects are restricted by the EU and only provide the opportunity to change fractional access possibilities for women rather than allowing for a more long-term, in-depth approach to tackle deeply rooted practices that support inequality.

Women remain as a group everywhere systematically excluded to a similar degree from the construction industry, even in spite of differences in their role, in the labour market and in policies in different countries. Our work has shown that active measures to combat this discrimination are effective, provided these are clearly directed at areas where positive outcomes are possible. These areas also differ significantly in each country. More than this, measures need to be directed towards weakening the structural factors determining discrimination, including the nature of training, wage structures and employment conditions. These, too, take very different forms in different countries and have a different significance with respect to changing the position of women. What our study points to is the need, in the first place, for more work on structural discrimination and how particular labour relations sustain and undervalue the role of women and, in the second, for the EU to change the parameters of its action programme to accommodate a mainstreaming approach.

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