



UKREN Comments on the Draft Report on progress made in equal opportunities and non-discrimination in the EU

UKREN welcomes this resolution and is grateful for the opportunity to comment on the Draft. There are many points to be welcomed in the text, especially the important focus on making the rights a reality, dealing with the gaps in rights and enhancing participation of Non Governmental Organisations and civil society in the process.

We would like to make the following comments and suggestions to strengthen the resolution:

1. As highlighted by ENAR, we consider that many of the points made in the draft resolution, especially on transposition, implementation and sanctions, are equally relevant to the Race Equality Directive including as applied to employment and it would therefore be appropriate to include a reference to the Race Equality Directive at these key points. As there are also specific references to the specific problems of certain grounds (such as the definition of disability and the application of exceptions) this would not detract from those important points. We are aware that the LIBE committee report on the Race Equality Directive has made similar points. However, the inclusion of them in this report that is focusing on employment would greatly assist in re-enforcing the link between non-discrimination and employment strategies. Additionally, our analysis shows that the inter-relationship between the Race Equality Directive and Framework Employment Directive needs to be considered in order to ensure consistency and coherence, especially on multiple discrimination.
2. The problem of getting real legal assistance to enable those who experience discrimination to take their cases through the legal system is widespread throughout Europe and we would therefore wish to see the wording of paragraph 10 strengthened.
3. Paragraph 15 is right to welcome the work that has been and is being done on multiple discrimination, however, we believe that the current directives where they do reach across several grounds can encompass multiple discrimination (Romania and Germany, for example, have explicit provisions recognising multiple discrimination). We would therefore wish to see some acknowledgement of this in relation to the Race Equality Directive and the

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Employment Equality directive. In this respect, we would like to see that any new directive explicitly recognises multiple discrimination and requires Member States to combat it and would suggest the following wording for paragraph 15:

Welcomes the Commission's interest in multiple discrimination, including the launching of a study on the subject; calls on the Commission to examine and supply further data on multiple discrimination; calls on the Commission to confirm that where similar provisions apply to different protected grounds under the existing directives under EC Treaty Article 13 discrimination on a combination of grounds is outlawed and calls on the Commission to adopt a broad definition of multiple discrimination in any future equality directives.

4. We recommend that a call for a requirement that there should be no regression in the terms of any new directive should be included in the resolution, either in paragraph 19 or somewhere else.