**Consultation questions**

**Question 1**

Do you agree with the vision for period dignity outlined in the plan? What suggestions would you make to improve it?

UNISON is broadly supportive of the vision outlined in the plan.

However, UNISON believes there should be specific reference to training within primary care because of the experience of many women who have struggled to get their voice heard in primary care settings.

UNISON believes the vision should separate out education, employment, and health-based settings – this is a huge area with some overlap but also areas of significant difference and we don’t believe it is helpful to pull these themes together under one element of the vision.

Attention must be given to women fleeing domestic abuse into housing refuges. When they flee from their homes with children they often leave without money and basic essentials.

A specific reference should be made about period dignity for people with disabilities. There are exceptional issues that people with disabilities with experience related to periods and period poverty. Addressing this point within the vision will improve the intersectionality of the overall vision.

In addition, the workplace should form a stronger part of the vision given the importance of work and the work environment on people’s wellbeing. Specific reference to supportive workplace policies should also form a part of the vision. It is not enough that periods and associated matters are responded to safely and non-judgmentally – as a vision, we should expect employers to actively support period dignity, particularly in the context of the wider fair work agenda.

Furthermore, UNISON is keen to see the vision delivered sooner than 2023 – the timescale within the vision seems too long for a basic issue that is or will be experienced by roughly 50% of the population.

Welsh Government has stressed a desire to work to a situation where periods are understood, accepted and normalised.

A motion passed at UNISON 2019 National Women's Conference, noted while some women suffer only mild symptoms, many suffer severe debilitating pain and cramps every month. Society has been slow to recognise that period pain can be a significant issue for working women everywhere. Some countries including Japan, South Korea, Taiwan and Indonesia have laws in place which allow women time off work when they are menstruating.

The Period Dignity Strategic Action Plan is an ideal opportunity for Welsh government to talk to unions and employers about introducing some sort of menstrual leave policy similar to those in other countries mentioned.

**Question 2**

How achievable is the vision within the next five years? What will prevent achievement of the vision and what may help to realise the vision?

UNISON believes the vision should be delivered in a shorter timeframe and before 2026. Trade unions already have the expertise and model policies that can be used across workplaces to support period dignity at work.

UNISON continues to advocate for improved facility time agreements in workplaces to support to roll out of the various equality strategies that are being rolled out from Welsh Government.

UNISON has consistently highlighted the integral importance of workplace equality reps in supporting the key equality-based initiatives the Welsh Government is progressing.

Welsh Government have previously committed to improving facility time in workplaces in Wales. Given the growing fair work agenda, it would be prudent to make that commitment a reality.

Proper dialogue with the trade unions at national, regional, and employer level will support on the delivery of this strategy. UNISON believes a more joined up approach across equality areas would be beneficial and bolsters the case for improved facility time agreements. Over the course of 2021, UNISON has made submissions on the LGBTQ+ action plan and the Race Equality action plan, amongst others, and has called for improved facility time agreements in each instance to help support this work and help remove barriers in the workplace.

In terms of other barriers to achieving the vision, this response is written as we face the growing uncertainty of the latest COVID variant, Omicron and the expectations and pressures this entails for the NHS in Wales. Clearly, without capacity within the NHS, it is not going to be possible to deliver fully on this agenda.

Furthermore, unless specific ring-fenced funding is made available for this strategy it will not be possible to fully realise this vision. Taking local authorities as an example, the majority of local authority councillors are male and are unlikely to prioritise a period poverty strategy ahead of other areas of work and this will act as a barrier. Providing ring-fenced funding will remove some of these barriers.

**Question 3**

The Plan is structured by policy theme. Are there themes or specific actions missing from the plan? What are these and whose responsibility are they?

The theme ‘workplace’ is limiting in terms of affording dignity to the whole workforce. There are many workers who do not have one single physical workplace, and this must be built into the plan.

Those who work in community care and social care, for example, will not have a single place of work and may need to access public toilets.

Over the last decade, the number of public toilets has vastly decreased. They have been closed by Welsh local authorities under severe financial pressure because of Westminster-driven austerity measures. One of the biggest complaints from UNISON’s public service workers out in the community is there are no public toilets available for their use.

There are other employers who time or measure the amount of time a worker spends away from their desk in the toilet – this is a barrier to period dignity.

Similarly, there are areas that are male dominated, for example refuse collection, where fewer women work, and they may also have unique considerations that this plan must reflect.

Furthermore, accessibility to toilets can be a particular issue for disabled people and they may experience particular challenges around changing places.

UNISON’s focus group discussions on this strategy identified that many workers feel a need for sink and toilet facilities to be in one cubicle area and that this would support many women to be able to move towards more environmentally friendly period products.

Furthermore, where workplaces have moved to gender neutral facilities, this must in fact be fully gender neutral and all toilets must have access to sanitary waste bins.

**Question 4**

Does the Period Dignity Strategic Action plan adequately respond to the intersection between period dignity and period poverty with protected characteristics and the experience of socio economic disadvantage. If not, how can we improve this?

UNISON believes the intersectionality between period dignity and people with disabilities needs to be strengthened. This needs to address some of the environmental issues identified above about adequate facilities (it is important to note as well, that provision of public toilets is much scarcer in rural areas), but also about access to information and education.

Information must be available in a range of formats including British sign language, easy-read, and age-appropriate materials.

Consideration needs to be paid not only to a medical model around this strategy, but also to a social model.

There are also other multi-cultural issues that will need to be considered when taking delivering on this strategy as periods are treated differently by different cultures and religions.

**Question 5**

What more should the Welsh Government do in relation to broader health based issues such perimenopause, the menopause, endometriosis, polycystic ovary syndrome (PCOS), premenstrual dysphoric disorder (PMDD) and gynaecological cancers. Do you believe these actions should be included in the Period Dignity Strategic Action Plan or in other policy work?

Period dignity should be renamed gynaecological health dignity. All the diseases mentioned impact on menstruation and the requirement for facilities. This would also limit the number of policies and required understanding for managers.

When considering how this strategy is rolled out in the workplace, it is useful to link the policies so they can complement each other, but there needs to be some demarcation to allow and encourage different ways to support the worker dependent on the health-based issue they are experiencing.

Workplace policies should be supportive rather than overly structured and must be supported by proper training for managers to ensure the vision is fully realised. Workplace policies are a strong starting point, but much of the success of the workplace vision will rest upon how these policies are implemented and how supported the worker feels. Managers and leaders need to be equipped with the knowledge and skills to allow them to implement the policies effectively.

Furthermore, flexibility within workplace policies must not be to the detriment of the worker – too often, wording such as: “at the discretion of the manager” is not applied in the benefit of the worker, despite policy intentions.

It is essential the language and style of written policies and the way they are explained to employees, is as clear and accessible as possible to eliminate possible confusion for those with Autism and other conditions.

**Question 6**

We would like to know your views on the effects that the Period Dignity Strategic Action Planwould have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be?  How could positive effects be increased, or negative effects be mitigated?

Translation to Welsh language must be appropriate and relatable to the English policies.

There is a strong argument to broaden translation to other languages besides English and Welsh to ensure people living in Wales who are not first-language English or Welsh have access to the materials.

As mentioned earlier in the response, there are numerous differences in the way periods and period dignity is treated by other cultures.

**Question 7**

Please also explain how you believe the Period Dignity Strategic Action Plancould be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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**Question 8**

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

It would be useful to explore the advancements made in Scotland on period dignity policy and implementation. Similarly, it would be helpful to assess any other benchmark comparators that we could learn from. Best practice examples, including our own, must be shared and utilised.

UNISON has a vast range of bargaining guides on numerous workplace issues, including women’s reproductive health. UNISON has expertise in negotiating and bargaining at all levels and we would be ideally placed to help drive this agenda forward across the public sector.

UNISON held a number of well-attended focus group sessions to support the drafting of our response. We have many empowered and active UNISON women who are ready and willing to support the delivery of this action plan, and others, in workplaces – they just need to be afforded the time to be able to work on this and other equality areas through paid facility time. The long-term savings of such an approach should be fully considered.

In our response to Question 1, we have also referenced the opportunity to examine the introduction and promotion of a menstrual leave policy.

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**Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.**

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