

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

| | |
|--|--|
| Title of proposal: | Period Dignity Strategic Action Plan |
| Official(s) completing the Integrated Impact Assessment (name(s) and name of team): | Hannah Fisher Sian Lewis Laura Price Gender Equality Team |
| Department: | Equality Branch |
| Head of Division/SRO (name): | Ruth Meadows |
| Cabinet Secretary/Minister responsible: | Minister for Social Justice, Jane Hutt |
| Start Date: | July 2020 Consultation October 2021 |

CONTENTS

| | |
|---|----|
| Section 1. What action is the Welsh Government considering and why? | 3 |
| Section 8. Conclusion..... | 20 |

SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

As Plan International state in their “Break the Barriers” report; “the taboos and lack of education surrounding menstruation have had a number of tangible, negative impacts on girls’ day-to-day lives”.ⁱ These impacts are wide ranging and potentially long term.

In 2014 the UN Human Rights Council acknowledged that lack of menstrual health management and stigma associated with menstruation have a negative impact on gender equality.ⁱⁱ Plan International and those leading academic research in this area set out a series of potential, negative experiences, which can contribute to this disadvantage:

- Lack of education around menstruation can negatively affect future sexual and reproductive health.
- Negative attitudes towards menstruation by peers, and related sexual harassment, can affect girls’ motivation to study, their self-esteem and their self worth, which can lead to them having lower ambitions and career expectations.
- The silence surrounding menstruation can lead to a lack of knowledge and choice amongst young people about reusable menstrual products, and therefore the possible options regarding their own bodies.
- A lack of information about both reusable products as well as how to dispose safely of non-reusable menstrual products
- has a negative environmental impact. Each menstruating person will use up to 250 pads or tampons annually. This equates to 3,750 million to dispose of per year, plus about 300 million plastic bags or boxes and about 1,500 million plastic tampon applicators. These pads, tampons and applicators take at least 800 years to decompose, or release toxic gases if burnt.ⁱⁱⁱ
- A lack of support and education in schools for girls and others who menstruate, about menstruation, can feed into school absenteeism, and lead to menstruators missing out on activities such as sport, due to worrying about leaking, as well as potentially affecting their views about physical exercise in the future.
- The lack of knowledge about what counts as ‘normal’ in terms of menstrual health can lead to the late diagnosis of serious conditions such as endometriosis, polycystic ovary syndrome (PCOS), premenstrual dysphoric disorder (PMDD), or gynaecological cancers.

- The menstrual cycle is also known to affect many chronic health conditions, such as anxiety, asthma, depression, irritable bowel syndrome, migraine and epilepsy, yet very few people are aware of this link.
- Research suggests that the impact of heavy periods and gynaecological conditions on employment may be chronic and, as they are likely to be experienced on a monthly basis and have an ongoing impact on women and their careers. Women living with heavy periods and gynaecological conditions are likely to experience disruption to their employment on more days per month than women without such conditions. It is also important to note that women notice some disruption to their work due to their bleeding whether or not their bleeding is heavy and whether or not they have a gynaecological diagnosis.^{iv}
- Moreover, access to menstrual products is a key issue for those living in poverty. Alongside the physical impact of not having access to appropriate sanitary protection, the experience of poverty can also be linked to feelings of shame, associated with not 'fitting in', and not being able to do what peers are doing. Period taboos often lead to girls feeling shame about their bodies and menstruation. When this shame is combined with the shame associated with poverty, the experience can have disproportionately negative impacts on girls' lives.^v

Period Dignity Strategic Action Plan

We are developing a Period Dignity Strategic Action Plan to set out the Welsh Government's approach to ensuring period dignity in Wales, to address the issues outlined in evidence above. The Plan is grounded in a commitment to work across Government, and with stakeholders, to develop and deliver a series of wide-ranging, holistically intersecting actions.

The timeframe for the Plan will apply over the next five years.

Vision

By 2026 we will live in a Wales where:

- periods are fully understood, accepted and normalised. It is widely recognised that periods are not a choice and period products are not a luxury;
- those who have periods have access to products of their choice, when and where necessary, in the most dignified way possible.
- equitable access to provision across Wales exists, whilst allowing for local arrangements.

- the stigma, taboos and myths which exist have been challenged through provision of information and educational resources. No-one is ashamed or embarrassed about periods and can speak openly and confidently about them, whether they have periods or do not;
- the potential impact of periods and how they may change during the peri-menopause, menopause and as a result of broader health issues is widely understood and;
- this impact is responded to sensitively within education, employment and health based settings.
- Citizens in Wales feel able to access health based services around their period and related matters and are confident that these services will be sensitive and informed by sex and gender.
- a broader range of period products are in use, limiting the negative environmental impact of many disposable products.
- all those who have periods...
 - fully understand their period and know what is normal for them;
 - are confident to seek help and medical advice, if necessary;
 - do not face health inequalities when seeking medical advice or help
 - know how best to manage their period to ensure it does not negatively impact on their life;
 - have an understanding of the different types of products available, their correct use and disposal, and can choose the most appropriate product for them;
 - have access to appropriate facilities to enable them to manage their period in privacy, with dignity and in a healthy way.

Embedding Period Dignity in schools and expanding our free period provision in communities and the private sector are both [Programme for Government commitments](#) for the 6th Senedd term. The Period Dignity Strategic Action Plan and our Period Dignity in Schools and Communities Grant will be key mechanisms for delivering these actions.

Collaborating with partners, both across Government and with outside organisations, has been fundamental to the development of this plan. We are grateful for the work of the Period Dignity roundtable and the feedback from trusted partners and stakeholders to develop this draft plan. In order to develop the plan further, and particularly, to ensure the

plan represents the needs of diverse groups, formal consultation is required. Throughout the consultation we will particularly reach out to women, children and young people, older people, non-binary and trans people, disabled people, people of various faiths and Black Asian and minority ethnic groups.

ⁱ <https://plan-uk.org/file/plan-uk-break-the-barriers-report-032018pdf/download?token=Fs-HYP3v> Accessed 5/7/21

ⁱⁱ UN Human Rights Council, 2014, Resolution 27/7, 'The Human Right to Safe Drinking Water and Sanitation', A/HRC/RES/27/7, http://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/27/L.11/Rev.1 Cited in <https://plan-uk.org/file/plan-uk-break-the-barriers-report-032018pdf/download?token=Fs-HYP3v> (accessed 9/7/21)

ⁱⁱⁱ AHPMA (Undated) Menstruation and sanpro/femcare market facts and figs, <http://www.ahpma.co.uk/docs/Menstruation%20Facts%20and%20Figs.pdf> [accessed 22 October 2017] - Assuming that packets and boxes carry 12, 15 or 20 pads or tampons each. Times of India (2017) 'Menstrual pads vs. tampons

vs. menstrual cups, *Times of India*, 20 March, <https://timesofindia.indiatimes.com/life-style/healthfitness/health-news/menstrual-pads-vs-tamponsvs-menstrual-cups/articleshow/57682699.cms>. Taken from <https://plan-uk.org/file/plan-uk-break-the-barriers-report-032018pdf/download?token=Fs-HYP3v> Accessed 15/7/21

^{iv} Lancaster, D. Work-related disruption associated with heavy menstruation and gynaecological diagnoses. University of South Wales, February 2020.

^v Yeandle et al. (2003) in Russell, L. and Darian, L. (2012) *More than one rung on the career ladder: examining barriers to the labour market for youngwomen living in poverty* in Waldren, J., and Kaminski, I. (2012) *Learning from the children: childhood, culture and identity in a changing world*, New York: Berghahn Books, Quoted in <https://plan-uk.org/file/plan-uk-break-the-barriers-report-032018pdf/download?token=Fs-HYP3v>

SECTION 8. CONCLUSION

8.1 How have people most likely to be affected by the proposal been involved in developing it?

We are grateful for the work of the Period Dignity roundtable and the feedback from trusted partners to develop this draft plan. Members of the roundtable include representation from:

- Welsh Local Government Association (WLGA)
- Local Authorities
- Period Dignity and Environmental activists
- Children in Need
- Children in Wales
- Disability Wales
- WEN Wales
- Stonewall Cymru
- BAWSO
- Trussell Trust
- Welsh Women's Aid
- University Wales
- EYST
- WINGS Wrexham
- Keep Wales Tidy
- PHS Group
- STOPP
- Keep Wales Tidy
- Llamau
- NUS Wales
- Plan International UK
- Sport Wales
- Hygiene Bank Wales
- Further education colleges

We've also undertaken some informal engagement with equality groups to understand the lived experiences of people with different protected characteristics. However in order to develop the plan further, and particularly, to ensure the plan further represents the needs of diverse groups, formal consultation is required. Throughout the consultation we will particularly reach out to women, young people, older people, non-binary and trans people, disabled people, people of various faiths and Black Asian and minority ethnic groups.

8.2 What are the most significant impacts, positive and negative?

Evidence gathered as part of the Equality Impact Assessment indicates that those who have periods currently experience a number of negative impacts, including:

- Missing school because of lack of access to period products, or being too embarrassed to discuss the impact of their period
- Overusing period products due to period poverty, with significant health implications
- The impact of shame and stigma about periods can cause a reduction in self-esteem leading to poor mental health
- Missing out on activities such as sport for fear of leaking and being embarrassed, because of period poverty or access to suitable facilities
- Fear or embarrassment about going to the doctor to discuss problems with their periods, leading to further delays in the diagnosis of gynaecological health problems
- The impact of the peri-menopause and menopause could be contributing to women leaving the workforce, a reduction of women in senior leadership positions and the Gender Pay Gap.

The Period Dignity Strategic Action Plan sets out the Welsh Governments approach for mitigating these impacts and ensuring Period Dignity for all in Wales. The Plan is grounded in a commitment to work across Government, and with partners, to develop and deliver a series of wide-ranging, holistically intersecting actions covering policy areas such as education, health and social care, employment, the environment, sports and culture and tackling poverty. Some key actions within the plan include to:

- Develop a Period Dignity communications strategy: aimed at ending stigma and taboo related to periods, open up wider conversations around periods for all, regardless of age or gender and to help increase use of reusable products and minimise the environmental impact of period products.
- Scope and develop good practice guidance for implementation of period dignity practice across the Public and Private sector in Wales. The guidance will outline how practical support around period dignity should be adjusted across a range of protected characteristics and highlight best practice and innovation.
- Work with our trade unions, public services, private and third sectors to promote that workplace policies on period dignity and the menopause are in place.
- Identify any gaps in the current provision of educational resources for learners and educators and work with stakeholders to fund the development of appropriate resources and explore the means by which these resources should be disseminated, in support of the inclusion of menstrual wellbeing in the curriculum.
- Provide access for disabled people to relevant information in appropriate forms. Depending on specific impairments, this may include tactical tools or more audio-visual materials with sign language, or shorter session plans.
- Provide period products, via the period dignity grant to schools, Further Educational establishments and to communities across Wales.

-
- Work with manufacturers, UK Government and Devolved Administrations to reduce plastic use in disposable/single use period products and to consider eco-friendly product development for period products.
 - In line with the Programme for Government commitment to legislate to abolish the use of more commonly littered, single use plastics and a commitment to phase out unnecessary single use plastics in our Circular Economy Strategy, we will fund education and training programmes (through the period dignity grant) to promote, support and increase use of reusable products. We will ensure that education and training includes information to cater to the specific needs of disabled learners when considering the use of reusable products.
 - Provide free products to inpatients in hospitals across Wales and identify options to widen this to generally accessed toilet facilities in hospitals and other health settings for patients, staff and visitors.
 - Encourage employers and businesses across Wales to make basic period products freely available in toilet facilities for staff and visitors.
 - Work with public sector, employers, sports grounds, tourist attractions etc. to ensure provision of free period products in as wide a variety of settings as possible.

The timeframe for the Plan will apply over the next five years, in which time we aim to achieve our vision for Period Dignity. Our vision outlines the positive impacts we intend to see as a result of this plan.

Vision

By 2026 we will live in a Wales where:

- periods are fully understood, accepted and normalised. It is widely recognised that periods are not a choice and period products are not a luxury;
- those who have periods have access to products of their choice, when and where necessary, in the most dignified way possible.
- equitable access to provision across Wales exists, whilst allowing for local arrangements.
- the stigma, taboos and myths which exist have been challenged through provision of information and educational resources. No-one is ashamed or embarrassed about periods and can speak openly and confidently about them, whether they have periods or do not;
- the potential impact of periods and how they may change during the peri-menopause, menopause and as a result of broader health issues is widely understood and;
- this impact is responded to sensitively within education, employment and health based settings.

-
- Citizens in Wales feel able to access health based services around their period and related matters and are confident that these services will be sensitive and informed by sex and gender.
 - a broader range of period products are in use, limiting the negative environmental impact of many disposable products.
 - all those who have periods...
 - fully understand their period and know what is normal for them;
 - are confident to seek help and medical advice, if necessary;
 - do not face health inequalities when seeking medical advice or help
 - know how best to manage their period to ensure it does not negatively impact on their life;
 - have an understanding of the different types of products available, their correct use and disposal, and can choose the most appropriate product for them;
 - have access to appropriate facilities to enable them to manage their period in privacy, with dignity and in a healthy way.

The most significant positive impact from the plan is that in making the commitments outlined within it, the Welsh Government is taking the first step in changing the conversation about periods – that they shouldn't be something to be ashamed of, or embarrassed about or hidden from view. The cultural shift and behaviour change this plan aims to cause will have a significant positive impact for everyone in Wales – whether they have a period or not. Those who experience periods will have access to products, understand their periods and be confident to talk about and address their needs, and those who don't will have the knowledge needed to feel confident to join the conversation and support the needs and rights of those who do.

8.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**

This plan will help us become a prosperous, healthier, more equal, and a globally responsible Wales and a Wales of vibrant culture, as outlined below:

| Goal | How the proposal maximises our contribution to achieving this goal |
|---------------------------|---|
| A prosperous Wales | The draft plan includes a number of ambitious actions to help tackle climate change and to use resources effectively. Actions include educating the public on the benefits of reusable period products and the environmental impacts of single use plastic products. There is also a commitment to reduce the number of plastic single-use products that can be purchased under the Period Dignity in |

| | |
|---|---|
| | Schools and Community Grant and to work with UK Government and manufactures. |
| A healthier Wales | By ending the shame and stigma associated with periods and providing education on menstrual wellbeing, the plan aims to achieve a Wales where periods are properly understood and people are confident to seek medical help when needed and to manage their period in a healthy way. Provision of free period products in schools, communities, further education colleges, universities and encouraging the provision of products in the private sector will also help people to manage their period in a healthier way. |
| A more equal Wales | Through our Equality Impact Assessment we have identified a number of negative impacts that people can face when managing their period - actions within the plan have been developed to mitigate these impacts. |
| A Wales of vibrant culture and thriving Welsh language | The onset and ongoing experience of menstruation may be reason young people withdraw from sport and other activities. The plan contains actions to understand this better and address waning participation. |
| A globally responsible Wales | Actions taken within the plan to address climate change through increasing the uptake of reusable products will contribute to global well-being. |

This plan also maximises our contribution to 9 out of ten of Welsh Governments well-being objectives, including to:

- Provide effective, high quality and sustainable healthcare.
- Continue our long-term programme of education reform, and ensure educational inequalities narrow and standards rise.
- Protect, re-build and develop our services for vulnerable people.
- Celebrate diversity and move to eliminate inequality in all of its forms.
- Build an economy based on the principles of fair work, sustainability and the industries and services of the future.
- Push towards a million Welsh speakers, and enable our tourism, sports and arts industries to thrive.
- Build a stronger, greener economy as we make maximum progress towards decarbonisation.

-
- Make our cities, towns and villages even better places in which to live and work.
 - Embed our response to the climate and nature emergency in everything we do.

- **avoid, reduce or mitigate any negative impacts?**

Through our impact assessment work we have not identified any negative impacts which could arise as a result of the plan. There are areas where further evidence is required, which we will continue to gather throughout the consultation phase, and responses from the consultation itself will inform further development of the plan to mitigate any negative impacts brought to light. We understand that implementation of the plan will need to be managed in a culturally sensitive way and we will need to continue to give careful consideration to understand how Period Dignity can be achieved for everyone in Wales. Our aim is to achieve equality of outcome over equality of opportunity, and we will continue to consider and listen to what additional support may be required for people with different protected characteristics. Through our Equality Impact Assessment we have identified numerous opportunities where we can remove barriers that people with protected characteristics may face to ensure Period Dignity can be achieved for everyone.

8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

The Plan is expected to deliver over a 5 year lifespan. It is a 'living' document which will feed into policy decisions and the implementation. The Plan will contain actions which will be owned by different policy departments across Welsh Government. These will be monitored by the officials working in those policy areas, the central Equalities team responsible for co-ordination and the Period Dignity roundtable which will oversee implementation and accountability. One of the actions within the plan is to develop a communications strategy to address the shame and stigma associated with periods which will also be subject to an evaluation of its impact. An evaluation of the Period Dignity in Schools and Communities grant is also included as an action, the findings of which will feed into the plan over its lifetime. Collaboration and engagement has been an important principle for the development of the Plan and including lived experience will be equally as important during its implementation. Monitoring and evaluation arrangements will be finalised as the Plan is being finalised post-consultation.