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University of Hertfordshire Business School

College Lane

Hatfield

Hertfordshire

AL10 9AB

United Kingdom

A comparative analysis of sex equality in employment in Turkey and Britain: Where next?

Introduction

Studying sex equality in employment from cross-national and comparative perspectives poses a challenge to dominant ethnocentric understandings of gendered forms of employment discrimination. Studying Turkey and Britain in this context is very important as they represent the margins of the European cultural and physical geography and comparative analysis of their experiences of sex equality in employment is educational for both practitioners and academics. Seeking to provide such a comparative analysis, this paper is organised in three sections: First, a brief historical account of sex equality in Turkey and Britain is offered. Secondly, the paper explores the present national agendas of sex equality in terms of legal frameworks, national machineries and organisational approaches. Finally, comparative evaluation and conclusions are presented. Identifying common and divergent patterns of sex equality, the paper offers insights into how greater equality may be achieved in both countries. Following the structure of this paper, the Table One presents a comparative overview of sex equality issues in Britain and Turkey.

Historical background to sex equality in Turkey and Britain

In terms of their historical trajectories of sex equality, Turkey and Britain do not make an easy ensemble. However, closer investigation of these two countries reveals that there are underpinning historical similarities that yield well to comparative evaluation. In Turkish society, relaxation of the religious stricture on sex segregation of public and private spheres of life during the declining years of the Ottoman Empire in the late 19th have enabled women's political activism to gain visibility. Following the national wars, the early years of the modern day Turkish Republic in the 1920s witnessed significant legal and social changes in women's rights. Turkish women gained their political right to vote and to be elected to the Grand National Assembly in 1934 (Tekeli 1993). In 1937, Turkey became a secular state by law, culminating further relaxation of laws and social norms which previously constrained women's full participation in public life in Turkey (Bilge

1995). Turkish women entered education, employment and other public domains of life in increasing numbers between the 1930s and the 1970s.

Table One: Sex Equality Issues in Turkey and Britain

Sex Equality Issues	Turkey	Britain
1. Historical background	Origins of feminist activism is in the 19 th Century	Origins of feminist activism is in the 18 th and the 19 th Centuries
2. Major national issues	Decreasing female labour participation Gendered impacts of migration, recession and resurgence of religious right. Disintegration of the Kemalist ideology Diminishing state support for equality. Increased need for legislation.	Increasing female labour participation Gendered impacts of devolution and high rates of teenage conception. Vertical and horizontal sex segregation and gender work cultures. Inadequate state support for equality.
2.1 Common issues	Increased legal support for equality Slow pace of change Continued sex discrimination in employment European Union as a driving force	
2.2 Legal framework	Rudimentary level of legislation Turkish constitution states that men and women are equal before the law. Labour Code: Article 26 on equal pay, Article 70 on maternity leave, Article 50 on inappropriate work, Articles 68 and 69 sectors and conditions of work unsuitable for women. 'Protective legislation' in Articles 50, 68 and 69 works to disadvantage women. CEDAW was ratified in 1986. European Union candidacy provides push for legal change.	Extensive liberal legislation Sex Discrimination Act (1975) Race Relations Act (1976) Disability Discrimination Act (1995) Sex Discrimination Act (as amended in 1996), the Protection from Harassment Act (1997), the Sex Offenders Act (1997), and the National Minimum Wage Act (1999) and the European Union membership of Britain were instrumental in mainstreaming of equality. Human Rights Act (1998). CEDAW was ratified in 1986
2.3 National machinery of sex equality	Directorate General of Women's Status and Problems, est. 1990.	Equal Opportunities Commission, est. 1976.
2.4 Organisational policy approach	Non-discrimination is assumed. Anti-discriminatory action is voluntary without penalty for non-compliance. There are test cases on constitutional rights of equality awaiting ruling. National modernisation project International agreements and the EU Ideology driven approach	Non-discrimination is a legal requirement. There is penalty for discrimination by sex. Positive action is allowed. Positive discrimination is unlawful. Progressive legal change is expected. Feminist activism International agreements and the EU Legislation and industry driven approaches
4. The way forward	Structural change supporting the implementation of the CEDAW and broadening the scope of the DGWSP. Introduction of laws on sex equality. Introduction of public and private sector partnership in tackling discrimination	Umbrella institution to recognise diversity in female population by sex, race, etc. Ensuring that the devolution has a balanced impact. Ideological support for sex equality and culture change that is associated with it.
5. Implications of cross-national comparisons	Gender cultures and structures are not biologically predetermined. They are constructed through social and economic experiences. Therefore, the gender based inequalities in employment are not destiny and they can be challenged using a combination of diverse strategies such as awareness raising, policy and law making, public and private sector partnership, and political campaigning.	

The emergent Turkish feminist movement in the 1970s had allied itself with Marxism (Akatlı 1994), and the military coup in 1980 hit both the Marxists and the Marxist-feminists severely (Tekeli 1993). Military rule ended and Turkish democracy was restored in 1982. The first government after the coup d'état implemented liberal and laissez-faire policies which brought unforeseen changes to Turkish society. Both privately-owned and state-owned television, radio and other mass media channels replaced the state monopoly in the 1980s and public debates resumed about feminist concerns ranging from women's employment and domestic violence to the rights of sex workers (Ecevit 1993). However, in the late 1980s, the feminist groups in Turkey fragmented, reflecting widening disparities in the fortunes of their supporters from different classes and ethnic groups, from rural and urban areas, and from different educational backgrounds. Within this social framework, the hard-core feminist movement in Turkey, which was still dominated by an elite group of academics or well-educated women from the urban centres of Turkey, enjoyed little success in reaching the lower socio-economic segments of Turkish society.

The history of sex equality is better documented in Britain than it is in Turkey. The origins of modern feminism in Britain have been located in the suffrage movement of the late 18th and early 19th centuries (Caine 1997), which prepared the ground for first wave feminism, promoting a new political identity for women and mobilising them to seek equal legal and social rights both in Britain and the USA. The first wave feminists in Britain, represented by a number of middle class women's political organisations and groups, carried out petitions, demonstrations and campaigns for the vote for women, subsequently achieving certain legal and political rights for women between the years of 1880 and 1928, until the Equal Franchise Act of 1928 (Humphries 1996: 99).

Despite these gains, women's general participation in the labour force declined during and after the First World War (Humphries 1996: 93). After the First World War, British society experienced a major social change as the ratio of women to men in the population increased due to wartime losses

in the male population (Lewis 1984: 4). Therefore, sustaining economic independence became a concern for increasing numbers of single women after the war years. The removal of the Sex Disqualification Act in 1919 allowed women to enter the legal profession, and the election of the first women to parliament immediately after the First World War, coupled with weakening social controls, allowed single women to resume paid work after the war.

During the Second World War, women once again entered formerly male-dominated occupations in large numbers. The Equal Pay Campaign Committee, formed by over hundred women's organisations in 1943, led to two progressive measures in the subsequent years: equal pay was accepted for teachers in 1952 and for Civil Service employees in 1954 (Caine 1997: 232-233). These limited achievements must be set against other, reactionary developments. In the same period, the Beveridge Report (1942), shaped women's entitlement to welfare benefits based on traditional notions of 'the family' (Crompton and Sanderson 1994: 50). Similarly, the marriage bars introduced in certain occupations during the inter-war period, in response to recession, were only removed gradually, finally ending in the 1960s.

In the 1960s and 1970s, women's jobs were usually located firmly at the bottom of the organisational hierarchies. As late as the 1960s, they were still expected to leave employment after marriage, or prior to the birth of their first child (Halford, Savage and Witz: 1997: v). Fuelled by the women's liberation movement, democratic, anti-war, and anti-racist movements of the time in the 1970s, as Crompton and Sanderson (1994: 53) suggested, 'the social citizenship of women was confirmed by legislation' in Britain. The first equal opportunities law to be enacted as an outcome of these efforts was the Equal Pay Act in 1970 (amended in 1983).

The historical evaluation of sex equality in both countries indicates that women's political activism was a common push for sex equality in both countries and relaxation of social controls have led to greater equality for women in both societies. The pursuit of sex equality in Turkey owes much to

women's activism and the country's national project of Westernisation and modernisation, which sought to promote sex equality as a key national ideology since the late 19th Century and particularly following the reformations in the 1920s. For Britain, women's political activism and progressive legislation emanating from the European Union have provided a similar impetus for legal and policy change towards sex equality. The subsequent sections explain how the current national agendas of sex equality were shaped by legal framework, state institutions and, organisation level policy and practice in both countries.

Legal framework of sex equality

In terms of legal framework sex equality, Turkey and Britain present truly divergent cases. While Britain has traditionally offered the most extensive legislation in wider Europe providing individual workers with protection against direct and indirect discrimination based on sex, race and disability, in Turkey protective legal provision against sex discrimination is still rudimentary: The Turkish constitution guarantees that women and men are equal and they shall enjoy equal rights. There are five other pieces of legislation pertaining to sex equality: First, Article 26 of the Labour Code states that 'in the workplace different wages cannot be paid to female and male workers doing the same quality of work with equal productivity only on the basis of gender difference'. Second, Article 70 the Labour Code regulates maternity leave, stating that female workers are prohibited from working six weeks before and after giving birth. Third, Article 50 of the Constitution states that 'no one shall be employed in work inappropriate to his/her age, gender and physical strength supposedly aiming to protect minors, women and workers with disabilities from degrading or heavy working conditions. In addition Articles 68 and 69 of the Labour Code outline the sectors and conditions which are deemed 'inappropriate for women'. These include mines, cable laying, sewage system, tunnel construction and other underground and underwater operation, fire services, the metal and chemistry industry, construction work, and also work involving night shifts and garbage collection (International Helsinki Federation of Human Rights 2000: 445-446). International Helsinki

Federation of Human Rights produced a comprehensive report on gender equality in Turkey in 2000, which explains the implications of the legal approach in Turkey:

Although from a legal point of view gender discrimination does not exist in terms of choosing and practising an occupation, women have frequently been excluded from decision making mechanisms and from certain professions. As a result, they have accepted, low paid, low status work without insurance. Being the first to be fired during economic crisis and being denied promotion regardless of qualifications are the most common examples of gender discrimination in the workplace (International Helsinki Federation of Human Rights 2000: 445).

There are still organisations in Turkey which employ no women at all, justified by these protective legal provisions, their so-called religious beliefs, organisational cultures or traditions, yet there is no legal scope to challenge their practices (Özbilgin 1998). The following example demonstrates such challenges facing working women:

Yeter Tayer (53) ... had worked for 20 years variously as driver, construction worker and repairperson by disguising herself as a man, having found it impossible to get employment as a woman after her husband died. This had enabled her to support her children and to escape the social constraints experienced by women (International Helsinki Federation of Human Rights 2000: 446).

Absence of protective legislation in Turkey is in stark contrast to the case in Britain. The Equal Pay Act 1970 and the Sex Discrimination Act (1975) (amended in 1986) have been two key pieces of legislation on sex equality. Although Britain has established a raft of equality legislation on sex, race and disability discrimination including the Race Relations Act 1976 and more recently the Disability Discrimination Act (1995), there is yet no protection against discrimination on the grounds of religion (except for Northern Ireland), sexual orientation or age. Further, Clarke (1995: 55) insightfully criticised the liberal approach to equal opportunities adopted in British legislation, arguing that the principle of 'sameness' which underpins it 'fails to address the reality that women's lives are different from men's; it aspires to an assimilationist model that takes the male role as the norm, and aims to encourage and enable women to be just like men' (Clarke 1995: 55).

While Turkey has failed to offer effective legal protection against sex discrimination in employment, the impact of British legislation since the 1970s has been marginal in closing the

gender gap in employment. Nevertheless, the equal opportunities legislation was instrumental in promoting public debate, raising awareness and encouraging women to seek managerial promotions in many British organisations. In recent years a greater push for sex equality came from international associations and agreements for both countries. Turkey has ratified several relevant international treaties and conventions, including the European Convention of Human Rights and Fundamental Freedoms and, most recently, in 1986, the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). Since 2000, increased relations between Turkey and Europe have also been providing a strong push for democratisation and pluralism in Turkey (Rumford 2001). As the longest standing applicant country to the European Union membership, the Turkish government needs to fulfil a set of accession criteria, which are commonly referred to as the Copenhagen criteria. The annual report of the European Union on Turkey in 2000 considered undersigning of the CEDAW a welcome development for Turkey. However, it was also critical of the current sex equality practice and legislation in Turkey, highlighting a need for structural and as well as legislative reforms:

‘In terms of equality of treatment, conformity with the EC acquis is not yet ensured... As far as the Civil Code is concerned, certain legal discrimination between men and women (notably concerning the family and working life of women) persist... The Turkish Constitution guarantees gender equality and lays down the principle of non-discrimination. However, efforts are needed to ensure implementation and enforcement of equality of treatment. In particular actions should be envisaged to reduce female illiteracy and promote urban employment for women through education and training (European Union Commission on Turkey 2001: 18-19).

The candidacy process and other national and international catalysts of change currently are likely to encourage Turkish government to legislate on equal opportunities. International agreements had a similarly positive impact on sex equality legislation in Britain. European Union has made much progress in 2000 in equal opportunities, producing two directives and a proposal for community action programme to combat discrimination (EIRO 2001: 42), widening the definition of discrimination (EIRO 2001: 2-3). As a member state Britain will seek to align its equal

opportunities legislation to offer protection against age, religion and sexual orientation discrimination as well as other forms of unfair discrimination by 2003.

Similar to Turkey, Britain ratified the CEDAW in 1986. The Committee of the CEDAW (1999) concluded that Britain satisfied many of the structural requirements of the convention. However, the committee made several hefty recommendations including elimination of gendered impacts of devolution in Britain. Since the elections in 1997, the labour government took effective steps to proceed with devolution of Wales, Scotland and Northern Ireland. These regions now implement a range of approaches to management of equal opportunities and their equality agendas may become uneven. The committee commented on the continuing under-representation of women in public and political life as well as the gender pay gap. The report recommended British government to address the problem of teenage conception, violence against women and women's poverty through multi-agency approaches. The international push that their European Union candidacy and membership as well as the CEDAW offers is substantial and promising for both Britain and Turkey.

National machinery of sex equality

National institutions (machinery) of sex equality have been established in order to oversee the implementation of sex equality legislation in both countries. To this end, the Turkish government established the Directorate General on the Status and Problems of Women, which is directly affiliated to the Prime Ministry, in 1990. The Directorate has 'a specific mandate to ensuring the rightful status of women and gender equality in the social, economic, cultural, economic and political fields' (DGSPW 1999: 4), offering training programmes to encourage and support women's active participation in these fields and overseeing a number of national programmes of development. Its presence is increasingly felt with opening of 12 provincial administrations (DGSWP 2000) However, the limited authority and scope that is afforded to the Directorate and the

meagre funding it was afforded from the national budget have hindered its proposed positive impact.

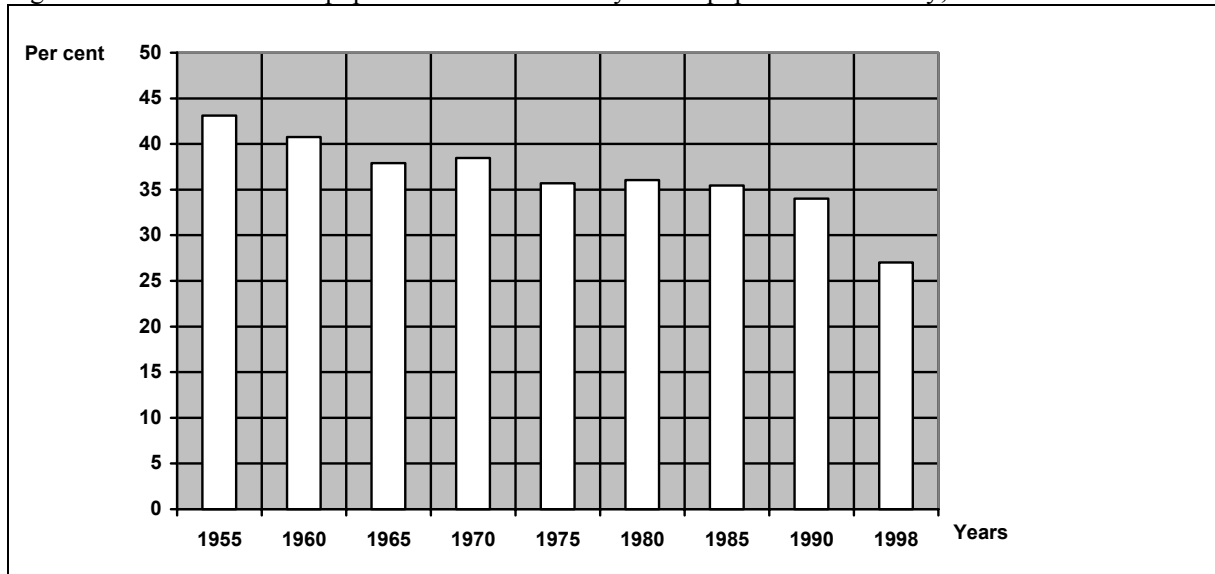
In Britain, a similar organisation, Equal Opportunities Commission was established in the 1970s to oversee the implementation of the Sex Discrimination Act and the Equal Pay Act. However, it recently reported limited success in eradicating sex discrimination: Women are still underrepresented in managerial posts in Britain. Although it has narrowed since 1970, the pay gap is still the widest in any state in the European Union (EIRO 2001: 10-11). However, with the forthcoming extension of the equal opportunities legislation, there are plans to create an umbrella organisation that will have a broader remit for a diverse range of equality issues.

Organisational policy and practice

While the effectiveness of the legal framework and its national machinery of sex equality in Turkey has been lagging behind that of its European counterparts, organisational level practice of sex equality was also compromised by three socio-economic developments during this time: First, the country has been experiencing chronic recession and this had a gendered impact on women and men's employment opportunities. Second, migration both from rural to urban areas and internationally had a disproportionately adverse affect on the women's economic activity. Finally, the resurgence of right wing religious and nationalist politics in Turkey poses a challenge to the fragile dynamics of sex equality in the country.

Due to economic recession since the 1960s it has become increasingly difficult for Turkish governments to prioritise the agenda of sex equality over macro economic concerns of the country. Recession had a significantly gendered impact on employment in Turkey: the proportion of women who are economically active in Turkey has for a number of years been declining relative to men (DGSPW 1999, see Figure One).

Figure One: Ratio of female population in economically active population in Turkey, 1955 to 1998



Source: DIE, 1995, pp. 22-23 and DGSPW, 1999.

The second striking national phenomenon affecting women's employment since the 1970s is the acceleration of migration from rural to urban areas. In 1997, Turkey had a growing population of 63 million, of whom 41 million lived in cities and 22 million in rural communities (DIE 2002). In the last three decades, a desire for the economic, social and cultural conveniences of the city promoted by the mass media and ethnic conflicts have fuelled social mobility and migration from rural to urban centres. While the country's urban population constituted 23.5 per cent of the total population of 14 million in 1935, by 1997 this had increased to 65 per cent (Table Two). Mass migration to cities has led to proliferation of shantytowns at the peripheries of urban centres in the 1980s and the 1990s. Most men and women, who sought internal migration from rural to urban areas, were from farming communities of Asia Minor. Their agrarian backgrounds deemed their skills redundant and their social integration difficult in urban areas. Therefore, migration caused great levels of deskilling and social exclusion for the migrant population (Erman 2001)

Table Two: Proportion of the Turkish population in cities and villages

Census Year	City (per cent)	Village (per cent)
1935	23.5	76.5
1940	24.4	75.6
1945	24.9	75.1
1950	25.0	75.0
1955	28.8	71.2
1960	31.9	68.1
1965	34.4	65.6
1970	38.3	61.7
1975	41.8	58.2
1980	43.9	56.1
1985	53.0	47.0
1990	59.0	41.0
1997	65.1	34.9

Source: DIE, 2002.

Women have been influenced by this massive migration to cities in two main ways. The common pattern of migration for members of the lower socio-economic classes starts with the migration of the men, who then try to achieve economic and social survival in the city in order subsequently to bring their families to join them. In this pattern, women face the new urban social and economic conditions later than men, and are reduced to financial dependence on the men who brought them to the city. Secondly, Turkish cities do not offer adequate employment opportunities for poorly educated labour, as their labour requirements are for a more highly skilled and educated work force than in rural areas. Furthermore, sex segregation and discrimination in unskilled jobs is even stronger than for highly skilled jobs (Kandiyoti 1997). Migration causes migrant women who are economically active in the rural economy either to lose the skills that they were able to use in agriculture and the household economy, or to suffer exploitation by becoming piece-work or temporary workers without adequate pay or social security. In either case, their economic and social dependence on husbands and fathers is increased. Table Three indicates that Turkish women outnumber men in agricultural sector in rural areas and that they are highly underrepresented in industrial and service sectors which are mostly located in urban areas. However, Gunter's (2000) evaluation of current political developments, heralds the possibility of reversal of migration, as ethnic and military conflict in south-eastern Turkey is becoming less and Turkey's European Union candidacy bid is linked to its democratisation process.

Table Three: Employed persons by economic activity in Turkey in 1990 and 1998 (per cent)

Indicators	October 1990		October 1998	
	Women	Men	Women	Men
Agriculture	75.8	33.6	70.0	32.6
Industry	9.8	26.8	10.6	27.2
Services	14.4	39.6	19.4	40.2

Source: DIE, 2000.

Resurgence of the religious right is the third major factor threatening sex equality in Turkey. In the 1990s, the rise of the religious and nationalist right in Turkey was often attributed to adverse affects of neoliberal structuring, mass migration and economic recession (Onis 1997). Therefore it was initially considered a temporary social problem for Turkey. However, in the 1991 General Election, the religious right gained unprecedented success, which was attributed to their ability to rally the electorate from the lower socio-economic classes, from ethnic minority and migrant backgrounds, groups which the other feminist movements in Turkey have largely ignored (Arat 1994). However, the remedies, which they proposed, were of traditional nature, offering no progressive solutions for working women's problems. Similarly the nationalist movement, which had increased popularity in the second half of the 1990s and the early 2000s, fail to offer a progressive agenda of sex equality.

In the 80 years of the Turkish Republic, principles of sex equality were promoted by a republican and secular state ideology, without recourse to legislation. In clear dichotomy with low female economic activity and literacy rates in Turkey, this ideology has enabled penetration of women in professional employment in greater numbers than their European counterparts (Özbilgin et al. 2000). However, this ideological stance is weakening due to the aforementioned social, economic and political challenges that mitigate against the traditional state ideology of sex equality.

Counterbalancing the gendered impact of these changes increasingly warrants women's political activism in Turkey and calls for Turkish government to support sex equality through specific legislation. It was noted earlier that such legal change is expected. However, the contemporary Turkish feminist movement embraces a diverse range of political and ideological stances from

conservative and liberal Islamist feminism (Arat 1990, Gole 1993) to radical and socialist feminisms (Arat 1994), subscribing to radically different conservative or progressive definitions of, and aspirations for, sex equality. Recent social trends indicate that Turkey is once more at the crossroads of tradition and modernisation, religion and secularism, west and east, democracy and totalitarianism. Various groups within the Turkish feminist movement are working to redefine the politics of sex segregation. Yet the very diversity of these groups, and their consequent incapacity to organise effectively to influence the current male-dominated environment of Turkish politics, dooms their efforts to ineffectuality.

It is possible to identify two forms of sex equality activism in Turkey: A relatively more traditional one emanating from the women's rights movement in Turkey and another form of activism emulating the discourse and language of the contemporary Anglo-Saxon dominant approaches to sex equality in a Turkish context. These two forms of activism have different traditions of discourse and practice. The former approach, namely, the women's rights activism in Turkey, dates back to the later periods of the Ottoman Empire. Its main aim has been to contribute to the national project of modernisation. This contribution would be achieved through elimination of explicit barriers to women's employment opportunities and their contribution to economic production in Turkey. Thus, the movement has rationalised its existence by aligning itself with the national plans of modernisation and development in Turkey. The latter movement of equal opportunities by sex is a more contemporary development in Turkey. Loosely linked to national development plans in Turkey, it promotes an ethical case for equality, drawing on Anglo-Saxon notions social justice and equality. This approach is likely to gain currency, if the Turkish government seeks to transport European Union legislation on sex equality.

Despite evidence of increased international and national push for sex equality, the current status of sex equality may be overstated: The reach of information on Turkey's commitment to sex equality is still very limited to large cities. Similarly the feminist activism is limited in scope and social

reach in Turkey. The legal protection and feminist activism mainly benefit articulate and well-informed women from the higher socio-economic classes of Turkish society, but fail to address the problems and concerns of the rest of the female population, who are less privileged. This suggests that there is a need for a new and stronger political and social perspective that caters for the expectations of Turkish women from a diverse range of backgrounds.

Starting with the enactment of the Equal Pay Act (1970), equal opportunity became a part of standard employment discourse in business and industry in Britain. Workplace Employment Relations Survey in 1998 identified that 64 per cent of the companies in Britain have written policies on equal opportunities (Cully et al. 1999). The rise in the number of cases taken to Industrial Tribunals suggests that there is now a better awareness of the available mechanisms and also that the legislation has not obliterated sex discrimination. Since the 1980s, many companies employing large numbers of workers have established equal opportunities departments, which were instrumental in ensuring that the organisation's position on equality is understood and implemented throughout the company. Although the implementation of equal opportunities legislation varied widely, Davidson and Cooper (1992) suggested that increasing numbers of women obtained senior posts within organisations in this period.

However, it should be noted that a rise in the economic activity rate of women does not of itself affect the quality of women's employment experience. Despite over three decades of legislation intended to promote sex equality in employment, labour market indicators suggest that both vertical and horizontal sex segregation, as well as gender pay gap, persist in Britain and work cultures such as long-hours working have a gendered impact on careers (Özbilgin 2000). Still fewer women than men occupy higher grade posts (see Table Four) and women are increasingly employed in part-time jobs (EOC 2002). Britain has indeed the second highest rate of part-time female employment in European Union after the Netherlands (EIRO 2001: 33). This is due to both the lack of adequate

child-care provision and also the economic advantages of such employment for British employers (Blackwell 2001). In Turkey, part-time employment is controlled by the same legal measures as full-time employment, providing part-time workers with the same employment, pension and unionisation rights, and holiday and sick pay entitlements as full-time workers, making part-time work unattractive economically for Turkish employers. Therefore, part-time employment in Turkey has been largely confined to domestic services such as cleaning and also workers with high-level technical expertise, such as doctors, lawyers, engineers and tax consultants, in small-scale organisations (Çelik 1992: 52-53). Based on this comparison it can be argued that the increase in women's participation in part-time work has been largely due to employers' intentions to exploit labour market opportunities.

Table Four: Proportion of women in management in the UK between 1974 and 2001

	1974	1990	1995	2000	2001
Director	0.6	1.6	3.0	9.6	9.9
Function head	0.4	4.2	5.8	15.0	15.8
Department head	2.1	7.2	9.7	19.0	25.5
Section leader	2.4	11.8	14.2	26.5	28.9
All executives	1.8	7.9	10.7	22.1	24.1

Source: Institute of Management and Remuneration Economics, National Management Salary Survey, cited in EOC 2002.

Women receive lower wages than men in Britain. There was a gradual change in women's full-time hourly earnings as a percentage of men's since 1975. Although there is a modest 10 per cent change towards equality over the last two decades, women are persistently paid lower wages than men, e.g. 81 per cent in 1999 (EOC 2001). Similarly in Turkey the gender gap in pay continues to be a problem: Turkish women's non-agricultural wage in proportion to men's stands at 84.5 per cent (United Nations 1995).

At the level of organisational practice, Storey (1999) identified two distinct approaches to management of sex equality: While the business case approach promoted voluntary and enlightened

self interest path to equality, the social justice case , based on the notion of fairness, pursued a legislation led agenda. Liff (1999) argued that the ‘legislation-led’ approaches to sex equality were only partially successful in the last 30 years and the ‘industry-led’ approaches did not deliver the cultural change that they promised. It is important, in this context, to recognise that, when combined, legal and business case approaches may provide a greater impetus for real sex equality in Britain.

Discussions

Commonalities between Turkey and Britain in terms of discourses and practices of sex equality are striking, particularly if we consider that these two countries have significantly different economic and political histories. The statistical indicators of sex discrimination in employment and gender gap in pay and examination of legislative provision and institutional support for equality of opportunity in employment in both countries suggest that there is still ample opportunity for progress towards sex equality. The European Union and CEDAW provide international push for legal and structural change in Turkey and Britain. Although there are push factors at national and international levels for both governments to implement effective strategies of sex equality, the pace of change towards equality so far has been slow in both countries (Woodward and Özbilgin 1999).

However, the similarities between Turkey and Britain should not be overstated, as differences and current divergence between their national agendas of change and practices of sex equality are more interesting to study. They are interesting as they reveal that gender relations are both outcomes and catalysts of their divergent macro economic and social agendas (Özbilgin 1998). In the case of Turkey, gender relations are not mainstreamed and thus sex equality issues did not inform the processes of urbanisation, economic and political change, which in turn had gendered impacts. In Britain, however, sex equality discourse is largely mainstreamed at the level of European Union and national policy making since the 1997 elections, although the devolvement may bring forth imbalances in opportunities between regions.

Policy making at the state level is significant in providing and promoting equal rights for women at work in both countries. However, the nature of this support is different in Britain and Turkey. Since the late 1980s, growing concerns over Turkey's fragile macro economic performance meant that issues of sex equality are marginalised at state level policy making. For example, women's inclusion in the labour market is no longer considered a significant aspect of Turkey's 80-year-old national modernisation project. Liberalisation of the Turkish economy coupled with withdrawal of state support for equality and negative impacts of migration, recession and political turbulence have led to a continued decrease in women's economic activity rates. However, as part of Turkey's bid to join the European Union, there is a growing awareness of the urgency for making adjustments to bring Turkish legislation in line with European Union legislative frameworks. In Britain, however, the proportion of women in the labour market has been consistently increasing and a protective legal framework, which Turkey is recommended to have, has been available since the 1970s.

However, the legal push for equality in Britain has failed to deliver the expected outcomes of social and cultural change towards sex equality. After 30 years of equal opportunities legislation, vertical and horizontal sex segregation and gender gap in pay are still intact in Britain. It can be argued that this was partly due to the failure of the legal system to attract ideological support from the British government and industry.

There is a level of legal and institutional support for women in employment in Turkey and Britain, carried out by civil organisations, sex equality initiatives of the industry, workers' unions and the designated state institutions of equality (e.g. the Directorate General of Women's Status and Problems in Turkey and the Equal Opportunities Commission in Britain). However, both countries require further structural reforms in their national mechanisms of sex equality. The evidence from Britain suggests that the proliferation of national agencies of sex, race, and disability deems equal opportunities issues at the cross section of these social classifications unduly complex. There are also concerns over uneven distribution of already limited funds between these institutions. Therefore, an umbrella organisation may provide a timely response to diverse equality needs in the British society. Turkey also needs structural reforms in the role of its national mechanism. If the

Directorate General of Status and Problems of women is to make a real impact, it should be adequately funded and empowered with rights to represent individual complaints in courts and declare opinion on and contribute to national planning efforts. These changes, however, are unlikely under the current economic crisis and without financial and political support from the European Union for Turkey's efforts to meet the Copenhagen criteria.

At the level of organisational policy and practice, it is possible to identify three distinctively different approaches to elimination of sex discrimination in these two countries: 'the legislation-driven', 'the industry-driven' and 'the ideology driven' approaches. Britain has been advocating the legal and moral case for equality for some time now and equality efforts in Turkey have been aligned to its national modernisation project since the early 1920s. However, Turkey is likely to move to a 'legislation-driven' approach in the near future. The policy-making efforts in the Turkish industry appear to be preoccupied by mainstream/malestream economic priorities, failing to recognise relevance of sex equality in a time of economic recession. In order for Turkish government to place equality issues in the operational and strategic mechanisms of the industry, adopting the European Union legislation in sex equality maybe necessary. However, the British experience indicates that legislation driven approaches to sex equality are not enough on their own in promoting real change towards sex equality. It is evident in the literature that the 'legislation-' and 'industry-driven' approaches are often defined in a false dichotomy and 'the ideology driven' approach is not recorded. Polarised applications of these individual principles in Britain and Turkey have failed to deliver the desired results. Therefore, rather than adopting an 'either-or' approach between 'the legislation-', 'the industry-' or 'the ideology- driven' approaches to sex equality, a contingency approach, which recognises the uses and limitations of these approaches and combines them effectively, could be more instrumental in promoting 'real' change towards sex equality.

At a more philosophical level, comparisons between Turkey and Britain in terms of sex equality in employment suggest that employment practices are gendered in different ways across national borders, refuting the biologically deterministic arguments about gender and work. Examination of legislation, national machinery, policy and practice in both countries also indicate that comparative analysis may facilitate dissemination of best practice and innovation in sex equality.

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