

Gender, family and employment in comparative perspective: the realities and representations of equal opportunities in Britain and France

Rosemary Crompton, City University, London
Nicky Le Feuvre, University of Toulouse Le Mirail, France

Summary

In this paper, we will explore how contrasting national discourses relating to women, and gender equality have been incorporated into and reflected in national policies. In the first section, we will outline the recent history of EU equal opportunities policy, in which positive action has been replaced by a policy of 'mainstreaming'. Second, we will describe the evolution of policies towards women and equal opportunities in Britain and France. It will be argued that whereas some degree of positive action for women has been accepted in Britain, this policy is somewhat alien to French thinking about equality – although pro-natalist French policies have resulted in favourable conditions for employed mothers in France. In the third section, we will present some attitudinal evidence, drawn from national surveys, which would appear to reflect the national policy differences we have identified in respect of the 'equality agenda'. In the fourth section, we will draw upon biographical interviews carried out with men and women in British and French banks in order to illustrate the impact of these cross-national differences within organizations and on individual lives. We demonstrate that positive action gender equality policies have made an important impact in British banks, while overt gender exclusionary practices still persist in the French banks studied. In the conclusion, we reflect on the European policy implications of our findings.

Key words

equality, equal opportunities, finance, gender, organizations

Résumé

Dans cet article, nous explorons comment les discours nationaux de nature diverse concernant les femmes et l'égalité entre hommes et femmes ont été pris en compte par les politiques nationales et sont reflétées dans celles-ci. Dans la première section, nous soulignons les développements récents dans la politiques européennes en matière d'égalité des chances où la politique d'action positive a été remplacée par une politique de 'mainstreaming'. Ensuite, nous décrivons l'évolution des politiques envers les femmes et d'égalité des chances au Royaume-Uni et en France. Nous argumentons qu'alors qu'au Royaume-Uni cette politique d'action positive envers les femmes a été, dans une certaine mesure, acceptée, elle se révèle toujours étrangère à la pensée française à propos de l'égalité – bien que les politiques françaises pro-natalistes ont eu pour résultat des conditions favorables pour les mères employées. Dans notre troisième section, nous présentons quelques indications en matière d'attitude tirées d'enquêtes nationales qui apparaissent faire écho aux différences dans les politiques nationales que nous avons identifiées en ce qui concerne l'agenda en matière d'égalité. Dans la quatrième section, nous nous basons sur des interviews bibliographique menés dans des banques françaises et anglaise avec des hommes et des femmes afin d'illustrer l'impact des différences nationales à l'intérieur des organisations et sur les vies individuelles. Nous montrons que les politiques d'action positive en matière d'égalité hommes/femmes ont eu un impact important dans les banques britanniques alors que des pratiques ouvertes d'exclusion subsistent encore dans les banques françaises étudiées. En conclusion, nous nous penchons sur les

implications de nos résultats en matière de politique européenne.

Introduction

Both gender equality and the related issue of equality policies are complex topics. Political philosophers continue to debate the abstract meaning of equality and a just and fair society (e.g. Rawls, 1972). However, the issue of equality v. 'difference' further compounds feminist debates relating to equality. Debates in political philosophy concerning equality, feminists argue, implicitly or explicitly assume the (concrete) reality of the abstract individual. However, feminists argue that the template for this abstract individual is in fact a *masculine* one. Thus the universal 'citizen', for example, is the employed male 'head of household', whose rights depend not only on the state and a body of law, but also on the sexual contract entered into with the woman who cares for his children and performs his domestic labour (Pateman, 1989). It has been argued that this 'difference' should be explicitly recognized in the treatment of women (as in 'welfare feminism'). Taking the argument further, it has been suggested that feminine 'difference' might be the basis of a more just, more fair, more equal set of societal arrangements (Gilligan, 1982).

In this paper, we will explore how different discourses relating to equality, as well as the 'woman problem', have been incorporated into national policies through a comparison of two rather different countries – Britain and France. We will focus in particular on the impact of equal opportunities policies and legislation. Equal opportunities policies, however, do not simply reflect national peculiarities but are also shaped by international and cross-national bodies such as the UN and the EU. Particular policies are frequently argued to have 'failed' or (more rarely) to have 'been successful'. In evaluating this failure and success, a comparison of the outcomes of dif-

ferent policies is an invaluable research tool and, indeed, cross-national comparisons supply an 'international laboratory' for policy evaluation. A further aim of this paper, therefore, will be to make a contribution to current debates relating to recent issues and developments concerning equal opportunities policy within the European Union.

This paper is in four parts. First, we will outline the recent history of EU equal opportunities policy, in which positive action has been replaced by a policy of 'mainstreaming'. Second, we will describe the evolution of policies towards women and equal opportunities in two EU member countries, Britain and France. It will be argued that whereas some degree of positive action for women has been accepted in Britain, this policy is somewhat alien to French thinking about equality. In the third section, we will present some attitudinal evidence, drawn from national surveys, which would appear to reflect the national policy differences we have identified. In the fourth section, we will draw upon biographical interviews carried out with men and women in British and French banks in order to illustrate the impact of these differences within organizations and on individual lives. In the conclusion, we reflect on the European policy implications of our findings.

European policies: from 'equal treatment' to 'mainstreaming'

It has become commonplace to divide EU equal opportunities policies into three different phases: *Equal Treatment*, *Positive Action*, and gender *Mainstreaming* (Walby, 1997; Schunter-Kleemann, 1999). *Equal Treatment* derives from Article 119 of the 1957 Treaty of Rome, which asserted the need to move towards equal pay for men and women in respect of equal work. This stance corresponds broadly to liberal theories of equality and citizenship. The focus is on the individual, who, given equal treatment in respect of

employment, is free to succeed or fail, as the case may be. It was argued that equal treatment policies were blind to the unequal position of men and women in relation to labour market access, not only in respect of past discriminations (for example, the inferior and gendered education customarily offered to girls in the past), but also because this approach neglected the consequences of the caring and domestic responsibilities that have customarily been assumed to be 'women's work'.

Thus in the 1980s and 1990s, in a number of countries within the EU there developed policies of *Positive Action*, as a consequence of a series of judgements that justified positive action to help women catch up with men – particularly in respect of the labour market. These actions included, for example, training courses designed to attract women, child-care projects, assertiveness training, and projects such as New Opportunities for Women (NOW). Such policies recognize 'difference' between men and women, and women are seen as requiring special treatment to enable them to compete with men. However, positive action is itself contentious. Neo-liberals argue that it creates new inequalities since men and women are not given equal treatment. Positive action also comes into conflict with civic universalism, as we shall see in our discussion of the French case below. Others have argued that 'helping women' transforms them ('women') into a client group in need of assistance, and that such policies might actually reinforce gender inequalities by perpetuating conventional assumptions relating to the gendered division of labour, particularly in the domestic sphere.

The current phase of EU policy, gender *Mainstreaming*, has gained considerably in influence since the UN International Women's Conference in Beijing (1995). The emphasis has shifted from women, as individuals and/or as a problematic or disadvantaged grouping, in order to focus critically on the *institutions* that generate gendered inequalities: 'Gender mainstreaming is the (re)organisation, improvement, development and evaluation of policy processes, so that gender equality is incorpo-

rated in all policies at all levels and at all stages, by the actors normally involved in policy-making' (Council of Europe, 1998: 14 cited in Verloo, 1999). As Schunter-Kleemann argues: 'Instead of trying to change women, it tries to change the systems and structures that disadvantage them. It seeks to transform organisations and procedures to allow men and women to participate on an equal footing' (1999: 18). Thus organizations should be transformed so as to take into account the diversity of women and men; indeed, other 'differences' – including race, sexual orientation and disability – have been incorporated into the mainstreaming paradigm. Mainstreaming is often presented as an alternative to previous Equal Treatment and Positive Action policies that have 'failed' (Verloo, 1999), but as we shall see, this argument is a contentious one.

Gender equality policies in Britain and France

The history of gender equality policies in Britain and France is inextricably bound up with other policies relating to women and the family. These policies, however, have often not been specifically addressed to the question of equality as such. Civil and political equalities for women in Britain were gained in advance of those of French women; for example, British women gained voting rights equal to men in the 1920s, whereas French women had to wait until 1944 to be granted the vote. Similarly, French husbands retained formal rights over their wives' activities in respect of their participation in the public sphere – for example, being able to open a bank account, or take up paid work – into the 1960s.¹

However, as has been widely noted, French family policies, in combination with pronatalism gave French women better access to the labour market than British women (Jenson, 1986; Lewis, 1992). The *preamble* to the constitution of the Fourth Republic (1946)

guaranteed equal rights for women, and also proclaimed each individual's duty to work and their right to employment. Paid maternity leave was introduced in France as early as 1913, and the benefits which many firms paid voluntarily to workers with families were made compulsory in the 1930s (Hantrais, 1993). Married women have never been formally excluded from the labour market in France as they have been in Britain, particularly during the inter-war period. Perhaps even more important, however, has been the extensive provision of child care by the French authorities. Nearly all French children between the ages of three and six, and 80 percent of two-year-olds, attend nursery schools (*écoles maternelles*), and there is also state provision for under twos in *crèches collectives*, as well as tax relief on child-care expenses. In contrast, equal rights in employment for women in Britain were not formally introduced until 1970, and Britain has had historically low levels of child-care provision (among the lowest in Europe), although this is changing with recent developments in Labour Government policy.

These policy differences between Britain and France reflect national differences of the recent past. French governments have been preoccupied with population policies ever since the massive wartime population losses from the Franco-Prussian war onwards. In comparison to the British, French trade unions were relatively weak in the inter-war period and Orloff (1996: 59) has suggested that:

British unions had the capacity to keep most married women out of paid work and to block the use of family allowances to restrain wages, while French employers had the capacity to block measures keeping married women out of the labour market and acceded to state-mandated family allowances, which promoted wage restraint while funnelling funds to families with children.

It would not be correct, however, to assume that the French state had never sought to dis-

courage women's labour market participation. As Martin (1996) demonstrates, the Allocation de Salaire Unique (ASU) paid to the husbands of non-working wives between 1941 and 1978 represented from the outset a strong financial incentive for mothers of two or more children to leave the labour market.² However, financial constraints led to the progressive reduction of the ASU and, from the end of the 1950s, the authors of the successive National Plans called for the suppression of what came to be seen as a barrier to the economic development of the country and as an important factor contributing to the labour shortages faced by French employers. From the end of the 1970s, policy decisions sought to encourage women's labour market participation, while maintaining relatively high fertility rates.

These policies have been reflected in a tendency towards unbroken employment careers, and higher levels of full-time employment, among French women over the past 30 years (Dex and Walters, 1989). Historically, these kinds of employment patterns among women have also been associated with somewhat lower levels of vertical occupational segregation in France. Full-time employment among French women has been associated with their greater representation in professional and managerial occupations until the relatively recent past (Povall, 1984).

It has been suggested, therefore, that the French case might be seen as an example of 'equality in difference'. That is, although French women were not given equal rights as citizens until a relatively late stage, nevertheless, the benefits they received as *mothers* meant that in aggregate the material circumstances of French women in the employment sphere were, relatively speaking, better than those of British women.

Thus Offen (1991: 152) has argued that in France there has been an emphasis on:

... women's role as mothers in the republican nation-state and ... state support for that role. At the same time, by defending

women's right to work and by continuing to argue for 'equality in difference' [they] promoted women's rights as embodied women in the French body politic rather than as individuals irrespective of gender consideration. It was not 'equality' or 'difference' but 'equality in difference' that triumphed in France.

Indeed, Offen (1991: 153) goes on to suggest that France might have become a 'post-patriarchal' society, and that the late 20th-century French welfare state has '... laid the foundation for "the paradise of women"'.

The idea of 'difference' is deeply embedded in French thinking about gender (Irigaray, 1984; 1989), as will be illustrated in the empirical sections of this paper. However, although this 'difference' was used to regulate women's access to certain occupations (mining, for example) or working patterns (such as night shifts) (see Stewart, 1989), as noted above, it has not been used as grounds on which to exclude women from employment *per se*. Nevertheless, in other respects equality policies in France since the 1970s and 1980s have not gone as far as in Britain. Indeed the idea of gender 'difference' is in conflict with other dimensions of French thinking about equality in which a universalism is emphasized. For example, in France there have been recent moves to achieve, via the legislature, equal access to political office for men and women (*parité*). These moves followed the publication of EU data that showed that the proportion of women in France holding political office was the second lowest in Europe (Martin, 1999). The measures proposed to achieve this end included elements of positive discrimination such as special training for women. The introduction of such special treatment (as opposed to equal treatment) has been strenuously opposed by a number of prominent French feminists (Badinter, 1998) who have argued that *parité* directly conflicts with Republican universalism, and, indeed, might be seen as a collapse into biological essentialism.

Here, it might be suggested, we have touched upon a long-standing contradiction in French attitudes to women and gender. Mothers in France, as we have seen, have been given special treatment by a state that did not give women full civil rights for many decades. However, 'special' treatment in respect of assistance with employment for *mothers* (through child-care facilities, etc.) has been counterbalanced by an emphasis on 'equal' treatment for *women* and men, once equal rights have been granted to women. Thus, in a parallel to the *parité* debate sketched out above, although French women have equal rights to men in employment, the enactment of such policies has not been consolidated by special measures to redress previous gender imbalances in employment and the labour market. An attempt was made in 1983, via the Loi Roudy, which included financial incentives to employers who developed equality programmes (*plans d'égalité professionnelle*). However, by 1992, only 24 companies had developed such plans (Laufer, 1992), and trade unions have in general only supported measures that apply to all employees rather than to women as a particular group.

In contrast, in Britain equal opportunities in employment have been directly promoted through the Equal Opportunities Commission (EOC). Although falling far short of 'hard' positive action policies such as quotas (Bacchi, 1996: 16), in Britain the discourse of equal opportunities in employment maintains a relatively high profile as evidenced by extensive discussions of issues such as the 'glass ceiling' preventing women from achieving managerial positions, the development of government-sponsored strategies such as 'Opportunity 2000', etc. These national differences became very apparent during our comparative case-study of women and men in managerial positions in banking, which will be discussed further below.

It might be argued, nevertheless, that the absence of special treatment or positive action policies for French women in employment is not a problem, given that a *de facto* 'equality

in difference' has been achieved (as Offen has suggested). Indeed, as has been noted above in our review of gender equality policies developed within the EU, positive action programmes are widely regarded as having failed in any case, and the turn to 'mainstreaming' is one consequence of this perceived failure. In the next sections of this paper, we will explore these issues using two comparative data sources. The first source draws on two separate attitude surveys carried out in France and Britain, and the second from interviews carried out with male and female bank managers in France and Britain.

Attitudinal comparisons

The data in Tables 1 and 2 is drawn from two separate surveys. IFOP (Institut Français de L'Opinion Publique) is a survey of young French men and women (aged 25–34) carried out in 1994 (Bozon et. al, 1994).³ In the same year, some similar questions were asked in the International Social Survey Programme's (ISSP) Gender and Family Relations module, and in the tables below the answers of young people in the same age category as the French survey have been extracted and percentaged.⁴

Table 1 indicates that the level of support for *any* employment of mothers of young children is much lower in Britain than in France, even though this group is in fact the fastest growing category in the British labour force. In France, there would seem to be a higher level of support for the *full-time* employment of mothers of young children.⁵ These contrasts in the attitudes of the French and British respondents reflect the past tradition of full-time work among French mothers, as discussed above.

Table 2 also shows considerable variations in attitudes between French and British respondents. French men and women are far more likely to say that men and women are treated on equal terms in the labour market, whereas the British respondents, particularly women, are more likely to think that men will be given preference. There are two possible interpretations of this table. First, these attitudes might indicate that the situation is indeed better for women in France, and that French women are less likely to find themselves discriminated against in the labour market. An alternative explanation, however, might be that French respondents are simply less aware of issues of gender equality in employment, given the absence of a positive discourse of gender equality and/or affirmative action in France.

Table 1 Mothers, employment, and child care (%)

	<i>If you were living in a couple with a child of less than three years, what would be the best solution if you had the choice?</i>		<i>Do you think that women should work outside of the home full time, part time or not at all when there is a child under school age?</i>		
	France	Britain	France	Britain	
	Men	Women	Men	Women	
Both full time	19	18	Full time	10	10
Both reduce	25	20			
Woman part time	26	32	Part time	42	42
Woman stay at home	27	29	Woman stay at home	48	49

Table 2 Attitudes to discrimination in employment (%)

<i>At the same age, experience and qualification level, would a man or a woman be more likely to get a job?</i>	<i>France</i>		<i>Would you say that job opportunities are, in general, better or worse (for women) than job opportunities for men with similar education and experience?</i>	<i>Britain</i>	
	<i>Men</i>	<i>Women</i>		<i>Men</i>	<i>Women</i>
Sex makes no difference	69	64	No difference	37	33
Better for men	25	26	Better for men	51	66
Better for women	4	9	Better for women	11	2

Some support for the latter interpretation (i.e. that the French are less conscious of gender-related labour market inequalities) is given by Table 3. This suggests that British respondents are more likely than the French to give gender egalitarian replies in response to questions designed to explore the phenomenon of occupational sex typing. Although the occupations identified are similar, the wording of the question is rather different in the two countries, and considerable caution should be used in making comparisons. Nevertheless, the data indicate that the French respondents are more tolerant of 'difference' in the occupational sphere. This might suggest less awareness of the possibility that inequalities might result as a consequence. However, these attitudes might reflect the continuing presence of the 'equality in difference' that Offen has argued is characteristic of French approaches to women and gender.

These comparative attitudinal data, therefore, reflect the variations in both past and present national policies relating to women's employment in France and Britain. The French would appear to be relatively tolerant of the employment of *mothers* (in comparison to the British), but they do not seem to be particularly conscious or aware of inequalities that might be faced by *women* in employment. In contrast, in Britain, where the discrimination and difficulties faced by women in em-

ployment have been the focus of considerable discussion (including government-sponsored, campaigns such as Opportunity 2000), an awareness of these issues would seem to be reflected in the attitudes of the respondents.

To establish that the nature (or national character) of family and gender-related policies have an impact on national attitudes, however, does not necessarily mean that the actual achievements and experiences of French as compared to British women are substantially different from each other. Indeed, those who have suggested that positive action or special treatment gender equality policies have 'failed' might want to argue that such policies make very little difference in any case. In the next section of this paper we will explore these issues via a comparative case-study of retail banking.

Gender and equal opportunity in British and French banks

Across Europe, the banking industry has a relatively recent history of overt gender discrimination in employment. The banking industry was the locus of the classic masculine bureaucratic career, into which young men with reasonable levels of education were recruited in the expectation that they would progress

Table 3 Attitudes to occupational stereotyping (%)

<i>Would you prefer to deal with a man or a woman who was a:</i>			<i>Is this job particularly suitable for men only, women only, or equally suitable for men and women</i>		
<i>France</i>			<i>Britain</i>		
	<i>Men</i>	<i>Women</i>		<i>Men</i>	<i>Women</i>
Police officer			Police officer		
man	43	51	man	34	18
woman	18	9	woman		
indifferent	39	40	both	66	82
Secretary			Secretary		
man	3	9	man	1	3
woman	63	42	woman	47	44
indifferent	34	48	both	52	54
Nurse			Nurse		
man	6	11	man	0	2
woman	51	34	woman	24	7
indifferent	43	55	both	76	91
Doctor			Doctor		
man	23	24	man	4	3
woman	21	20	woman	1	1
indifferent	56	55	both	96	96
Local councillor			Local councillor		
man	19	22	man	0	3
woman	22	20	woman	5	0
indifferent	59	59	both	95	98

through the ranks and eventually achieve managerial positions (Lockwood, 1958). After the Second World War, young women were increasingly recruited into banking in Britain, but as a short-term secondary labour force that was expected to leave paid employment with the arrival of marriage and motherhood. In the British case, these expectations were underlined by overt exclusionary practices such as separate pay scales for married women, together with a formal requirement (not actually enforced) to resign on marriage. Such practices continued into the 1960s (Crompton and Jones, 1984). French banks have a similar history of exclusionary practices against women, but they were not formally codified as they were in Britain; (for example, there was no formal bar on

the employment of married women (see Crompton and Le Feuvre, 1992).

Perhaps not surprisingly, therefore, the banking industry was decisively affected by 'equal treatment' equality legislation, which was introduced at national and European levels from the 1970s, and, as we have seen, was built into the Treaty of Rome. In Britain, the industry was subject to an investigation by the Equal Opportunities Commission in the 1980s (Crompton, 1989), as a result of which British banks have changed their practices. They would now be considered as 'leading edge' employers in the equal opportunities field. These changes have included the introduction of a wide range of positive measures including assistance with child care and leave to care for sick children, training courses to

help women 'catch up', training videos for patriarchalist male managers, and a general raising of consciousness concerning gender equality within banking. In contrast, however, although French banks have a long record of providing extensive services to parents (good maternity and sick leave, holiday camps and presents for children), they have not engaged in explicit policies of equality of gender opportunity in the recent past. As with approaches to gender equality more generally, on the whole French employers have not made the move from 'equal treatment' to 'special treatment' that has been characteristic of important sectors of employment in Britain.⁶

Recent interviews carried out with female and male bank managers in a major clearing bank in Britain and in two regional banks in France gave ample illustration of the difference in the emphasis given to gender equality policies in the two countries.⁷ British interviewees, male and female, were both aware of gender equality policies, and conscious of the changes that had taken place in the relatively recent past. In contrast, French interviewees, of both sexes, were not aware of gender equality policies (which is hardly surprising as there were none!) and, indeed, were more likely to complain of gender discrimination.

The older women among our British interviewees gave similar accounts of the past history of masculine exclusionary practices in Northbank.⁸ For example, Interviewee 2/23 (born 1946, only ever employed in Northbank) described how, when she joined the bank:

... I knew there were various jobs that girls did – girls went into the machine room which boys – didn't they went into standing orders or onto the counter ... As far as I was concerned, what I was working towards was that [the counter]. When I got to be onto the counter ... I've made it! This is it! The counter was organized by men, the chief cashier had a wing collar, very much the old school ... I didn't take the banking exams – it was not encouraged, it

was sort of dismissed ... like 'well there are banking exams but our ladies don't normally do them', close of conversation.

However, by the early 1980s: '... the area manager [following new job she had taken within the bank when her husband changed jobs] was the first I'd come across who was happy to appoint women – all of a sudden lady managers appeared and by 1990 there were eight of us!'

High-profile equal opportunities policies were introduced by Northbank in the early 1980s to very favourable publicity, and another interviewee (2/26, born 1960, married, two children) described their impact on her own decision making as follows:

... it [career decision] wasn't an ambition to do banking as such, it was an ambition to combine a university course [banking and finance degree with work experience at Northbank] with something that had a job with good potential, and also I must admit ... Northbank's ... stance on the promotion of females and their equal opportunity awareness was something that attracted me at that stage because it was far ahead of the other banks.

Another British woman (2/30, born 1959, married, one child) was sent on a special course for non-graduates with career potential: '... nine weeks at University, a dissertation, free to choose any lectures – confidence building, more able to deal with customers – I felt I could walk on water'. One result of the course (besides promotion) was that she set up (with the support of the bank) a women's network in her area: '... just networking, doing what the men have always done naturally'.

Positive policies to encourage women, therefore, were welcomed by many, including some of the men we interviewed, as in the case of this man (2/81, born 1952) whose partner was also a bank manager: 'She and many others would say that 10 years ago they wouldn't have become managers because of

not being pushed for exams ... plus the fact, the awful attitude that used to prevail that the female gender wouldn't be as good as the male'. Another man (2/82, born 1956, married, two children) described women managers in the following terms:

The women of quality are in the jobs on merit, whereas there are still some men who have got jobs because they've come through the ranks and they were managing years ago ... I don't know of a poor woman manager, I couldn't name one. I could name plenty of men.

Despite these very positive endorsements of the high-profile equal opportunities policies followed by Northbank, it is nevertheless important to emphasize that both female and male interviewees raised doubts as to the actual extent of the success of these policies. For example (2/25, born 1954, married, pregnant with first child):

We [i.e. Northbank] went through a stage where we could be proactively promoting women ... [name of Equal Opportunities Director] has done tremendous things from that point of view, from crèche facilities and things like that ... quite honestly people wouldn't dare absolutely flaunt the kinds of [equal opportunity] policies, but unfortunately what hasn't happened ... the very senior people, and we're talking about the general managers, they're still of an age where 'she's just a woman', and you're not going to get rid of that, you don't change people's mentality ... I think it'll only be the next generation coming through that'll make a real difference ... I think that's particularly why we haven't got many very senior ladies, because the people who are doing those appointments, they're all of the old style management.

It is also the case that, despite the high-profile equal opportunities policies described above, a number of women managers in Britain were

aware of and had experienced gender discrimination at a personal level. For example (2/30, married, one child):

I went to one of my line managers and said I wanted to do foreign ... he said 'Clare you're a woman, you will never go on foreign'. ... I was so bloody angry about it that I thought 'Right, you swines', and to me, the way to show them was to keep succeeding.

She did, indeed, 'keep on showing them' and is now a senior manager in the bank. Nevertheless, it is important not to be too complacent as to the extent of what positive equal opportunities policies can achieve in practice. However, within Northbank their impact appears to have been a positive one and, if nothing else, to have considerably improved the morale of those involved.

In some contrast, the interviews with managers in France (in *Crédit Eglise* and *Caisse Provident*⁹) provided ample evidence of active sex discrimination. For example (5/22):

I am an international manager, but I think I will be the only one, but not in the same way as men and not at the same level as my male colleagues. That is, I am a manager but a manager in name only, not at the level of salary that, at my age and experience I should have ... I'm not equal [to the men].

Similarly, another woman manager (5/28, born 1959, married, two children) gave graphic accounts of the discrimination she had faced when applying for management status. Despite support from her immediate (male) supervisor, her business school degree qualifications and the excellent reports on her work performance, she was repeatedly refused promotion. After a battle lasting several years, she eventually made the management grade, only to find herself up against the 'glass ceiling' a few years later. Having worked at Head Office since she had joined the bank, she realized that it was vital to move over to

branch management, which plays a strategic role in the promotion system of French banks, in order to progress further. The response from the Managing Director could hardly have been more explicit: 'Madame, as long as I'm around there will never be a woman in power, and never a woman branch manager, that's for sure'.

Her experience does not seem to be an isolated case, since she maintains that:

Men just do better. There isn't the prejudice. They manage to defend their interests better than we do. They are listened to more because it's a masculine system and they are taken seriously ... I know another woman manager here who earns 1,000–1,500 francs less than a man who isn't even on a management grade. She's the manager, she has all the responsibility, but he earns more than her.

However, several French respondents stressed the fact that the bank they worked for represented a particularly bad employer for women, even by banking standards. One interviewee (5/27, born 1961, married, two children, two step-children) stated:

Crédit Egale is the most misogynist bank there is. There isn't a single woman branch manager, not one. If you take other banks, you do find more women managers. ... The worst thing at Crédit Egale at the moment is the fact that they have given several women managerial status, but that doesn't mean much, since they have increased the limits of the managerial grades. ... at Head Office, it doesn't mean a thing. A woman on a management grade often earns less than a man who hasn't got managerial status. It doesn't really make any difference to the role of women in decision making in the bank.

Male managers in France were also conscious of the misogynist tendencies in banking. A young male manager (5/75, born 1960) commented that:

... banking is very sexist ... you look at the history of banks, in people's imaginations, a banker is a banker à l'anglaise [i.e. stuffy, old-fashioned], a world where women were absent. Then when women started coming into banking they were given low-level jobs and even today, when they have a choice, they always prefer the man.

Similarly, another manager (5/73, born 1958), when asked whether he would encourage his children to take up banking as a career, commented that:

I would not encourage them particularly as they [his children] are girls – just look at the figures – in the upper management echelons here there isn't a single woman. ... Men in the generation just before mine ... these are men who have never come into contact with women as equals. As far as they are concerned there are two categories: men who have the right to progress, and women.

Nevertheless, it might still be possible to argue that, despite the specific instances of gender discrimination described in our interviews, all that this reveals is that senior management in banking in France is unconcerned about gender equality issues, or appearing to be 'politically correct'. After all, women in Britain also told tales of discriminatory behaviour by particular male managers, despite the fact of high-level positive action policies. Thus if, despite the prejudice that they encounter, women in the banking industry in France are as likely to be promoted as British women, does the absence of a positive equal opportunities policy actually matter?

One way of answering this question is through a direct comparison of the gender/grade structures in the banks in which we carried out our interviews. An initial comparison of the figures suggested that women had indeed experienced much better opportunities in Northbank, where 26 percent of the managers were women, as compared to only 11 percent in Crédit Egale and 15 percent in

Table 4 Grade/gender structures in French and British banks, 1998 (full-time employees only, %)

	<i>Northbank</i>		<i>Crédit Egale</i>		<i>Caisse Provident</i>	
	<i>Men</i>	<i>Women</i>	<i>Men</i>	<i>Women</i>	<i>Men</i>	<i>Women</i>
Clerical/ <i>Employé/Gradé</i>	50	84	63	93	61	90
Managers/ <i>Cadres</i>	50	16	37	7	39	10
	100	100	100	100	100	100
Number	17,432	29,339	258	188	946	603

Caisse Provident. However, as Northbank has a higher proportion of female employees, the proper basis for the comparison relates to the percentage of the sex in managerial positions rather than the percentage in the occupation, as summarized in Table 4.

Again the data in Table 4 suggest that women have been more likely to gain managerial positions in the British than in the French banks studied. We say 'suggest' rather than 'prove' because there are a number of problems in drawing these comparisons. First, the data available for Northbank are only available at the national level, whereas for the French banks regional figures are given.¹⁰ Second, as is indicated by the percentages, a greater proportion of employees in Northbank are in managerial positions (31 percent) than are in *Crédit Egale* (24 percent) or *Caisse Provident* (28 percent). More generally, there are difficulties in treating the grade hierarchy in banking as an upward escalator, given the erosion of the 'bottom-up' banking career. That is, in contrast to the recent past, today's banks now practise multi-level recruitment, and many (particularly women) will be recruited to clerical grades with no expectation of moving upwards into the managerial hierarchy. Thus a more meaningful comparison would be of the careers of men and women initially recruited at a similar level, but unfortunately this is not possible.

Despite these caveats, it would seem to be the case that British women have been able to move more rapidly into managerial positions

within banking than have French women. This interpretation would be supported by longitudinal comparisons. In 1989, only 2.8 percent of women in Northbank had reached managerial grade, as compared to 5.3 percent of women in a similar French bank (Crompton and Le Feuvre, 1992). Thus, over the last decade, the rate of entry of British women into managerial positions in banking has been considerably more rapid than that of French women (as is also suggested by aggregate level comparisons; see Note 10). It is not possible, of course, to demonstrate conclusively that the more favourable outcome for British women has been an outcome of positive equal opportunity policies, but their impact certainly cannot be discounted.

Discussion and conclusions

We have suggested that cross-national comparative research might play an important role in policy evaluation, in that the comparison of national circumstances that are very similar, but in which a particular policy is present (or absent), is one way in which to gauge the effectiveness of the policy in question. As we have seen in this paper, France and Britain are two countries characterized, at the national level, by very different attitudes and policies towards women's employment (particularly that of mothers), levels of child-care provi-

sion, and both 'difference' and equal opportunities discourses. French universalism has effectively put a brake on any moves towards 'special treatment' for women as employees (and this would seem to be borne out by the attitudes of the French trade unions), although the favourable treatment of mothers has in practice been of considerable benefit to French working women. As far as women were concerned, universalism has historically had its positive aspects; for example, married women have never been formally excluded from paid employment in France, as they have been from a number of important occupations in Britain, particularly during the inter-war period.

Nevertheless, this in-depth comparison of women's access to managerial jobs in banking in the two countries suggests that positive equal opportunities policies have had the desired impact in Britain, in some contrast with the French experience.¹¹ Policies that facilitate labour force participation by mothers – as has historically been the case in France – are not necessarily linked to the promotion of equality for women as individuals. Indeed, it is doubtful whether any of our French interviewees would agree that a 'paradise of women' (Offen, 1991) has been established in their corner of France. Our interview evidence would also be in conflict with the attitudes described in Table 2 where, it will be remembered, over 60 percent of French respondents (and nearly 70 percent of men) thought that sex made 'no difference' in the labour market if a man and a woman were equally well qualified.

Finally, besides giving an illustration of the impact of policies in the case of the specific industry under discussion in this paper, we would also like to suggest that our evidence makes a contribution to current European debates relating to gender equality. As we have noted in our discussion of European policies, it is sometimes suggested that positive action has failed, and, by implication, should be replaced by a policy of 'mainstreaming'.¹² However, our comparative case-studies suggest that, on the contrary, positive action can go some way to achieving the desired effect.

Of course it is important to try to change institutions, but this does not wipe out the discrimination that women (and other categories) may experience as individuals. It would be unfortunate, therefore, if the adoption of mainstreaming meant that positive action policies were therefore to be dropped.

More generally, the French experience (within the banking industry) suggests that, in the absence of an explicit discourse of gender equality, it is all too easy for ingrained discriminatory attitudes to persist. Thus, if the goal of gender equality in employment is a real one, it would seem that a variety of strategies together with a flexible approach to the definition and conceptualization of 'equality' itself are both required to be present if success is to be achieved.

Notes

- 1 There is little evidence that these rights were widely used by the 1960s.
- 2 Between 1946 and 1954, the combination of the ASU and the family allowance paid to a couple with at least two children aged under 16 years, with an economically inactive wife, represented an income equivalent to the average national wage of a woman working full time in a manual occupation. (Martin, 1996: 159).
- 3 IFOP included 1502 cases with oversampling in some categories. However, as we are working from published tables, weighted figures are given. Respondents in the same age group as in the IFOP survey – 25–34 – were identified in the British ISSP survey. This generated, for Britain, 115 men and 123 women. Percentages only (not raw numbers) are all that are available from the published IFOP tables (the raw IFOP data were not available). These difficulties of comparison mean that extreme care should be used in evaluating these tables. We are also conscious of the fact that differences in wording in the two countries can produce 'findings' that are in fact artefacts of these variations. Nevertheless, the fact that the attitudinal contrasts reflect what is already known about Anglo–French differences would, we argue, justify the use of these comparisons, to say nothing of the difficulties of locating suitable comparative data as far as these two countries are concerned.

- 4 For a description and discussion of the ISSP programme of research, see Davis and Jowell (1989).
- 5 There is clearly an age effect at work here in that younger people are less likely to say that the mother should stay at home. Taking the ISSP sample as a whole, 66 percent of British men and 60 percent of British women said that the mother should stay at home. This suggests that generational experience of the mothers of young children working might mean that the British 'catch up' with the French.
- 6 In addition to banking, in Britain the Civil Service (national and local), the BBC and the National Health Service have all engaged in positive equality policies.
- 7 The research was funded by the ESRC (R000235617, R00022283), and the British Council. For further information and results relating to the first stage of the research, see the papers in Crompton (1999).
- 8 This is a pseudonym.
- 9 These are pseudonyms.
- 10 As these are regional organizations the data are only available at this level. The figures in Table 4 were obtained from the banks in which the interviews were conducted. However, national data for another major French bank gives distributions that are closer to those of Northbank. National statistics do not use comparable occupational categories. They show that in 1998, 34% of *cadres et professions liberales* in France were women. In the UK, women were 32% of managers and administrators and 40% of professionals. These aggregate figures suggest a broad similarity between the two countries, suggesting that British women have 'caught up' very rapidly with the French.
- 11 Although positive equal opportunity policies do seem to have had an impact in the British case, it is important to remain aware that such policies are not, on their own, capable of ensuring absolute equality and/or the harmonization of work and family life. Other comparative analysis (see Crompton and Birkelund, 2000) shows that the demands of managerial employment are such that both of these objectives are problematic and difficult to attain, even in the most favourable of circumstances.
- 12 In business-speak, this has been called 'managing diversity'.

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