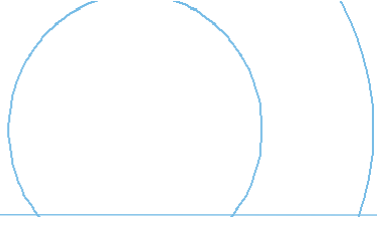


Annual Equality Report
2019/20
and
actions 2020/21

DRAFT



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Foreword

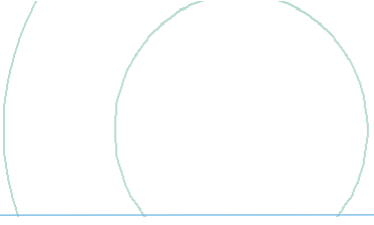


A commitment to treating people fairly is central to the role of an ombudsman. My team and I are committed to providing a service which is easy for everyone to use and to providing equal opportunities for all staff. We are aware that through our casework we can influence the way bodies in our jurisdiction consider equality and human rights issues.

In November 2019, we published our new Equality Plan covering the period between 2019 and 2022, together with actions for 2019/20. The Plan is far-reaching and comprehensive, outlining 11 Equality Objectives. It celebrates the successes of the office in promoting equality, diversity and inclusion – but it also identifies many areas for improvement and more focused effort. I am delighted to publish this Report on the first year of the Plan’s implementation, together with the actions to be taken in 2020/21.

Whilst plans are important, what really makes a difference is the actions taken as a result of the plans. We made real progress during 2019/20. Amongst other actions, we published our first Equality and Human Rights Casebook; signed up as a Disability Confident Committed employer; and reached FairPlay Employer ‘silver’ level. We also reduced our median Gender Pay Gap, from 21% at March 2019 to 11% at March 2020.

This publication was prepared against the backdrop of two forces reshaping our society, both with deep implications for equality. First, the Covid-19 pandemic represents a once in a generation crisis for public health and economy. However, its impact on equality is also beginning to emerge. Second, the ongoing Black Lives Matter protests have highlighted yet again the deep and ongoing inequalities affecting BAME people in the US, UK and globally.



We stand with our black colleagues, black people around the world and all who are publicly denouncing racism. It is therefore both timely and appropriate that our actions for 2020/21 include an emphasis on strengthening our contribution to race equality, justice and inclusion in Wales. However, I want to also take this opportunity to set a long-term aspirational target for ensuring BAME representation on my Advisory Panel and Audit and Risk Assurance Committee within the lifetime of my current Equality Plan. I am hopeful that actions under the Plan this year will support us in fulfilling this commitment.

I would like to thank all the stakeholders who supported me and my staff in the development of this Report and actions and look forward to further engagement with them and the public as we put the 2020/21 actions into practice.

Nick Bennett

Public Services Ombudsman for Wales

Our Equality Objectives

We have 11 Equality Objectives, mapped to the three strategic aims of our Corporate Plan:

Deliver Justice



1.1: Capture comprehensive and meaningful equality data from PSOW service users



1.2: Effectively target under-represented complainant groups



1.3: Ensure that PSOW's services are accessible to all public service users in Wales who need them



2.1: Ensure that PSOW casework staff can identify and adequately respond to equality and human rights issues

Promote Learning, Work to Improve Public Services



2.2: Publish more information about how PSOW casework takes account of equality and human rights considerations.



2.3: Ensure that equality is embedded in the planning and implementation of PSOW's new powers



3.1: Capture comprehensive and meaningful equality employment data



3.2: Act to improve the representation of protected groups in PSOW workforce

Use Resources Wisely and Future-proof the Organisation



3.3: Address PSOW Gender Pay Gap



3.4: Promote staff wellbeing and awareness of equality and diversity issues



3.5: Ensure that the consideration of equality is embedded in PSOW decision making

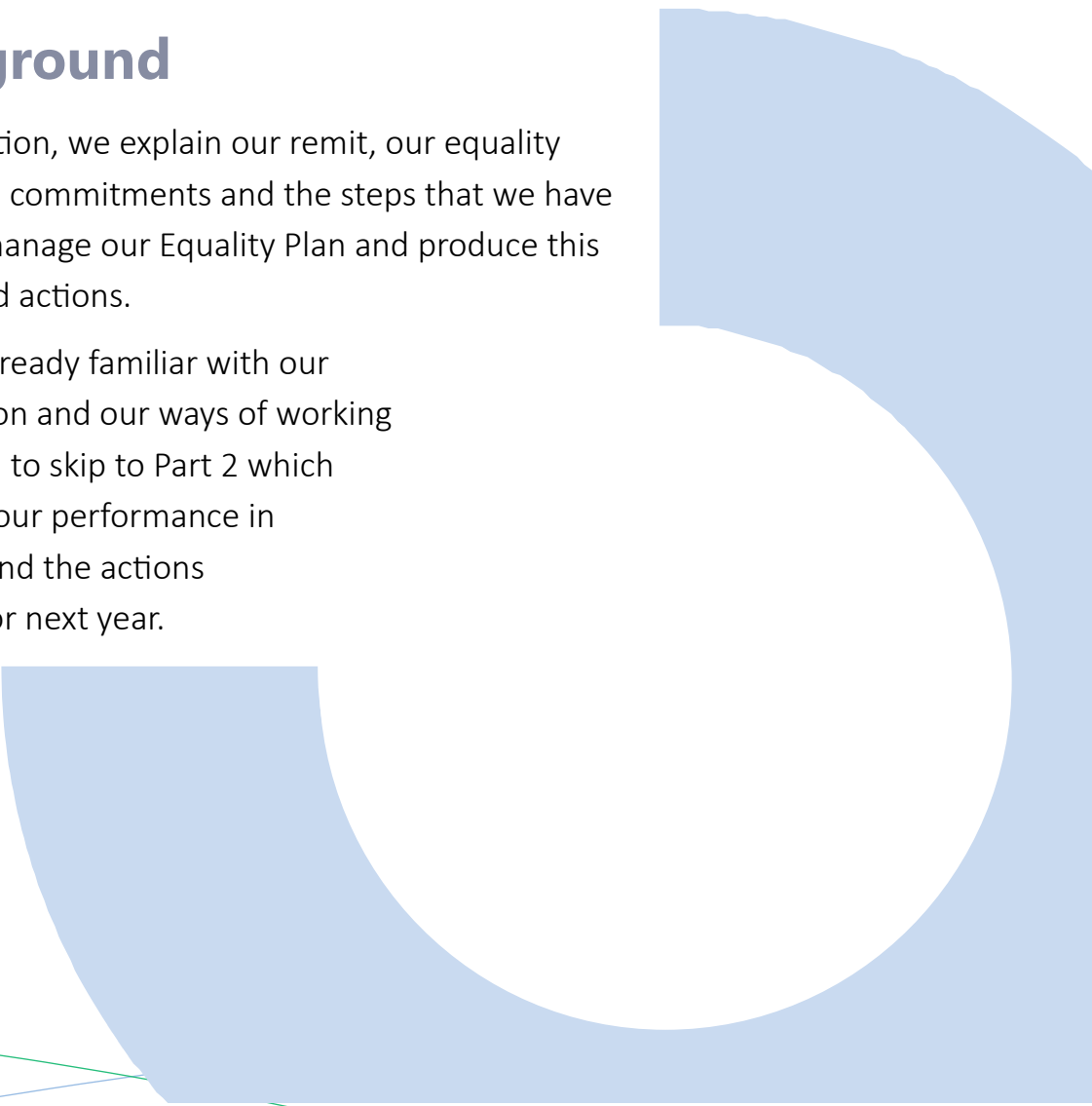


Part 1

Background

In this section, we explain our remit, our equality duties and commitments and the steps that we have taken to manage our Equality Plan and produce this Report and actions.

Readers already familiar with our organisation and our ways of working are invited to skip to Part 2 which discusses our performance in 2019/20 and the actions planned for next year.



About us

We have three main roles.

Our first role is to **handle complaints about maladministration, service failure, or failure to provide a service** by most public service providers in Wales, such as:



local government



NHS (including GPs and dentists)



registered social landlords



Welsh Government and its sponsored bodies

More information on our process for handling complaints about public bodies in Wales can be found on [our website](#) (also in [Easy Read](#)).

Our second role is to **consider complaints that elected members of local authorities have breached their Codes of Conduct**, which set out the recognised principles of behaviour that members should follow in public life. In this role, we can consider complaints about:



county and county borough councils



community councils



fire authorities



national park authorities

More information on our process for handling complaints about a local authority member's conduct can be found on [our website](#) (also a in [Easy Read](#)).

Our third role is to **drive systemic improvement of public services**. Traditionally, we have done this mainly by publicising our findings, for example in public interest and thematic reports, annual letters to bodies in our jurisdiction and casebooks.

However, in 2019 the Act establishing our office was reformed. As part of the reform, we were given new powers to drive systemic improvement. We can now undertake investigations on our own initiative—even when we have not received a complaint. We can also set complaints standards for public bodies in Wales and monitor their performance in complaint handling.

We are independent of all government bodies and the service we provide is free of charge.

Our equality duties and commitments

We have to comply with general and specific duties under the Equality Act 2010 in relation to protected characteristics. We are also committed to acting in the spirit of the socio-economic duty and to supporting the Welsh language.

General equality duty

The Equality Act 2010 introduced a public sector equality duty (the 'general duty'), replacing the separate duties on race, disability and gender equality.

Under the general duty we must have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

The general duty covers the following protected characteristics: **age; disability; sex; sexual orientation; gender reassignment; race** (including ethnic or national origin, colour or nationality); **religion or belief** (including lack of belief); **pregnancy and maternity**; and **marriage and civil partnership** (but only in respect of the requirement to have due regard to the need to eliminate discrimination).

Specific equality duties

The general equality duty is not prescriptive about the approach a public authority should take in order to comply with their legal obligations. Listed bodies in Wales also have specific duties to help them in their performance of the general duty.

Under the specific duties in Wales, **we must set Equality Objectives and prepare Strategic Equality Plans.**

We must also collect and monitor equality data (including in relation to employment and pay differences); assess impact of our policies and procedures on equality; engage with protected groups; provide training on equality to staff; and consider equality in procurement.

Socio-economic duty

Part 1 of the Equality Act 2010 requires specified public bodies to consider how their strategic decisions may help to reduce socio-economic inequalities – resulting, for instance, from differences in occupation, educational opportunities or place of residence. This is referred to as [the socio-economic duty](#).

The Welsh Government has committed to commencing the socio-economic duty in Wales. Although it had indicated that the duty would be commenced in September 2020, it had to re-prioritise its business in response to the Covid-19 crisis.

PSOW is unlikely to fall under the socio-economic duty under the test set out in the Equality Act 2010. However, we are committed to act in the spirit of the duty and have already taken steps to strengthen consideration of socio-economic inequalities in our work.

Welsh language

We are committed to ensuring that the Welsh language is welcomed and treated no less favourably than English in all aspects of our work and that we meet the needs of Welsh speakers. We currently operate in accordance with our [Welsh Language Policy](#) which was reviewed in 2018.



Under our new Act, we are required to comply with Welsh Language Standards, and these will supersede the current policy in due course. During 2019/20, we engaged with the office of the Welsh Language Commissioner to discuss the extent of our envisaged Welsh language duties. In November 2019, we received our draft Compliance Notice and sent our response in March 2020.

However, given the ongoing public emergency related to Covid-19 outbreak and the challenges of introducing changes whilst staff are working at home, we have asked the Commissioner to delay the imposition of standards.

How we manage our Equality Plan

Our **Management Team** has the overall responsibility for the strategic direction and governance of the office and ensures that operational management complies with all legal, statutory and good practice guidance requirements. The Management Team receives quarterly reports on the implementation of the Plan and planning moving forward.

The **Head of Policy** is responsible for the coordination of implementation of actions under the Plan; the evaluation and review of the Plan; the preparation of annual equality reports; and the formulation of new actions moving forward. The Head of Policy also assists staff in completing Equality Impact Assessments (EIAs).

All **staff assigned responsibilities for actions** are responsible for completing the actions assigned to them, with progress monitored on an ongoing basis at team level.

All staff receive information about actions under the Plan and are encouraged to contribute ideas and feedback and participate as relevant.

During 2019/20, we convened an internal voluntary staff Equality Plan Group to assist the Head of Policy. The Group

- **helps monitor the implementation of the Equality Plan**
- **helps to formulate proposals for actions under the Plan**
- **acts as a sounding board for equality projects and initiatives within the office**
- **offers feedback and advice on Equality Impact Assessments.**

How we prepared this Report and actions

In developing this Report and actions, we drew on research from a range of sources and insights from numerous stakeholders.

We drew on a variety of secondary sources, including publications, research and data by the Equality and Human Rights Commission (especially the 2018 report 'Is Wales Fairer?'); the Office for National Statistics; the statistics division of the Welsh Government; the UK Government Equalities Office; Stonewall; Chwarae Teg; and many others. We also assembled and analysed the data available from our internal equality monitoring processes.

References to the data informing our analysis can be found in the Appendices.

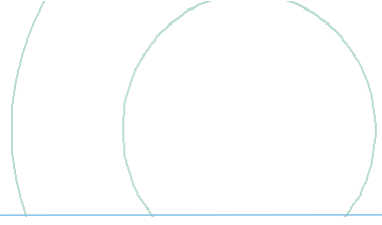
In preparing this Report we consulted and engaged in four stages:



At each stage we asked whether:

- our Equality Objectives are still current and relevant
- the proposed actions are appropriate
- we should consider any other actions.

Given the ongoing Covid-19 outbreak, we felt that it was neither feasible nor safe to organise close engagement exercises with protected groups. Instead, we opted for an external consultation. We thank all those who took time to offer comments on this Report in these challenging times.



Part 2

Our performance in 2019/20 and actions for 2020/21

Based on the feedback received, we decided that all our Equality Objectives remain valid. This part presents our performance during 2019/20 and planned new actions for 2020/21.



Strategic Aim 1: Deliver Justice

A fair, independent, inclusive and responsive complaints service.



Objective 1.1: Capture comprehensive and meaningful equality data from PSOW's service users

In 2019/20, we continued to collect data on the equality profile of service users.

Although complainants can share with us their equality data using different formats, almost all the data at March 2019 was received through our online complaints submission form. We were concerned that this format may exclude individuals who choose to - or have to - contact us through other channels. To address this, we developed during 2019/20 proposals to adopt a more proactive approach to the collection of equality data. These proposals will be refined and implemented during 2020/21.

During 2019/20, we also intended to modify the wording of the complainant equality questionnaire, including by adding questions about caring duties. We prepared an updated version of the questionnaire based on best practice. However, applying this updated version required changes to our Casework Management System. Unfortunately, these changes could not be accommodated during 2019/20 and will be taken forward in the coming year.

We are conscious that the collection of the equality data must be complemented by sufficient capacity to analyse it. In 2019/20, we developed an internal live document collating up-to-date equality information by each equality characteristic (including data on any issues around access to services and access to justice). We will be using this document to improve our understanding of the equality data we collect, as well as to support members of staff responsible for completing Equality Impact Assessments.

In 2019/20, we also committed to develop new ways of identifying equality themes from our casework. However, due to time constraints, we did not manage to develop a new process for tagging the relevant cases on our Casework Management System. Although we have done some preparatory work on this action, its completion had to be delayed until 2020/21.

Our 2019/20 commitments	% completed
continue to capture equality data from complainants	100%
undertake a project to analyse the profile of complainants, not only with respect to the demographic profile of the Welsh population overall, but also using the available research on the needs of vulnerable groups and any barriers to accessing services that they may be facing	100%
review the complainant equality questionnaire to include questions in respect of caring duties from 2020/21 onwards	0%
develop how we gather and analyse information on the socio-economic status of complainants	0%
develop a plan to improve the response rate from complainants, drawing on good practice by similar bodies and academic and consumer research	100%
develop and trial a methodology to better capture how subjects of complaints relate to protected groups	30%

Our actions in 2020/21	Target or output	Responsibility
continue to capture equality data from complainants	reports available on a quarterly basis	IT Team Improvement Team
update our online complaint form to include a revised equality monitoring questionnaire	the form updated by March 2021	IT Team Improvement Team
implement a more proactive approach to the collection of equality data from complainants, including over the phone and/or by text	detailed implementation plan by September 2020 plan implemented by November 2020	Improvement Team Complaints Assessment Team Investigation Team IT Team
develop our internal process of tagging cases involving equality or human rights considerations in our Casework Management System	guidance for staff formulated by October 2020	Improvement Team CMRG
Relevant protected characteristic(s): Relevant to all protected groups		

Equality profile of our complainants and its analysis can be found in [Appendix 1](#).



Objective 1.2: Effectively target under-represented complainant groups

We use the equality monitoring data collected from our service users to shape our outreach strategy.

Last year, we chose to focus on one of the main under-represented groups of complainants - people over the age of 65. In February 2020, we arranged a session with members of the Age Cymru Consultative Forum. The aim of the session was to understand what barriers older people may be facing in accessing complaint handling service offered by our office or by other public bodies in Wales.

The participants spoke about the need to increase the visibility of our office and better advertise communication channels more accessible to older people. They suggested that we distribute more promotional material in libraries, GP surgeries and hospitals; strengthen our presence in the media; and organise more public talks and events. We are grateful to Age Cymru for facilitating this opportunity and to the members of the Forum for a lively and insightful discussion. We evaluated the project and intend to organise more such events in 2020/21.

Analysis of the profile of our complainants in 2019/20 suggests that many of the trends observed in previous years have continued. Complainants under the age of 25 and over the age of 65 remained noticeably under-represented. Although we are aware that complaints are often made on behalf of these individuals, we would expect these groups to be better represented overall. We will continue our efforts to better engage with them in the coming year.

However, we also intend to widen our focus to other groups. In 2019/20, only 3% of our new complaints were from people who identified with nationalities other than Welsh, English or British. This was despite the fact that this group is estimated to comprise 5.7% of Welsh population (2011 Census) and 7.5% of Welsh full-time workers ([Wales Centre for Public Policy, 2019](#)). Evidence also suggests that this group faces difficulties in accessing certain services (healthcare in particular) and can be exposed to discrimination.

In line with the focus of our actions this year, we also intend to step up our efforts to better target potential BAME complainants. At 5%, this group remains under represented, compared to the Welsh average of 6% to 8% ([StatsWales 2019](#); [National Survey for Wales, 2018/19](#)).

Since 2016, we have established three Sounding Boards – Service Users, Health and Local Government – to provide an opportunity to learn from our stakeholders and to use their feedback to improve services. During 2019/20, we intended to gather the feedback from our Service Users Sounding Board on our equality work. Whilst we engaged with Sounding Board members on a number of issues during the year, for logistical reasons it has not been possible to schedule the planned meetings and this action was not completed.

Our 2019/20 commitments	% completed
in consultation with the relevant bodies, run a pilot Equality Focus Group to gain insights into the service from individuals with protected characteristics, with an initial focus on older people	100%
evaluate the pilot and, depending on the evaluation, plan further focus groups in 2020/21, targeting other protected characteristics	100%
work with the Service Users Sounding Board, to ensure that work on equality and diversity remains a key focus of discussion	0%

Our actions in 2020/21	Target or output	Responsibility
work with organisations such as the Wales Strategic Migration Partnership and the Welsh Refugee Council to gather feedback about improving our visibility among the migrant community	organisations engaged with	Improvement Team
organise Equality Focus Groups with migrant and BAME communities	groups held and feedback gathered	Improvement Team
Relevant protected characteristic(s): Race		



Objective 1.3: Ensure that PSOW's services are accessible to all public service users in Wales who need them

We are dedicated to ensuring that our services are equally accessible to all users and are of equal quality regardless of the format and communication channels used.

In 2019/20 we produced Easy Read translations* of a number of factsheets on our website. We also continued to provide a range of accessibility services, including considering and responding to any request for a reasonable adjustment. In November 2019, we introduced new internal Reasonable Adjustment Guidelines. Although we are confident that we meet the requirements of our service users, in 2020/21 we will remind our staff again to record all requests for reasonable adjustments.

* Easy Read translations use a combination of words and pictures to aid understanding.

During 2019/20, we commissioned Beaufort Research to undertake on our behalf a telephone survey of a representative sample of our complainants. **91%** of the respondents found it easy or very easy to contact us. This opinion was even higher among those respondents who were also satisfied with the outcome of their complaint (**98%**).

In line with our commitments for 2019/20, we also added to the survey a question about reasonable adjustments. We make our service users aware of the option to request reasonable adjustments in hard copy and online complaint forms and in letters acknowledging the receipt of new complaints. Nevertheless, only a relatively small proportion could remember being asked about reasonable adjustments. Whilst this could be because respondents did not need reasonable adjustments or did not consider the question important to them, we will make sure that we emphasise this option in our future communications with complainants.

Under our new Act, we can now accept complaints other than in writing, including oral complaints. We trust that in due course this new power will facilitate access to the service by individuals who, for a range of reasons, are unable to submit their complaints in writing. We reviewed the uptake of oral complaints during 2019/20. This option was used by about **2%** of our complaints overall. Also, results of a national survey that we commissioned indicated that **77%** of respondents to our national survey were aware of this option.

Whilst we want this service to be used primarily by the individuals who cannot submit complaints in writing, we also want to make sure that all who may need this service are

aware of it. During 2020/21, we will finalise and launch an outreach campaign to promote our power to receive oral complaints.

Our 2019/20 commitments	% completed
continue to provide a range of services to facilitate communication with service users	100%
introduce and review internal Reasonable Adjustment Guidelines	100%
amend the customer satisfaction feedback form to include questions regarding PSOW's performance on equality	100%
review the number of oral complaints received and assess the need to develop promotional or engagement activity to raise awareness of this facility	100%

Our actions in 2020/21	Target or output	Responsibility
maintain high customer satisfaction with accessibility of our service	percentage of complaints who agree that we are easy to find over 90%	Complaints Assessment Team Equality and Human Rights Act Group Casework Support
make sure that we record all requests for reasonable adjustments	guidance to staff issued	
ensure that our casework officers ask complainants about additional needs proactively and on an ongoing basis	guidance to staff issued percentage of complaints who remember being asked about reasonable adjustments over 40%	
launch an outreach strategy to increase awareness of our powers to accept oral complaints	uptake of the service to increase from 50 to 120 awareness of the service to increase from 77% to 80%	Improvement Team
increase visibility of different formats for submission of complaints	website content adjusted	Improvement Team
Relevant protected characteristic(s): Relevant to all protected characteristics. However, activities to promote accessibility will focus especially on individuals with disabilities and older complainants.		

Strategic Aim 2: Promote Learning, Work to Improve Public Services

Promote learning from complaints and stimulate improvements on a wider scale.



Objective 2.1: Ensure that PSOW casework staff can identify and adequately respond to equality and human rights issues arising in casework

Consideration of equality and human rights issues as an integral part of casework handling is 'bread and butter' to our staff. We have in place an internal Equality and Human Rights Advice Group (EHRAG), which meets frequently to support the consideration of equality and human rights in complaints casework.

We continue to offer our casework staff specific training to help them engage with complainants with specific needs. In 2019/20, we held training sessions on mental health awareness, autism spectrum disorders and managing challenging conversations. In 2020/21, we will continue to scope the demand for such training. We will also train a member of staff to support colleagues with advice on good communication with people with autism.

During 2019/20 we also finalised an induction module on our equality and human rights, work, which was delivered to all new colleagues.

Our 2019/20 commitments	% completed
revise our internal policy on 'Managing Customer Contact' to include a section about engaging with complainants with specific accessibility requirements	100%
develop a training module on integrating equality and human rights considerations in casework, to be offered to all investigation staff	100%
provide targeted training to the Complaints Assessment Team staff on mental health awareness, autism spectrum disorders and managing challenging conversations	100%

Our actions in 2020/21	Target or output	Responsibility
depending on demand, deliver training on unconscious bias to caseworkers	training delivered	Training Lead
train a member of staff as 'Autism Champion', to support caseworkers and colleagues with advice on good communication with people with autism	member of staff trained	Casework Support
Relevant protected characteristic(s): Relevant to all protected groups, but particularly people who are disabled.		



Objective 2.2: Publish more information about how PSOW casework takes account of equality and human rights considerations

For many years now, we have published casebooks containing summaries of all investigation reports issued, as well as a selection of summaries relating to complaints settled as an alternative to investigation. Whilst many of those have involved equality and human rights matters, in 2019/20 we committed to producing a dedicated publication to highlight this work.

Our first [Equality and Human Rights Casebook](#) (also available in [Easy Read](#)) assembles a selection of cases where human rights matters have either been expressly raised as part of the complaint or have been pivotal to our findings. It has been well received by our stakeholders and we intend to repeat the publication in 2020/21. To support this work we intend to start tagging the relevant cases in our Casework Management System.

Our 2019/20 commitments	% completed
publish a casebook on cases in which we applied equality and human rights considerations	100%
plan to repeat the publication on an annual basis	100%
improve how casework staff record such considerations in handling a case, to facilitate reporting in the future	30%

Our actions in 2020/21	Target or output	Responsibility
publish the second Equality and Human Rights Casebook	casebook published by November 2020	Equality and Human Rights Advisory Group Improvement Team
Relevant protected characteristic(s): Relevant to all protected groups.		



“The new Human Rights Casebook by the Public Services Ombudsman for Wales is an excellent resource for ensuring that public bodies remain committed to their equality and human rights obligations.”

Equality and Human Rights Commission



Objective 2.3: Ensure that equality is embedded into the planning and implementation of PSOW's new powers

Under our new Act, we now have new powers to drive systemic improvement: [the power to undertake investigations on own initiative and to establish a Complaint Standards role](#).

To use the Complaints Standards powers, we were required to publish a statement of principles for complaints handling procedures for public bodies. We can then publish model complaints handling procedures for these bodies. To use the power of investigation on 'own initiative' we were required to publish general Criteria for these investigations. We laid all these documents before the National Assembly for Wales in October 2019 and they were approved in January 2020.

The documents demonstrate that [we consider equality as a key element of this work](#). For example,

- the model Concerns and Complaints Policy underlines that the process should be complainant focused, respond flexibly to individuals' differing needs, and that complainants and staff complained about should be treated equally and with dignity;
- the Criteria for Own Initiative Investigations include a commitment to consider whether the matters to be investigated under these powers would affect a wide group of citizens or individuals, particularly if they may be vulnerable or disadvantaged.

During 2019/20, we engaged with many stakeholders to identify the proposed subject for our first own initiative investigation, for example Audit Wales, the Welsh Commissioners, Citizens Advice Wales, Shelter Cymru and Llamau.

This work led us to propose that our [first own initiative investigation should focus on homelessness in Wales](#). Welsh Government statistics have shown that the number of Welsh households being assessed as homeless is increasing. Homelessness has a range of well-documented negative impacts. Amongst others, it can aggravate people's existing vulnerabilities (for example due to their age, race, sexuality or physical or mental health difficulties) and restrict their ability to access the support and assistance they require.

We believe that the focus on homelessness is appropriate because ensuring that vulnerable people are treated fairly by public service providers is central to the role of the Ombudsman. This focus also allows us to deliver justice for people who do not complain to us and thus 'give voice to the voiceless'.

Our 2019/20 commitments	% completed
ensure that emphasis on equality and diversity is integrated into any final guidance to bodies in jurisdiction under the new powers for the Complaints Standards Authority for Wales	100%
ensure that, in the assessment of suggested topics for own initiative investigations, the needs of protected groups are considered, with particular focus on groups under-represented among PSOW's complainants	100%

Our actions in 2020/21	Target or output	Responsibility
commence an Equality Impact Assessment of our first own initiative investigation	EIA commenced in May 2020	Improvement Team
Relevant protected characteristic(s): Relevant to all protected groups.		

Strategic Aim 3: Use Resources Wisely and Future-proof the Organisation

Identify and adopt best practice. Secure value for money and services that are fit for the future. Support staff and ensure good governance which supports and challenges us.



Objective 3.1: Capture comprehensive and meaningful equality employment data

In 2019/20, we continued to monitor the equality profile of our workforce and job applicants. For the first time we also analysed this data for successful candidates. This analysis gave us new and better insight into our recruitment trends.

The [response rate to this equality monitoring has improved](#) compared to 2018/19 - especially dramatically for our job applicants. For our current staff, this may be in part thanks to our new equality questionnaires, updated in line with best practice and now also including questions about caring duties. For our job applicants, we also updated the equality questionnaire and improved its visibility in the recruitment package. However, these changes were only introduced in April 2020, so the dramatic improvement in the response rate predated them!

Our staff equality monitoring is currently not connected to individual HR records. This means that we are unable to analyse the equality profile of people who access training, apply internally to change position, become involved in grievance or disciplinary procedures or decide to leave the organisation. To address this, [we consulted our staff in January 2020 on attributing the equality data to personnel records](#). The proposals generated some understandable concerns about confidentiality and data protection. During 2020/21, we will develop an internal system to implement our proposals and make sure that all staff are given an opportunity to test and comment on it.

Once the new system is implemented, we are confident that we will be able to start analysing the equality profile of different groups within our workforce, including those who accessed training or applied to change position internally. However, we will publish this data only if we can do so without identifying the individuals concerned and risking unfair processing of personal information.

Our 2019/20 commitments	% completed
review the methodology for the collection of equality data from job applicants and current employees to improve the response rate and develop PSOW's evidence base	100%
review how PSOW analyses successful job applicants by protected characteristic and publish this analysis, if appropriate to do so	100%
anticipating the introduction of the new socio-economic duty, modify workforce and job applicant equality questionnaire to include questions in respect of caring duties from 2020/21 onwards	100%
consult staff on linking their equality data to individual HR records, to enable the office to better report on the equality profile of the workforce and identify areas for consideration	100%
review how the office records the data on individuals who accessed and completed training, as well as those who applied to change position internally	100%

Our actions in 2020/21	Target or output	Responsibility
in consultation with staff, implement new system for staff equality monitoring connected to HR records	new system in place by March 2021	IT Team Corporate Services
analyse the equality profile of staff who access training, apply internally to change position, become involved in grievance or disciplinary procedures or decide to leave the organisation - and publish this analysis, if appropriate to do so	analysis available in April 2021	Corporate Services
Relevant protected characteristic(s): Relevant to all protected groups.		

The data on the 2019/20 equality profile of our workforce and job applicants can be found in Appendix 2 and Appendix 3.



Objective 3.2: Act to improve the representation of protected groups in PSOW's workforce

We are proud to be an equal opportunities employer and we seek to ensure that in our recruitment we do not discriminate against any group in society. We were glad to see that **87% of staff who responded to our staff survey this year felt that PSOW is committed to creating a diverse, equal and inclusive workplace.**

Last year, the analysis of our equality led us to identify some positives but also areas for improvement. Women were very well represented in our workforce and amongst job applicants. However, under-represented groups included young people (up to 24 years old); people who identified as LGB+; people of nationalities other than Welsh, English or British; and Welsh speakers. Also, although BAME people were comparatively well-represented amongst job applicants, our workforce was predominantly white.

However, the most significant area where our workforce and job applicants were not representative of the Welsh average related to disability. This finding prompted us to sign up as a **Disability Confident Committed employer**. The scheme supports employers to make the most of the talents disabled people can bring to the workplace. During the year we revised our recruitment materials and arrangements, confirming our commitment to offer interviews to disabled candidates if they meet essential criteria. We also reviewed our advertising strategy to check that we advertise on the right sites to reach applicants who are disabled. However, our plans to engage on this work with other bodies were affected by the Covid-19 outbreak. With all our staff currently working from home, we also had to put on hold any plans for work placements or apprenticeships for people who are disabled. These actions will be picked up during 2020/21.

Alongside better recording of requests for reasonable adjustments from our complainants, we will also make sure that we maintain a record of such requests from our job applicants, to be able to assess how we support accessibility in our recruitment process.

Our actions under the Disability Confident Committed scheme have not yet had a tangible impact. Analysis of the workforce and job applicant equality profile at March 2020 revealed that the proportion of people who identified as disabled among our staff and job applicants remained low (4.8% and 7% respectively) – although, positively, it was much higher amongst our successful candidates (14%). However, we trust that our actions under the Disability Confident scheme will start to bear fruit during 2020/21.

However, in another noticeable trend, we saw a decrease in the proportion of BAME people amongst our job applicants (4% compared to 9% in 2018/19). Although this group was much better represented among successful appointments (14%) overall, we saw only a small increase in BAME representation in our workforce this year. People of nationalities other than Welsh, English or British were also under-represented. Given the emphasis of our actions plan this year on race, in 2020/21 we intend to strengthen our focus on promotion of more ethnic diversity in our recruitment and employment strategies.

Our 2019/20 commitments	% completed
sign up as a Disability Confident Committed employer	100%
engage with relevant bodies (e.g. Disability Wales and Job Centre Plus Disability Advisors) to review the Ombudsman’s recruitment process and vacancy advertising strategy to attract people who identify as disabled	0%
explore the use of apprenticeships / work placements to offer opportunities to people who identify as disabled	0%

Our actions in 2020/21	Target or output	Responsibility
engage with relevant bodies (e.g. Disability Wales and Job Centre Plus Disability Advisors) to review our vacancy advertising strategy to better target people who identify as disabled;	Revised approach to advertising	Corporate Services HR Adviser Recruitment Lead
explore the use of apprenticeships / work placements to offer opportunities to people who identify as disabled;	Work placement arranged	
ensure that details of our recruitment are shared with relevant BAME organisations in Wales	Recruitment details shared when there are vacancies	
funding permitting, become a member of Investing in Ethnicity or another comparable certification scheme	Arrangements in place	
maintain a record of requests for reasonable adjustments from our job applicants	Recording system in place and some data available	
Relevant protected characteristic(s): Relevant to all protected groups. However, the focus of the actions in 2019/20 will be on disability and ethnicity.		



Objective 3.3: Address PSOW's Pay Gap

We are delighted that this year our **median Gender Pay Gap decreased**, from 21% at March 2019 to 11% at March 2020.

	March 2019	March 2020
% of staff female	73%	75%
Median Gender Pay Gap	21%	11%
Mean Gender Pay Gap	23%	19%

Women among our job applicants consistently outnumber men by a significant margin and most of our workforce continues to be female. We also have in place a range of policies and training opportunities to remove barriers to employment or career progression by female staff. We are aware that, in a relatively small organisation, individual recruitment outcomes can make apparently large differences.

However, our Gender Pay Gap at March 2019 prompted us to seek an external specialist opinion on our performance on gender equality. As a result, we decided to engage with Chwarae Teg and seek accreditation as a FairPlay Employer.



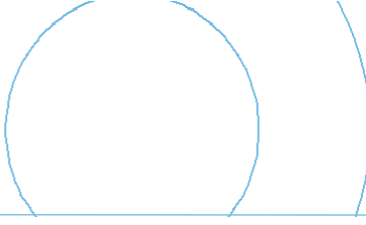
Chwarae Teg is a leading Welsh charity working on gender equality, including in the workplace. Its FairPlay Employer scheme benchmarks organisations in terms of gender equality across four levels: bronze, silver, gold and platinum.

ChwaraeTeg conducted their assessment in February 2020. The assessment included a staff survey, giving us an insight into issues that may affect progression of our staff.

We were delighted to achieve the silver Fair Play Employer level, having scored above the Welsh public sector average across all the categories assessed.

In awarding us this recognition, Chwarae Teg stated:

“This is a significant achievement and demonstrates the business commitment to making a difference to the recruitment, retention and progression of women working and contribution to broader efforts to close the gender pay gap and ensure the Welsh economy reaps the benefits of gender equality.”

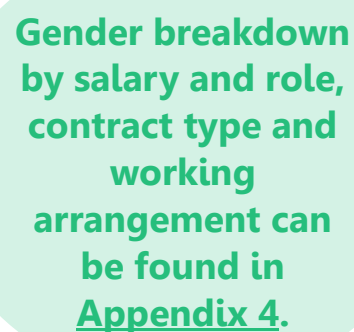


Whilst we are pleased with these results, there clearly remain areas in which we can seek improvements. We have now received recommendations for actions from Chwarae Teg in respect of our approach to flexible working, recruitment and selection and reward and recognition. We will be working with Chwarae Teg on the implementation of an action plan in 2020/21.

Analysis of our Gender Pay Gap at March 2020 gave us further reasons for optimism. During the year, we saw our median Pay Gap decrease by 10 percentage points and our mean Pay Gap decrease by 4 percentage points. Although still high, at 11% our Median Gender Pay Gap is now below the Welsh average (13.5%) and below the Welsh average in the public sector (14.2%).

The change can be attributed to the fact that women are now better represented at the higher pay scales (with increases in the 'Improvement Officers and Managers' band from 56% in 2018/19 to 62% in 2019/20). At the same time, the main reason for our Gender Pay Gap persisted. At the junior level (administrative and frontline staff) 89% of staff are now female - compared to 84% in 2018/19.

We committed in 2019/20 to investigate in more detail this low representation of men in junior roles. However, after re-evaluating this action we concluded that we are more likely to be able to influence progression of our staff once appointed. We are also in the process of gathering staff views on opportunities for their development and progression, as part of the annual Performance Review and Development Process. Once this process is completed, we will be able to consider the need for targeted management and personal development courses.



Gender breakdown by salary and role, contract type and working arrangement can be found in Appendix 4.

Our actions in 2019/20	% completed
engage with Chwarae Teg to consult on a detailed action plan on the Gender Pay Gap and work towards 'FairPlay Employer' recognition	100%
engage with staff to capture their views on what they require to progress in their careers and what may hold them back	100%
evaluate the scope for offering more targeted mentoring opportunities and/or management and personal development courses	50%
review the recruitment strategy to identify reasons for under-representation of men in junior roles	0%

Our actions in 2020/21	Target or output	Responsibility
working with Chwarae Teg, implement a FairPlay Employer action plan in respect of <ul style="list-style-type: none"> flexible working recruitment and selection in conjunction with Business Diversity reward and recognition. 	plan agreed and implemented by quarter 4	Management Team
ascertain demand for management and development courses and endeavour to offer to all staff who require them	demand scoped	Training Lead
Relevant protected characteristic(s): Gender		



Objective 3.4: Promote staff wellbeing and awareness of equality and diversity issues

We recognise that work can impact upon health and wellbeing and we are committed to providing a healthy working environment and to improving the quality of working lives for all staff. We also want to create an environment where everyone feels that they are treated fairly and have equal access to opportunities.

Wellbeing

During 2019/20, we launched a number of actions under [our new Wellbeing Strategy](#). Amongst other steps we,


- provided standing desks to all staff who wanted one
- provided annual health checks to staff
- trained a number of staff as mental health first aiders who can provide support to staff and signpost to other support services
- launched lunchtime mindfulness sessions and walks
- set up a reflection and prayer room.

Our internal staff Wellbeing Group has been instrumental in the development of the Strategy and implementation of the actions this year. In tribute to the work of the Group, amazingly, [96% of respondents to our staff survey this year agreed that they were kept well informed about the work undertaken in the office to support wellbeing](#).

During 2020/21, we will develop further actions to support the wellbeing of our staff. Amongst other actions, we will develop the use of the reflection and prayer room, for example for breastfeeding.

Awareness

In 2019/20, we committed to run a survey to capture staff perceptions of our performance on equality and any ideas for new actions to be implemented. Part of this task was accomplished through the annual staff survey. We were glad to see that [86% of the respondents agreed that they were treated fairly at work](#) and [87% agreed that PSOW respects individual differences](#). We were also pleased that [87% of the respondents felt well informed about the work undertaken in the office to promote equality](#).



In order to avoid survey fatigue, we decided to gather further ideas from staff for actions under the Equality Plan in other ways. We set up a space on our Intranet where ideas can be submitted. We also set up an internal staff Equality Plan Group helping shape ideas for action. Finally, the draft of this Equality Report and actions for 2020/21 was circulated internally, with all staff given an opportunity to submit feedback and ideas.

Appraisal process

We acknowledge that a common way for organisations to support equality is to encourage staff to set an equality objective as part of the annual appraisal process and ensure that they then receive appropriate training and support to help them fulfil those objectives.

We already ask all staff to undertake equality and human rights awareness training on a regular basis. However, during 2019/20, we also produced [an additional guidance note for all line managers to encourage their staff to assess equality training needs and consider setting one equality objective](#) as part of their Performance Review and Development discussion. We will be evaluating this approach next year.

Training

We recognise that all staff should be able to benefit equally from opportunities for training and personal development. All our staff are encouraged to complete [28 hours of Continuing Professional Development](#) per financial year. We are delighted that in 2019/20, [93% of staff met this target](#) – up from 77% last year.

This year, 82% of staff agreed or strongly agreed that the training and development they received was appropriate and relevant to their job – only slightly down from 83.6% last year. However, a lower proportion felt that all staff have equal access to opportunities for development and support - 73%. Whilst this is still an increase compared to last year (70.9%), we will investigate why this score is lower than satisfaction with training overall.

Our actions in 2019/20	% completed
train a number of members of staff as Mental Health First Aiders, equipping them with practical skills to spot the triggers and signs of mental health issues and provide initial support	100%
work with a staff wellbeing group to identify and progress measures to support staff wellbeing (for instance, consider re-launching the Wellbeing Week; or provide space for a reflection/prayer room)	100%
undertake an annual equality survey to obtain feedback from staff on our performance, to capture new ideas and identify staff needs. This could include designating some staff as Diversity Champions, or asking members of staff to take on a role in raising awareness and providing advice and support in relation to particular protected characteristics	50%
ensure that all line managers encourage their staff to assess equality training needs and consider setting one equality objective as part of their Performance Review and Development discussion in 2020/21	100%

Our actions in 2020/21	Target or output	Responsibility
maintain high staff awareness of our work to promote wellbeing and equality	awareness of well-being work at year end at least at 90%	Wellbeing Group
scope staff ideas for the use of the reflection and prayer room	ideas gathered	Wellbeing Group
maintain high staff awareness of our work to promote equality	awareness of equality work at year end at least at 90%	Improvement Team
evaluate uptake of equality objectives in the Performance Review & Development Process	evaluation completed by quarter 2	Improvement Team
gather staff views about access to training	evaluation completed by quarter 4	Training Lead
Relevant protected characteristic(s): Relevant to all protected characteristics		



Objective 3.5: Ensure that the consideration of equality is embedded in PSOW decision making

We strive to ensure that the general equality duty is an integral part of policy development and high-level decision making in the office. To this end, in 2019/20 we reviewed our Equality Impact Assessment (EIA) tool, including better integration of the Welsh language and socio-economic inequalities.

During the year, we scoped the need for additional training in completing EIAs. The staff responsible for completing the assessments indicated that such training would be useful. In 2020/21 we will organise briefing sessions for all relevant staff to ensure that the process is completed consistently, in a timely manner and to a high standard.

Our previous EIA tool captured negative impact only. As none of the policies that we had assessed using that tool were deemed to have a substantive negative impact, we have not published so far any of our assessments. Our new tool also considers positive impact and we expect that this will mean that we begin to publish more assessments in the future.

As we finalised our new EIA tool in March 2020, the disruption to our work programme caused by the Covid-19 pandemic meant that we were not able to apply it immediately to review our Procurement Policy. We will therefore undertake this work in the next financial year.

Our EIA tool was developed to assess our policies and procedures. However, we are aware that some of our projects, for example in relation to procurement or communications, would be better served by a shorter and more tailored impact assessment tool. We will develop these tools during 2020/21.

Our actions in 2019/20	% completed
review the EIA tool and consider how it can be better integrated into the decision-making process in individual cases and projects	100%
develop the EIA to also include consideration of the needs of Welsh language speakers	100%
identify any staff training needs with respect to the EIA as applicable to their work	100%
begin to publish EIAs on proposed policies and practices and any reviews of existing policies and practices, where the impact on protected groups is deemed as substantial	100%
review the procurement policy in line with the revised EIA tool	0%

Our actions in 2020/21	Target or output	Responsibility
hold briefing sessions for all policy owners to help them familiarise themselves with our new EIA procedure	sessions held in quarter 2	Improvement Team
review the procurement policy in line with the revised EIA tool	policy reviewed in quarter 2	Corporate Services
develop tailored tools to embed equality considerations in procurement and communications projects	tools developed by quarter 3	Improvement Team Corporate Services
Relevant protected characteristic(s): Relevant to all protected characteristics.		

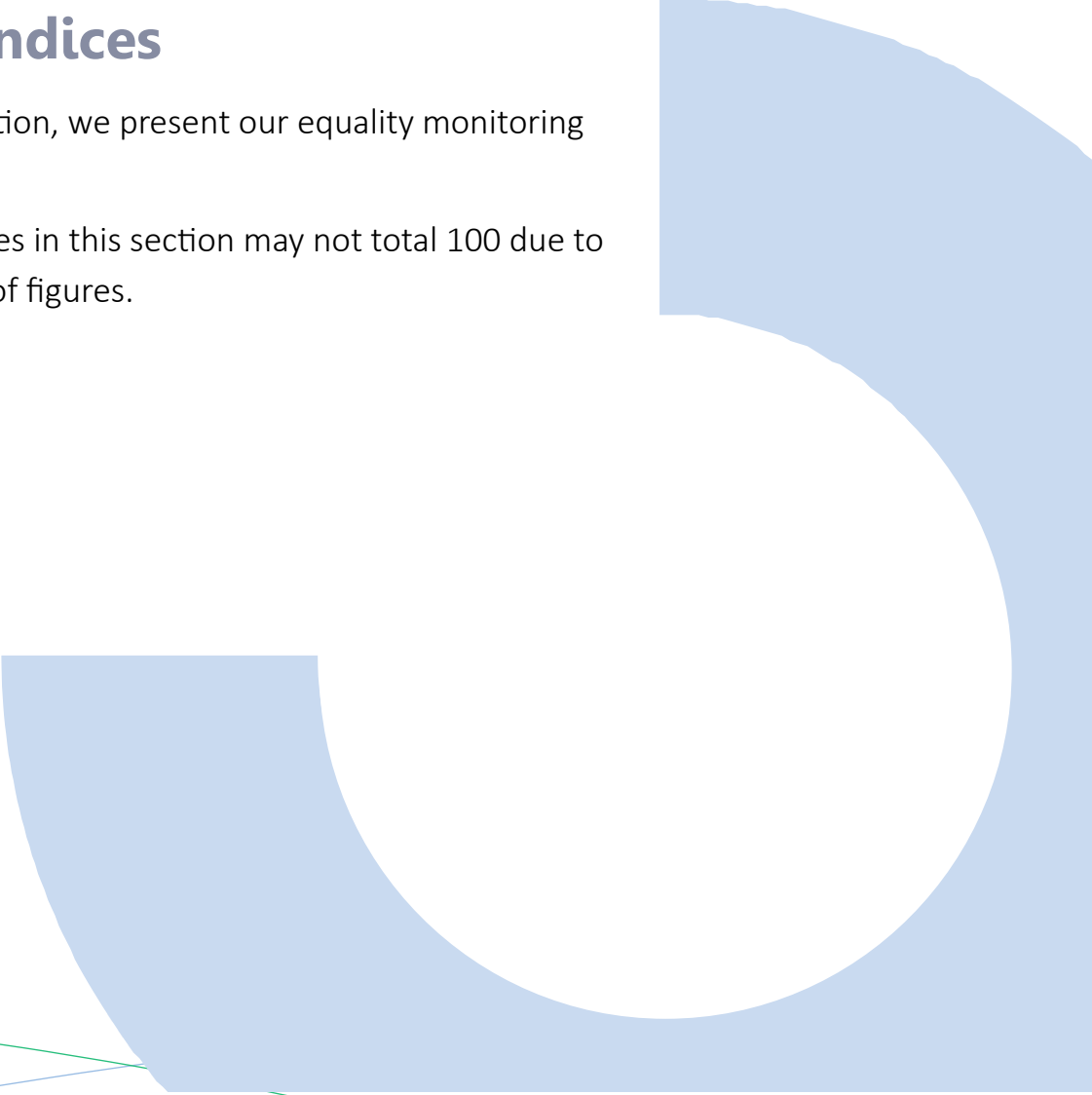


Part 3

Appendices

In this section, we present our equality monitoring data.

Percentages in this section may not total 100 due to rounding of figures.





Appendix 1: Equality profile of our complainants



[GRAPHICS TO BE ADDED]





The table below presents the equality profile of our complainants in 2019/20, compared to 2018/19. In 2019/20




- 890, or 36% of our new complaints were accompanied by equality data
- 77, or 1.6% of our new enquiries were accompanied by equality data
- 85% of all submissions of equality data (and 96% of those for which we recorded the method of contact) were made through our online web form.





Correction: In the data for 2018/19 published in our Equality Plan 2019-22, we stated that of the complaints received, 837 were accompanied by equality data (a response rate of 34%). This was incorrect. 837 was the total of all the data submissions for all cases - complaints *and* enquiries. The total of submissions for complaints alone was 752. This means that the response rate last year was 2018/19.

The 2018/19 figures below have been adjusted accordingly and all adjustments were marked in red. The adjustments were within 1 percentage point and did not affect the broader trends and themes in our data that we identified last year.

	2019/20	2018/19
	<p>Age</p> <ul style="list-style-type: none"> • Under 25: 2% • 25-34: 16% • 35-44: 22% • 45-54: 23% • 55-64: 20% • 65-74: 11% • 75 or over: 2% • PNS: 4% 	<ul style="list-style-type: none"> • Under 25: 4% • 25-34: 14% • 35-44: 22% • 45-54: 23% • 55-64: 21% • 65-74: 11% • 75 or over: 2% • PNS / NR: 3%
	<p>People under 25 remained under-represented among our complainants, compared to 11% of the Welsh population between 16 and 24 years old (ONS 2018). The representation of this group has declined compared to 2018/19. Although others may complain on behalf of young people, we would expect this group to be better represented.</p> <p>The proportion of people over 65 amongst our complainants also remained much lower than the Welsh average of 21% (ONS 2018). Although others may complain on behalf of older people, we would expect this group to be better represented—especially given that people in this age group are more likely than average to access health services (National Survey for Wales 2018/19).</p>	
	<p>The proportion of people over 55 has remained above the Welsh average (13%). This is positive, since research conducted for us by Beaufort Research (2020) suggested that people over 55 found it more difficult to complain to public bodies than average.</p>	

	2019/20	2018/19
	Gender	
	<ul style="list-style-type: none"> Female: 51% Male: 45% PNS: 4% 	<ul style="list-style-type: none"> Female: 48% Male: 49% PNS / NR: 3%
	The proportion of females amongst our complainants remained in line with the Welsh average (50.9%) (2011 Census).	
	Gender reassignment	
	<ul style="list-style-type: none"> Identified with the gender assigned at birth: 90% Did not identify with the gender assigned at birth: 1% PNS: 8% 	<ul style="list-style-type: none"> Identified with the gender assigned at birth: 85% Did not identify with the gender assigned at birth: 2% PNS / NR: 14%
	There is little reliable data on the size of the trans population in Wales. This makes it difficult to assess the representation of this group among our complainants. However, we are aware that this group may be particularly vulnerable, especially so with respect to access to healthcare.	
	National identity	
	<ul style="list-style-type: none"> Welsh: 48% English: 11% British: 31% Other: 3% PNS: 7% 	<ul style="list-style-type: none"> Welsh: 51% English: 13% Scottish: 1% British: 28% Other: 3% PNS / NR: 5%
	People of nationalities different to Welsh, English or British were under-represented amongst our complainants, compared to 5.7% of the Wales population overall in 2011 (2011 Census). We would expect this group to be better represented, given the research indicating that migrants may face barriers in accessing healthcare (2016 EHRC). Also, in 2018, non-EU born migrants were over twice as likely to describe themselves as members of a group that faces discrimination compared to EU-born migrants (19% vs. 8%). Furthermore, there was a sharp, temporary increase in EU migrants' perceptions of discrimination around the time of the EU referendum in 2016 (The Migration Observatory, 2020).	
	Ethnicity	
	<ul style="list-style-type: none"> White (all backgrounds): 89% Mixed or multiple ethnic group: 2% Asian or Asian British: 1% Black, African, Caribbean or Black British: 2% PNS: 5% 	<ul style="list-style-type: none"> White (all backgrounds): 92% Mixed or multiple ethnic group: 2% Asian or Asian British: 1% Black, African, Caribbean or Black British: 1% Other: 1% PNS / NR: 3%
	Representation of BAME people amongst our complainants has remained the same since 2018/19. At 5%, this group remains under-represented, compared to the Welsh average of 6% to 8% (StatsWales 2019 ; National Survey for Wales, 2018/19).	

	2019/20	2018/19
	Main language	
	<ul style="list-style-type: none"> English: 89% Welsh: 4% Other: 1% PNS: 6% 	<ul style="list-style-type: none"> English: 90% Welsh: 5% Other: 1% PNS / NR: 4%
	<p>The proportion of our complainants who stated that their main language was Welsh has marginally decreased since 2018/19, from 5% to 4%. This is much lower than the percentage of Welsh speakers in the population overall (19%) (2011 Census) or as much as 31% with some Welsh language ability (National Survey for Wales 2017/18). However, the survey question asks about the main language only. We intend to modify our complainant survey questions in April 2021 to include also questions about fluency in Welsh. This data should give us a more accurate picture of representation of Welsh speakers among our complainants.</p>	
	Disability	
	<ul style="list-style-type: none"> Yes: 24% No: 66% PNS: 10% 	<ul style="list-style-type: none"> Yes: 23% No: 71% PNS / NR: 6%
	Health problem or disability limiting day-to-day activities	
	<ul style="list-style-type: none"> Yes. limited a lot: 23% Yes. limited a little: 13% Not limited at all: 52% PNS: 11% 	<ul style="list-style-type: none"> Yes. limited a lot: 19% Yes. limited a little: 17% Not limited at all: 57% PNS / NR: 7%
	<p>Overall, the proportion of our complainants who identified as disabled in 2019/20 was in line with the Welsh average of 25% (UK Government - Department for Work and Pensions, 2019) and exceeded the Welsh average when more detailed questions were asked. We'd expect to see a high representation of this group, given that this group is more likely than people who are not disabled to access health services; and to face difficulties in access (National Survey for Wales 2018/19; Welsh Government 2015). Research conducted for us by Beaufort Research (2020) suggested also that disabled people found it more difficult than average to complain to public bodies.</p>	
	Marriage and civil partnership	
	<ul style="list-style-type: none"> I am married: 44% I am single: 32% I am in a civil partnership: 3% Other: 7% PNS: 14% 	<ul style="list-style-type: none"> I am married: 50% I am single: 28% I am in a civil partnership: 3% Other: 8% PNS / NR: 11%
	<p>The proportion of our complainants who were married or in a civil partnership has decreased compared to 2018/19. It appeared to exceed the Welsh average of 46.6% in 2011 (2011 Census), though fell a little short of later estimates of 50% (National Survey for Wales, 2018/19).</p>	




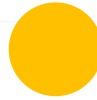

	2019/20	2018/19
	Sexual orientation	
	<ul style="list-style-type: none"> Heterosexual or Straight: 83% Gay or Lesbian: 3% Bisexual: 2% PNS: 12% 	<ul style="list-style-type: none"> Heterosexual or Straight: 86% Gay or Lesbian: 2% Bisexual: 1% Other: 1% PNS / NR: 10%
	<p>The proportion of our complainants who identified as LGB+ appeared increased marginally since last year. At 5%, it exceeded the cautious estimates of the proportion of this group within the Welsh population overall - 2.5% in 2017 (ONS 2019) and 4% in 2018/19 (National Survey for Wales 2018/19). However, it fell short of the other available estimates of the LGB+ population in the UK (10%) (YouGov 2019).</p> <p>Research in 2018 suggested that 13% of LGBT people have experienced some form of unequal treatment from healthcare staff because of their sexual orientation (Stonewall 2018). This could indicate that representation of this group amongst our complainants is too low and we will monitor this trend.</p>	
	Religion or belief – including lack of belief	
	<ul style="list-style-type: none"> Christian (all denominations): 39% No religion: 43% Muslim: 1% Buddhist: 1% Other: 3% PNS: 13% 	<ul style="list-style-type: none"> Christian (all denominations): 42% No religion: 43% Muslim: 1% Hindu: 1% Other: 4% PNS / NR: 9%
	<p>The proportion of our complainants who identified with no religion remained in line with the Welsh average (43%) (StatsWales 2015-17).</p>	
	<p>The proportion of people who followed religions other than Christianity has decreased slightly compared to 2018/19. It remained in line with the estimates of this group in the Welsh population overall - 5% in 2015-17 (StatsWales 2015-17). However, it was noticeable that this year, many more people also chose not to answer this question.</p>	
	<p>The proportion of people who identified as Christian decreased and remained lower than Welsh average in 2015-17 (53%) (StatsWales 2015-17).</p>	
	Pregnancy and maternity	
	We do not currently monitor this characteristic.	
	Working status	
	<ul style="list-style-type: none"> Employed or self-employed: 52% Retired from paid work: 18% Otherwise not in paid work: 17% PNS: 13% 	<ul style="list-style-type: none"> Employed or self-employed: 56% Retired from paid work: 19% Otherwise not in paid work: 14% PNS / NR: 11%
	<p>52% of our complainants—and 58% of those aged under 25 to 64 - were in employment. This was lower than the Welsh average in December 2019 for people aged 16-64 in Wales (73.5%) (StatsWales 2019).</p>	






Appendix 2: Equality profile of our workforce






[GRAPHICS TO BE ADDED]

Our workforce equality monitoring is conducted through an anonymous voluntary internal staff survey. In 2019/20, 63 out of 73 employees completed the survey (response rate 86%). This compares well to the response rate in 2018/19 (73%).

	2019/20	2018/19
	Age	
	<ul style="list-style-type: none"> Under 25: 5% 25 to 34: 19% 35 to 44: 30% 45 to 54: 30% 55 to 64: 16% 	<ul style="list-style-type: none"> Under 25: 6% 25 to 34: 12% 35 to 44: 29% 45 to 54: 33% 55 to 64: 20%
	Compared to 2018/19, in 2019/20 a lower proportion of our staff were under the age of 25. At 5%, this group remained under-represented in our workforce, compared to 11% of the Welsh population between 16 and 24 years old (ONS 2018). This is not a positive trend, since this age group is known to experience a comparatively low employment rate (50.4%) (EHRC 2018) and is believed to be more at risk of zero-hours contracts (ONS 2020) and material deprivation (EHRC 2018).	
	Although still above the Welsh average of 13% (ONS 2018), the proportion of people between 55 and 64 among our staff declined from 20% to 15.9%.	
	Gender	
	<ul style="list-style-type: none"> Female: 73% Male: 25% Prefer to use own term: 2% 	<ul style="list-style-type: none"> Female: 69% Male: 31%
	The proportion of females in our workforce exceeded significantly the proportion of this group in the Welsh population overall (50.9%) (2011 Census). This is a positive trend, since, as of September 2019, men in Wales were more likely than women to be in employment (StatsWales 2019).	
	Gender reassignment	
	<ul style="list-style-type: none"> Did not identify as trans: 98% PNS: 2% 	<ul style="list-style-type: none"> 100% identified with the gender as described at birth
	There is little reliable data on the size of trans population in Wales. This makes it difficult to assess the representation of this group in our workforce.	
	National identity	
	<ul style="list-style-type: none"> Welsh: 59% English: 5% British: 33% Other: 3% 	<ul style="list-style-type: none"> Welsh: 49% English: 10% British: 38% PNS / NR: 2%
	The proportion of individuals among our workforce identifying with nationalities different to Welsh, English or British increased from 0% to 3%. However, this group remained under-represented compared to 5.7% of the Wales population overall in 2011 (2011 Census) and 7.5% of Welsh full-time workers (Wales Centre for Public Policy, 2019).	

	2019/20	2018/19
	Ethnicity	
	<ul style="list-style-type: none"> White (all backgrounds): 94% Asian / Asian British: 3% Black / Black British: 2% PNS: 2% 	<ul style="list-style-type: none"> Black, African, Caribbean or Black British: 4% White (all backgrounds): 96%
	Representation of BAME people among our workforce increased marginally since 2018/19, from 4% to 5%. However, this group remained under-represented, compared to the Welsh average of 6-8% (StatsWales 2019; National Survey for Wales, 2018/19) and the representation of this population in our local area (8%)* (StatsWales 2019).	
	Main language	
	<ul style="list-style-type: none"> English: 79% Welsh: 16% Other: 2% PNS: 3% 	<ul style="list-style-type: none"> English: 83% Welsh: 12% PNS / NR: 4%
	Welsh language skills - fairly good or fluent	
	<ul style="list-style-type: none"> Speaking: 24% Reading: 27% Writing: 27% Understanding: 27% 	
	The proportion of people in our workforce who identified their main language as Welsh increased from 12% to 16% - although it remained lower than the percentage of Welsh speakers in the population overall (19%) (2011 Census) or as much as 31% with some Welsh language ability (National Survey for Wales 2017/18). However, the proportion of people with fairly good or fluent skills was much higher.	
	Disability	
	<ul style="list-style-type: none"> Yes: 5% No: 92% PNS: 3% 	<ul style="list-style-type: none"> Yes: 4% No: 94% PNS / NR: 2%
	Health problem or disability limiting day-to-day activities	
	We did not ask this question in 2019/20.	<ul style="list-style-type: none"> Yes. limited a lot: 4% Yes. limited a little: 6% Not limited at all: 88% PNS / NR: 2%
	Overall, people who identified as disabled remained under-represented in our workforce, compared to 21% of the Welsh working age population, rising to 22% in south east Wales (StatsWales 2015-17). This is not a positive trend, since in 2016/17, the employment rate for disabled people (34.6%) was much lower than for non-disabled people (73.4%). Disabled people were also more likely than non-disabled people to work in low-pay occupations (EHRC, 2018).	

* Blaenau Gwent; Bridgend; Caerphilly; Cardiff; Merthyr Tydfil; Monmouthshire; Neath Port Talbot; Newport; Rhondda Cynon Taf; Swansea; Torfaen; and Vale of Glamorgan.

	2019/20	2018/19
	Marriage and civil partnership	
	<ul style="list-style-type: none"> • Yes: 64% • No: 33% • PNS: 3% 	<ul style="list-style-type: none"> • Married or in a civil partnership: 59% • Single or other: 35% • PNS / NR: 6%
	<p>The proportion of people who were married or in a civil partnership among our workforce has increased compared to 2018/19 (64% compared to 59%). It exceeded the Welsh average of 46.6% in 2011 (2011 Census) and 50% in 2018/19 (National Survey for Wales 2018/19). This is overall a positive trend, since in 2018, single people were more likely to be employed than married people (EHRC 2018).</p>	
	Sexual orientation	
	<ul style="list-style-type: none"> • Gay or Lesbian: 5% • Heterosexual or Straight: 91% • PNS: 5% 	<ul style="list-style-type: none"> • Gay or Lesbian: 2% • Heterosexual or Straight: 96% • PNS / NR: 2%
	<p>The proportion of people in our workforce who identified as LGB+ has increased since last year (from 2% to 5%). It exceeded the cautious estimates of the proportion of this group within the Welsh population overall - 2.5% in 2017 (ONS 2019) and 4% in 2018/19 (National Survey for Wales 2018/19), but was lower than other available estimates of the LGB+ population in the UK (10%) (YouGov 2019).</p>	
	Religion or belief – including lack of belief	
	<ul style="list-style-type: none"> • No religion: 43% • Christian (all denominations): 46% • Muslim: 3% • Other: 2% • PNS: 6% 	<ul style="list-style-type: none"> • No religion: 53% • Christian (all denominations): 43% • Other: 2% • PNS / NR: 2%
	<p>The proportion of people in our workforce who identified with no religion has decreased since 2018/19 and is now in line with the Welsh average - 43% (StatsWales 2015-17).</p>	
	<p>The proportion of people who followed religions other than Christianity among our workforce increased compared to 2018/19 (5% compared to 2%). This is closer to the estimates of this group in the Welsh population overall - 5% in 2015-17 (StatsWales 2015-17). However, this year more people also chose not to answer this question.</p>	
	<p>The proportion of people who identified as Christian was slightly lower than Welsh average in 2015-17 (53%) (StatsWales 2015-17). However, it increased since 2018/19.</p>	
	Caring duties	
	<ul style="list-style-type: none"> • Yes: 52% • No: 48% 	
	<p>In line with broader trends (National Survey for Wales 2018/19; EHRC 2018), women were more likely than men to have caring duties (59% to 31%). Most of the staff who indicated that they had caring duties were carers for a child or children. Only a very small percentage of respondents indicated that they had caring duties noted that they were primary carers for someone because of disability, health condition or problems related to old age (6.4% compared to 25% Welsh average) (National Survey for Wales 2018/19).</p>	

Appendix 3: Equality profile of our job applicants



[GRAPHICS TO BE ADDED]




In 2019/20, 469 individuals applied for positions with us and 12 were recruited. 11 new employees were recruited on permanent contracts and 1 on a fixed term contract.

Equality data of job applicants is collected via anonymous forms, separate from the recruitment process.




Because of the way the data was collected in 2018/19, we were not able to differentiate between equality forms not returned by job applicants and 'prefer not to say' responses. As a result, we decided to remove these answers from the analysis. We know, however, that between 47% and 50% of respondents fell into one of these two categories.





We addressed this issue in 2019/20, clearly separating the forms not returned from 'prefer not to say' responses. This analysis enabled us to establish that we received equality forms from 92% of the candidates. The difference between the data analysis methods used in 2018/19 and 2019/20 means that comparisons between these two years must be made with caution.

2019/20		2018/19	
All candidates	Successful candidates	All candidates	
Age			
<ul style="list-style-type: none"> Under 25: 3% 25 to 34: 24% 35 to 44: 31% 45 to 54: 29% 55 to 64: 10% PNS: 3% 	<ul style="list-style-type: none"> Under 25: 7% 25 to 34: 36% 35 to 44: 29% 45 to 54: 29% 	<ul style="list-style-type: none"> Under 25: 9% 25 to 34: 20% 35 to 44: 31% 45 to 54: 27% 55 to 64: 12% 	
	<p>Compared to 2018/19, this year the representation of people under the age of 25 among our job applicants decreased significantly - from 9% to 3%. This is compared to 11% of Welsh population between 16 and 24 years old (ONS 2018). This is not a positive trend, since this age group is known to experience a comparatively low employment rate (50.4%) (EHRC 2018) and is believed to be more at risk of zero-hours contracts (ONS 2020) and food insecurity (EHRC 2018). This group was slightly better represented among the successful candidates, though still below the Welsh average.</p>		
	<p>The proportion of people between 55 and 64 years old among job applicants declined slightly and was in 2019/20 below the Welsh average of 13% (ONS 2018). Also, there were no people from this age group among the successful candidates. This is not a positive trend, since this group is known to experience lower employment rates (59%) (EHRC 2018).</p>		

2019/20		2018/19	
All candidates	Successful candidates	All candidates	
Gender			
<ul style="list-style-type: none"> Female: 64% Male: 34% PNS: 2% 	<ul style="list-style-type: none"> Female: 71% Male: 29% 	<ul style="list-style-type: none"> Female: 75% Male: 25% 	
	<p>The proportion of females among our job applicants and successful job applicants exceeded significantly the proportion of this group in the Welsh population overall - 50.9% (2011 Census). This is a positive trends, since data suggests that, in Wales, men were more likely to be economically active than women - 81% compared to 72% (ONS Annual Population Survey 2018)</p>		
Gender reassignment			
<p>This question was not asked during 2018/19 or 2019/20, but will be asked from April 2020 onwards.</p>			
National identity			
<ul style="list-style-type: none"> Welsh: 57% English: 3% British: 34% Scottish: 1% Other: 1% PNS: 2% 	<ul style="list-style-type: none"> Welsh: 64% British: 29% Other: 7% 	<ul style="list-style-type: none"> Welsh: 54% English: 3% British: 39% Other: 3% 	
	<p>Individuals identifying with nationalities other than Welsh, English or British continued to be under-represented among our job applicants – with a decrease from 3% in 2018/19 to 1% in 2019/20. This was compared to 5.7% of the Wales population overall in 2011 (2011 Census) and 7.5% of Welsh full-time workers (Wales Centre for Public Policy 2019). This said, this group was comparatively well-represented among the successful candidates.</p>		
Ethnicity			
<ul style="list-style-type: none"> White (all backgrounds): 88% Asian /Asian British: 2% Mixed or multiple ethnic group: 2% PNS: 8% 	<ul style="list-style-type: none"> White (all backgrounds): 86% Asian /Asian British: 7% Mixed or multiple ethnic group: 7% PNS: 0% 	<ul style="list-style-type: none"> White (all backgrounds): 90% Asian /Asian British: 5% Mixed or multiple ethnic group: 4% Other: 1% 	
	<p>Representation of individuals from ethnic backgrounds other than white among our job applicants has decreased since 2018/19, from 9% to 4%. This group was under-represented compared to the Welsh average of 6-8% (StatsWales 2019; National Survey for Wales 2018/19) and the representation of this population in our local area (8%)* (StatsWales 2019). This said, positively this group was comparatively well-represented among the successful candidates (14%).</p>		

* Blaenau Gwent; Bridgend; Caerphilly; Cardiff; Merthyr Tydfil; Monmouthshire; Neath Port Talbot; Newport; Rhondda Cynon Taf; Swansea; Torfaen; and Vale of Glamorgan

2019/20		2018/19	
All candidates	Successful candidates	All candidates	
Main language			
<ul style="list-style-type: none"> English: 88% Welsh: 8% Bilingual: 2% PNS: 3% 	<ul style="list-style-type: none"> English: 79% Welsh: 21% 	<ul style="list-style-type: none"> English: 90% Welsh: 6% Bilingual: 1% Other: 3% 	
	<p>The proportion of Welsh speakers or individuals who were bilingual among our job applicant increased slightly since 2018/19 – from 7% to 10%. However, it remained lower than the Welsh average of 19% Welsh speakers in the population overall, 14% in the 20-64 age group (2011 Census), and as much as 31% with some Welsh language ability (National Survey for Wales 2017/18). This said, Welsh speakers were very well-represented among the successful candidates.</p>		
Disability			
<ul style="list-style-type: none"> No: 88% Yes: 7% PNS: 4% 	<ul style="list-style-type: none"> No: 93% Yes: 7% 	<ul style="list-style-type: none"> No: 93% Yes: 7% 	
Health problem or disability limiting day-to-day activities			
<ul style="list-style-type: none"> Yes. limited a lot: 1% Yes. limited a little: 7% Not limited at all: 87% PNS: 6% 	<ul style="list-style-type: none"> Yes. limited a little: 14% Not limited at all: 71% PNS: 14% 	<ul style="list-style-type: none"> Yes. limited a lot: 1% Yes. limited a little: 6% Not limited at all: 93% 	
	<p>Overall, people who identified as disabled remained under-represented among our job applicants - 7% compared to 21% of the Welsh average in the working age population and 22% in south east Wales (StatsWales 2015-17). Although based on more detailed questions this group was much better represented among the successful candidates (14%), the proportion remained below the Welsh average also in that group.</p> <p>This is not a positive trend, since in 2016/17, the employment rate for disabled people (34.6%) was much lower than for non-disabled people (73.4%). Disabled people were also more likely than non-disabled people to work in low-pay occupations (EHRC 2018).</p>		
Marriage and civil partnership			
<ul style="list-style-type: none"> Yes: 50% No: 46% PNS: 4% 	<ul style="list-style-type: none"> Yes: 57% No: 43% 	<ul style="list-style-type: none"> Yes: 45% No: 55% 	
	<p>The proportion of married people among our job applicants increased compared to 2018/19. It was slightly lower than the Welsh average of 46.6% in 2011 (2011 Census) but in line with a more recent estimate of 50% (National Survey for Wales 2018/19).</p>		

2019/20		2018/19	
All candidates	Successful candidates	All candidates	
Sexual orientation			
<ul style="list-style-type: none"> Heterosexual or Straight: 88% Gay or Lesbian: 3% Bisexual: 2% PNS: 6% 	<ul style="list-style-type: none"> Heterosexual or Straight: 100% 	<ul style="list-style-type: none"> Heterosexual or Straight: 93% Gay or Lesbian: 5% Bisexual: 2% 	
	<p>The proportion of our job applicants who identified as LGB+ fell compared to last year (from 7% to 5%). It still exceeded the cautious estimates of the proportion of this group within the Welsh population overall - 2.5% in 2017 (ONS 2019) and 4% in 2018/19 (National Survey for Wales 2018/19), but was lower than other available estimates of the LGB+ population in the UK (10%) (YouGov 2019). Furthermore, this group was not represented at all among the successful candidates.</p>		
Religion or belief – including lack of belief			
<ul style="list-style-type: none"> No religion: 51% Christian (all denominations): 37% Buddhist: 1% Muslim: 1% Other: 1% PNS: 8% 	<ul style="list-style-type: none"> No religion: 50% Christian (all denominations): 43% Muslim: 7% 	<ul style="list-style-type: none"> No religion: 58% Christian (all denominations): 36% Buddhist: 1% Hindu: 1% Muslim: 1% Other: 2% 	
	<p>The proportion of people who followed religions other than Christianity among our job applicants decreased compared to 2018/19 (from 5% to 3%). In 2019/20, it was lower than the estimates of this group in the Welsh population overall - 5% (StatsWales 2015-17). However, this group was better represented amongst the successful candidates (7%).</p>		
	<p>The proportion of people who identified with no religion (51%) exceeded the Welsh average in 2015-17 (43%) (StatsWales 2015-17). However, this could be influenced by the age profile of job applicants. 58% of our job applicants were between 16 and 44 years old. For this age group, the Welsh average of people with no religion was higher, at 56% (StatsWales 2015-17).</p>		
	<p>The proportion of people who identified as Christian was lower than the Welsh average in 2015-17 (53%) (StatsWales 2015-17) - though, again, broadly consistent with the proportion of people who identified as Christian in the 16 to 44 age group (39%).</p>		
Pregnancy and maternity			
<p>We do not currently monitor this characteristic as part of the recruitment process. This is to avoid any concerns by the applicants that this characteristic could influence the process.</p>			

Appendix 4: Gender breakdown by salary and role, contract type and working arrangement

As we have a large number of grades, some with a single post holder, the table below provides the gender breakdown of staff by salary and role:

Role	Salary (FTE)	Male	Female	Total	% Male	% Female
Administrative and frontline staff	£19k - £31k	2	17	19	11%	89%
Investigation Officers and Support Service Managers	£32k - £44k	9	26	35	26%	74%
Improvement Officers and Managers	£45k - £57k	5	8	13	38%	62%
Senior Managers	£58k +	2	3	5	40%	60%
	Total	18	54	72*	25%	75%

* The total number of employees in this table does not include the Ombudsman

At 31 March 2020, there was 1 member of staff on a fixed term contract and 72 on permanent contracts. 22 members of staff worked part-time (18 female and 4 male).

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