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# Equality Plan 2023-2026

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November 2023



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# **Equality Plan 2023-2026**





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## Our role

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**We have three main roles:**



**We investigate complaints about public services.**

**We consider complaints about councillors breaching the Code of Conduct.**



**We drive systemic improvement of public services and standards of conduct in local government in Wales.**



## Our ambition



People of Wales feel that public services treat them fairly and respond when things go wrong.



Welsh public services listen to individuals and use their complaints to learn and improve.



Welsh local government is trusted to deliver the highest standards of conduct.



The Public Services Ombudsman for Wales continues to be an influential and respected voice in public service improvement.

## Our principles

We are

- independent
- impartial
- fair
- open to all who need us.

# Legal background

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## 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

Listed bodies in Wales, including our office, also have 'specific duties' to help them comply with the general duty.

Under those duties, 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 the 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. This duty was introduced in Wales in March 2021.

We are not one of the organisations required to comply with the socio-economic duty. 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 fully embrace the Welsh language and we want to make sure that we treat it no less favourably than English in all aspects of our work and that we meet the needs of Welsh speakers. You can read our revised Welsh Language Policy on our website ([click here](#)).

# The scope of this Plan

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## Context

Our previous Equality Plan covered the period from 2019 to 2022. It identified 11 Equality Objectives, related to how we deliver our complaints service, how we embed equality considerations into our improvement work and how we work as an employer. You can find that Plan [here](#).

In 2020, we also developed our 'Race and Ethnicity at Work Charter'. We did that against the backdrop of the Black Lives Matter Protests, to strengthen our contribution to race equality, justice and inclusion in Wales. The Charter included some further and more detailed steps to support our complainants and our staff from ethnic minority backgrounds. You can find that Charter [here](#).

In 2022, we extended the Plan and the Charter for a year, as we started to work on our new Strategic Plan setting the direction for the office for 2023-2026.

We completed many actions that we had committed to under the Plan and the Charter. For example, we improved how we collect equality data and started new and useful conversations with organisations across Wales representing communities that rarely complain to us. We updated our Equality Impact Assessment procedure and started to apply it when planning our investigations on our own initiative. We significantly reduced our mean and median gender pay gaps. We also increased the ethnic diversity of our workforce and our Advisory Panel.

However, we did not have the impact that we wanted to have in all respects. The profile of our complainants did not change noticeably during the lifetime of the Plan. Some groups remain under-represented among our staff – for example, very few people identify as disabled. We also know that there is more for us to do to ensure that no groups face barriers when using our service.

## **Our new Equality Plan**

We developed our Equality Plan to support the delivery of our new Strategic Plan 2023-2026 and its mission: to have a positive impact on people and public services in Wales.

To achieve this, we will structure our work under this Plan based on the following principles:

### **Targeted and focused**

We do not have the capacity or resources to reach all communities or to address every area that we could potentially improve. We must target and prioritise our work under this Plan, based on our understanding of areas that require most attention and where we can have most impact.

### **Impact-oriented**

We understand that it is sometimes difficult to capture the impact of our work and that, in many areas, we may be able only to influence change. However, we will be transparent about the intended impact of our work under this Plan and clear on how we intend to measure it. Every year, we will include the relevant actions and targets under this Strategy in our Business Plan and we will monitor our performance.

### **Streamlined**

Our Equality Plan is aligned to and, in some respects, reiterates the steps under our other strategic documents – for example, our People Strategy and our Communications and Engagement Strategy. This ensures that we embed attention to equality across our work but do not duplicate our efforts. Our new Equality Plan will also integrate some actions from our current Race and Ethnicity at Work Charter.

Our Equality Plan will contribute to all four aims of our Strategic Plan:

### **Strategic Aim 1: Delivering justice with a positive impact for people and public services**

This Plan will help us ensure that, whenever we can, we support people with additional access needs to use our complaints service. It will also shape how we gather views on our service from under-represented groups and how we act on feedback.

### **Strategic Aim 2: Increasing accessibility and inclusion**

This Plan will set out how we will work to raise awareness and understanding of our office to ensure equal and equitable access to our service. It will also support us in developing new and accessible resources responding to the needs of our target equality groups.

### **Strategic Aim 3: Increasing the impact of our proactive improvement work**

This Plan will help us to ensure that lessons from our complaints and own initiative investigations lead to better services for all communities in Wales, including those that are most disadvantaged. We will also continue to explore how we can improve the accessibility of local complaints processes.

### **Strategic Aim 4: Ensuring that we are a healthy, efficient and accountable organisation**

This Plan will support us in recruiting, retaining and developing a diverse workforce, that is more representative of the communities that we serve.

# How we prepared this Equality Plan

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When preparing this Plan, we followed several steps. We:

- evaluated our performance under our previous Equality Plan
- analysed the equality and pay data that we collect from our service users and staff
- looked at broader equality data and research, for example, from the Office for National Statistics, the statistics division of the Welsh Government and the UK Government Equalities Office guidance.

We also drew on the preliminary data to be published by the Equality and Human Rights Commission in its next 'Is Wales Fairer?' Report 2023. Unfortunately, there is very little research available on the experiences of different groups when using public services and on their experiences of the administrative justice system.

We also consulted on this Equality Plan with:

- Our Management Team
- Our Equality Group
- Our staff
- The Welsh public and organisations supporting equality groups, through open consultation.

Finally, we also considered the responses we received during our previous consultation on our Strategic Plan 2023-2026 (to see the summary of responses, [click here](#)).

# Our Equality Objectives

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Our Objectives under this Equality Plan will be:

## Strategic Aim 1: Delivering justice with a positive impact for people and public services

1. Ensure that we support people with additional access needs to use our complaints service.
2. Help to improve our services and impact through better engagement with equality groups.

## Strategic Aim 2: Increasing accessibility and inclusion

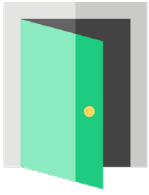
3. Raise public awareness of the office and its role and powers among groups under-represented among our complainants.
4. Maintain and develop more accessible information explaining who we are and how we work.

## Strategic Aim 3: Increasing the impact of our proactive improvement work

5. Through our Complaints Standards role, seek to influence positively the accessibility of local complaints processes.

## Strategic Aim 4: Ensuring that we are a healthy, efficient and accountable organisation

6. Work to improve representation of target groups among our workforce.
7. Continue to monitor our gender pay gap and identify any opportunities to reduce it further.



## 1. Ensure that we support people with additional access needs to use our complaints service.

This Objective is especially relevant to people who may experience barriers to access, such as older people, disabled people, people from diverse ethnic and national backgrounds, Welsh speakers and people who experience socio-economic disadvantage.

### How we will know we have made a difference

What we want to see	How we will measure this
People agree that we are accessible	Service user assessment
People agree that we meet their requests for additional support	Service user assessment
Increased use of our Welsh language service	Our casework data monitoring
Our staff feel confident to offer and deliver additional support	Staff survey

## Where we are now

We want to make sure that we offer a fair and equal service to all. We were glad to see that, in 2022/23, 87% of our complainants that we asked said that it was easy to contact us – compared to 80% in the previous year. However, based on the feedback we gather every year from advice and advocacy bodies, we understand that some groups – for example, people with learning disabilities – may still struggle to use our service. We are also conscious that some groups – for example older people, disabled people or people experiencing socio-economic disadvantage – may be more likely to struggle to access our service through digital channels.

There are many ways in which we can help people to complain to us. Most people complain to us online, by email or by post. However, since 2019, we can also accept complaints that are not in writing. In 2021/22, we took 221 oral complaints, though in 2022/23, this number decreased to 160.

We are also committed to asking everyone who complains to us if they need help and support. For example, we can offer documents in different

formats, arrange translation into different languages, or signpost people to relevant advice or advocacy bodies. In 2022/23, 79 people asked us to make some additional adjustments to help them use our service. We welcome these requests. However, we believe that there may be more people who would benefit from adjustments, given that about 25% to 30% of our service users tell us, through our anonymous equality monitoring, that they are disabled.

We fully embrace the Welsh language and we want to make sure that we treat it no less favourably than English in all aspects of our work and that we meet the needs of Welsh speakers. You can read our revised Welsh Language Policy on our website.

People who complain to us can deal with us in Welsh, if they wish. However, in 2022/23, only 26 people chose that option.

## Where we want to be

We are happy that most people say that our service is accessible. However, our ambition is to make our service accessible for everyone.

We know that our oral complaints service is demand-led. However, as part of our future communications and engagement work, we will be highlighting the option to complain to us other than in writing, especially when targeting groups that may be at risk of digital exclusion.

We are also confident that we can satisfy most requests for additional support. However, we want to be more proactive in how we offer this support, by raising public awareness of what we can do, as well as helping our staff understand when support may be needed and how to provide it.

Finally, we want to change how Welsh speakers use our service. Although we know that even fluent Welsh speakers often choose to use public services in English (for example, see research by [Citizen's Advice](#)), we want to do more to promote our Welsh language service.

## How we will get there

Under this Equality Plan, we will:

- create new resources to raise public awareness of support that we can offer and of our Welsh language service
- revise our internal process guiding how we monitor additional needs and offer support
- organise regular training for staff to raise awareness of how best to support different equality groups.



## 2. Help to improve our services and impact through better engagement with equality groups.

This Objective is relevant to young people, disabled people, people from diverse ethnic and national backgrounds, Welsh speakers and people with lower educational attainment.

### How we will know we have made a difference

What we want to see	How we will measure this
More extensive feedback from our service users identifying with different groups	At least one call for evidence launched by us per year and suggested improvements considered internally

### Where we are now

We already undertake extensive relevant research and engagement to understand how people feel about our service. Every two years, we commission a national awareness survey of the Welsh public. Every year, we organise a telephone survey of a representative sample of our complainants. We also hold Sounding Boards with bodies in our jurisdiction and with advice and advocacy bodies to gather feedback about on service. In 2022, we held, for the first time, a survey of bodies in our jurisdiction. Although the uptake has been very limited, the results were a valuable source of information and insight.

However, we do not generally receive or gather feedback specifically from our service users from diverse communities or with specific access needs. This feedback could help us understand how to better target and support these groups.

We also do not gather feedback from people with Welsh language skills who could use the service in Welsh but do not choose to do so. Their feedback could help us understand why only a very small number of people access our service in Welsh.

## Where we want to be

We want to ensure that we continue to gather high quality evidence that supports us to improve. Also we want to understand how under-represented groups feel about our service and what barriers they may be experiencing.

## How we will get there

Under this Equality Plan, we will:

- work to undertake more focused research and engagement with users of our services identifying with different equality groups (including Welsh language speakers).



### 3. Raise public awareness of the office and its role and powers among groups under-represented among target groups.

This Objective is especially relevant to young people, disabled people, people from diverse ethnic and national backgrounds, Welsh speakers and people with lower educational attainment.

#### How we will know we have made a difference

What we want to see	How we will measure this
An increase in the proportion of people who know about our office, especially among the younger respondent group	National awareness survey (2024 and 2026)
Better representation of our target groups among our complainants	Our equality monitoring

#### Where we are now

We serve the Welsh public and people across Wales need to know about us and understand how we can help them. However, the public awareness survey that we undertook in 2022 showed that awareness of the office had dropped to 43%, from 48% in 2020, including among groups such as older people, people from diverse ethnic backgrounds, Welsh speakers and disabled people.

We also know from our equality data that some groups are consistently under-represented among our complainants (see details of the profile of our complainants in Annual Equality Report).

#### Where we want to be

Our ambition under this objective is to ensure that diverse communities in Wales know about our service and understand what we can and cannot do.

We understand that not all people we reach may currently have a reason to use our service. Also, as people need first to complain about any issues directly to the public service provider, we understand that there may be a delay before the communities that we target approach us.

Nevertheless, our ambition is to see a change in the profile of our complainants, with diverse communities being noticeably better represented.

### **How we will get there**

Although, under our previous Equality Plan, we sought to better target under-represented groups, the profile of our complainants has not changed significantly since 2019.

We know that to attract more diverse groups to use our service we need to work differently.

Under this Equality Plan (as well as our Communications and Engagement Strategy), we will:

- seek to undertake more targeted face-to-face outreach
- undertake extensive engagement with key 'gatekeepers' (such as advice and advocacy bodies, parliamentary stakeholders and others) to better reach our target communities
- create more accessible resources explaining what we do and promote those resources better to our key audiences.

We do not have the capacity to reach all communities in equal measure. Under this Plan, we will therefore focus on specific groups, identified as priorities based on our review of research and equality monitoring (see overleaf).

## Our target communities

### Young people

Only 3% of people who complained to us in 2022/23 (and shared their equality data) were under 25 – compared to 12% of the Welsh population aged 15-24. Awareness of our office among this group is also lower than average (30%, compared to 43% in 2022).

This is despite the fact that there is an increasing demand among this group for some health services, such as mental health services. We also know that people in this group can be especially vulnerable as they experience highest unemployment and are more likely to be living in poverty, so they may be especially in need of additional support.

### People from diverse ethnic and national backgrounds

4% of people who complained to us in 2022/23 (and shared their equality data) said they were from diverse ethnic backgrounds and 3% said they were from diverse national backgrounds.

This does not represent the demographic profile of Wales in 2021 (6.3% and 5.4% respectively). Also, awareness of our office among diverse ethnic groups dropped between 2020 and 2022. We know that these groups are more likely to be vulnerable – for example, experience material deprivation – and more likely to experience barriers to using public services.

### Disabled people

30% of people who complained to us in 2022/23 (and shared their equality data) said they were disabled. This was much higher than the Welsh average of 21.6%. 42% said they were limited in their everyday life by a health problem or disability.

However, although people in this group are well-represented among our complainants and comparatively well aware of our office, we know that they are likely to make more use of public services (such as healthcare) and may face barriers when using those services. For example, in our own national awareness research, 67% people in this group said they found it difficult to complain to their local council, a healthcare provider or a social landlord – compared to 52% respondents overall.

## Our target communities

### Welsh speakers

4% of people who complained to us in 2022/23 (and shared their equality data) said that Welsh was the first language of their household. This group is under-represented compared to 17.8% of people in Wales who identified as Welsh speakers in the 2021 Census. We suspect that many more people complaining to us had Welsh language skills (we only ask about the main language of the household). We also know that Welsh speakers are more likely to be aware of our office. However, based on the data available to us, we will work to ensure that more Welsh speakers use our service.

### People experiencing socio-economic disadvantage

38% of people who complained to us in 2022/23 (and shared their equality data) said they had a degree qualification or equivalent. This was above the Welsh average of 31% and suggests that people with lower educational attainment may not know about us or may struggle to use our service. This may include younger people, disabled people or people from some ethnic backgrounds such as Gypsy, Roma and Irish Traveller.

To ensure as much impact as possible, we will focus our awareness raising work on events and areas where our target communities are especially well represented. We can identify the areas of particular interest based on the most recent research, including the Census 2021 data.

Although we must be mindful of our limited capacity and resources, we will aim to be visible and active across Wales.



## 4. Maintain and develop more accessible information explaining who we are and how we work.

This Objective is especially relevant to people who may experience barriers to access, such as older people, disabled people, people from diverse ethnic and national backgrounds, Welsh speakers and people with lower educational attainment.

### How we will know we have made a difference

What we want to see	How we will measure this
Better uptake of our digital resources	Google Analytics
Positive feedback from advice and advocacy partners	Feedback gathered through Sounding Boards
Increased engagement with our social media content	Individual platform analytics

### Where we are now

It is essential that our communications channels and content are accessible. Our communications will sometimes need to be tailored to the needs of specific groups.

Our key digital resource is the website. The current website is strongly focused on directing people to our complaint form and, although it holds

much more information relevant to various stakeholders, that information is often not easy to find and may not be presented accessibly. Beyond that, we have started to produce some more visual resources to present our work (e.g. a video summarising our Annual Report).

Our current communications activity centres on the use of our social media platforms: X, LinkedIn and Facebook. The former two platforms

have been going from strength to strength, although we are mindful that there is more we can do to ensure better engagement with our content. However, our Facebook account is underused and engagement on that platform is poor.

We currently design all our digital publications in-house (except for 'Easy Read' versions).

We produce very little printed material. Paper forms and factsheets are available for complainants on demand. We are occasionally asked for large print versions of our resources and we produce those versions on demand.

We regularly provide news and information to media organisations, through press releases, interviews and videos. We also sometimes publish articles in the press.

## Where we want to be

We know that we need to focus more on the content that we produce and the communications channels that we use.

Our customer satisfaction research results in 2022 showed a decrease in the proportion of people who agreed that we were accessible (80%, compared to 92% in 2021).

The feedback that we gathered through our annual Sounding Board session confirmed that we need to do more to improve our accessibility, emphasising especially the need for more visual and interactive resources. It also pointed to the need for some printed resources, which may also be required to support more face to face outreach. Feedback on this Plan also highlighted the need to help the communities that may be more at risk of digital exclusion, such as older people.

## How we will get there

Under this Equality Plan (as well as our Communications and Engagement Strategy), we will:

- expand our use of social media platforms, including by undertaking a review of our activity and good practice, to increase engagement with our content by target equality groups.
- start producing, where appropriate, more printed resources and sustainable giveaway items that can be distributed to our stakeholders and shared at events
- reorganise and simplify our website content, with an emphasis on user journey and accessibility support
- develop new accessible digital formats (such as videos / podcasts) to improve the understanding of our role and processes
- produce translations of key resources into community languages, including British Sign Language (BSL)
- explore new channels for the publication of our work, including community press and stakeholder newsletters
- Work to use Plain English / Cymraeg Clir consistently, except where this is not possible, for legal reasons.



## 5. Through our Complaints Standards role, seek to influence positively the accessibility of local complaints processes.

This Objective is relevant to all equality groups.

### How we will know we have made a difference

What we want to see	How we will measure this
More public bodies recording and providing information on protected characteristics of complainants	Through complaints data collected under our complaints standards powers

### Where we are now

In 2019, we gained new powers to proactively improve how public bodies handle complaints. Under our previous Equality Plan, we committed to ensuring that equality is embedded in the planning and implementation of these new powers. This included checking that our own training and guidance was accessible.

Since then, we have offered hundreds of training sessions to organisation about good complaints handling.

We have also brought 51 public bodies in Wales under our model complaints policy – our Complaints Standards. When local councils, Health Boards and social landlords handle complaints, we expect them to be flexible when responding to complainants' differing needs.

However, recent research by the EHRC has suggested that the complaints processes of local councils are not accessible enough and that many do not collect and analyse data on the protected characteristics of people making informal complaints.

## Where we want to be

We want to support better collection and analysis of equality data by organisations under our Complaints Standards. This would not only help these organisations to better support complainants, but also help us to understand to what extent the profile of people using our service reflects the profile of people complaining about Welsh public services.

## How we will get there

Under this Equality Plan, we will:

- use our Complaints Standards powers to gather more evidence on complainant equality monitoring by public service providers in Wales
- promote better collection and analysis of equality data.



## 6. Work to improve representation of target groups among our workforce.

This Objective is especially relevant to young people, disabled people, people from diverse national backgrounds and trans people.

### How we will know we have made a difference

What we want to see	How we will measure this
Better representation of target groups	Equality monitoring of our staff and job candidates
Assurance that our recruitment process is accessible	Feedback from our job candidates

### Where we are now

We serve the people of Wales and we want our workforce to be representative of the Welsh public.

Some groups are well-represented among our workforce. Positively, in 2023:

- 7.5%\* of our staff said they identified with diverse ethnic backgrounds. For comparison, 5.3% of the Welsh population of working age identified with diverse ethnic backgrounds, whilst 4% identified with diverse ethnic backgrounds and were economically active (StatsWales 2023).

- 74% of our staff were female. This continues to be a positive trend, since men in Wales are more likely than women to be in employment (StatsWales 2020).
- at 17%, the proportion of staff between 55 and 64 was well above the Welsh average of 13%.
- 4% of our staff told us that they identified with diverse sexual orientations. This significantly exceeded the representation of this group according to the 2021 Census (3%), though 7.6% of people did not respond to this Census question.

- 6% of staff told us that they identified with diverse religions. This was higher than the Welsh average of 4% (2021 Census).
- 14%\* of our staff told us that Welsh was the first language of their household. However, the proportion of people who had fluent or fairly good Welsh language skills was much higher – between 26% and 30%.

However, some groups remained under-represented:

- Only 5% of our staff identified as disabled – compared with 4% in 2019. For comparison, in 2023, about 37% of Welsh people of working age identified as disabled, and 15% identified as disabled and economically active (StatsWales 2023).
- Only 4% of our staff identified with diverse national backgrounds (this measure is different to ethnic backgrounds). This was compared to 6.9% of Welsh residents estimated to be born outside of the UK (Welsh Government) and 7.5% of Welsh full-time workers (Wales Centre for Public Policy 2019).

- Only 1% of our staff were under 25 – compared with 6% of the Welsh population aged 20-24 (Statista).
- No staff member identified as trans.

Due to limited response rate, we were not able to report on the equality profile of our job applicants in 2022/23.

However, in 2021/22, 6% of our job applicants who shared this information said they were from diverse ethnic backgrounds and 7% of shortlisted candidates were from those backgrounds.

Yet, the proportion of candidates identifying with nationalities different to Welsh, English or British was low, at 3%. Also, only 9% of candidates told us that they were disabled.

\* The figures in this section account also for staff on maternity leave and bank workers. As a result, the representation of staff from diverse ethnic backgrounds and whose first language is Welsh varies slightly compared to the figure in our Annual Report 2022/23.

## Where we want to be

For us to reflect the diversity in society, our aim is to attract more applicants from diverse backgrounds.

## How we will get there

We now have in place our new People Strategy which focuses on three elements: Attraction, Retention and Development.

Under that Strategy – and this Equality Plan - we will:

- advertise our opportunities in new, innovative styles and across a variety of media, in a way that enables us to attract a wider range of applicants from diverse backgrounds and who can evidence the essential criteria of the role advertised
- ensure our recruitment processes (both internal and external) are accessible, relevant, visual (wherever possible) and sensitive to candidates needs as appropriate. Tailor our application process to ensure any potential barriers for candidates are removed at the earliest possible stages and throughout the recruitment process.
- maximise outreach opportunities to target groups by including what we can offer as an employer. This will ensure we gather feedback on our processes to ensure they remain relevant and accessible and may include, where appropriate, opportunities for shadowing.



## 7. Continue to monitor the gender pay gap and identify any opportunities to reduce it further.

This Objective is especially relevant to people who identify as female.

### How we will know we have made a difference

What we want to see	How we will measure this
Gender Pay Gap remains small or is reduced	Staff equality monitoring and pay analysis

### Where we are now

Under specific duties in Wales (see section 1 above) we must look in our Equality Plan at the Gender Pay Gap in our organisation.

In 2019, when we prepared our last Equality Plan, our mean Gender Pay Gap was 23% and our median Gender Pay Gap was 21%.

In March 2023, our mean Gender Pay Gap was 12% and we had no median Gender Pay Gap. For comparison, Chwarae Teg estimated that the median Gender Pay Gap in Wales in 2021 was 12.3%.

We are delighted with this progress. However, we are aware that, in a relatively small organisation, individual recruitment outcomes can make apparently large differences. For example, an appointment of one senior female manager could significantly affect the overall Gender Pay Gap. Equally, more appointments of men in junior roles would also affect the pay balance. Therefore, although we know it is important that we closely monitor our Gender Pay Gap, we know that it is difficult for us to directly control it.

## Where we want to be

We want to maintain our progress towards closing our gender pay gap. This needs to include ensuring that our working arrangements are sufficiently flexible and that we encourage progression for our current staff.

## How we will get there

We will:

- support our female and male staff so all are well-placed to progress within the organisation when opportunities arise
- monitor our Gender Pay Gap.

## How we will monitor our work under this Plan

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Our **Management Team** has the overall responsibility for the strategic direction and governance of the office.

Our **Chief Operating Officer** and Director of Improvement ensures that the way we work complies with all legal, statutory and good practice guidance requirements under the Equality Act 2010, the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and our Welsh Language Standards.

Day to day responsibility for the monitoring of delivery of this Plan sits within our **Improvement Team**.

Our **Head of Policy, Communications and Equality Diversity and Inclusion (EDI)** is responsible for evaluating and reporting on our work during the year. This includes regular monitoring of the equality profile of our complainants.

In these responsibilities, the Head of Policy, Communications and EDI will be supported by our internal staff **Equality Group**.

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

# How we will identify, collect and publish relevant information

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To create this Plan and evaluate our performance, we rely on several sources of data.

## People who use our service

We invite our complainants to share quality data with us through our online complaint form, a survey on our website, paper forms or telephone survey. In 2022, the response rate through all these channels was 41%.

We analyse this data every three months to capture any changes in the profile of our complainants. We publish this general profile every year in our Annual Equality Report.

## Our staff

We conduct an annual staff equality survey. We can attribute the responses to individual HR records and so can analyse this data by use of grievance and disciplinary process, as well as by the profile of our staff who completed the recommended hours of Continuous Professional Development (CPD). In 2022, 94% of staff responded to that survey.

We also gather and analyse information about the gender pay gap and gender breakdown by salary and role, contract type and working arrangements.

We publish the general equality profile of our staff every year in our Annual Equality Report. We also publish information about the gender pay gap and gender breakdown by salary and role, contract type and working arrangement.

However, historically, we have not published equality information related to the use of our grievance and disciplinary process. This is because the process is used very rarely, and publishing this information could help to identify the individuals involved.

## Our job candidates

We invite all people who apply to join us to take part in our equality survey. In 2022/23, 12% of candidates responded to that survey. We analyse this data every year to capture any changes in the profile of our complainants and we publish it, if appropriate, in our Annual Equality Report.

## How we will assess and monitor the impact of policies and practices and publish any assessment reports

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We have in place an Equality Impact Assessment (EIA) Policy and Procedure. It includes the consideration of impacts on equality, socio-economic disadvantage, and the Welsh language.

We apply this procedure to assess our policies (new or revised), major projects and decisions, as well as some of our general functions. We have applied it to assess topics for both our investigations to be undertaken on our own initiative.

We publish all our full EIAs on our website [here](#). We also publish summaries of these EIAs in our Annual Equality Report.

# How we will promote staff knowledge and awareness of our equality duties and identify training needs in relation to those duties

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We want to create an environment where everyone feels that they are treated fairly and have equal access to opportunities.

Every year, we undertake an internal staff survey, in which we ask staff, among others, if they agree that they were well-informed about the equality work. In 2022, 85% of our staff who responded agreed.

For all new starters, we have a separate induction module which explains our equality and Welsh language duties.

Beyond that, we use our internal communications channels to let our staff know on an ongoing basis about relevant equality, diversity and inclusion awareness days as well as any training opportunities or events related to equality, diversity and inclusion.

We identify training needs through our annual appraisal process. As part of the process, objectives are developed and agreed for the year ahead and any training and development needs are identified as part of this process. Those needs are incorporated into the annual Corporate Training Plan. Since 2021, we have been encouraging our staff to set at least one equality-related objective.



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