

April 2018

Archwilydd Cyffredinol Cymru  
Auditor General for Wales

# Strategic Equality Plan

Joint Strategic Equality Plan of the Auditor General for Wales  
and Wales Audit Office



WALES AUDIT OFFICE  
SWYDDFA ARCHWILIO CYMRU



This plan has been prepared in accordance with the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

If you require this publication in an alternative format and/or language, or have any questions about its content, please contact us using the details below.

We welcome correspondence in Welsh and English and we will respond in the language you have used. Corresponding in Welsh will not lead to a delay.

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This document is also available in Welsh

# Contents

Foreword	4
Summary of our equality objectives	5
Who we are	6
How the Equality Act 2010 and Welsh regulations affect us	8
How we developed our equality objectives	10
Our equality objectives for 2018 to 2022	12
<b>Appendices</b>	
Appendix 1 – Impact assessment arrangements	26
Appendix 2 – Promoting knowledge and understanding	28

# Foreword

This Strategic Equality Plan sets out the key things that the Auditor General and the Wales Audit Office are committed to doing over the next four years in order to help eliminate discrimination, advance equality of opportunity and foster good relations.

The Auditor General's main functions involve examining and reporting on the stewardship of public money by Welsh public bodies. When undertaking this work we consider how well public bodies are run and the effectiveness of their services. The Auditor General is therefore in a position to identify opportunities for helping to eliminate discrimination and promote equality of opportunity in the delivery of public services. In reporting on public bodies, and in making recommendations, the Auditor General is able to encourage beneficial changes in terms of equality.

As an employer of around 270 staff, the Wales Audit Office has a significant and direct impact on people in terms of equality. The Board fully recognises the duty to provide equal opportunity across the full range of employment factors, including: recruitment; training; promotion; ways of working; and terms and conditions, including pay. We are committed to providing a work environment that values the diversity of all people, both our own staff and those with whom we come into contact during our work, and we fully support the rights of people to be treated with dignity and respect.

As the Auditor General and the Wales Audit Office are separate legal entities, each with their own respective functions, and each covered by the relevant Welsh regulations, each are required to produce a Strategic Equality Plan. However, as we work together in the same organisation, for coherence and economy we have agreed to bring our objectives and plans together in a joint plan.

In the Plan, we set out nine specific objectives to help us perform the General Equality Duty. Towards the end of 2017, we developed initial proposals for what our revised equality objectives should be, after reviewing the effectiveness of steps taken and progress made towards meeting the previous objectives published in our [Strategic Equality Plan](#) in 2014. We then ran a public consultation on our proposals from 1 December 2017 to 9 February 2018. The [Consultation](#) was published on our website and promoted through social media, and was circulated directly to a number of stakeholders representing individuals with protected characteristics. All responses to the consultation were then taken into account when finalising the content of this Plan.



**Huw Vaughan Thomas**  
Auditor General for Wales



**Bill Richardson**  
Equality Champion and  
Non-Executive Board Member,  
on behalf of the Wales Audit  
Office

# Summary of our equality objectives

## AUDITOR GENERAL OBJECTIVES

We will engage with people that represent the interests of protected groups when considering:

- a) what programmes of value for money examinations and studies we will undertake; and
- b) the approach to be adopted in value for money examinations and studies that are relevant to the General Equality Duty.

We will undertake at least one value for money examination or study that has a primary focus relevant to the General Equality Duty during the four-year period covered by the Plan.

We will revise the Auditor General's Code of Audit Practice to ensure the prescription in the Code enables us to better perform the General Equality Duty when undertaking our audit work.

## JOINT OBJECTIVES

We will provide information about our work, including via our website, in a way that is accessible and avoids putting people who have impairments at a substantial disadvantage.

We will improve the extent and quality of information such as external feedback that we gather regarding how our work has contributed or could contribute to performing the General Equality Duty.

## WALES AUDIT OFFICE OBJECTIVES

We will implement a People Strategy that, among other things, gives due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations, drawing on our workforce information in respect of the protected characteristics.

We will take a strategic approach to addressing our structural gender pay differences, alongside structural pay differences in relation to other protected and related characteristics.

When procuring externally sourced services, we will:

- a) include requirements relevant to performance of the General Equality Duty in our tender award criteria; and
- b) comply with the General Equality Duty when stipulating the performance standards to be included in the contract agreement.

We will foster good relations between Wales Audit Office staff sharing relevant protected characteristics and those that do not by providing senior and other staff equality 'champions' and supporting the work of relevant staff networks.



# Who we are

- 1 The Auditor General for Wales is the statutory external auditor of most of the Welsh public sector.
- 2 The Auditor General is responsible for the audit of the majority of public money spent in Wales, including the funds that are voted annually by the National Assembly. Significant elements of this funding are passed by the Welsh Government to the NHS and local government in Wales.
- 3 The Wales Audit Office employs professional staff and utilises other resources, including additional expertise from private sector accountancy firms, to enable the Auditor General to carry out his functions.
- 4 The Auditor General uses the resources provided by the Wales Audit Office to independently examine whether public money in Wales is being managed wisely and is properly accounted for.

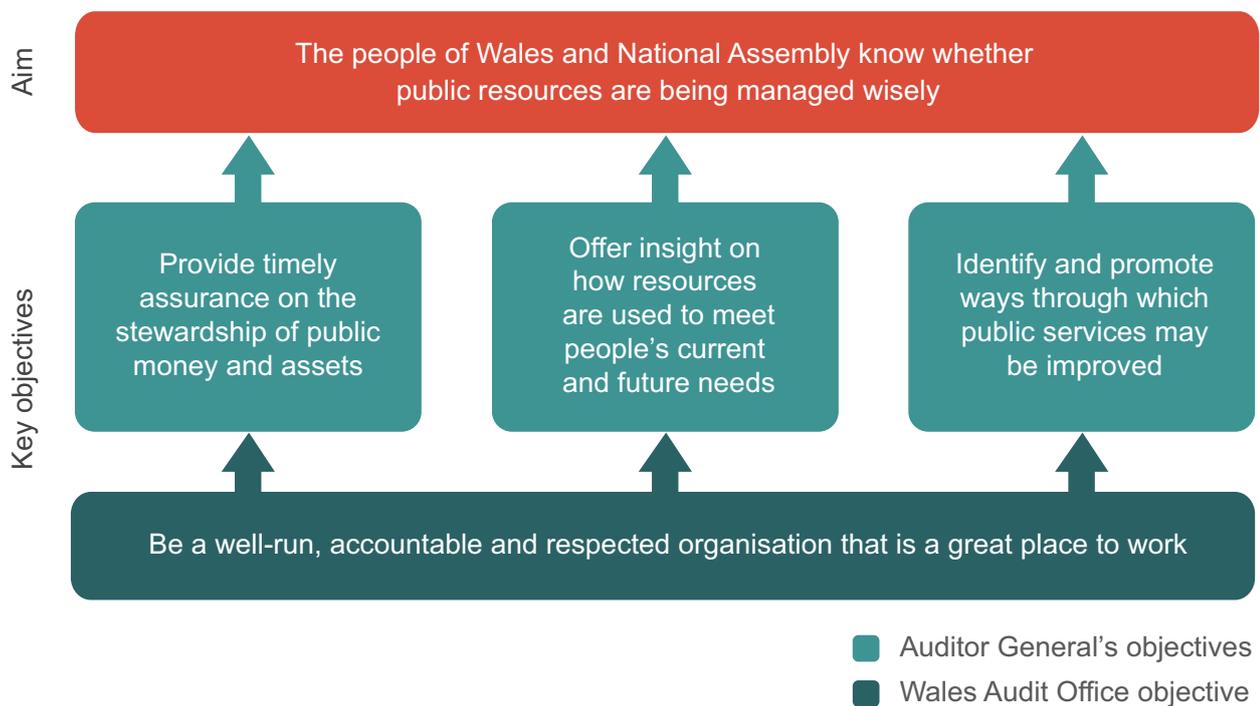
## Public sector audit involves:

- Providing an opinion on the accounts
- Considering whether public money is being used for approved purposes (regularity)
- Considering how public business is being conducted (propriety)
- Examining whether proper arrangements are in place to secure value for money

- 5 The Auditor General's functions may be exercised, in combination if necessary, across different types of bodies to examine public spending irrespective of who delivers the services.
- 6 We also identify good practice from across the full breadth of the Auditor General's audit work and disseminate this through our [Good Practice Exchange](#) and other media, including shared learning seminars and webinars.

- 7 Each year we publish an [Annual Plan](#) that provides more information on:
- a who we are;
  - b how we follow the public pound in Wales;
  - c our vision and values;
  - d our aim and objectives;
  - e our operating environment;
  - f our three-year strategic priorities;
  - g our planned programmes of work for the next 12 months; and
  - h how we measure and report on our performance.

## OUR AIMS AND OBJECTIVES



# How the Equality Act 2010 and Welsh regulations affect us

- 8 The Equality Act 2010 covers nine protected characteristics: age; disability; gender reassignment; race; religion or belief; sex (gender); sexual orientation; marriage and civil partnership; and pregnancy and maternity.
- 9 The Act prohibits a variety of forms of discrimination, harassment and victimisation. The basic framework of protection covers all employers, including the Wales Audit Office, and service providers, including the Auditor General for Wales.
- 10 The Act also introduced the Public Sector Equality Duty, which is often known as the General Equality Duty. Under this Duty, like other public authorities, we must, in exercising our functions, have due regard to the need to:
  - a eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act;
  - b advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - c foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 11 Welsh Ministers have also set Specific Public Sector Equality Duties<sup>1</sup> for public authorities in Wales including the Auditor General for Wales and Wales Audit Office. These duties include:
  - a developing specific equality objectives to help meet the General Equality Duty;
  - b involving persons representing individuals with protected characteristics in the setting of equality objectives and more widely in the duties;
  - c monitoring and reporting on progress made in fulfilling equality objectives;
  - d publishing for each year relevant employment information;
  - e publishing assessment reports setting out, where significant, the likely impact of new policies and practices (see [Appendix 1](#));
  - f making arrangements for promoting knowledge and understanding of equality matters among employees (see [Appendix 2](#)); and
  - g publishing a Strategic Equality Plan which sets out, among other things, equality objectives, steps to be taken to meet those objectives, and the expected time it will take to achieve the objectives.

<sup>1</sup> Under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

- 12 While neither the Auditor General nor the Wales Audit Office are listed public bodies for the purposes of the Well-being of Future Generations (Wales) Act 2015, we nonetheless seek to embed the principle of sustainable development in the way we run our business, and to maximise our contribution to achieving the seven Welsh well-being goals, including that of a more equal Wales.
- 13 We also have a responsibility to uphold the conventions set out in the Human Rights Act 1998.
- 14 This joint Strategic Equality Plan meets the requirements set out under 11.g above, and has been developed to help us meet the General Equality Duty, maximise our contribution to achieving the goal of a more equal Wales, and to support our work in upholding relevant Human Rights Act conventions.
- 15 As the Auditor General and the Wales Audit Office are separate legal entities, each with our own respective functions, and each covered by the Welsh regulations, we are each required to produce a Strategic Equality Plan. However, as we work together in the same organisation, for coherence and economy we have agreed to bring our objectives and plans together in a joint plan.

# How we developed our equality objectives

- 16 Our previous equality objectives were set out in the joint [Strategic Equality Plan](#) we published in 2014. Since publishing that Plan, we have undertaken and published annual reviews of the effectiveness of steps taken and progress made towards meeting the equality objectives, the most recent of which was included in our [Equality Report 2016-17](#).
- 17 In order to establish a revised suite of equality objectives, our Equality Steering Group, with input from our Equality Interest Group<sup>2</sup> and Board Equality Champion, gave consideration to the following:
  - a whether existing objectives for which steps taken and progress made had been assessed as effective or highly effective should be removed from the list;
  - b whether objectives for which steps taken and progress made had been assessed as having limited effectiveness should be retained, and if so whether some rewording was required to ensure they remain fit for purpose; and
  - c whether any new objectives should be added to the list to reflect our current circumstances, with particular reference to our employment information for 2016-17 analysed by protected and related characteristics, our strategic and operational risk registers, and the analysis of our operating environment and three-year strategic priorities described in our [Annual Plan for 2017-18](#).
- 18 The initial outcome of those discussions, following further consideration by the Management Committee and the Wales Audit Office Board, was that we replaced our previous set of ten objectives with a new suite of nine.
- 19 We then went out to public consultation on the proposed new objectives from 1 December 2017 to 9 February 2018. The [Consultation](#) was published on our website and promoted through social media. In order to help ensure that we were meeting our engagement duties, the consultation was circulated directly to a number of stakeholders representing individuals with protected characteristics, including via the WCVA-facilitated Equalities and Human Rights Coalition, the Welsh Public Sector Equality Network and the EHRC Wales Equality and Human Rights Exchange Network.
- 20 During the consultation period and in response to a request, we also produced an easy read version of the consultation document for adults with learning disabilities. This was the first time we had produced an easy read document.

<sup>2</sup> The respective roles of the Steering and Interest Groups are described in paragraphs 28 and 29 of this Plan.

- 21 We received eight responses to the consultation from a diverse range of stakeholders. All respondents either agreed or strongly agreed with our objectives as proposed, with no suggestions for any additional objectives to be added.
- 22 The majority of respondents particularly welcomed the focus on engaging with people that represent the interests of protected groups when considering what programmes of value for money examinations and studies we will undertake and the approaches to be adopted in value for money examinations and studies that are relevant to the General Equality Duty.
- 23 To this end, a number of correspondents highlighted the importance of engaging with individuals across the range of protected characteristics, as well as their representatives, and of developing and using effective approaches to engaging with groups whose participation is disproportionately low.
- 24 There was also widespread support for our objective to provide information about our work in a way that is accessible and avoids putting people who have impairments at a substantial disadvantage. A number of suggestions were made for how we might do that, including through the use of social media channels and videos, face-to-face discussions, hosting stakeholder events, and through seeking opinions on the desired form of communication.
- 25 Some respondents commented that undertaking only one value for money examination or study that has a primary focus relevant to the General Equality Duty during the four-year period covered by the Plan would be insufficient, given the evidence base of the challenges facing Wales published in the Equality and Human Rights Commission's recent publication [Is Wales Fairer?](#) In response, the Auditor General has clarified that his commitment is to undertake at least one examination or study that has a primary focus relevant to the General Equality Duty during the period of this Plan, but that this does not rule out the inclusion of other studies involving equality considerations in his forward work programme.
- 26 All responses to the consultation were taken into account when finalising the content of this Plan.

# Our equality objectives for 2018 to 2022

- 27 Our equality objectives are designed to help ensure that the Auditor General and the Wales Audit Office meet the General Equality Duty. Each of the objectives are potentially relevant to all nine protected characteristics.
- 28 An Equality Steering Group has previously been established to:
  - a ensure the necessary arrangements and programme of work are in place for meeting the Auditor General and Wales Audit Office's equality objectives; and
  - b help ensure the arrangements and programme of work are fully implemented and delivering the required outcomes.
- 29 In addition, an Equality Interest Group has been established in order to ensure effective engagement with employees representing the interests of protected groups, when designing and implementing the programme of equality work, and when undertaking assessments of the likely impact of new policies and practices.
- 30 For the period of this Plan and on a bimonthly basis, the Steering Group, with input from trade union representatives and the Interest Group, will consider and discuss:
  - a progress made on the key projects within the programme of equality work;
  - b further work that needs to be undertaken on those projects to deliver the required outcomes; and
  - c how this work will be embedded in the future.
- 31 We will then report on the effectiveness of steps taken and progress made towards meeting our equality objectives in our annual equality reports.

# AUDITOR GENERAL OBJECTIVES

## OBJECTIVE ONE

We will engage with people that represent the interests of protected groups when considering:

- a) what programmes of value for money examinations and studies we will undertake; and
- b) the approach to be adopted in value for money examinations and studies that are relevant to the General Equality Duty.



## WHY ARE WE DOING THIS?

The Auditor General's examinations and studies are regarded as influential in changing the policies and practices of public bodies.

It is therefore appropriate that, when planning value for money audit work, we take account of the views of people who represent the interests of protected groups, so as to ensure that the programme includes work that can have a positive effect, and that we adopt audit approaches that are relevant and effective in terms of eliminating discrimination, promoting equality of opportunity and fostering good relations.



## WHAT ARE WE GOING TO DO, AND WHEN?

Each year, at regular intervals, we will engage with a range of people and organisations that represent the interests of protected groups, to seek their views on potential work for inclusion in our forward programme, and on the approaches to be adopted in relevant examinations and studies.

This will include engaging with the Wales Council for Voluntary Action-facilitated Equalities and Human Rights Coalition, and with members of the Equality and Human Rights Commission in Wales' Exchange Network.



## HOW WILL WE MONITOR OUR PROGRESS?

Through our annual quality review arrangements, we will examine the working records of the development of our programme of value for money work in each year, in order to check whether (a) appropriate efforts have been made to obtain the views of representatives and (b) whether appropriate regard has been given to such views in the development of the programme.

We will also examine the planning records of relevant value for money projects each year in order to check whether (a) appropriate efforts have been made to obtain the views of representatives and (b) whether adequate regard has been given to such views in the approaches adopted in each project. The Assistant Auditor General will inform our Equality Steering Group on progress made towards achieving this objective at the end of each financial year.



# AUDITOR GENERAL OBJECTIVES

## OBJECTIVE TWO

We will undertake at least one value for money examination or study that has a primary focus relevant to the General Equality Duty during the four-year period covered by this Plan.



### WHY ARE WE DOING THIS?

The Equality and Human Rights Commission has identified seven key equality-related challenges that need to be addressed in Wales over the next five years. Through our work, we are keen to play our part in helping make Wales a fairer country and respond to these challenges.

In addition, while neither the Auditor General nor the Wales Audit Office are listed public bodies for the purposes of the Well-being of Future Generations (Wales) Act 2015, we nonetheless seek to maximise our contribution to achieving the seven Welsh well-being goals, including that of a more equal Wales.



### WHAT ARE WE GOING TO DO, AND WHEN?

Alongside the commitments described under **Objective one**, in early 2018-19 we will engage with the Equality and Human Rights Commission in Wales to discuss where there appears to be greatest scope for the Auditor General's value for money work to help Wales meet its seven key equality challenges.

We will then take account of the outcomes from those discussions on an ongoing basis over the period 2018 to 2022 when populating our programmes of value for money examinations and studies.

It should be noted that, alongside undertaking at least one examination or study that has a primary focus relevant to the General Equality Duty, we will give due consideration as to whether other studies to be included in our forward programme of work should include equality considerations.



### HOW WILL WE MONITOR OUR PROGRESS?

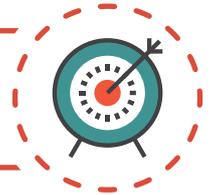
Our Equality Steering Group will liaise regularly with the Auditor General and relevant members of our Senior Leadership Team over the period of this Plan to monitor progress made towards meeting this objective.



# AUDITOR GENERAL OBJECTIVES

## OBJECTIVE THREE

We will revise the Auditor General's Code of Audit Practice to ensure the prescription in the Code enables us to better perform the General Equality Duty when undertaking our audit work.



### WHY ARE WE DOING THIS?

We aim to undertake all of our audit work in accordance with the Auditor General's Code of Audit Practice. The Code prescribes the way in which the Auditor General's audit and certain other functions are to be carried out and embodies what appears to the Auditor General to be best professional practice.

It is therefore important that we ensure that the Code is written in such a way so as to enable the Auditor General to best perform the General Equality Duty.



### WHAT ARE WE GOING TO DO, AND WHEN?

We have recently consulted, including with people that represent the interests of protected groups, on a revised draft of the [Code of Audit Practice](#) of the Auditor General for Wales. The revised Code includes enhanced prescription on how, when exercising the Auditor General's functions, auditors must also perform the General Equality Duty.

The Auditor General intends to publish the revised Code in May 2018 and has committed to reviewing the Code every year to ensure it remains aligned with best professional practice.



### HOW WILL WE MONITOR OUR PROGRESS?

Through our annual quality review arrangements, we will examine samples of audits and will check the extent to which auditors have complied with the Code, including the prescription associated with performing the General Equality Duty.

The Assistant Auditor General will inform the Equality Steering Group on the extent to which auditors have complied with the prescription in the Code associated with performing the General Equality Duty at the end of each financial year.



# WALES AUDIT OFFICE OBJECTIVES

## OBJECTIVE FOUR

We will implement a People Strategy that, among other things, gives due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations, drawing on our workforce information in respect of the protected characteristics.



## WHY ARE WE DOING THIS?

Over the past 12 months we have developed a vision statement for the organisation which outlines our aspirations and serves as a guide for all of our future actions. One of these aspirations is that our people excel.

In addition, it is one of our key objectives that the Wales Audit Office is a well-run, accountable and respected organisation that is a great place to work.

Central to us achieving our aspirations and key objectives, alongside compliance with the General Equality Duty, is the implementation of a People Strategy which draws on our workforce information and the results of our staff surveys, and seeks to eliminate discrimination, promote equality of opportunity and foster good relations.



## WHAT ARE WE GOING TO DO, AND WHEN?

In April 2018, we will launch a People Strategy which is underpinned by the following four priorities:

- a) embedding our values and behaviours into how we work with each other and how we make decisions;
- b) helping our people to be the best they can be and ensuring we've got the right skills and experiences in the right place;
- c) increasing the diversity of our workforce in the medium to longer term, particularly at the more senior levels; and
- d) developing a coaching culture to ensure thriving conditions for organisational success.

During the course of 2018 to 2022 we will develop and implement an action plan aimed at achieving these four priorities, and, where relevant, enabling the Wales Audit Office to best perform the General Equality Duty.



## HOW WILL WE MONITOR OUR PROGRESS?

Our Equality Steering Group, with input from our Culture Change Group and People Development Group, will monitor, on an ongoing basis, progress made on planned actions aimed at delivering our four People Strategy priorities that are relevant to the Wales Audit Office performing the General Equality Duty.



# WALES AUDIT OFFICE OBJECTIVES

## OBJECTIVE FIVE

We will take a strategic approach to addressing our structural gender pay differences, alongside structural pay differences in relation to other protected and related characteristics.



### WHY ARE WE DOING THIS?

The Wales Audit Office applies rigorous pay alignment arrangements to ensure jobs of equal worth are pay-aligned.

However, as of 31 March 2017, we had an overall negative gender pay gap of 17.5%. While a small improvement on the position last year, the mean basic full-time equivalent annual salary of those staff that identified themselves as female remains over £8,000 less than that of staff that identified themselves as male.

The distribution of women and men across pay bands is the immediate explanation for this gap; nearly three-quarters of female staff are employed in pay bands below band 5<sup>3</sup> compared to a figure of less than 55% for male staff. In part, this figure is influenced by the significant success we have had in recent years in attracting female candidates to join our rolling and expanding programme of graduate trainee recruitment (around two-thirds of our current group of graduate trainees identify themselves as female).

We have also identified substantial overall pay gaps in relation to the protected characteristics of ethnicity and age.

On 14 February 2017, we held an externally facilitated staff focus group to seek views on the reasons for the distribution of staff across pay bands, and ways through which we can address the overall pay gaps.



3 The Wales Audit Office pay scale comprises 10 main pay bands – bands 1 to 7 and bands A to C, alongside pay bands for trainees, technicians and work placements. Bands 6 and 7 are management pay bands and bands A to C are senior leadership team pay bands

## WHAT ARE WE GOING TO DO, AND WHEN?

As outlined under **Objective four**, one of the four key priorities for our **People Strategy** is to increase the diversity of our workforce in the medium to longer term, particularly at the more senior levels.

During 2018-19 and 2019-20, planned actions, informed by the outcomes from the aforementioned staff focus group, include:

- a) reviewing our recruitment and assessment approaches and use of language in our job adverts, with a view to removing any potential barriers that relate to particular protected characteristics;
- b) advertising all management band and senior leadership team vacancies on an external basis, as well as internally;
- c) developing coaching and mentoring opportunities for all staff including aspiring managers and leaders, with a particular focus on under-represented groups; and
- d) giving further consideration to potential positive action approaches to recruitment to senior posts.



## HOW WILL WE MONITOR OUR PROGRESS?

We will continue to collect workforce information as required by the Welsh equality regulations, and monitor our pay gaps using a similar format to that required by the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

Our Equality Steering Group will monitor progress made on planned actions aimed at addressing our structural pay differences and increasing the diversity of our workforce, particularly at the more senior levels.



# WALES AUDIT OFFICE OBJECTIVES

## OBJECTIVE SIX

When procuring services, we will:

- a) include requirements relevant to performance of the General Equality Duty in our tender award criteria; and
- b) comply with the General Equality Duty when stipulating the performance standards to be included in the contract.



## WHY ARE WE DOING THIS?

As well as employing staff, the Wales Audit Office procures audit services from private sector accountancy firms.

In order to meet the General Equality Duty across all of Welsh public audit, we need to ensure that firms acting on behalf of the Auditor General perform the duty in the course of their work.

We also procure a wide range of other services, and want to ensure that all our suppliers help us to perform the General Equality Duty where this is relevant.



## WHAT ARE WE GOING TO DO, AND WHEN?

In the first 12 months of this Plan, we will:

- a) develop a procurement strategy that will be fully equality impact assessed and cover all aspects of our responsibilities under the General Equality Duty;
- b) utilise government framework agreements where these thoroughly meet the Duty; and
- c) develop an equality and procurement checklist that covers all protected characteristics when awarding all contracts regardless of value.

On an ongoing basis, we will then:

- a) identify procurements that are relevant to performing the General Equality Duty;
- b) for relevant procurements, include questions in invitations to tender that ask how operators propose to help us perform the Duty and report on the operation of those proposals; and
- c) incorporate successful bidders' proposals for (i) helping perform the Duty and (ii) reporting on the operation of those measures in contract specifications.

We will also:

- a) expand the risk assessment template currently used in our business cases to take into account the Human Trafficking and Slavery legislation; and
- b) revisit our existing suppliers' contract monitoring form, which we currently use for larger contracts.



## HOW WILL WE MONITOR OUR PROGRESS?

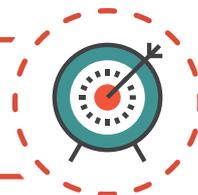
Our Head of Business Services, who has oversight of all Wales Audit Office procurement activity, will report on a six-monthly basis to our Equality Steering Group on progress made towards achieving this objective.



# WALES AUDIT OFFICE OBJECTIVES

## OBJECTIVE SEVEN

We will foster good relations between Wales Audit Office staff sharing relevant protected characteristics and those that do not by providing senior and other staff equality 'champions' and supporting the work of relevant staff networks.



### WHY ARE WE DOING THIS?

In October 2017 we undertook a staff survey using the same core questionnaire as used in the Civil Service People Survey (CSPS). Overall, the results of the survey were typical of an organisation regarded as 'high performing'. In particular, it was reassuring to note that colleagues across the Wales Audit Office feel very positive about the relationships within their teams.

One question in the survey explored whether staff feel that the organisation respects individual differences (eg cultures, working styles, backgrounds, ideas, etc). While 81% of staff gave a positive answer to this question, we nonetheless want to make further efforts by providing equality champions and supporting the work of staff networks to help ensure all staff have a positive employee experience from this perspective.

While we have previously provided senior staff equality allies, engagement with those allies by our wider group of staff has been limited to date, and in previous equality reports we have assessed ourselves as having limited effectiveness in this area.



### WHAT ARE WE GOING TO DO, AND WHEN?

During 2016-17, our staff developed a set of five desired behaviours to shape our future culture. One of these desired behaviours is being respectful of other people and of individual differences. As outlined under **Objective four**, one of the four key priorities for our People Strategy is embedding our desired behaviours into how we work with each other and how we make decisions.

In the first 12 months of this Plan, we will:

- a) establish a group of senior and other staff equality champions, including members of our Equality Steering and Interest Groups;
- b) raise awareness among staff of the identity of those champions and their role in fostering good relations and embedding our desired behaviours, and in providing support and advice where staff express any concerns; and
- c) work with the Chairs of our staff women's and LGBT networks to determine and provide appropriate levels of support.



## HOW WILL WE MONITOR OUR PROGRESS?

The Equality Steering Group will review the effectiveness of the champion role and the support provided to the staff networks by seeking, on an annual basis, the views of our Equality Interest Group and the network Chairs.

The Equality Steering Group will also take an interest in the effectiveness of the sharing of knowledge and learning between the staff networks.

We intend to run a staff survey using the CSPS questionnaire on an annual basis, which will include monitoring responses to a question about whether staff feel that the organisation respects individual differences.



# JOINT OBJECTIVES

## OBJECTIVE EIGHT

We will provide information about our work, including via our website, in a way that is accessible and avoids putting people who have impairments at a substantial disadvantage.



### WHY ARE WE DOING THIS?

Our overall aim is that the people of Wales and National Assembly know whether public resources are being managed wisely. It is expressed as an outcome to which we are a key contributor due to our wholly independent status, professional expertise and extensive rights of access to information.

Section 20 of the 2010 Equality Act (reasonable adjustment duty) includes a duty for public bodies to make information available in accessible formats.

In 2017, we gained accessibility accreditation for our website, including validation of meeting international Web Content Accessibility Guidelines success criteria, alongside a greater understanding of tackling digital exclusion.

As outlined in our [Annual Plan for 2018-19](#), we are committed to continuing to improve and enhance the readability and accessibility of our audit products and other publications to maximise their reach and impact.



### WHAT ARE WE GOING TO DO, AND WHEN?

We have recently commenced, and will continue work in 2018-19, on a project focused on exploring ways through which we can transform the way we communicate about and increase engagement with our work. This project will be informed in part by the relevant responses received to the recent consultation on our equality objectives, including the request for an easy read version of the consultation

On an annual basis, we will seek external advice and reaccreditation on the accessibility of our website, including through testing by individuals with a range of physical and learning disabilities.

And we will continue to install additional software on our website which provides further options for improving accessibility and increasing engagement with our work, including through enlarging selected text and reading it aloud, providing written and spoken translations in multiple languages, blocking on-screen distractions, and converting selected text into MP3 format.



## HOW WILL WE MONITOR OUR PROGRESS?

Alongside seeking the views of representatives of protected groups on our forward programme of value for money examinations and studies, as outlined under **Objective one**, we will seek their feedback on the accessibility of our audit products and other publications, to inform our ongoing communications project.

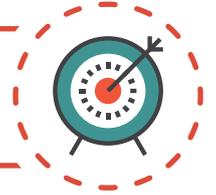
We will also collect annual statistics on the usage of accessibility software installed on our website, which will be considered by the Equality Steering Group with a view to assessing its ongoing impact and effectiveness.



# JOINT OBJECTIVES

## OBJECTIVE NINE

We will improve the extent and quality of information such as external feedback that we gather regarding how our work has contributed or could contribute to performing the General Equality Duty.



### WHY ARE WE DOING THIS?

We have limited information that provides evidence of the impact of the Auditor General's and Wales Audit Office's work in terms of performance of the General Equality Duty.

While we have previously sought external feedback on how our work could better contribute to performing the General Equality Duty, the feedback to date has been limited and in previous equality reports we have assessed ourselves as having limited effectiveness in this area.



### WHAT ARE WE GOING TO DO, AND WHEN?

Alongside seeking the views of representatives of protected groups on our forward programme of value for money examinations and studies, as outlined under **Objective 1**, we will also seek their feedback on how individual pieces of work that have already been undertaken and that were relevant to the General Equality Duty have addressed the needs of protected groups.

We will also seek their views on our on-going work to help us identify where we could do more.

This will be done each year from 2018 both through the post-project learning process and as part of our engagement with such representatives regarding the forward programme.



### HOW WILL WE MONITOR OUR PROGRESS?

The Equality Steering Group will annually examine a sample of completed post project learning reports on projects relevant to the General Equality Duty in order to check whether information on how individual pieces of work have served to address the needs of protected groups has been considered and recorded.



# Appendix 1 – Impact assessments arrangements

The Auditor General and the Wales Audit Office must<sup>4</sup>

- a assess the likely impact of relevant policies and practices (current, revised or new) on their ability to comply with the General Equality Duty;
- b publish reports of those assessments where they show a substantial impact (or likely impact) on their ability to meet the General Equality Duty; and
- c monitor the impact of particularly relevant policies and practices on their ability to meet the General Equality Duty.

Impact assessments are undertaken by our Law and Ethics team to ensure consistency and a strong base of technical expertise. Following preparation of each draft assessment report, the report and the draft policy or practice to which it relates are provided to our Equality Interest Group for review, in order to comply with the engagement provisions.

Towards the end of 2016-17, we also extended the scope of our impact assessments to include Welsh language considerations, so as to comply with the Welsh language standards, and to ensure we meet our responsibilities under the Human Rights Act 1998.

From an equality and human rights perspective, our assessments are focused around the following questions:

- a Is there potential for discrimination or adverse impact with regard to the General Equality Duty, or for an infringement of human rights?
- d Have all opportunities to eliminate discrimination, advance equality of opportunity, foster good relations and support human rights been taken?

We publish reports on our [assessments of policies and practices that are particularly relevant](#) on our website.

The following flowchart illustrates the key stages of and outcomes from an impact assessment from the prospective of equality and human rights.

<sup>4</sup> Under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

# Key stages of an impact assessment

## Stage 1: Screening

Is the policy or practice relevant in terms of equality and/or human rights?  
If yes, proceed to **stage 2**, if no, proceed to **stage 3**.

## Stage 2: Impact assessment

Is there potential for discrimination or other adverse impact with regards to equality, and/or infringement of human rights?  
Have all opportunities to advance equality of opportunity, foster good relations and support human rights been taken?

### Outcome 1: No issues

No potential for discrimination or other adverse impact or infringement has been identified.

All opportunities have been taken.

Proceed to **stage 3**.

### Outcome 2: Amend

Missed opportunities and/or some potential for discrimination or other adverse impact or infringement have been identified.

Amend the policy accordingly and proceed to **stage 3**.

### Outcome 3: Continue

Missed opportunities and/or some potential for discrimination or other adverse impact or infringement have been identified.

Proceed to **stage 3** and clearly set out the rationale for not amending.

### Outcome 4: Stop

Significant potential for discrimination or other adverse impact in terms of equality and/or infringement of human rights has been identified.

Stop application of the policy or practice immediately, redraft and restart **stage 2**.

## Stage 3: Approval

Taking full account of the outcome from the impact assessment (where applicable), should the policy or practice be approved?

## Stage 4: Publication of report and review

The outcomes from impact assessments of policies and practices that are particularly relevant in terms of equality and/or human rights will be published on our website in the form of a report.

Arrangements will be established for periodically reviewing the impact of particularly relevant policies and practices.

## Appendix 2 – Promoting knowledge and understanding

- 32 In 2012, we introduced an online equality training package for staff, working in partnership with Estyn, Care and Social Services Inspectorate Wales and Healthcare Inspectorate Wales. All existing staff have completed this training package and all new starters complete the training as part of their induction process.
- 33 In the first year of this Plan, we will be updating this package to ensure it remains fit-for-purpose and delivers value for money, and will provide subsequent refresher training for all staff.
- 34 Over the period of this Plan, we will also raise awareness and promote knowledge and understanding of equality matters among our staff via a range of other mechanisms, including through:
- a the work of our newly-established senior and other staff equality champions;
  - b the proactive work of our staff women’s and LGBT networks;
  - c communicating with staff on progress made through our work as a member of the Stonewall Diversity Champions Programme and through achieving accreditation as a Disability Confident Employer;
  - d providing staff with a range of equality-related information, policies and guidance, including the Auditor General’s Code of Audit Practice, guidance on preparing accessible publications, guidance on our impact assessment arrangements, information about our diversity monitoring arrangements and how to make requests for adjustments to be made to their working arrangements;
  - e ongoing dissemination of information relating to a ‘diversity calendar’ of internationally recognised equality events, and holding related ‘lunch and learn’ seminars; and
  - f blogs prepared and published on our intranet by members of our Equality Steering and Interest Groups, particularly relating to the work of those two groups, and on our attendance of Equality and Human Rights Commission in Wales and Welsh Public Sector Equality Network events, whereby we ensure we remain sighted of, and where appropriate contribute to, ongoing developments in the field.



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