

Strategic Equality Plan

2019/20 – 2021/22

AND

Actions

2019/20

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Foreword

A commitment to treating people fairly is central to the role of an Ombudsman. I am committed to providing a service which is easy for everyone to use and to providing equal opportunities for all staff. I am also aware that through my casework I can influence the way bodies in my jurisdiction consider equality and human rights issues. I take my duties under equality legislation in Wales very seriously, both as a provider of public services and as an employer.

Although my office published its first equality plan in 2012, for the period to 2015, equality considerations have always been an integral part of my strategic and business planning and of the day-to-day work of my office. Since 2015, my equality objectives have been integrated into my Strategic and Corporate Plans but, following a review, I have prepared this as a separate Plan.

On the one hand, this Plan allows me to celebrate some of the successes of my office and staff. I can be proud of our efforts to ensure the accessibility of our services and to gather feedback from our service users. I have dedicated much attention to embedding equality and human rights considerations into our complaints handling processes. I highly value my capable and committed workforce and ensure they are supported with a range of training opportunities to increase their awareness of equality and diversity as well as other activities to support their well-being. I believe that these efforts are appreciated: I am delighted that our staff survey in 2018/19 revealed that 93% of staff were proud to work in the office.

On the other hand, in developing this Plan I also took a long, hard look at my work. While I do invite my service users, staff and job applicants to share equality data to help me target and improve my work, the response rate to this monitoring has not been as high as I would have wished. There is also a scope for me to improve how I use the equality data collected so I can better target outreach activities and employment, recruitment and training policies. Although most of my workforce is female, due to the uneven distribution of women across salary scales, my office has a Gender Pay Gap. I also recognise that there is scope for targeted positive action to improve the representation of some groups among job applicants and in my workforce. I have identified a number of specific objectives and actions to address these issues in this Plan.







I believe that this Plan represents a step change in my efforts to embed equality considerations in all aspects of my work. I would like to thank all the stakeholders who supported me and my staff in the development of this Plan and look forward to further engagement with them and the public as I put my commitments into practice.






Executive summary

This Equality Plan will guide the office of Public Services Ombudsman Wales (PSOW) as it strives to meet its commitment to promote and support equality, both as a service provider and as an employer. It will be instrumental in ensuring that this commitment is reflected throughout the organisation and in every element of the work that it does.

Analysis of available data presents a mixed picture at present. While there is much to be proud of, there is room for improvement, particularly around the collection and analysis of data.

This Plan sets out 11 equality objectives for the organisation, linked to the three core aims of our Corporate Plan 2019/20 – 2021/22. These equality objectives are as follows:

Corporate Plan aim	Equality objective	
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
Promote Learning, Work to Improve Public Services		2.1. Ensure that PSOW casework staff can identify and adequately respond to equality and human rights issues arising in casework
		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

Corporate Plan aim	Equality objective	
Use Resources Wisely and Future-proof the Organisation		3.1. Capture comprehensive and meaningful equality employment data
		3.2. Act to improve the representation of protected groups in PSOW's workforce
		3.3. Address PSOW's Pay Gap
		3.4. Promote staff well-being and awareness of equality and diversity issues
		3.5. Ensure that the consideration of equality is embedded in PSOW decision making

For each objective, the Plan outlines the current situation and a number of specific actions to be taken in working towards fulfilling the objective. Under each objective, the Plan also states their relevance to protected characteristics and where responsibility for implementation lies.

This document also sets out how PSOW will monitor, evaluate and review progress against the equality objectives. Finally, it sets out the consultation process undertaken with stakeholders in the development of this Plan and PSOW's new reporting arrangements.

PSOW is committed to ensuring that equality is central to all that it does and how it does it. This document provides a road map for targeting and maximising these efforts.

Outline of the Plan

This Equality Plan sets out the strategic equality objectives of PSOW between 2019/20 and 2021/22. The Plan includes specific measurable actions for the Ombudsman to take under each objective in the first year of the Plan and provides the framework for the development of further detailed actions for the following years.

[Section 1](#) of the Plan presents the roles and responsibilities of PSOW, including the new powers under the Public Services Ombudsman (Wales) Act 2019. [Section 2](#) explains the extent of the public sector equality duties in Wales which also apply to PSOW.

Those already familiar with these aspects can navigate to [Section 3](#), outlining what other considerations influenced the development of this Plan. This section explains that PSOW's equality objectives have been aligned to the Corporate Plan of the office. It also acknowledges that PSOW's commitment to equality also extends to the Welsh language, human rights and the well-being agenda. Finally, it underlines that this Plan was developed in the light of internal and external consultation and engagement, as well as a broad range of data and research. Details of the data and research that informed the preparation of this Plan can be found in the Appendices.

[Section 4](#) sets out 11 equality objectives, linked to the three core aims of PSOW's Corporate Plan 2019/20 – 2021/22. Under each objective, the Plan outlines PSOW's work to date, specific actions to be taken, their relevance to protected characteristics and who within the organisation is responsible for implementation.

[Section 5](#) of the Plan sets out how PSOW will monitor and evaluate progress against the equality objectives and the proposed actions. It also confirms that PSOW's equality objectives, and specific actions under each objective will be reviewed on an annual basis. Moreover, this section outlines how, in evaluation and review of the work under this Plan, PSOW will seek to consult and engage both internally and externally.

Finally, [Section 6](#) explains how this Plan will be published and how PSOW will report on activities and achievements under the Plan in the future.

1. Introduction to the Office of the Public Services Ombudsman for Wales (PSOW)

This section presents the role and areas of responsibility of PSOW.

1.1. PSOW's role

The Ombudsman has three specific roles. The first is to consider complaints about public service providers in Wales; the second is to consider complaints that members of local authorities have broken the Code of Conduct; the third is to set complaints handling standards for public service providers. The Ombudsman is independent of all government bodies and the service provided is free of charge.

1.2. Complaints about public service providers

Under the Public Services Ombudsman (Wales) Act 2019, the Ombudsman considers complaints about bodies providing public services where responsibility for their provision has been devolved to Wales. These include:

- local government (both county and community councils);
- the National Health Service (including GPs and dentists);
- registered social landlords (housing associations);
- the Welsh Government, together with its sponsored bodies.

The Ombudsman is also able to consider complaints about privately arranged or funded social care and palliative care services and, in certain specific circumstances, aspects of privately funded healthcare.

When considering complaints, the Ombudsman looks to see whether people have been treated unfairly or inconsiderately or have received a bad service through some fault on the part of the service provider. Attention will also be given to whether the service provider has acted in accordance with the law and its own policies. If a complaint is upheld, the Ombudsman will recommend appropriate redress. The principal approach taken when recommending redress is, where possible, to put the complainant (or the person who has suffered the injustice) back in the position they would have been in if the problem had not occurred. Furthermore, if, from his investigation, the Ombudsman sees a systemic weakness, recommendations will be made with the aim of reducing the likelihood of others being similarly affected in future.

More information on PSOW's process for handling complaints about a public body in Wales can be found on the [Ombudsman website](#) (also in [Easy Read](#)).

1.3. PSOW's new powers under the 2019 Act

The 2019 Act extends the powers of the Ombudsman under earlier legislation. It enables the Ombudsman to undertake investigations on his own initiative. The Act also gives PSOW the power to create a Complaint Standards Authority. Under this power, PSOW must publish a statement of principles concerning complaints handling procedures for bodies in his jurisdiction. He may also publish model complaints handling procedures for these bodies. Consultation on the scope and implementation of these two powers closed on 30 September 2019.

1.4. Code of Conduct Complaints

Under the provisions of Part III of the Local Government Act 2000, together with relevant Orders made by the National Assembly for Wales under that Act, the Ombudsman considers complaints that members of local authorities have breached their authority's Code of Conduct. He is also a "prescribed person" under the Public Interest Disclosure Act for raising whistleblowing concerns about breaches of the Code of Conduct by members of local authorities. The Ombudsman can consider complaints about the behaviour of members of:

- county and county borough councils;
- community councils;
- fire authorities;
- national park authorities and
- police and crime panels.

All these authorities have a code of conduct which sets out the recognised principles of behaviour that members should follow in public life.

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

2. Overview of the public sector equality duties in Wales

The Equality Act 2010 brought together and replaced the previous anti-discrimination primary and secondary legislation within a single Act.

The Act includes a public sector equality duty (the 'general duty'), replacing the separate duties on race, disability and gender equality. The broad purpose of the equality duty is to integrate consideration of equality and good relations into the day-to-day business of public authorities. Under the general duty public bodies are required to have due regard to the need to:

1. eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
2. advance equality of opportunity between people who share a relevant protected characteristic and those who do not
3. 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
- The general duty applies also to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination

The general equality duty is not prescriptive about the approach a public authority should take in order to comply with their legal obligations. However, under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, listed bodies in Wales also have specific duties to help them in their performance of the general duty and to aid transparency.

The specific duties in Wales include:

- Equality objectives
- Strategic Equality Plans
- Engagement
- Assessing impact
- Equality information
- Employment information
- Pay differences
- Staff training
- Procurement

PSOW must meet both general and specific duties.

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. While this duty has not been commenced to date by the UK Government, since 2018 it has been implemented in Scotland. The Welsh Government has committed to also introduce the socio-economic duty by the end of 2019. However, this Plan already contains some actions to help PSOW consider socio-economic inequalities in his work.

3. Preparation of this Plan

3.1. PSOW's Vision, Mission and Strategic Aims

To maximise the impact of this Plan, it was decided that it should be aligned closely with PSOW's core Vision and Mission, as well as the three Strategic Aims of the Corporate Plan 2019/20-21/22.

Our Vision for public services in Wales: Services that actively listen and learn from complaints.

Our Mission: To uphold justice and improve public services.

Our Strategic Aims

- **Strategic Aim 1: Deliver Justice:** *A fair, independent, inclusive and responsive complaints service.*
- **Strategic Aim 2: Promote Learning, Work to Improve Public Services:** *Promote learning from complaints and stimulate improvements on a wider scale.*
- **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.*

3.2. Welsh language

Under the Equality Act 2010, language – including the Welsh language – is not a protected characteristic. However, PSOW fully supports the Welsh Language (Wales) Measure 2011 which confirms the official status of the Welsh language in Wales. PSOW is committed to ensuring that the Welsh language is welcomed, treated no less favourably than English in all aspects of its work and that the needs of Welsh speakers are met. PSOW currently operates in accordance with its [Welsh Language Policy](#) which was reviewed in 2018. Under new legislation, PSOW is required to comply with Welsh Language Standards, which will replace the Ombudsman's Welsh Language Policy.

3.3. Human rights

PSOW considers equality and human rights as two sides of the same coin. He supports and is committed to complying with the duties placed on the office by the Human Rights Act 1998, incorporating into UK law the Articles of the European Convention on Human Rights. In addition to treating people in accordance with their Convention right, PSOW is also committed to acting in accordance with the core values which underpin human rights. These values are known as 'FREDA principles' and comprise Fairness, Respect, Equality, Dignity and Autonomy. This Plan dedicates attention to human rights side by side with equality and contains several actions directly relevant to PSOW's human rights work (see for example [Objective 2.2](#)).

3.4. Well-being

Although PSOW is not subject to the full duties of the Well-being of Future Generations (Wales) Act 2015, he fully supports the vision of the Act to create a more sustainable Wales. This Plan is directly relevant to one of the ‘Well-being Goals’ under the Act – ‘A More Equal Wales’. It also contains detailed actions related to promotion of staff well-being (see for example [Objective 3.4](#)). However, PSOW also seeks to maximise his contribution to achieving all seven Welsh Well-being Goals. The 2019 Act future-proofed the office, placing it in a much stronger position to deal with the challenges of the ageing society, enhance and uphold social justice and assist the most vulnerable. PSOW also recognises the impact of activities in the office on the environment and is working to reduce consumption and the generation of waste.

3.5. Consultation, engagement and research

When developing this Plan, PSOW drew on research from a range of sources and insights from numerous stakeholders.

Relevant data gathered by the Equality and Human Rights Commission (including the 2018 report ‘Is Wales Fairer?’); the Office for National Statistics; the statistics division of the Welsh Government; and the UK Government Equalities Office guidance was considered.¹ Account was also taken of the data available from internal equality monitoring processes. An overview of the data informing this Plan can be found in Appendix 6.

When developing this Plan, PSOW consulted and engaged internally and externally. Internally, all staff had opportunities to contribute ideas and feedback. Externally, comments were invited, among others, from the Equality and Human Rights Commission (EHRC), Diverse Cymru, Age Cymru, Disability Wales, Chwarae Teg, Interfaith Council for Wales, Muslim Council of Wales and Stonewall. Welsh Council for Voluntary Action and Council for Wales of Voluntary Youth Services coordinated invitations for feedback from their members. PSOW also sought advice from the statutory Welsh Commissioners, and the members of PSOW’s Advisory Panel. Finally, feedback from members of the Service Users Sounding Board on equality matters influenced both the Corporate Plan and this Equality Plan.

The Ombudsman is grateful for the insights of all the stakeholders that contributed to the development of this Plan.

¹ [Eight ways to understand your organisation’s gender pay gap](#) (2019); [Four steps to developing a gender pay gap action plan](#) (2019); [Reducing the gender pay gap and improving gender equality in organisations: Evidence-based actions for employers](#) (2019).

4. PSOW’s equality objectives

This section outlines PSOW’s equality objectives. The Plan sets 11 objectives across the 3 Strategic Aims. Under each Objective, this Plan outlines the current position, specific actions to be taken, their relevance to protected characteristics and responsibilities for implementation.

This Plan sets out the actions for 2019/20 only. Actions for 2020/21 will be developed during 2019/20, using data gathered and analysed, and will be presented in the Ombudsman’s next annual equality report. This approach reflects the fact that many of the identified actions for 2019/20 involve a review of, and consultation on, current practice. Information gathered in this way will shape future activities and commitments under this Plan.

Since this Plan is being published halfway through the financial year, the proposed actions for 2019/20 are intended to be both ambitious and realistic.

PSOW is required to set equality objectives for each of the protected characteristics or state the reasons for not doing so. Many of the objectives under this Plan are cross-cutting – they apply equally to all the protected groups. However, the sections below will highlight the instances where an objective is particularly relevant to a specific group.

4.1. 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

PSOW currently collects data on the equality profile of service users through two main channels. Complainants are invited to complete an equality questionnaire following submission of their complaint online. From June 2018, the Ombudsman also began to invite complainants to provide equality monitoring information through a survey available on the website.² Most of the data received in 2018/19 was submitted online as part of the complaint submission. However, only 34% of all complaints received were accompanied by equality data.

The profile of individuals who contacted PSOW with complaints between April 2018 and March 2019, as well as the analysis in the context of the broader demographic profile of Wales, can be found at Appendix 1.

The Ombudsman would expect the proportion of complainants with protected characteristics to at least mirror that in the overall population of Wales. However, since those with some protected characteristics may be more likely to access or rely on public services, the proportion of complainants from disadvantaged or vulnerable groups could be expected to exceed the appropriate share of the population. At the same time, it is also important to bear in mind that some of those most in need may be least likely to complain to the Ombudsman. This means that more detailed work is needed by PSOW to better analyse the equality profile of complainants.

² This latter system replaces the previous arrangement whereby PSOW’s Complaints Assessment Team (CAT) would send out hard copies of equality monitoring forms (although hard copies of the equality questionnaire are still available on request).

In 2019/20, PSOW will:

- continue to capture equality data from complainants;
- develop and trial a methodology to better capture how subjects of PSOW complaints relate to protected groups;
- review the complainant equality questionnaire to include questions in respect of caring duties from 2020/21 onwards;
- develop how PSOW gathers and analyses information on the socio-economic status of complainants;
- develop a plan to improve the response rate from complainants, drawing on good practice by similar bodies and academic and consumer research;
- 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

Main responsibility: IT Team and Improvement Team

Relevant protected characteristic(s): This objective is relevant to all protected groups



Objective 1.2: Effectively target under-represented complainant groups

PSOW uses the equality monitoring data collected to shape its outreach strategy. For instance, in 2017/18 the Ombudsman focused outreach work on children and young people, engaging with a range of bodies working with this group, including the Children’s Commissioner for Wales. Recently, PSOW held a joint event with the Commissioner at the National Eisteddfod 2019 to raise awareness of the difficulties faced by young people in accessing administrative justice.

Nevertheless, analysis of the data currently available suggests that people under the age of 25 remain under-represented among PSOW’s complainants. The Ombudsman also receives fewer complaints than expected from those over the age of 65. Other groups that appear to be under-represented are individuals from minority national backgrounds, Welsh speakers, and possibly the LGB+ community.

Since 2016, PSOW has 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. The Service Users Board has to date provided valuable insights to help PSOW improve its equality monitoring, outreach activities and accessibility of services.

The Ombudsman also engages regularly with a range of third sector bodies including RNIB Cymru, Diverse Cymru, Citizens Advice, Learning Disability Wales and the Welsh Council for Voluntary Action. He regularly speaks at events organized by these bodies to raise awareness of his work and to reach out to under-represented or vulnerable groups.

In 2019/20, PSOW will:

- work with the Service Users Sounding Board, to ensure that work on equality and diversity remains a key focus of discussion;
- 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;
- evaluate the pilot and, depending on the evaluation, plan further focus groups in 2020/21, targeting other protected characteristics.

Main responsibility: Improvement Team

Relevant protected characteristic(s): This objective is relevant to all protected groups. However, the focus of the first Focus Group will consider the needs of older service users.



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

PSOW is dedicated to ensuring that its services are equally accessible to all users and are of equal quality regardless of the format and communication channels used. The Ombudsman considers and responds to any request for a reasonable adjustment and has a number of facilities and support services readily available.

For instance, when communicating with our customers directly, the Ombudsman provides the option of correspondence in ‘Easy Read’.³ He uses a telephone interpreting service provided by Prestige Network and Language Line to assist complainants who are not comfortable to make their complaint in English or Welsh. The Ombudsman’s staff can also undertake home visits, as required.

The information on PSOW’s website can be provided in a number of accessible formats. Key documents can also be produced in alternative formats, such as CD/tape and Braille. PSOW’s website has continually been upgraded, and now features an enhanced ‘BrowseAloud’ service, which assists the user by adding text-to-speech functionality to the website.

³ Easy read is a method of presenting written information to make it easier to understand for people who have difficulty reading.

Additionally, the 'Google Translate' service has been embedded so that PSOW's website content pages can be automatically translated into any one of over 100 languages, on selection. A British Sign Language (BSL) video and a link to the 'SignVideo' (interpreting service for BSL users) are also available on the website.

PSOW's forms and letters were updated in 2017/18 to make the arrangements for reasonable adjustments clearer.

Under the Public Services Ombudsman (Wales) Act 2019, the Ombudsman is able to accept complaints other than in writing, including oral complaints. It is hoped that this new power will facilitate access to the service by individuals who, for a range of reasons, are unable to submit their complaint in writing.

More information on how to complain to PSOW can be found on the [Ombudsman website](#) (also including [A Young Person's Guide to Making a Complaint](#)).

In 2019/20, PSOW will:

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

Main responsibility: The Complaints Assessment Team and Equality and Human Right Advice Group will be responsible for actions related to reasonable adjustments. The Improvement Team will be responsible for the review of the uptake of oral complaints and the customer feedback process.

Relevant protected characteristic(s): This objective is relevant to all protected groups. However, activities to promote accessibility will focus especially on individuals with disabilities and older complainants, as well as individuals who do not speak English or Welsh.

4.2. 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 not new to PSOW’s staff. The office has adapted the Human Rights Manual developed by the Northern Ireland Public Services Ombudsman to ensure that it is fully relevant to PSOW’s work in Wales. PSOW’s Complaints Assessment Team and Investigation Team also refer as needed to [the EHRC human rights guide for ombudsman schemes](#); and engage directly with the EHRC in Wales, making use of the advisory service provided by the Commission.

In addition, PSOW has in place an internal Equality and Human Rights Advice Group (EHRAG), which meets frequently to develop and support the consideration of equality and human rights in complaints casework.

PSOW’s casework staff receive specific training to help them engage with complainants with specific needs. In addition to other training arrangements (see more details in section 4.3. below), training with Disability Wales is compulsory for all members of our Complaints Assessment Team. The Team also benefited from Transgender Awareness Training in February 2019.

In 2019/20, PSOW will:

- revise its internal policy on ‘Managing Customer Contact’ to include a section about engaging with complainants with specific accessibility requirements;
- develop a training module on integrating equality and human rights considerations in casework, to be offered to all investigation staff;
- provide targeted training to the Complaints Assessment Team staff on mental health awareness, autism spectrum disorders and managing challenging conversations.

Main responsibility: Equality and Human Rights Advice Group and Training Lead

Relevant protected characteristic(s): This objective is relevant to all protected groups. However, the focus of the casework staff training is likely to make this objective more relevant to PSOW’s service users with disabilities.



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

PSOW’s annual reports to date have highlighted cases where equality and human rights were particularly relevant. For instance, in the last annual report (2018/19), the Ombudsman highlighted a deeply troubling case of a young boy who was forced to wait for three years to have his kidney removed. This had a serious impact on his life and it is likely his human rights were compromised because of the impact on both his physical and mental wellbeing and the extent of avoidable suffering he endured.

In addition, for many years now, PSOW has 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. Many of those have involved equality and human rights matters, either implicitly through the core work of Ombudsmen in championing the FREDA principles (Fairness, Respect, Equality, Dignity, Autonomy) or, more recently, explicitly by reference to specific human rights articles. However, PSOW has not to date produced a dedicated publication to highlight this work.

In 2019/20, PSOW will:

- publish a casebook on cases in which he applied equality and human rights considerations;
- improve how casework staff record such considerations in handling a case, to facilitate reporting in the future;
- plan to repeat the publication on an annual basis.

Main responsibility: Equality and Human Rights Advice Group and Improvement Team

Relevant protected characteristic(s): This objective is relevant to all protected groups.



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

On 23 July 2019, the new PSOW Act came into force. It gives the Ombudsman new powers, including the ability to undertake ‘own initiative’ investigations in due course. In addition, the Act also provides for the establishment of a Complaint Standards Authority. PSOW is required to publish a statement of principles for complaints handling procedures for bodies in his jurisdiction. PSOW may also publish model complaints handling procedures for these bodies. Consultation on the scope and implementation of these two powers closed on 30 September 2019.

The proposed 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. The proposed procedure for such investigations also states that suggestions of areas to be investigated may be submitted by service user groups, charities or voluntary organisations and advocacy services. Feedback from such organisations will help PSOW target own initiative investigations for the benefit of the protected groups.

The proposed model Concerns and Complaints Policy for Public Services Providers in Wales 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 proposed accompanying Guidance for Public Service Providers on Implementing the Concerns and Complaints Policy makes it clear that complaints processes must be accessible, including availability in different formats. It also stresses that public service providers should maintain a comprehensive list of relevant advice and advocacy organizations in their locality and signpost effectively to ensure equality of access and appropriate support for all complainants.

In 2019/20, PSOW will:

- 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;
- 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.

Main responsibility: Improvement Team

Relevant protected characteristic(s): This objective is relevant to all protected groups.

4.3. 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

PSOW collects employment equality data through several channels. The data on the current workforce is based on an anonymous voluntary internal survey. In 2018/19, 49 out of 67 employees responded to the survey (a response rate of 73%). Data relating to job applicants is collected via anonymous forms, which are kept separate so they are not available to those involved in the selection and appointment process. In 2018/19, approximately 50% of our job applicants shared their equality data.

The equality monitoring outlined above is currently not connected to individual HR records. As individuals are not asked to re-submit equality data when they access training, apply internally to change position, become involved in grievance or disciplinary procedures or decide to leave the office, PSOW is currently unable to report on these groups by protected characteristics.

The profile of PSOW’s workforce can be found in Appendix 2, while the profile of job applicants can be found in Appendix 3. More information about the data that is unavailable at PSOW can be found in Appendix 4.

In 2019/20, PSOW will:

- 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;
- 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;
- review how the office records the data on individuals who accessed and completed training, as well as those who applied to change position internally;
- review how PSOW analyses successful job applicants by protected characteristic and publish this analysis, if appropriate to do so;
- 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.

Main responsibility: Improvement Team and Corporate Services

Relevant protected characteristic(s): This objective is relevant to all protected groups.



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

PSOW is proud to be an equal opportunities employer. PSOW’s recruitment forms clearly state the commitment to ensure that people using the service or employed by the office are treated equally. PSOW also seeks to avoid any inadvertent discrimination against members of any group in society.

Job applications are anonymised before they are passed to those who are shortlisting and/or interviewing. Staff involved in recruitment decisions have undertaken equality and recruitment training. To increase accessibility, PSOW accepts applications electronically as well as on paper.

The available data shows that, in 2018/19, females continued to constitute most of the PSOW workforce, as well as most of the job applicants. It is also positive that, although the representation of the BAME⁴ community in PSOW’s workforce in 2018/19 was slightly lower than the Welsh average (and lower than the proportion of this population in the local area) this group was proportionally well represented among job applicants during the same period. People who follow religions other than Christianity were also well represented among job applicants.

At the same time, more work is needed. Only a small proportion of the Ombudsman’s workforce and job applicants in 2018/19 were younger than 25. Other under-represented groups included individuals who do not identify their nationality as Welsh, English or British, Welsh speakers, people who identify as Christian, and the LGB+ community. However, compared to the Welsh average, the most significant disparity appears to relate to the proportion of PSOW’s workforce and job applicants who identify as disabled. Consequently, in addition to promoting equality, the Ombudsman will give more emphasis to positive action to target these under-represented groups.

In 2019/20, PSOW will:

- sign up as a Disability Confident Committed employer;⁵
- engage with the relevant bodies (e.g. Disability Wales and Job Centre Plus Disability Advisors) to review the Ombudsman’s recruitment process and vacancy advertising strategy to better target people who identify as disabled;
- explore the use of apprenticeships / work placements to offer opportunities to people who identify as disabled;
- engage with the relevant third sector bodies to prepare an action plan for targeting other under-represented groups in 2020/21.

Main responsibility: Corporate Services and HR consultants

Relevant protected characteristic(s): This objective is relevant to all protected groups.

However, the focus of actions in 2019/20 will be on individuals who identify as disabled.

⁴ BAME stands for ‘Black, Asian and minority ethnic’

⁵ Disability Confident is a UK Government scheme launched in its current form in 2013. The scheme supports employers to make the most of the talents disabled people can bring to the workplace. Recognition as a Disability Confident Committed employer (level 1 of the scheme) involves action in five areas: inclusive and accessible recruitment; communicating vacancies; offering an interview to disabled people; providing reasonable adjustments; and supporting existing employees. It also involves steps to offer opportunities for work experience for people with disabilities.



Objective 3.3: Address PSOW's Pay Gap

This section focuses on PSOW's Pay Gap in relation to gender. Since not all PSOW staff shared their equality data in 2018/19, the information presented in this section is based on assumed gender identity so that it reflects the full workforce.

As explained above, PSOW's staff equality monitoring is currently anonymous and not connected to individual HR records. Therefore, it is not currently possible to analyse PSOW's Pay Gap based on other protected characteristics, such as disability or ethnicity.

At 31 March 2019, PSOW employed 67 members of staff. 73% of the workforce was assumed to be female. However:

- the median Gender Pay Gap was 21% (compared to 13.7% in Wales in 2016/17)
- the mean Gender Pay Gap was 23%.⁶

Gender breakdown by salary and role, contract type and working arrangement can be found in Appendix 5.

The distribution of women across the pay scales provides an explanation for the Gender Pay Gap figures. Whilst women were well represented at the higher pay scales, making up 60% of senior managers, this remained slightly lower than their proportion of the overall workforce. At the most junior level, 84% of staff were female. Also, 25% of the workforce in the £50k to £60k salary bracket was female.

PSOW already operates a range of policies to remove barriers to employment or career progression by female staff. Considerable flexibility is available to all staff, such as flexitime, limited core hours and a flexible working policy.⁶ In 2018/19, almost 50% of spending on training was used to support staff at lower pay scales (up to £25k), where the majority of the workforce was female. PSOW also offered a Management Development Programme to 18 staff members (9 male and 9 female) and external mentoring training to 10 staff members (3 male and 7 female). While mentoring arrangements have been in place in previous years, from 2019/20 onwards, all new staff are assigned a senior member of staff as a mentor.

The Ombudsman is 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. Since the preparation of the 2018/19 figures, PSOW undertook a major recruitment exercise which is likely to affect the overall gender balance across a number of pay scales.

⁶ PSOW's Gender Pay Gap was calculated based on FTE (full-time equivalent) annual salary. The first figure shows the difference between the midpoints in the ranges of men's and women's pay. The second figure shows the difference between the average of men's and women's pay. The figure for the Welsh average of the Gender Pay Gap was drawn from the [EHRC report 'Is Wales Fairer?' \(2018\)](#)

The Ombudsman is proud of the continuing success in attracting a high number of female staff. In 2018/19, 75% of the job applicants who submitted equality information identified as female. Nevertheless, PSOW is determined to step up efforts to address its Gender Pay Gap.

In 2019/20, PSOW will:

- engage with staff to capture their views on what they require to progress in their careers and what may hold them back;
- engage with Chwarae Teg to consult on a detailed action plan on the Gender Pay Gap and work towards ‘FairPlay Employer’ recognition;⁷
- evaluate the scope for offering more targeted mentoring opportunities and/or management and personal development courses;
- review the recruitment strategy to identify reasons for under-representation of men in junior roles.

Main responsibility: Management Team

Relevant protected characteristic(s): Gender



Objective 3.4: Promote staff well-being and awareness of equality and diversity issues

PSOW recognises that work can impact upon health and well-being and is committed to providing a healthy working environment and to improving the quality of working lives for all staff. In January 2019, the office held a Well-being Awareness Week, which was extremely well received by staff. In August 2019, PSOW also approved a distinct Well-being Strategy to support well-being as an employer and to encourage staff to look after and improve their own well-being.

In 2018/19, PSOW introduced a new staff training and development process which includes the whole organisation’s training needs from Induction through to Continued Professional Development. The Ombudsman ensures that training opportunities are equally available, with all staff encouraged to complete 28 hours of Continuing Professional Development per financial year. In 2018/19, 77% of staff were able to meet this advisory target.

83.6% of respondents to PSOW’s staff survey in 2018 agreed or strongly agreed that the training and development they received was appropriate and relevant to their job (up from 72.7% in 2017). 70.9% of staff felt that access to opportunities for development and support is fairly managed and opportunities for development and support are accessible to all. This represented an increase from 2017 (67.2%).

7 The FairPlay Employer Benchmark supports employers to identify and tackle barriers in their organisations, giving them a clear path on the journey of gender equality and diversity. Organisations that subscribe to the service will be benchmarked in terms of gender equality in their sector and will qualify for one of four levels of FairPlay Employer award. More information on the work of Chwarae Teg and the FairPlay Employer journey can be found on the Chwarae Teg website: <https://chwaraeteg.com/projects/fairplay/>

Staff also have access to specific equality and diversity training. All staff are required to undertake online equality and human rights training on a biennial basis. This training is also compulsory for all new staff. It can be undertaken flexibly to suit staff work patterns. This is in addition to the specific training for casework officers, as well as further equality training as identified during the Performance Review and Development Process (PRDP) discussion. PSOW’s internal guide to ‘Identifying Training and Development’ includes a section to focus consideration on equality and human rights training and development needs.

In 2019/20, PSOW will:

- 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;
- work with a staff well-being group to identify and progress measures to support staff well-being (for instance, consider re-launching the Well-being Week; or provide space for a reflection/prayer room);
- undertake an annual equality survey to obtain feedback from staff on the Ombudsman’s 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;
- 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 (PRDP) discussion in 2020/21.

Main responsibility: Well-being Group with respect to well-being activities; Improvement Team with respect to capturing staff feedback; line managers and Training Lead with respect to the PRDP process

Relevant protected characteristic(s): This objective is relevant to all protected characteristics. However, the well-being activities make it especially relevant to individuals who may identify as having a disability.



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

PSOW has in place an Equality Impact Assessment (EIA) tool to ensure that the general equality duty is an integral part of policy development and high-level decision making in the office. However, these assessments are currently not published. PSOW’s procurement policy states that suppliers are expected to be able to demonstrate satisfactory equality policies in relation to the services they provide.

In 2019/20, PSOW will:

- review the EIA tool and consider how it can be better integrated into the decision-making process in individual cases and projects;
- develop the EIA to also include consideration of the needs of Welsh language speakers;
- identify any staff training needs with respect to the EIA as applicable to their work;
- 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;
- review the procurement policy in line with the revised EIA tool.

Main responsibility: Policy Management Officer; Management Team (with respect to EIA approval); Training Lead (with respect to training)

Relevant protected characteristic(s): This objective is relevant to all protected characteristics.

5. Monitoring, evaluation and review

Progress on the identified actions will be monitored on an ongoing basis at team level. All teams already discuss equality and human rights issues as a fixed agenda point at their monthly meetings. The Improvement Team and team managers will ensure that all staff are aware of the scope of this Plan.

Each team and officer assigned responsibilities for implementation under this Plan will develop more detailed action plans as appropriate. Progress across all teams will be monitored quarterly and on an annual basis by the Management Team.

PSOW's equality objectives and specific actions will be reviewed on an annual basis. However, the key review period will be in three years' time, to align with the three-year strategic planning cycle of the office.

Evaluation and review of the Plan, as well as the actions for the next year, will be coordinated by the Improvement Team.

PSOW will ensure that all staff have the opportunity to contribute to the evaluation and review of the Plan and the formulation of the actions for the next year. Staff feedback and ideas will be gathered through:

- the annual equality survey to be introduced under this Plan;
- dedicated sessions during our all-staff meetings;
- staff Diversity Champions (should staff express interest in taking on these roles).

In the evaluation and review of this Plan, as well as setting actions for the consecutive years, PSOW will also:

- consult with external organizations as appropriate, including the EHRC, the statutory Welsh Commissioners and advocacy and representative bodies and
- engage with the Service Users Sounding Board and Equality Focus Group(s) in due course.

6. Publication and reporting

This Equality Plan and actions will be published on the Ombudsman website and promoted on social media. The Ombudsman will also share copies of the Plan with key representative bodies to ensure awareness of the publication among protected groups. Versions of the report in alternative formats will be made available on request.

The text of the executive summary and outline of the Plan will be also published separately on PSOW's website to enable use of assistive technology (BrowseAloud). An Easy Read version of these texts will be made available in due course.

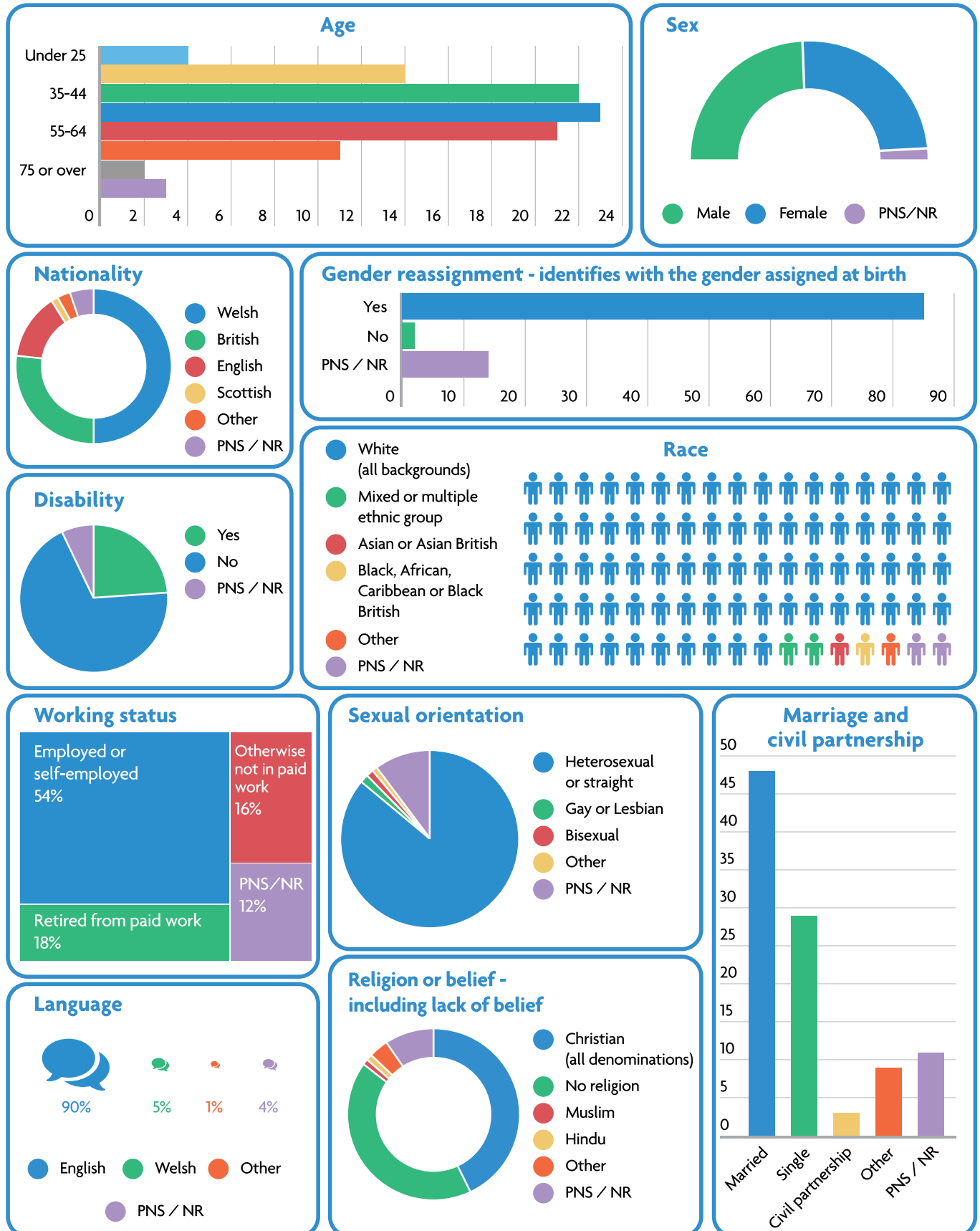
In 2020, alongside the annual report, PSOW will also publish an annual equality report. It will detail:

- the progress against the actions identified in this Plan;
- the equality profile of PSOW's service users and workforce (while preserving the need for confidentiality in a small organisation);
- information on the Gender Pay Gap;
- reports on EIAs of proposed policies and practices, together with any reviews of existing policies and practices, where the impact is deemed substantial;
- a statement on any reviews of our equality objectives and the actions for 2020/21.

The Ombudsman will also publish the equality profile of service users and workforce on the website on an annual basis.

Appendix 1: Service user profile

PSOW service users in 2018/19 at a glance



PNS / NR: prefer not to say / no response

The table below presents the equality profile of PSOW’s complainants, based on equality monitoring of complaints received between April 2018 and March 2019 (compared to the data gathered in 2017/18).

Of the 2489 complaints received in 2018/19, 837 were accompanied by equality data – a response rate of 34%. 95% of the data was received as part of online complaint submissions.

	2018/19	2017/18	PSOW analysis
Age	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%	Under 25: 3% 25-34: 14% 35-44: 17% 45-54: 23% 55-64: 20% 65-74: 13% 75 or over: 3% PNS / NR: 7%	Whilst complaints would be often made on behalf of children or young people, overall complainants under the age of 25 remain under-represented among PSOW’s complainants (compared to 29% of the Welsh population overall). Likewise, individuals over the age of 65 also appear to be under represented (compared to 21% of the Welsh population overall), with a decrease in the uptake of PSOW’s service among this group, compared to 2017/18.
Sex	Male: 48% Female: 49% PNS / NR: 3%	Male: 48% Female: 45% PNS / NR: 7%	There does not appear to be a significant variation in the uptake of PSOW’s service based on gender. This reflects the general Welsh population (50.9% female and 49.1% was male in 2011).
Gender reassignment	Identifies with the gender assigned at birth: 85% Does not identify with the gender assigned at birth: 2% PNS / NR: 13%	Identifies with the gender assigned at birth: 86% Does not identify with the gender assigned at birth: 2% PNS / NR: 12%	Given the scarcity of reliable data, it is difficult to make a firm judgement on the uptake of PSOW’s service by this protected group. However, the Ombudsman is aware that this group may be particularly vulnerable, especially so with respect to access to healthcare.
Nationality	Welsh: 50% English: 14% Scottish: 1% British: 27% Other: 3% PNS / NR: 5%	PSOW did not report on this characteristic in 2017/18	Individuals who do not identify as Welsh, English or British appear to be under represented among PSOW’s complainants (compared to 5.7% of the Wales population overall in 2011)

	2018/19	2017/18	PSOW analysis
Race	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%	White (all backgrounds): 89% Other ethnic backgrounds: 5%** PNS / NR: 6%	Representation of individuals from ethnic backgrounds different to white among PSOW's complainants appears to be broadly in line with the Welsh average (5% in 2019).
Language	English: 90% Welsh: 5% Other: 1% PNS / NR: 4%	-	Welsh speakers appear to be under represented among PSOW's complainants (compared to 19% of the Welsh population overall in 2011).
Disability	Yes: 24% No: 70% PNS / NR: 7%	Yes: 25% No: 64% PNS / NR: 11%	The uptake of PSOW's service by people who identify as disabled appears to be marginally lower than the proportion of this group within the Welsh population overall (25% in 2015/16).
Health problem or disability limiting day-to-day activities	Yes, limited a lot: 19% Yes, limited a little: 17% Not limited at all: 56% PNS / NR: 8%	Yes, limited a lot: 23% Yes, limited a little: 15% Not limited at all: 51% PNS / NR: 12%	However, responses to more detailed questions regarding impact of disability suggest that the uptake of PSOW's service by this group may in fact exceed the Welsh average. This is as expected, given that the majority of complaints to PSOW relate to health.
Sexual orientation	Heterosexual or Straight: 85% Gay or Lesbian: 2% Bisexual: 1% Other: 1% PNS / NR: 10%	Heterosexual or Straight: 82% Gay or Lesbian: 2% Bisexual: 2% Other: 1% PNS / NR: 13%	The proportion of people who identify as LGB+ among PSOW's complainants appears to exceed the ONS estimates of the proportion of this group within the Welsh population overall (2.5% in 2017). However, it is lower than other available estimates of the LGB+ population (10%). It is therefore possible that LGB+ people are under represented among PSOW complainants. It would also appear that there has been a slight decrease with respect of this group in comparison to 2017/18.

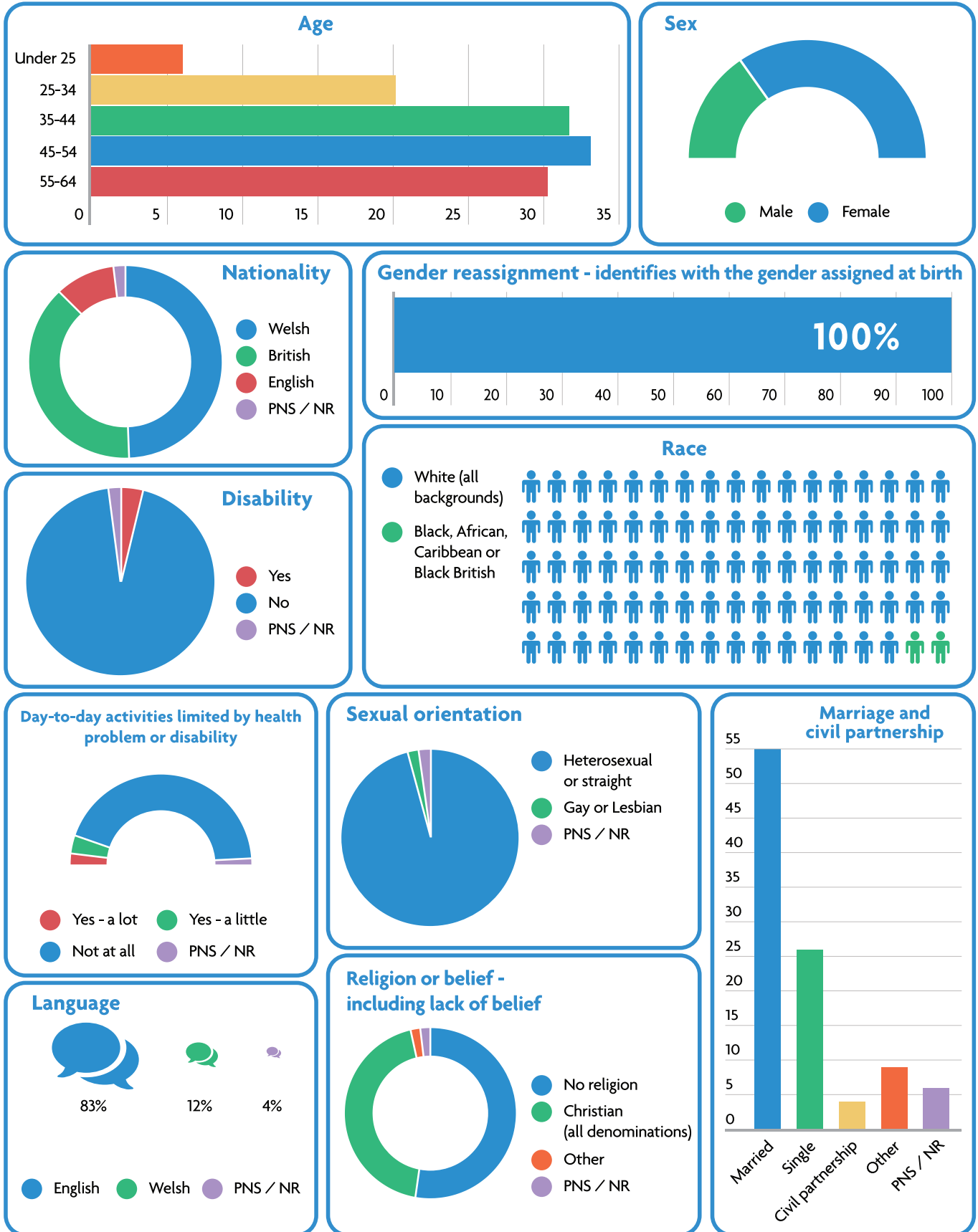
	2018/19	2017/18	PSOW analysis
Religion or belief – including lack of belief	<p>Christian (all denominations): 43%</p> <p>No religion: 42%</p> <p>Muslim: 1%</p> <p>Hindu: 1%</p> <p>Other: 4%</p> <p>PNS / NR: 9%</p>	<p>Christian (all denominations): 48%</p> <p>No religion: 40%</p> <p>Other: 6%**</p> <p>PNS / NR: 6%</p>	<p>Representation of individuals who follow religions other than Christianity among PSOW's complainants appears to exceed the proportion of this group in the Wales population overall (2.7% in 2011 and 5% in 2015/17).</p> <p>However, people who identify as Christians appear to be slightly under represented (57.6% in Wales overall in 2011 and 53% in 2015-17). The proportion of people who identify with no religion resembles the Welsh average in 2015-17 (43%).</p>
Marriage and civil partnership	<p>I am married: 48%</p> <p>I am single: 29%</p> <p>I am in a civil partnership: 3%</p> <p>Other: 9%</p> <p>PNS / NR: 11%</p>	<p>Yes: 50%</p> <p>No: 38%</p> <p>PNS / NR: 12%</p>	<p>Overall, representation of this group among PSOW's complainants appears to be broadly in line with the Wales population overall. The proportion of individuals in civil partnerships exceeds the Wales average (0.2% in 2011).</p>
Pregnancy and maternity	<p>PSOW does not currently monitor this characteristic</p>	-	<p>Monitoring of this characteristic will be considered under the PSOW Equality Plan 2019/20-21/22.</p>
Working status	<p>Employed or self-employed: 54%</p> <p>Retired from paid work: 18%</p> <p>Otherwise not in paid work: 16%</p> <p>PNS / NR: 12%</p>	-	

* PNS / NR: prefer not to say / no response

**This statistic was collated in PSOW's 2017/18 report

Appendix 2: Workforce profile

PSOW workforce 2018/19 at a glance



PNS / NR: prefer not to say / no response

PSOW’s workforce equality data is based on an anonymous voluntary internal staff survey. Between April 2018 and March 2019, 49 out of 67 employees responded to the survey (response rate 73%). This compares to 44 out of 65 in 2017/18 (68% response rate).

	2018/19	2017/18	PSOW analysis
Age	Under 25: 6% 25 to 34: 12% 35 to 44: 29% 45 to 54: 33% 55 to 64: 20%	Under 25: 5% 25 to 34: 18% 35 to 44: 32% 45 to 54: 29% 55 to 64: 16%	<p>Overall, people between the age of 16 and 24 are underrepresented in PSOW’s workforce (11% of the Wales population overall in 2018). However, there has been a small increase in this respect in comparison to 2017/18.</p> <p>The proportion of individuals in the 35-54 age group is higher than in the Welsh population overall (25%). However, the percentage of individuals between 55 and 64 is also higher than the Welsh average (13%). This is positive, given the EHRC (2018) evidence that in Wales this group has lower employment rates compared to the 35-54 age group.</p>
Sex	Female: 69% Male: 31%	Female: 68% Male: 32%	The proportion of females in PSOW’s workforce exceeds significantly the proportion of this group in the Welsh population overall (50.9% according to the 2011 Census)
Gender reassignment	100% identify with the gender as described at birth	93% identify with the gender as described at birth PNS / NR*: 7%	Given the scarcity of reliable data, it is difficult for to make a firm judgement on the representation of this group in PSOW’s workforce.
Nationality	Welsh: 49% English: 10% British: 38% PNS / NR: 2%	Welsh: 60% English: 7% British: 31% Irish: 2%	Individuals who do not identify as Welsh, English or British appear to be under represented in PSOW’s workforce (compared to 5.7% of the Wales population overall in 2011).

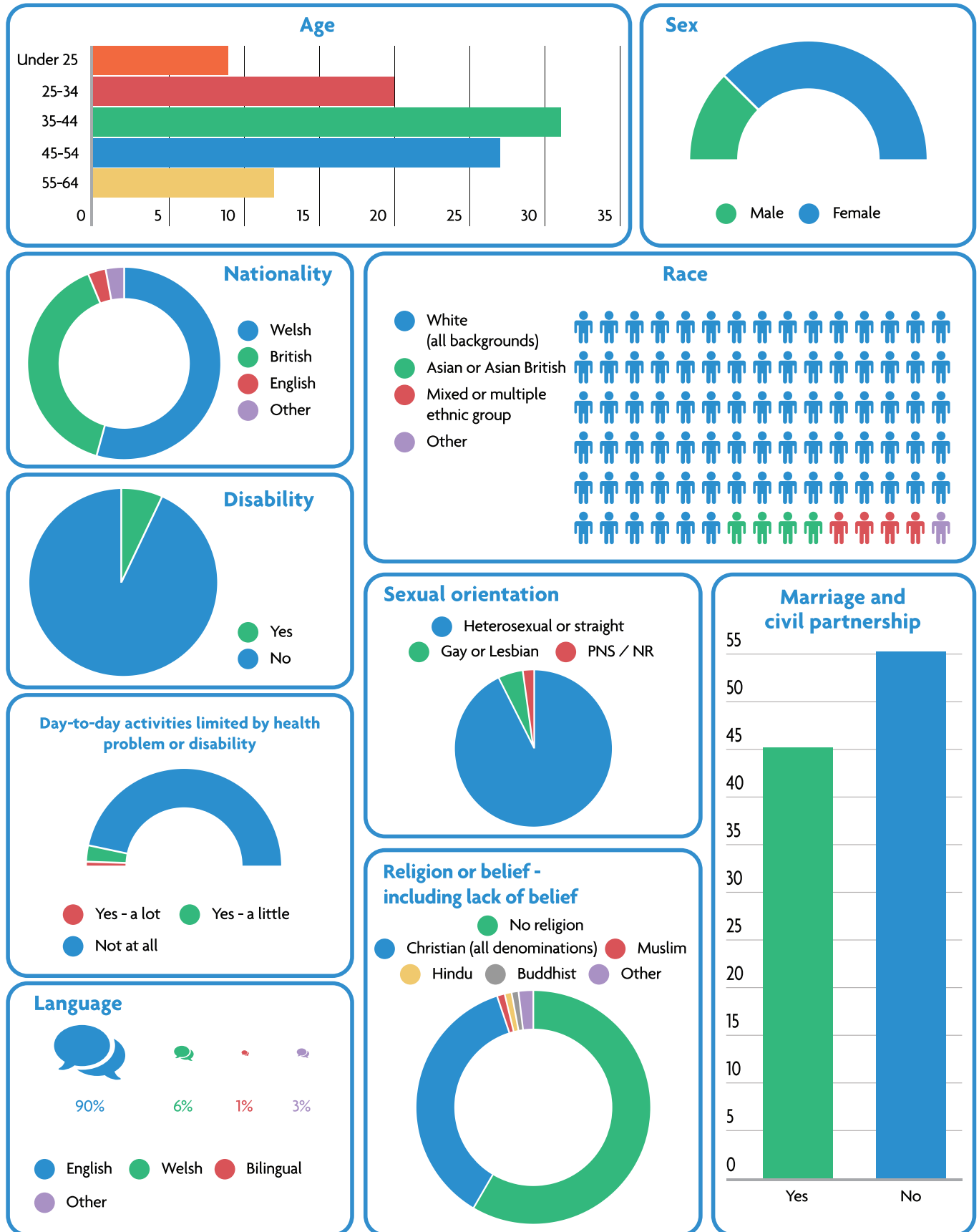
	2018/19	2017/18	PSOW analysis
Race	White (all backgrounds): 96% Black, African, Caribbean or Black British: 4%	White (all backgrounds): 98% Black, African, Caribbean or Black British: 2%	Representation of individuals from ethnic backgrounds different to white in PSOW's workforce is slightly lower than the Welsh average (5%) and lower than representation of this group in PSOW's local area (7%)
Language	English: 83% Welsh: 12% PNS / NR: 4%	English: 84% Welsh: 16%	Welsh speakers appear to be under represented among PSOW's workforce (compared to 19% of the Welsh population overall in 2011)
Disability	No: 94% Yes: 4% PNS / NR: 2%	No: 89% Yes: 7% PNS / NR: 5%	Overall, people who identify as disabled appear to be under represented in PSOW's workforce (compared to 21% of the Welsh working age population in 2015-17, rising to 22% in south east Wales).
Health problem or disability limiting day-to-day activities	Yes. limited a lot: 4% Yes. limited a little: 6% Not limited at all: 88% PNS / NR: 2%	Yes. limited a lot: 7% Yes. limited a little: 2% Not limited at all: 89% PNS / NR: 2%	There has been little change in this respect since 2017/18.
Sexual orientation	Heterosexual or Straight: 96% Gay or Lesbian: 2% PNS / NR: 2%	Heterosexual or Straight: 89% Gay or Lesbian: 2% PNS / NR: 9%	The proportion of people in PSOW's workforce who identify as LGB+ appears to be broadly in line with the ONS estimates of the proportion of this group within the Welsh population overall (2.5% in 2017). However, it remains lower than other available estimates of the LGB+ population (10%). It is therefore possible that LGB+ people are under represented among PSOW's workforce.

	2018/19	2017/18	PSOW analysis
Religion or belief – including lack of belief	No religion: 53% Christian (all denominations): 43% Other: 2% PNS / NR: 2%	No religion: 55% Christian (all denominations): 39% Other: 2% PNS / NR: 4%	Representation of individuals who follow religions other than Christianity in PSOW’s workforce appears to be slightly lower than the proportion of this group in the Wales population overall in 2011 (2.7%) and lower than the proportion in 2015-17 (5%). People who identify as Christians appear to be under represented (57.6% in Wales overall in 2011 and 53% in 2015-17). The proportion of people who identify with no religion exceeds the Welsh average in 2015-17 (43%).
Marriage and civil partnership	I am married: 55% I am single: 26% I am in a civil partnership: 4% Other: 9% PNS / NR: 6%	I am married: 60% I am single: 20% I am in a civil partnership: 2% Other: 11% PNS / NR: 7%	The proportion of married people among PSOW’s workforce is higher than the Welsh average (46.6% in 2011). This is to be welcome, given that according to the EHRC (2018) single people in Wales were more likely to be employed than married people (62.5% compared to 58.3%).
Pregnancy and maternity	Pregnancy and maternity information that PSOW holds in relation to the staff is confined to HR records of maternity.		-

* PNS / NR: prefer not to say / no response

Appendix 3: Applicant profile

PSOW job applicants in 2018/19 at a glance



PNS / NR: prefer not to say / no response

In 2018/19, 169 individuals applied for positions at PSOW. There was recruitment to replace departing staff, for a new post and for fixed term cover for maternity leave and a secondment. Eight new employees were recruited on permanent contracts and one on a fixed term contract.

Equality data of job applicants is collected via anonymous forms, separate from the recruitment process. Our current monitoring process does not differentiate between equality forms not returned and a decision not to respond to specific questions. For clarity, both these categories were removed from the data below. However, it must be underlined that, across all the categories, the proportion of no responses was between 47% and 50%.

	2018/19	PSOW analysis
Age	Under 25: 9% 25 to 34: 20% 35 to 44: 31% 45 to 54: 27% 55 to 64: 12%	Overall, people between the age of 16 and 24 are slightly under represented in PSOW’s job applicants (11% of the Wales population overall in 2018). The proportion of individuals in the 35-54 age group is higher than in the Welsh population overall (25%). However, the percentage of individuals between 55 and 64 almost mirrors the Welsh average (13%). This is positive, given the EHRC (2018) evidence that in Wales this group has lower employment rates compared to the 35-54 age group.
Sex	Female: 75% Male: 25%	The proportion of females among PSOW’s job applicants exceeds significantly the proportion of this group in the Welsh population overall (50.9% according to the 2011 Census)
Gender reassignment	PSOW does not currently monitor this characteristic as part of the recruitment process	Monitoring of this characteristic will be considered under the PSOW Equality Plan 2019/20-21/22.
Nationality	Welsh: 54% English: 3% British: 39% Other: 3%	Individuals from nationalities different to Welsh, English or British appear to be under represented among PSOW’s job applicants (compared to 5.7% of the Wales population overall in 2011).
Race	White (all backgrounds): 90% Asian /Asian British: 5% Mixed or multiple ethnic group: 4% Other: 1%	Representation of individuals from ethnic backgrounds different to white among PSOW’s job applicants exceeds the Welsh average (5%) and the representation of this group in PSOW’s local area (7%)

	2018/19	PSOW analysis
Language	English: 90% Welsh: 6% Bilingual: 1% Other: 3%	Welsh speakers appear to be under represented among PSOW’s job applicants (compared to 19% of the Welsh population overall in 2011)
Disability	No: 93% Yes: 7%	Overall, people who identify as disabled appear to be under-represented among PSOW’s job applicants (compared to 21% of the Welsh working age population, rising to 22% in south east Wales).
Health problem or disability limiting day-to-day activities	Yes. limited a lot: 1% Yes. limited a little: 6% Not limited at all: 93%	
Sexual orientation	Heterosexual or Straight: 93% Gay or Lesbian: 5% Bisexual: 2%	The proportion of people among PSOW job applicants who identify as LGB+ appears to exceed the ONS estimates of the proportion of this group within the Welsh population overall (2.5% in 2017). However, it remains lower than other available estimates of the LGB+ population (10%). It is therefore possible that LGB+ people are under represented among PSOW job applicants.
Religion or belief – including lack of belief	No religion: 58% Christian (all denominations): 36% Buddhist: 1% Hindu: 1% Muslim: 1% Other: 2%	Representation of individuals among PSOW’s job applicants who follow religions other than Christianity appears to exceed the proportion of this group in the Wales population overall in 2011 (2.7%) and corresponds to this proportion in 2015-17 (5%). People who identify as Christian appear to be under represented (57.6% in Wales overall in 2011 and 53% in 2015-17). The proportion of people who identify with no religion exceeds the Welsh average in 2015-17 (43%).
Marriage and civil partnership	Yes: 45% No: 55%	The proportion of married people among PSOW’s job applicants is similar to the Welsh average (46.6% in 2011).
Pregnancy and maternity	PSOW does 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.	Monitoring of this characteristic will be considered under the PSOW Equality Plan 2019/20-21/22.

Appendix 4: Other employment data

Employees who applied for training / completed training

PSOW does not currently hold information on the number of staff who accessed training in a format that lends itself to external reporting. Since staff equality monitoring is anonymous and not connected to the individual HR records, it is currently impossible to comprehensively analyse participation in training based on the protected characteristics. Steps to address these issues are identified in PSOW's Equality Plan.

In 2018/19, no one was refused their application for training.

Internal applications to change position

PSOW does not currently hold this data for employees in general. Furthermore, for the reasons outlined above, it would have been impossible to analyse this group based on the protected characteristics. Steps to address these issues are identified in PSOW's Equality Plan.

Individuals who left employment

In 2018/19, five members of staff left the office. For the reasons outlined above it is not currently possible to analyse this group based on the protected characteristics. Steps to address these issues are identified in PSOW's Equality Plan.

Individuals involved in grievance and disciplinary proceedings

While PSOW does hold this data, for the reasons outlined above it is not currently able to analyse it based on the protected characteristics. Steps to address these issues are identified in PSOW's Equality Plan. However, while this data will be analysed internally, it is unlikely that PSOW will be able to report publicly on this group within the workforce without identifying the individuals concerned and risking unfair processing of personal information.

Appendix 5: Gender breakdown by salary and role, contract type and working arrangement

As PSOW has a large number of grades, some with a single post holder, the table below provides the gender breakdown of staff by salary and role.

	Salary (FTE)	Male	Female	Total	% Male	% Female
Administrative and frontline staff	Up to £20k	0	6	6	0%	100%
	£20k to £30k	3	10	13	23%	77%
Investigation Officers and Support Service Managers	£30k - £42k	6	21	27	22%	78%
Improvement Officers and Managers	£42k - £50k	4	8	12	44%	56%
	£50k to £60k	3	1	4	75%	25%
Senior Managers	£60k +	2	3	5	40%	60%
	Total	18	49	67	27%	73%

As at 31 March 2019, there was one member of staff on a fixed term contract, with all other staff on permanent contracts. 17 members of staff worked part-time (15 female; 2 male).

Appendix 6: Broader equality data and research informing the Plan

As PSOW has a large number of grades, some with a single post holder, the table below provides the gender breakdown of staff by salary and role.

Age	Data
<p>Age</p>	<p>According to the Office for National Statistics,⁸ in 2018:</p> <ul style="list-style-type: none"> • 18% of the Welsh population was under the age of 15; • 11% was between 16 and 24 • 13% was between 25 and 34 • 11% was between 35 and 44 • 14% was between 45 and 54 • 13% was between 55 and 64 • 21% was over the age of 65. <p>According to the EHRC (2018) those aged 35–44 and 45–54 had the highest employment rates in 2016/17 (82–84%).</p> <p>The rates for those aged 16–24 (50.4%) and 55–64 (59.0%) were much lower (although, for the latter group, employment rates increased by 81% since 2010/11).</p> <p>According to the National Survey for Wales, in 2018-19, 49% of people aged 75 or over were internet users.⁹</p>
<p>Sex</p>	<p>According to the 2011 Census, 50.9% of the Welsh population was female and 49.1% was male.¹⁰</p> <p>In 2016/17, median hourly earnings were higher for men in Wales (£11.36) than women (£9.80) in 2016/17, representing a 13.7% gender pay gap.</p> <p>Using an alternative source, the ONS Annual Survey of Hours and Earnings (ASHE) states that the median gender pay gap for all employees in 2017 was 14.8%.¹¹</p>
<p>Gender reassignment</p>	<p>According to the UK Government Equalities Office (2018), no robust data on the UK trans population exists, with tentative estimates that there are approximately 200,000-500,000 trans people in the UK.¹²</p> <p>YouGov research published by Stonewall highlighted numerous areas where trans people in the UK continue to face discrimination. For instance, according to a 2018 study, 12% of trans people have been physically attacked by customers or colleagues in the last year because of being trans.¹³ Another 2018 study found that almost half of trans people (46%) have thought about taking their own life in the last year. The same research found that 13% of LGBT people have experienced some form of unequal treatment from healthcare staff because they're LGBT.¹⁴</p>

8 [Mid-year population estimates by age and year](#), StatsWales.

9 [National Survey for Wales 2018-19, Internet use and digital skills](#), Welsh Government – Statistics for Wales, September 2019.

10 The ONS [mid-year population estimates for 2018](#) showed a similar figure.

11 [Is Wales Fairer? The state of equality and human rights 2018](#), Equality and Human Rights Commission, 2018.

12 [Trans People in the UK](#), Government Equalities Office, 2018.

13 [LGBT in Britain - Work Report](#), Stonewall, April 2018.

14 [LGBT in Britain – Health](#), Stonewall, November 2018.

	Data
Nationality	<p>According to the 2011 Census,</p> <ul style="list-style-type: none"> 57.5% of the Welsh population identified as Welsh only 16.9% identified as British only 11.2% identified as English only 7.1% identified as Welsh and British 0.8% identified as English and British 5.7% identified as other
Race	<p>According to the Local Labour Force Survey/Annual Population Survey, in 2019,¹⁵ 5% of the Welsh population identified as not being from a white background. However, this percentage is higher than average in south east Wales,¹⁶ where most of PSOW's workforce are located – at 7%.</p>
Language	<p>According to the 2011 Census, 19% of respondents in Wales identified as Welsh speakers. While the Census is the main source of information on the proportion of Welsh speakers in Wales, the National Survey for Wales 2017-18 found that 19% of adults aged 16 and over reported that they can speak Welsh, with a further 12% reporting to have some Welsh-speaking ability.¹⁷</p>
Disability	<p>In 2015/16, 25% of people in Wales (0.8 million) reported being disabled.¹⁸ This compares to 21% across the UK overall; and 18% of those of working age. While the study did not specify this latter statistic in relation to Wales, according to the Annual Population Survey data for 2015-2017, 21% of people in Wales in the 16-64 age group reported being disabled – 22% in south east Wales.¹⁹</p>
Sexual orientation	<p>There is no accurate data on LGB+ people in the Welsh population. According to the ONS, the proportion of Wales' population aged 16 years and over identifying as heterosexual or straight was 95% in 2017.²⁰ 2.5% of people identified themselves as lesbian, gay, bisexual or did not consider themselves to fit into the heterosexual or straight, bisexual, gay or lesbian categories.</p> <p>However, these figures represent minimum estimates. For instance, the YouGov survey in 2019²¹ found that 10% of respondents across the UK described themselves as gay, lesbian, bisexual or other – with this percentage increasing to 23% in the 18-24 age group. Furthermore, when people were asked to plot themselves on a 'sexuality scale' (rather than asked to choose binary options) only 66% identified as completely heterosexual (44% in the 18-24 age group).</p> <p>YouGov research published by Stonewall highlighted numerous areas where LGB+ people continue to face discrimination. A 2018 study found that 13% of LGBT people have experienced some form of unequal treatment from healthcare staff because they're LGBT.²² According to another 2018 study, more than a third of LGBT staff (35%) have hidden or disguised that they are LGBT at work in the last year because they were afraid of discrimination.²³</p>

15 [Ethnicity by area and ethnic group](#), StatsWales.

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

17 [Welsh language confidence and attitudes \(National Survey for Wales\): April 2017 to March 2018](#), Welsh Government – Statistics for Wales, October 2018.

18 [Family Resources Survey: financial year 2015/16](#), UK Government - Department for Work and Pensions. According to the definition of disability in the Equality Act 2010, a person is considered to be disabled if they have a physical or mental impairment that has 'substantial' and 'long term' negative effects on their ability to do normal daily activities.

19 [Disability Status by Region](#), StatsWales.

20 [Sexual orientation, UK: 2017](#), Office for National Statistics, January 2019.

21 [One in five young people identify as gay, lesbian or bisexual](#), YouGov, July 2019.

22 [LGBT in Britain – Health](#), Stonewall, November 2018.

23 [LGBT in Britain - Work Report](#), Stonewall, April 2018.

	Data
<p>Religion or belief – including lack of belief</p>	<p>According to the 2011 Census,</p> <ul style="list-style-type: none"> 57.6% of the respondents in Wales declared that they were Christian 32.1% that they had no religion 1.5% that they were Muslim 0.3% that they were Buddhist 0.3% that they were Hindu 0.1% that they were Sikh 0.1% that they were Jewish 0.4% that they had other religion 7.6% did not respond <p>According to the Annual Population Survey data for 2015-2017, 43% of people in Wales reported having no religion (46% in south east Wales) and 53% identified as Christian (49% in south east Wales). About 2% identified as Muslim and 3% reported other religion (with no significant differences between the Wales population overall and south east Wales).²⁴</p>
<p>Marriage and civil partnership</p>	<p>According to the 2011 Census,</p> <ul style="list-style-type: none"> 46.6% of the Welsh population declared that they were married 33.5% that they were single 9.7% that they were divorced 7.9% that they were widowed 2.2% that they were separated 0.2% that they lived in a same sex civil partnership <p>According to the EHRC (2018),²⁵ in April–June 2018, single people (62.5%) were more likely to be employed than married people (58.3%) or those formerly married (38.5%), and the employment rate of single people had risen by 4.9 percentage points since 2010/11.</p>

²⁴ [Religion by region](#), StatsWales.

²⁵ [Is Wales Fairer? The state of equality and human rights 2018](#), Equality and Human Rights Commission, 2018.

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