

# **Equality Impact Assessment Form:**

## **Equality Report 2019/20 and actions 2020/21**

See Equality Impact Assessment Policy and Procedure for detailed guidance on how to complete this form.

### Section 1: Purpose and scope of policy

<b>Title</b>	Equality Report 2019/20 and actions 2020/21
<b>New or existing</b>	Report and action plan under the existing Equality Plan 2019-2022
<b>Owner</b>	Ania Rolewska
<b>Officer(s) undertaking the EIA</b>	Ania Rolewska Equality Plan Group
<b>What does the policy aim to achieve?</b>	The publication aims to report on the first year of implementation of PSOW Equality Plan 2019-22 and outline the actions for next year
<b>How is the policy related to other areas of work?</b>	Report under the existing Equality Plan 2019-2022
<b>Who is likely to be affected by this policy?</b>	<ul style="list-style-type: none"> <li>• Service users</li> <li>• Staff</li> <li>• Job applicants</li> <li>• The public</li> </ul>

### Section 2: Assessment of relevance and proportionality

Key points to remember:

- to assess relevance you must consider evidence related to all equality characteristics
- you must record all evidence considered in [section 4](#) of this form.

Question	No	Yes	Comments
Does the policy relate to PSOW's equality objectives and identified actions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Yes – this is the report on the implementation of the objectives

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Question	No	Yes	Comments
Does the policy relate to functions that evidence, or previous activities have identified as being important to, particular characteristics?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PSOW Equality Plan is relevant to all protected characteristics. However, specific actions in 2019/20 focused especially on disability, age and gender in relation to accessibility of our service and our inclusivity as employer. Specific actions in 2020/21 added also a focus on ethnicity and national identity.
Does the policy relate to an area where there are known inequalities, or a significant potential for reducing inequalities or improving outcomes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>One of the key broad aim of the Equality Plan is to support PSOW in fulfilment of the general and specific equality duties and has the potential to address inequalities in relation to all protected characteristics, socio-economic disadvantage and the Welsh language.</p> <p>The 2019/20 report and actions follow the structure of the Equality Plan, which seeks to address inequalities in three main areas:</p> <ul style="list-style-type: none"> <li>• Accessibility and responsiveness of our service (Corporate Aim 1)</li> <li>• Promotion of equality and human rights as part of improvement of public services (Corporate Aim 2)</li> <li>• Equality, diversity and inclusion at PSOW as a workplace (Corporate Aim 3)</li> </ul>
Is there evidence to suggest that this policy may affect:			
<ul style="list-style-type: none"> <li>• equal treatment of people with certain characteristics</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Yes – it seeks to ensure that we treat equally all our complainants, staff and job applicants. The particular focus of the actions in 2019/20 in this respect has been on disability, age and gender; and in 2020/21 also on ethnicity and national identity.
<ul style="list-style-type: none"> <li>• meeting the needs of people with equality characteristics (including through provision of reasonable adjustments)</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Yes – the actions in 2019/20 in 2020/211 include steps that we have taken to date and intend to take to improve the accessibility of our service and provision of reasonable adjustments.
<ul style="list-style-type: none"> <li>• participation of people with equality characteristics</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Yes – preparation of the Report 2019/20 and actions 2020/21 involved internal and external consultation and engagement. Furthermore, the implementation of the actions to date led to development of new

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Question	No	Yes	Comments
			contacts with organisations representing protected groups (e.g. Age Cymru) and this is expected to continue in 2020/21.
<ul style="list-style-type: none"> <li>community relations between different equality groups</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Yes – the Equality Plan and actions 2019/20 and 2020/21 seek to make PSOW a more inclusive and diverse workplace
Is there evidence to suggest that this policy may influence disadvantage due to people's socio-economic status?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Yes – the Equality Plan highlights our commitment to working in the spirit of the socio-economic duty and in 2019/20 we have taken some steps to improve how we can fulfil this commitment (e.g. adding questions regarding caring duties to staff equality monitoring).
Is there evidence to suggest that this policy may affect opportunities for people to use Welsh or affect how PSOW treats the Welsh language?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Yes – the Equality Plan highlights our commitment to supporting the Welsh language. Actions for 2019/20 and 2020/21 include some steps that will improve how the Welsh language is considered as part of our processes (e.g. as part of the Equality Impact Assessments)

If you answer 'yes' to any of these questions, proceed to [section 3](#).

If a policy is not deemed relevant for conducting a full EIA, proceed to [section 5](#).

### Section 3: Full Equality Impact Assessment

Key points to remember:

- you must consider at this stage any need for collection of further evidence - including through engagement with groups potentially affected by the policy;
- you must record all evidence informing this stage in [section 4](#) of this form.

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Characteristic	Negative impact			Positive impact			n/a	Justification based on the evidence considered	Proposed actions to mitigate negative impact /maximise positive impact	Negative impact			Positive impact		
	H	M	L	H	M	L				H	M	L	H	M	L
General aspects	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Most of the 2020/21 actions are cross-cutting and are expected to broadly positively impact accessibility and responsiveness of our service; how we promote equality and human rights as part of improvement of public services; and how we support equality, diversity and inclusion at PSOW as a workplace.</p> <p>The 2019/20 actions do not include specific steps in relation to all protected groups. This is due to the need to prioritise certain areas where action is needed most.</p>	The need to identify actions in respect of the protected groups not included in the 2020/21 actions will be re-evaluated next year.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>People over 65 remain under-represented among our complainants. Actions in 2020/21 include commitments to:</p> <ul style="list-style-type: none"> <li>• launch an outreach strategy to promote oral complaints</li> <li>• increase visibility of different formats for submission of complaints (apart from the online complaint form)</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Disabled people are under-represented among our workforce and job applicants. Actions in 2020/21 include commitments to:</p> <ul style="list-style-type: none"> <li>• undertake actions in relation to recruitment under Disability Confident scheme</li> <li>• improve how we record requests for reasonable adjustments from complainants and job applicants</li> <li>• better highlight the option to request reasonable adjustments</li> <li>• launch an outreach strategy to promote oral complaints</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Characteristic	Negative impact			Positive impact			n/a	Justification based on the evidence considered	Proposed actions to mitigate negative impact /maximise positive impact	Negative impact			Positive impact		
	H	M	L	H	M	L				H	M	L	H	M	L
								<ul style="list-style-type: none"> <li>train Autism Champion to offer advice to casework staff and colleagues</li> </ul> <p>The Report and actions will be available as Executive Summary and Easy Read.</p>							
Gender	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Despite women being well-represented among our workforce and job applicants, our gender pay gap remains high (11% median and 19% mean). Actions in 2020/21 include commitments to:</p> <ul style="list-style-type: none"> <li>implement recommendations of Chwarae Teg, to support gender equality at PSOW</li> <li>scope the demand for management and development courses</li> </ul>	<p>The consultations suggested that our 2020/21 actions in respect of ethnicity can be strengthened as follows</p> <ul style="list-style-type: none"> <li>add an explicit commitment to review our flexible working policy</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Report does not identify specific actions in respect of trans community. This is due to insufficient general data on the size of trans population in Wales, but also high rate of no responses to equality monitoring questions about trans identity. However, it is expected that the cross-cutting actions for 2020/21 will also positively impact people who identify as trans.</p>	<p>The impact on this protected characteristic must be revisited in 2021/22</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Report does not identify specific actions in respect of people's marital status, since our equality monitoring did not point to under-representation or inequalities in respect of this characteristic. However, it is expected that the cross-cutting actions for 2020/21 will also positively impact people of different marital status.</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy & maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>It is expected that the cross-cutting actions for 2020/21 will also positively impact people who are pregnant, on parental leave or adopting.</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Characteristic	Negative impact			Positive impact			n/a	Justification based on the evidence considered	Proposed actions to mitigate negative impact /maximise positive impact	Negative impact			Positive impact		
	H	M	L	H	M	L				H	M	L	H	M	L
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Representation of diverse ethnic communities remains low among our complainants, staff and job applicants. Actions in 2020/21 include commitments to:</p> <ul style="list-style-type: none"> <li>run a focus group with migrant communities to capture views on accessibility of our service</li> <li>work with organisations engaging with migrant communities to increase our visibility</li> <li>deliver unconscious bias training to casework staff, depending on demand</li> <li>sign up to Investing in Ethnicity or another comparable certification scheme</li> <li>better share vacancy adverts with BAME organisations in Wales</li> </ul>	<p>The consultations suggested that our 2020/21 actions in respect of ethnicity can be strengthened as follows:</p> <ul style="list-style-type: none"> <li>run a focus group with BAME people to capture views on accessibility of our service</li> <li>include a commitment to ensure BAME representation on PSOW Advisory Panel / ARAC</li> <li>underline the context of the Report publication (Black Lives Matter protests)</li> <li>consider delivering unconscious bias training to all staff</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Report does not identify specific actions in respect of people's religion. We have seen some under-representation of people who are Christian among complainants and staff.</p> <p>However, it is expected that the cross-cutting actions for 2020/21 will also positively impact people of different religions and beliefs.</p>	<p>The impact on this protected characteristic must be revisited in 2021/22</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Report does not identify specific actions in respect of sexual orientation. The proportion of people who identified as LGB+ among our complainants, staff and job applicants was broadly in line with estimates of the size of this population in Wales. However, it was below some higher</p>	<p>The impact on this protected characteristic must be revisited in 2021/22</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Characteristic	Negative impact			Positive impact			n/a	Justification based on the evidence considered	Proposed actions to mitigate negative impact /maximise positive impact	Negative impact			Positive impact		
	H	M	L	H	M	L				H	M	L	H	M	L
								<p>estimates; and there was no LGB+ representation among successful candidates.</p> <p>It is expected that the cross-cutting actions for 2020/21 will also positively impact people of different sexual orientations.</p>							
Socio-economic status	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The actions for 2020/21 include revision of the complainant equality form, to better capture data on caring duties and education.</p> <p>It is expected that the cross-cutting actions for 2020/21 will also positively impact people experiencing socio-economic disadvantage.</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Welsh language	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Report does not identify specific actions in respect of the Welsh language. This is a weakness, since although the available data showed that Welsh speakers were comparatively well-represented amongst staff, this group was under-represented among job applicants and complainants.</p> <p>However, there are grounds to believe that this may be at least in due to the question format (asking about 'main language' rather than ability to use Welsh. The actions for 2020/21 include revision of complainant equality form to gather better data in this respect.</p> <p>It is expected that the cross-cutting actions for 2020/21 will also positively impact Welsh speakers.</p> <p>The Report will be published bilingually in all three formats (full report, executive summary and Easy Read).</p>	<p>This is an area that must be revisited once better data becomes available.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



## Section 4: Register of evidence and engagement

Existing evidence considered	
Equality screening	n/a
Equality Impact Assessment	<ul style="list-style-type: none"> <li>• PSOW Equality Reference Document</li> <li>• Staff equality profile 2019/20 and 2018/19</li> <li>• Complainant equality profile 2019/20 and 2018/19</li> <li>• Job applicants equality profile 2019/20 and 2018/19</li> </ul>
Additional evidence collected	
Equality screening	
Method of evidence collection	n/a
Record of the evidence collected	n/a
Date completed	n/a
Equality Impact Assessment	
Method of evidence collection	<b>Internal consultation: staff (1 – 10 June 2020)</b>
Record of the evidence collected	Would welcome strengthening the emphasis on BAME inclusion Explain better that although some groups are under-represented amongst our complainants (e.g. people over the age of 65) this may be because people in these groups ask other family members or friends to pursue complaints with us on their behalf
Date completed	10 June 2020
Method of evidence collection	<b>Management Team feedback</b>
Record of the evidence collected	Agreed to strengthen the emphasis of the report on our work to promote ethnic diversity Agreed in principle to include a target for BAME representation on the Advisory Panel / ARAC
Date completed	16 June 2020
Method of evidence collection	<b>External consultation: public call for comments (26 June – 9 July 2020)</b>
Record of the evidence collected	Wales Strategic Migration Partnership (WLGA) <ul style="list-style-type: none"> <li>• Welcomed the report – possible areas for cooperation identified:</li> </ul>

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- WLGA stakeholder forums – possible opportunities for us to participate in the future and present the work of the Ombudsman;
- WLGA promotional materials – opportunity for us to contribute to updating some of your existing toolkits (e.g. Cultural Orientation) or develop new ones, raising awareness of different mechanisms in the administrative justice sector;
- our promotional materials – attention may be needed to the availability of our promotional materials in different languages;
- recruitment – opportunity for us to share any vacancies.

### Chwarae Teg

- “Data is a powerful tool and it is good to see in the plan how it is being used to drive improvements”
- suggested an updated GPG figure
- requested that the opening statement reference Chwarae Teg here as well regarding the FairPlay Employer Silver Award

### Ethnic Minorities & Youth Support Team Wales

- welcomed the report and actions and the emphasis on BAME inclusion
- was eager to cooperate as we implement the 2020/21 actions, especially in relation to recruitment and Equality Focus Group

### Former complainant

- The individual shared their feedback on the aspects of our service that in their view lock out some complainants. Specifically, they argued that our expectation that a complaint would be submitted within 12 months locks out the individuals complaining about private care settings, where the complaints process is protracted and unresponsive.
- They also pointed out that ageism and stereotyping are rife in complaint handling in social care settings and suggested that it would be useful for us to analyse the profile of our complainants by outcome.

### Ethnic Minority Welsh Women Achievement Association

- discussed opportunities to cooperate on focus groups. She underlined that a focus group should be coordinated by people from diverse ethnic backgrounds, and that they should have good communication skills, since confidence is often a barrier for the women that the Association works with. Agreed to discuss facilitating a group in the new year

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	<ul style="list-style-type: none"> <li>was happy to receive any recruitment information.</li> </ul> <p>Age Cymru</p> <ul style="list-style-type: none"> <li>We welcome the reflection in the report under Objective 1.2 of points raised in Age Cymru's Consultative Forum with reference to increase the visibility of the service and to better advertise communication channels more accessible to older people.</li> <li>With reference to communication channels we would highlight that as not all older people are online, it is important that services are accessible both offline and online. Services provided online need to be high quality and easy to use, whilst offline services should be of equal quality and fully accessible</li> </ul>
Date completed	9 July 2020

### Section 5: Outcomes report

<b>EIA stage completed</b>	Screening	<input checked="" type="checkbox"/>	
	Impact assessment	<input checked="" type="checkbox"/>	
<b>Outcome of the EIA procedure</b>	Proceed with policy – no changes	<input type="checkbox"/>	
	Make changes to policy	<input checked="" type="checkbox"/>	
	Do not proceed with policy	<input type="checkbox"/>	
<b>Action plan (full EIA only)</b>			
Where actions are required to mitigate the level of negative impact or maximise positive impact, please specify:			
<b>Key issue</b>	<b>Action to be taken</b>	<b>Responsible officer</b>	<b>Date for completion</b>
1. Emphasis on race and ethnicity	Modify foreword - add target re BAME representation on ARAC / Advisory Panel Add action on BAME Focus Group	AR	07/07/2020
2. Gender Pay Gap section	Minor clarifications requested by Chwarae Teg to be applied	AR	07/07/2020

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	Review of flexible working policy added		
3. Training to casework staff (ethnicity)	Commit to delivering unconscious bias training to all staff	SC	Wording to be changed – remove ‘depending on demand’
<b>Monitoring (full EIA only)</b>			
<b>Please outline monitoring arrangements</b>	<ol style="list-style-type: none"> <li>1. changes applied already in the report submitted to the MT</li> <li>2. “</li> <li>3. depends on the availability of resources and appropriate training. If these can’t be confirmed quickly, the Report could be published with the current wording</li> </ol>		
<b>Please specify responsible officer</b>	3. MT		
<b>Publication needs (full EIA only)</b>			
Was the impact deemed as substantial (high)?	YES		

Authorised by the MT	<input checked="" type="checkbox"/>
Date	14/07/2020