

## PSOW Annual Report 2021/22

### Equality Impact Assessment Form

#### About the function, policy, project or decision being assessed

What is being assessed?	<input type="checkbox"/>	Function
	<input type="checkbox"/>	Policy
	<input checked="" type="checkbox"/>	Project
	<input type="checkbox"/>	Decision
Title of the function, policy, project, or decision	PSOW Annual Report 2021/22	
What is this function, policy, project, or decision aiming to achieve?	The report presents our work during 2021/22. It is one of the main ways in which we are held to account by the Senedd. It is also one of the main channels through which we publicise our work more generally.	
Who is affected by this function, policy, project, or decision?	Our audience: Members of the Senedd, the public (including former or potential complainants and potential job candidates), the press, relevant bodies, researchers who may be interested in our work,	
Who should be consulted about this function, policy, project, or decision?	The Management Team PSOW Advisory Panel	
Who is conducting this impact assessment?	Ania Rolewska (Head of Policy, Communications and EDI)	
Date: 11/07/2022		Version: 1.0

#### Initial screening

Question	Y	N	If 'YES', briefly explain why
Does this policy, project or decision relate to our functions or areas of work within those functions for which EIA has identified equality impacts?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	As one of our most high profile publications in the year, this is a major communications project. Although the EIA of our communications function has not been completed yet, we anticipate that most aspects of our communications work will have equality impact.
Does this policy, project or decision relate to our Equality Objectives?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yes, to the extent that these objectives include attention to accessibility of our service and how we promote equality and human rights considerations through our improvement work.

Is there a risk that this policy, project, or decision could disadvantage any group of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yes, in that the publication may not be accessible to all audiences.
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If you answered 'yes' to any of the questions above, proceed to the full impact assessment.

## Impact Assessment

Characteristic	Potential impact			Please explain this impact	Can this impact be mitigated or enhanced?  If so, how?	Impact after actions		
	Negative	Neutral	Positive			Negative	Neutral	Positive
Cross-cutting considerations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that the Report will not adequately or sufficiently explain our work in relation to equality, diversity and inclusion.	<p>The Report takes the following steps to adequately emphasise this work:</p> <ul style="list-style-type: none"> <li>• EDI is one of our 'key messages' and one of the key sections of the Report in Executive Summary and video format.</li> <li>• The Report explains what we did during the year to be as accessible as possible, draws attention to our publications such as the Equality and Human Rights Casebook and emphasises our EDI work as an employer.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that the imagery used in the Report will not convey how at PSOW we embrace equality, diversity and inclusion.	Where we used images of people in the Report, we took care to select diverse images. However, our ability to portray a broad range of equality characteristics is constrained by the number of images in the Report as well as availability of suitable images in our stock image service (Shutterstock).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that the Report format will not be accessible to all	<p>The Report will be published in the following formats:</p> <ul style="list-style-type: none"> <li>• Full report (PDF)</li> <li>• Executive Summary <ul style="list-style-type: none"> <li>➢ PDF</li> <li>➢ Video</li> <li>➢ Easy Read</li> <li>➢ HTML</li> </ul> </li> </ul> <p>The PDF versions will be bookmarked and tagged to help users that use assistive technology. ALT text will be</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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					<p>added to all images. It has not been possible to produce a fully accessible PDF as our brand colours are not all currently accessible. Care was taken to limit the use of corporate dark blue colour (not accessible).</p> <p>The full report will state clearly that the publication can be requested in different formats, including large print, hard copy and Braille.</p>			
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that the publication will not be accessible to older users, who may prefer formats other than digital.	The Annual Report states clearly that the publication can be requested in different formats, including large print and hard copy.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that older people will not engage with this publication. Although our awareness research showed that that older people were more aware of us than an average respondent, people over 65 are under-represented among our complainants.	As part of our distribution plan, we will seek to raise awareness of the publication by sharing the Report in different formats with Age Cymru and asking it to distribute the Report using its networks. Our ability to undertake more targeted outreach around this publication is currently constrained by our resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that younger people (under 25) will not engage with this publication. We know that although awareness of our office has improved slightly among this demographic since 2020, this demographic remains significantly under-represented among our complainants.	<p>The Annual Report will be produced in video format, which should appeal more to younger audiences. The video will be distributed through our social media channels.</p> <p>As part of our distribution plan, we will seek to raise awareness of the publication by sharing the Report and the video with organisations such as Council for Wales of</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Characteristic	Potential impact			Please explain this impact	Can this impact be mitigated or enhanced?  If so, how?	Impact after actions		
	Negative	Neutral	Positive			Negative	Neutral	Positive
					Voluntary Youth Services. Our ability to undertake more targeted outreach around this publication is currently constrained by our resources.			
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that the publication will not be accessible to disabled people, including those with sight loss and with learning disabilities.	<p>The Annual Report will be produced in Easy Read and video format. The full report will state clearly that the publication can be requested in different formats, including large print, hard copy and Braille.</p> <p>This will mitigate the risk that disabled people will have difficulties in accessing the publication.</p> <p>The video about the report could also be interpreted in British Sign Language. Unfortunately, resources did not allow us to develop that format side by side with other formats. Depending on capacity, we can look to produce a BSL transcription of sections of the Annual Report video later in the year.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	It appears quite likely that disabled people will engage with this publication. Disabled people are well represented among our complainants, and our awareness research showed that that demographic was more aware of us than an average respondent.	As part of our distribution plan, we will seek to raise awareness of the publication by sharing it with Disability Wales, Learning Disability Wales and other organisations that offer advice and support to disabled people, and asking them to distribute the publication using their networks. Our ability to undertake more targeted outreach around this publication is currently constrained by our resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Characteristic	Potential impact			Please explain this impact	Can this impact be mitigated or enhanced?  If so, how?	Impact after actions		
	Negative	Neutral	Positive			Negative	Neutral	Positive
Gender (sex)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The Report offers an opportunity to highlight the work done at PSOW to improve gender equality.	The Report emphasises this work by drawing attention to our work with Chwarae Teg and explaining changes in our gender pay gap figures.  As part of our distribution plan, we will ask Chwarae Teg and Fair Treatment for Women in Wales to share the Report in its different formats through its networks.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that people who identify as trans will not engage with this publication. We do not measure awareness of our office among this equality group. However, we know that only a very small proportion of our complainants identifies as trans, and a very large proportion of people chose not to answer the question about their gender identity, pointing to issues around trust.	As part of our distribution plan, we will seek to raise awareness of the publication by sharing it with Stonewall and asking it to distribute the publication using its networks.  Our ability to undertake more targeted outreach around this publication is currently constrained by our resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The assessment identified no specific impact of this project on this equality group.	n/a	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy & maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The assessment identified no specific impact of this project on this equality group.	n/a	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that the publication will not be accessible to people from diverse ethnic backgrounds. Our data shows that those communities have little engagement with our office and that awareness of the office among	As part of our distribution plan, we will seek to raise awareness of the publication by sharing it with Ethnic Minorities & Youth Support Team, Race Equality First and Race Council Cymru, and asking them to distribute the publication using their networks.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Characteristic	Potential impact			Please explain this impact	Can this impact be mitigated or enhanced?  If so, how?	Impact after actions		
	Negative	Neutral	Positive			Negative	Neutral	Positive
				those communities dropped between 2020 and 2022.	Our ability to undertake more targeted outreach around this publication is currently constrained by our resources.			
Religion or belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that people following diverse religions will not engage with this publication. Our data shows that those communities have little engagement with our office.	As part of our distribution plan, we will seek to raise awareness of the publication by sharing it with Cytun and asking it to distribute the publication using its networks.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	We do not measure awareness of our office among this equality group. Based on our equality monitoring, we know that this equality group is represented reasonably well among our complainants. However, a very large proportion of people chose not to answer the question about their sexual orientation, pointing to issues around trust. There is a risk that people who identity as gay, lesbian, bisexual or other will not engage with this publication.	As part of our distribution plan, we will seek to raise awareness of the publication by sharing it with Stonewall and asking it to distribute the publication using its networks.  Our ability to undertake more targeted outreach around this publication is currently constrained by our resources.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Welsh language	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that the publication will not be accessible to Welsh speakers.	The Annual Report in all the formats will be published in Welsh and English. The Annual Report video will be subtitled in Welsh. Press release about the Report will be shared with our contacts in Welsh language media and a staff member who speaks Welsh will be available for interviews.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Socio-economic characteristics	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is a risk that the publication will not be easily accessible to people with no access to good broadband, which could prevent	Care was taken to produce the PDFs in compressed press quality. This means that the file is small enough to	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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<ul style="list-style-type: none"> <li>rurality</li> <li>low/no income</li> <li>caring duties</li> </ul>				<p>downloading the Report in PDF formats and/or streaming the Annual Report video.</p> <p>The best internet speed for 4K streaming is a minimum of 25 Mbps. According to Ofcom data, the vast majority of household in Wales have 'decent' broadband. However, issues remain for rural communities.</p>	<p>be sent as an email attachment and it should easily download and open on most PCs.</p> <p>Unfortunately, we see currently no way in which we can mitigate issues that people living in rural communities may face when accessing our video content. It is hoped that other formats of the publication will serve to mitigate that disadvantage.</p>			



Please record the evidence that you used to assess impact:

### PSOW complainant profile

2018/19	2021/22	2022/23 Q1	Comments
<b>Age</b> <ul style="list-style-type: none"> <li>under 25 – 4%</li> <li>over 65 – 13%</li> </ul>	<b>Age</b> <ul style="list-style-type: none"> <li>under 25 – 2.8%</li> <li>over 65 – 14.4%</li> </ul>	<b>Age</b> <ul style="list-style-type: none"> <li>under 25 – 2.5%</li> <li>over 65 – 13%</li> </ul>	The representation of young people (2.5%) and people over 65 (13%) does not match the demographic profile of Wales.
<b>Trans identity</b> <ul style="list-style-type: none"> <li>yes – 2%</li> <li>PNS - 14%</li> </ul>	<b>Trans identity</b> <ul style="list-style-type: none"> <li>yes – 1.5%</li> <li>PNS – 9.2%</li> </ul>	<b>Trans identity</b> <ul style="list-style-type: none"> <li>yes – 3%</li> <li>PNS – 13%</li> </ul>	The proportion of people who appear to identify as trans increased from 1.5% to 3%. However, the high rate of no responses to this question indicates a lack of trust that we need to address.
<b>Nationality</b> <ul style="list-style-type: none"> <li>not Welsh, English, Scottish or British - 3%</li> <li>PNS - 5%</li> <li>PNS</li> </ul>	<b>Nationality</b> <ul style="list-style-type: none"> <li>not Welsh, English, Scottish or British – 2.7%</li> <li>PNS – 8%</li> </ul>	<b>Nationality</b> <ul style="list-style-type: none"> <li>not Welsh, English, Scottish or British – 1.25%</li> <li>PNS – 12%</li> </ul>	The representation of people of diverse nationalities has dropped to 1.25%, the lowest proportion within the last 4 year. It does not match the demographic profile of Wales. Note a very high 'prefer not to say' response rate to this question.
<b>Ethnicity</b> <ul style="list-style-type: none"> <li>diverse ethnic backgrounds - 5%</li> <li>PNS - 3%</li> </ul>	<b>Ethnicity</b> <ul style="list-style-type: none"> <li>diverse ethnic backgrounds – 4.3%</li> <li>PNS – 6.7%</li> </ul>	<b>Ethnicity</b> <ul style="list-style-type: none"> <li>diverse ethnic backgrounds – 2%</li> <li>PNS – 9%</li> </ul>	The representation of people from diverse ethnic backgrounds dropped compared to 2021/22 (from 4.3% and 2%) and is now well below the demographic profile of Wales. Note a very high 'prefer not to say' response rate to this question.
<b>Language</b> <ul style="list-style-type: none"> <li>Welsh – 5%</li> <li>other - 1%</li> </ul>	<b>Language</b> <ul style="list-style-type: none"> <li>Welsh – 4%</li> <li>other – 1.3%</li> </ul>	<b>Language</b> <ul style="list-style-type: none"> <li>Welsh – 3%</li> <li>other – 1.5%</li> </ul>	The proportion of people who state that Welsh is the first language of their household is much lower than the proportion of Welsh speakers in Wales. However, this question is flawed as Welsh is not the first language of many Welsh speakers. The representation of users of other languages remains very low.
<b>Disability</b> <ul style="list-style-type: none"> <li>yes – 23%</li> <li>limited a lot or a little – 36%</li> </ul>	<b>Disability</b> <ul style="list-style-type: none"> <li>yes – 25%</li> <li>limited a lot or a little – 37%</li> </ul>	<b>Disability</b> <ul style="list-style-type: none"> <li>yes – 28%</li> </ul>	The proportion of our complainants who identified as disabled rose compared to 2021/22 (from 25% to 28%) and is now in line with the Welsh average of 28% (Stats Wales 2020). The proportion of people who said that they were limited a lot or a little because of a health problem or disability was higher again (38%)

<p>Sexual orientation</p> <ul style="list-style-type: none"> <li>• gay/lesbian/bi sexual other – 4%</li> <li>• PNS – 10%</li> </ul>	<p>Sexual orientation</p> <ul style="list-style-type: none"> <li>• gay/lesbian/bi sexual other – 5.8%</li> <li>• PNS – 15%</li> </ul>	<p>Sexual orientation</p> <ul style="list-style-type: none"> <li>• gay/lesbian/bi sexual other – 6%</li> <li>• PNS – 17%</li> </ul>	<p>The proportion of people who identified as gay, lesbian, bisexual or other was in line with 2021/22 and exceeded the cautious estimates of the proportion of this group within the Welsh population overall. However, it fell short of the other available estimates of the LGB+ population in the UK (10%) (YouGov 2019). Note a very high 'prefer not to say' response rate to this question.</p>
<p>Religion</p> <ul style="list-style-type: none"> <li>• other religions (not Christian) – 6%</li> <li>• PNS - 9%</li> </ul>	<p>Religion</p> <ul style="list-style-type: none"> <li>• other religions (not Christian) – 6.6%</li> <li>• PNS -</li> </ul>	<p>Religion</p> <ul style="list-style-type: none"> <li>• other religions (not Christian) – 3%</li> <li>• PNS – 19%</li> </ul>	<p>The proportion of people who followed religions other than Christianity dropped compared to 2021/22 (from 6.6.% to 3.1%). This was lower than the proportion of this group in the Welsh population overall. Note a very high 'prefer not to say' response rate to this question.</p>
<p>Working status</p> <ul style="list-style-type: none"> <li>• otherwise not in paid work – 14%</li> <li>• PNS - 11%</li> </ul>	<p>Working status</p> <ul style="list-style-type: none"> <li>• otherwise not in paid work – 16%</li> <li>• PNS – 12%</li> </ul>		

### Awareness of PSOW (2022)

Unfortunately, awareness of our office has dropped by 5% since 2020, from 48% to 43%. Nevertheless, the level of awareness remains significantly higher than in 2012 (35%).

People were more likely to be aware of us if they were:

- over 55 (49%)
- disabled (49%)
- Welsh Speakers (48%)
- from Mid & South Wales (48%); or
- in higher/intermediate managerial, administrative/professional roles, or supervisory or clerical, junior managerial, administrative/professional roles (48%).

Positively, awareness of our office has increased by 4% among people aged 16-34 (30% in 2022 compared to 26% in 2020), although this group was still among those least aware of us.

Concerningly, awareness of our office had dropped by 21% among people who identified as BAME (24% in 2022 compared to 45% in 2020).

Of those who heard of us, most learnt about the office from word of mouth (28%) or through work (17%).

### Internet access data (Wales)

Public Services Ombudsman for Wales

Equality Impact Assessment: PSOW Annual Report 2021/22

According to [Ofcom](#),

- 90% of Wales has access to good 4G geographic coverage from at least one of the mobile operators and 61% has coverage from all four operators.
- 96% of premises in Wales have access to a decent broadband connection from a fixed connection

Connectivity remains poor in some of the very hard to reach areas in Wales

**Please record any consultation and engagement undertaken**

The Management Team offered feedback on the Annual Report on 2 occasions. It was made aware of the barriers that prevent us from producing a fully accessible PDF. No specific feedback on accessibility was shared.

The Advisory Panel offered feedback on the full Annual Report (unformatted). Feedback on fully designed version and the Report in different formats is pending.

**Outcomes report**

<b>EIA stage completed</b>	<input checked="" type="checkbox"/>	Initial screening
	<input checked="" type="checkbox"/>	Full assessment
<b>Summary of negative impacts identified</b>	No negative actions after actions	
<b>Decision</b>	<input checked="" type="checkbox"/>	Proceed – no changes
	<input type="checkbox"/>	Proceed – actions needed
	<input type="checkbox"/>	Do not proceed
<b>Action plan</b>	Depending on capacity, look to produce a BSL transcription of sections of the Annual Report video later in the year.	
	<b>Authorised by</b>  MT	<b>Date</b>  11/07/2022