



Comisiynydd Pobl Hŷn Cymru
Older People's Commissioner for Wales

Strategic Equality Plan: Annual Report 2020-21

The Older People's Commissioner for Wales

The Older People's Commissioner for Wales protects and promotes the rights of older people throughout Wales, scrutinising and influencing a wide range of policy and practice to improve their lives. She provides help and support directly to older people through her casework team and works to empower older people and ensure that their voices are heard and acted upon. The Commissioner's role is underpinned by a set of unique legal powers to support her in reviewing the work of public bodies and holding them to account when necessary.

The Commissioner is taking action to end ageism and age discrimination, stop the abuse of older people and enable everyone to age well.

The Commissioner wants Wales to be the best place in the world to grow older.

How to contact the Commissioner:

The Older People's Commissioner for Wales
Cambrian Buildings
Mount Stuart Square
Cardiff
CF10 5FL

Phone: 03442 640 670
Email: ask@olderpeoplewales.com
Website: www.olderpeoplewales.com
Twitter: @talkolderpeople

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Mae'r ddogfen hon ar gael yn Gymraeg // This document is available in Welsh

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Introduction

Protecting and promoting older people's rights is a key part of my role as Older People's Commissioner for Wales, and I welcome this opportunity to highlight the action I have taken during 2019-20 to comply with duties set out in the Equality Act.

Whilst the rights we have are often taken for granted, the Covid-19 pandemic has highlighted the inequalities faced by many older people and has demonstrated just how easily people's rights can be eroded. We all need to be proactive to ensure that people's rights are upheld.

For me, this means not only taking forward my own work to tackle ageism and age discrimination, as well as making the case for a rights-based approach across our public services, but also building equality and rights into all I do as Commissioner to ensure I engage with and represent older people in all of their diversity.

Many of the issues faced by older people today are underpinned by inequality, by a failure to recognise and uphold their rights. So as Commissioner I will continue to do all I can to promote equality and protect the rights of all older people in Wales.



Heléna Herklots, CBE

Older People's Commissioner for Wales

Summary requirements and structure of the report

The Older People's Commissioner for Wales is a listed authority under the Equality Act (Statutory Duties) (Wales) Regulations 2011 and must adhere to the general duty to promote equality laid out in the Equality Act 2010.

Other reporting requirements included the publication, by 1 October 2020, of a new Strategic Equality Plan for 2020-24, incorporating specific objectives. Due to the postponement of the required deadline for publication of the Commissioner's Strategic Equality Plan 202-24, this annual progress report will cover two Strategic Equality Plans, published no later than 31 March 2022.

This report focuses on the specific Welsh duties and the Commissioner's Strategic Equality Objectives for both 2016-20 and 2020-24:

- Section 3 explains the Commissioner's role
- Section 4 sets out the Commissioner's Equality Objectives for 2016-20 and 2020-24
- Section 5 outlines the Commissioner's work on embedding equality, including progress for 2020-21 against Strategic Equality Objectives
- Appendix A – Workforce profile as at 31 March 2021

Copies of the Commissioner's Strategic Equality Plan and prior year annual reports can be found on the Commissioner's [website](#).

Role of the Older People's Commissioner for Wales

The Commissioner is a Corporation Sole created under the Commissioner for Older People (Wales) Act 2006, an independent legal entity in her own right and a listed authority for the purpose of the Equality Act (Statutory Duties) (Wales) Regulations 2011.

The Commissioner for Older People (Wales) Act 2006 sets out a number of statutory duties for the Commissioner.

1. Promote awareness of the interests of older people in Wales and the need to safeguard those interests.

The Commissioner uses her status to help set the agenda amongst decision makers at all levels about issues affecting older people and promotes public discussion through the media.

A key role for the Commissioner is to be a powerful champion for older people leading and intervening in a wide and increasing range of debates and decision making across Wales.

2. Promote the provision of opportunities for, and the elimination of discrimination against, older people in Wales.

The Commissioner advocates changes to the law, guidance and practice in order to address inequality. She presents realistic and positive images of older people, recognising older people in all their diversity.

Older people are individuals and, whilst they might share some common concerns, their individual status remains undiminished. There should be no one view of older people and the Commissioner aims to reflect this in her work.

The Commissioner promotes understanding of the nature of discrimination against older people in its most evident and its more hidden – but equally damaging – forms and sees tackling discrimination effectively as key to making progress across all policy areas, not just health and social care.

3. Encourage best practice in the treatment of older people in Wales.

The Commissioner aims to achieve this through a variety of methods, including bringing together people and evidence and - where necessary - carrying out research, to demonstrate effective practice.

Most importantly she presses for excellent services to be made widely and consistently available for older people. She encourages change to established practices where alternatives have been shown to work better. She encourages service providers to face the challenge of change so that the needs of older people can be better met, e.g. giving older people early support in order to prevent greater dependency at a later stage.

4. Keep under review the adequacy and effectiveness of the law affecting the interests of older people in Wales.

The Commissioner builds the case for change and makes this case to the Welsh Government and the Welsh Parliament. She establishes what the issues and opportunities are through bringing together leading legal and other expertise and the experience and views of older people.

The law is a vital part of empowering and protecting older people and providing redress, and yet it is often complex, confusing, and hard to access and in need of reform. The Commissioner has already played a strong role in recommending changes that will benefit older people and others.

Illustrations of the types of activity that have or may be undertaken by the Commissioner are set out below:

- Providing leadership on the issues that matter to older people
- Raising the profile of older people within Welsh Public Services
- Making representation to Welsh Government
- Reviewing how devolved organisations discharge their functions
- Publishing guidance and standards
- Assisting individuals to make complaints or representations
- Commissioning research or assisting others in doing so
- Carrying out, commissioning or assisting others with educational activities
- Issuing non-statutory guidance
- Advocating for changes to legislation, guidance and practice
- Speaking out publicly about service failures
- Promoting good practice

It is important to note that the Commissioner does not provide frontline services other than through direct advice and support provided to older people through the advice and assistance team.

The majority of the Commissioner's business involves working with others to effect changes in policies and practices.

The Commissioner's Equality Objectives for 2016-20

The Commissioner published a Strategic Equality Plan in March 2016 following consultation with older people and stakeholders, replacing the Strategic Equality Plan that was published in March 2012.

The Strategic Equality Plan identifies specific equality objectives and sets out the way ahead for future years. The strategy was published to ensure that equality and human rights are embedded in the thinking and working practices of the Commissioner and her staff.

The Commissioner set out the following objectives for 2016-20:

1. To ensure that in my employment of staff I am non-discriminatory, promote equality of opportunity for all and foster good relations between staff members.

- I will aim to increase the diversity of my workforce
- All staff will have development and advancement opportunities to ensure they maximise their potential
- I will ensure that all staff are rewarded and remunerated on an equal basis regardless of protected characteristic
- I will ensure there is a culture within my organisation in which all staff feel comfortable to be open about their protected characteristics and feel that they are a person of value to me as an employer and across the organisation

2. To ensure that my procurement policies and practices and associated tender documentation take account of the need to meet legal equality requirements.

- I will review annually all of my procurement policies, practices and tender documentation to ensure they meet the public sector equality duty
- I will ensure that contractors are made fully aware of my equality duties

3. To ensure that my work is relevant to, and is seen as being relevant to, older people in all their diversity.

- I will increase my engagement with older people across the breadth of protected characteristics
- I will ensure that my work is informed by what older people across the breadth of protected characteristics tell me about what matters to them, and that my work draws specific attention to impacts for those with differing combinations of protected characteristics
- I will strengthen the impact assessment that underpin the key deliverables of my work to ensure that they take full account of the impact of protected characteristics upon the outcome sought for older people

4. I will ensure that my work is underpinned increasingly by a rights-based approach and that across Wales a rights-based agenda is developed.

- I will ensure staff integrate a human rights-based approach in their work
- I will promote the UN principles and awareness of Ageism
- I will work with government to promote the use of UN principles and a rights-based approach in forming legislation

5. To empower and equip older people to challenge the discrimination they face.

- I will equip older people with the knowledge and tools to empower them to challenge discrimination

6. To promote an accurate and balanced view of older people in all their diversity, grow understanding about older people and their needs and to challenge stereotypes, both within my organisation and amongst other organisations.

- I will increase the depth of understanding amongst my staff about the diversity of older people and the extent to which protected characteristics impact upon their lived experiences and access to services
- I will increase the depth of understanding amongst my staff about the diversity of older people and I will increase the depth of understanding amongst key public services about the diversity of older people and the extent to which protected characteristics impact upon their access to services and their wider lives
- I will on an ongoing basis challenge stereotypes and myths about older people and lay down clear expectations for change
- I will strengthen our partnership working with other equality and human rights-based organisations to strengthen the voices of older people and increase the impact of our work

7. To encourage and support other public bodies to comply with their own duties under the Equality Act 2010 as they apply to older people and to challenge significant breaches of legal duties.

- I will provide guidance to public bodies undertaking key service changes to assist them in ensuring they comply with their statutory duties in relation to engagement, impact assessment and proportionality
- I will keep under review service delivery and changes that have the potential for significant detriment or disproportionate impact on older people

The Commissioner's Equality Objectives for 2020-24

Following the postponement of the required publication date by the Equality and Human Rights Commission (Wales), the Commissioner published a Strategic Equality Plan on 1 October 2020 to replace the previous plan published in March 2016.

Engagement with older people in Wales played a vital role in shaping the Commissioner's Equality Objectives. To ensure that equality is embedded throughout all her activity, the Commissioner's Equality Objectives for 2020-24 closely reflect both the organisation's vision and values, as well as closely aligning to her Strategy.

The Commissioner set out the following objectives for 2020-24:

1. Promote diversity within the Commissioner's workforce and ensure equality of opportunity for all employees

- Keep under review the effectiveness of the Commissioner's recruitment process to encourage a diverse range of applicants.
- Capture comprehensive and meaningful equality employment data.
- Promote a high-level of understanding of equality and diversity issues throughout the Commissioner's workforce, with specialist training for specific roles.
- Continue to monitor gender pay differences within the Commissioner's workforce.

2. Ensure that equality guides internal processes, including within strategic decision making

- Evaluate the Commissioner's procurement practices to ensure that they advance equality whilst continuing to meet legal equality requirements.
- Review and strengthen the role of the Commissioner's Equality Impact Assessment process to inform decision-making.
- Evaluate the effectiveness of the Commissioner's Equality Impact Assessment processes.

3. Ensure that the diversity of older people is reflected throughout the Commissioner's work to make Wales the best place in the world to grow older

- Work to ensure that public bodies reduce inequalities experienced by older people.
- Work to ensure that all older people are empowered to know their rights and are able to challenge discrimination in all its forms.
- Work to ensure that the impact of ageism upon older people and society is understood.
- Work to ensure that communities meet the needs of a diverse range of older people.

- Work to ensure that support for people experiencing abuse reflects the needs of older people in all their diversity.
- Work to ensure that health and social care meets the needs of a diverse range of older people.
- Scrutinise public bodies and hold to account those responsible for instances of age discrimination.
- Work with the Equality and Human Rights Commission to advance the rights of older people at a national and international level.
- Work with the Children's Commissioner for Wales to promote intergenerational solidarity.

4. Provide help and support to a diverse range of older people to ensure their rights are upheld and they are not discriminated against

- Capture equality data from enquirers to the Casework Team to increase diversity.
- Evaluate the diversity profile of older people in contact with the Casework Team.
- Increase the awareness of the Casework Team amongst older people with protected characteristics.
- Ensure that the Casework Team is accessible to all older people.

5. Ensure that the Commissioner's work is underpinned by the experiences of a diverse range of older people and is fully accessible

- Engage with the diversity of the older population to learn and understand, inform and empower
- Regularly audit and continually improve the accessibility of the Commissioner's website
- Ensure that the Commissioner's communications are accessible to all and reflect the diversity of older people

Commissioner's work on embedding equality

As a publicly funded body, the Commissioner and her staff have a range of statutory functions and other administrative responsibilities, these include:

- Promoting the interests of older people, including challenging discrimination, encouraging best practice and reviewing the law.
- Making the role known to older people across Wales.
- The recruitment, engagement, training, and management of staff.
- The procurement of services including tendering for goods and services such as research.
- Reward, recognition, and payment of staff.
- Providing assistance to older people who wish to make a complaint or representation to public bodies or other service providers.

The Commissioner's work to embed and further equality in her work for 2020/21 is outlined below:

Workforce Diversity

The Commissioner undertakes a review of her recruitment practices following each appointment to better understand the potential barriers and ensure that when recruiting, practices are inclusive and are accessible to a wide range of candidates with a broader spectrum of protected characteristics. The Commissioner operates a Guaranteed Interview Scheme (GIS) which provides individuals with disabilities the right to proceed to the next stage of the selection process if they meet the minimum criteria at the shortlisting stage.

Job vacancies are advertised through a variety of networks to ensure as wide a reach as possible in addition to information being available in a wide range of formats on request.

Information on protected characteristics of all candidates is collected and monitored to ensure equity of opportunity. Additionally, the Commissioner continues to collect, monitor and publish equality data on the profile of her workforce. This data is available in Appendix A. The Commissioner continues to monitor the gender pay gap of her workforce which currently is in favour of women. This data is also available in Appendix A.

The Commissioner undertakes an on-going review of contract types and working patterns across her workforce to understand and deal with potential barriers with a view to retaining candidates with a broader spectrum of protected characteristics.

As part of her commitment to ensuring the review and application of good practice to promote an inclusive working environment which promotes learning, development and overall wellbeing, the Commissioner's office is Small Workplace Health Award (Gold) accredited. The Award is a national recognition scheme for businesses that look after the health and wellbeing of their employees and is independent evidence of the Commissioner's commitment to create a positive

workplace environment for all staff. Achieving the Gold Award requires employers to evidence the organisation's commitment to having a culture that promotes positive behaviour among all staff and does not tolerate inappropriate behaviour (e.g. bullying and harassment) and to evidence flexible working practices to contribute to staff well-being.

Staff participate in six-monthly performance management reviews to identify and put in place appropriate plans to meet learning and development objectives. Learning and development objectives are discussed as part of the six-monthly performance reviews and also during monthly one-to-one meetings, to ensure staff are enabled to maximise their potential. Where identified training and development needs are relevant to multiple staff, this was progressed through in-house training mandated to all relevant staff.

To further embed a culture of openness where staff feel comfortable to be open about their protected characteristics, the Commissioner continued to ensure appropriate awareness raising of the Equality Act 2010 and protected characteristics amongst her staff team.

Organisational processes and decision making

The Commissioner undertakes a periodic review of all procurement policies and practices to reflect statutory duties, good practice and learning. This includes ensuring that all tender documents are reviewed as part of any tender evaluation. All contractors for lower value contracts are aware of equality duties and the Commissioner's expectations when work is being undertaken on her behalf.

Engagement with older people and stakeholders

The Covid-19 pandemic and the restrictions to face-to-face contact fundamentally changed the way in which the Commissioner and her team were able to engage with older people. As the Commissioner's usual engagement activities were paused, a series of online engagement sessions were undertaken. To help ensure that older people deemed 'digitally excluded' were also enabled to participate, work was undertaken with stakeholders, including 50+ Coordinators, to ensure that online engagement events were accessible to all older people.

The Commissioner was particularly focussed on engagement with older people living in care homes in order to hear directly about older people's experiences of the Covid-19 pandemic and the impact of restrictions on their lives. In June 2020, the Commissioner published [Care Home Voices: A snapshot of life in care homes in Wales during Covid-19](#) following over 120 responses from older people, their families and friends and care home staff to a series of questions about their experiences during lockdown, the issues and challenges they have faced and the changes and improvements they would like to see. Responses were shared via an online form, over the telephone, by email and by letter. Specific engagement sessions with a small number of care home residents in care homes in north and south Wales were also undertaken to allow more detailed discussions with older people about their experiences of the Covid-19 pandemic.

The Covid-19 pandemic disproportionately impacted people from Black, Asian and Minority Ethnic communities and highlighted the inequality faced by people from Black, Asian and Minority Ethnic communities. In response to this, the Commissioner wanted to understand the specific impact on older people from Black, Asian and Minority Ethnic communities in Wales. From June 2020 to February 2021, the Commissioner and her team hosted a series of engagement sessions with stakeholders representing the views of older people from Black, Asian and Minority Ethnic communities in Wales.

In July 2020, the Commissioner attended the EYST BAME Topic Forum to hear directly from older people from Black, Asian and Minority Ethnic Communities on the issues that have affected them during the Covid-19 pandemic and their concerns for the recovery period. In March 2021, the Commissioner was invited to address the EYST All Wales BAME Roundtable to discuss how to better meet the needs of Black, Asian and Minority Ethnic older people in light of the continuing pandemic and discuss how we might work better to ensure that older people from Black, Asian and Minority Ethnic Communities in Wales receive culturally appropriate, compassionate care and services. The Commissioner also attended the EYST Wales Online Forum: 'Reflections and Projections: Looking back Covid 19 impact; Looking forward to Recovery' which aimed to outline the action needed to create race equality in Wales.

The Commissioner's publications also aim to reflect the diversity of older people in Wales. The Commissioner is committed to ensuring that her publications are accessible to all older people through embedding her Publications Style Guide throughout all materials and adhering to RNIB Guidelines. Publications that are produced specifically for older people are made available both electronically and in hard copy, with accessible versions of documents made available on request (such as in BSL).

In February 2021, the Commissioner undertook a review of her website to ensure that it was fully accessible. A test of compliance against the Web Content Accessibility Guidelines (known as WCAG 2.1) was undertaken and areas for improvement identified. These actions will be progressed as part of the planned website upgrade in March 2022.

Programme of work

In April 2020, following the publication of her three-year strategy, [Making Wales the Best Place in the World to Grow older](#) the previous April, the Commissioner updated her planned programme of work to reflect the inequalities highlighted by the Covid-19 pandemic and published [Covid-19 Response: Commissioner's Work Priorities](#). The Commissioner's updated work priorities included the addition of specific work to ensure that older people's rights are protected and that they can access the help and support they need during the pandemic.

In response to concerns that older people's rights were not being sufficiently protected in care homes and across health and social care more widely, in May 2020 the Commissioner called for an investigation by the Equality and Human Rights Commission to examine and scrutinise the action taken by the Welsh Government in this area. To further understand the issues and to give a voice to the people living and working in care homes, the Commissioner published [Care Home Voices: A snapshot of life in care homes in Wales during Covid-19](#) in June 2020. The report highlighted the issues and challenges faced by older people and included calls for action to ensure that older people living in care homes were kept safe and protected, and that their rights, including their human rights, were upheld.

In addition to the issues highlighted by the Care Home Voices report, the Commissioner also responded to specific concerns raised about inappropriate blanket healthcare decisions on issues such as Do Not Attempt Resuscitation (DNAR) notices, the slow response by the Welsh Government to make testing widely available to care home residents and staff, and the apparent discharge of Covid-19 positive older people from hospitals into care homes. In July 2020, the Commissioner agreed to work jointly with the Equality and Human Rights Commission in to consider whether the Welsh Government and public bodies in Wales had met their responsibilities to uphold the human rights of older people and to ensure that older people were not being discriminated against in restrictions to control the spread of Covid-19.

The Commissioner wrote jointly with the Equality and Human Rights Commissioner for Wales to the Welsh Government to request assurances that the rights of older people living in care homes were being upheld and for information on their decision-making processes to evidence compliance with the Public Sector Equality Duty and the Human Rights Act. This work found that there were shortcomings in the Welsh Government's decision-making processes with regards to equality and human rights considerations during the first months of the pandemic and that Welsh Government were not able to adequately evidence the appropriate consideration of older people and their rights, with insufficient attention given to upholding the rights of older people living in care homes. As a result, Welsh Government improved its consideration of human rights, including setting up an internal working group to help embed practice with EHRC providing training to officials, and improved its undertaking of Equality Impact Assessments as part of its policy and decision-making processes.

The Commissioner continued to draw attention to the issue of human rights in care homes and, in September 2020, published a [position statement on care home visiting](#) and called for older people's rights to be protected and for decisions to be proportionate and in line with the human rights legal framework when imposing restrictions on visiting.

In April 2020, the Commissioner submitted a letter to the Director of Social Services and integration at Welsh Government setting out her concerns regarding the Draft Welsh Government Guidance consequent to the Coronavirus Act 2020 Guidance on the modifications to the Social Services and Well-being (Wales) Act 2014. She highlighted the disproportionate impact on older people of the changes to the people's rights under the 2014 Act as, although the largest group receiving social care services, older people receive less support per individual than other adults in receipt of social care meaning that any prioritisation of scarce social care resources ultimately have a greater impact on older people as they are disadvantaged from the offset. The Commissioner was successful in amending the Guidance to ensure strict governance arrangements were in place for local authorities wishing to enact the provisions to reduce people's rights to social care.

Again, in October 2020, the Commissioner submitted a response to the Welsh Government consultation on repealing Part 2, Schedule 12 provisions of the Coronavirus Act 2020 highlighting the inequality felt by older people in relation to the response to the pandemic from across public bodies, including that the fulfilment of their care and support needs were seen as non-essential. She raised concerns that, despite the Schedule 12 provisions not being formally enacted in Wales, there were concerns around whether the law was having an effect on people's rights by their very existence. The Commissioner drew attention to instances where older people were experiencing long delays in assessments, the inability to access any form of respite, as well as people being discharged from hospital without an appropriate care package. In her response, the Commissioner stated that it was unacceptable to remove or limit older people's legal rights to accessing social care – which for many older people remove their ability to live independently – and supported the repeal of these provisions.

In order to increase the depth of understanding amongst public services about the diversity of older people, the Commissioner's Ageing Well team continued to work closely with statutory and public services in Wales to influence the adoption of policies which focus on the wellbeing of older people as individuals at a strategic level.

All areas of the Commissioner's programme of work consider the diversity of older people. To ensure an accurate and balanced view of older people in all their diversity is reflected within each project, staff undertake Equality Impact Assessments which require on-going consideration of

equality throughout the course of each project. In addition to this, the Commissioner expects all staff to undertake engagement with a diverse range of older people to continue to grow their understanding about older people and the challenges they face.

Challenging instances of ageism and age discrimination

The Commissioner provides direct support to older people and their representatives through her Advice and Assistance service. From April 2020 to March 2021, the Commissioner provided assistance to 643 older people, either directly or through family members who contacted the Commissioner on their behalf, to help them uphold their rights and challenge instances of discrimination.

The information, assistance and guidance provided by the advice and assistance team directly empowers older people and their families and helps them to understand and claim their rights. As the circumstances of everyone who contacts the Commissioner are different, the assistance and support provided by the team is tailored to reflect people's individual needs, and in some cases, particularly the most complex, the team will intervene on behalf of an older person (subject to their consent). Support is provided to enable older people and their families to challenge the decision-making process and working practices of public bodies, helping them to navigate complex systems, policies and processes, often in the most difficult and distressing of circumstances.

The Commissioner's Advice and Assistance Team received many enquiries from older people regarding Covid-19 restrictions, in particular the impact of restrictions on older people's human rights, and requests for information on the roll out of the Covid-19 vaccination programme. As well as informing people of their rights in areas such as care home visiting restrictions and accessing vaccination, the information gathered through the Advice and Assistance service was fed back to Welsh Government to ensure that action was taken to address widespread issues, such as ensuring vaccination provision for older people who were unable to leave their home and travel to vaccination centres.

To empower older people and equip them with the information they need to take action against ageism, the Commissioner's Taking Action Against Ageism training was delivered online. The training sessions continued to examine the ways that ageism and age discrimination may manifest themselves in a number of settings – including the workplace, in health, care and other services, and within the media – and helped participants to understand the ways that ageism can be challenged. The sessions gave participants a better understanding of the legislation that can be used to challenge ageism, as well as the organisations that can provide information, advice and support if someone sees or experiences ageism.

Appendix A: Workforce profiles as at 31/03/21

Headcount Information

A listed body in Wales must collect and publish on an annual basis the number of people employed by the authority on 31 March each year by protected characteristic.

- Age
- Gender reassignment
- Sex
- Disability
- Pregnancy and maternity
- Sexual orientation
- Race – including ethnic or national origin, colour or nationality
- Religion or belief – including lack of belief

The Commissioner undertakes an annual staff survey to gather regular equality data. This survey is confidential and responses are anonymous. For the reporting year 2020/21, 18 responses were received out of a possible 19. However, due to the size of the organisation, where figures account for 10% or less, details are removed to prevent individuals from being identified.

Number of people employed by Protected Characteristic:

Age	
16-24	-
25-34	3
35-44	8
45-54	2
55-64	3
65 & Over	-
Prefer not to say	-

Gender / Sex	
Male	6
Female	11
Prefer not to say	-

Is your gender identity the same as the gender you were assigned at birth?	
Yes	17
No	-
Prefer not to say	-

Sexual Orientation	
Bisexual	-
Gay Man	-
Gay Woman / Lesbian	-
Heterosexual / Straight	16
Asexual	-
Other	-
Prefer not to say	-

Relationship Status	
Married	6
Divorced	-
Civil Partnership	-
Single	-
Co-habiting	8
Separated	-
Widowed	-
Prefer not to say	-

Religion	
No religion or belief	12
Christian (all denominations)	4
Buddhist	-
Hindu	-
Jewish	-
Muslim	-
Sikh	-
Any other religion or belief	-
Prefer not to say	2

National Identity	
Welsh	15
Scottish	-
English	-
Northern Irish	-
Irish	-
British	-
Gypsy or Irish Traveller	-
Prefer not to say	-
Prefer not to say	-

Ethnic Origin	
White	17
Mixed/Multiple ethnic groups	-
Asian	-
Black/African/Caribbean	-
Other – please specify	-

Dependents	
None	11
Children under 18	6
Children under 25 and in full time education	-
Person aged 60+	-
Prefer not to say	-

Disability	Yes	No / N/A	Prefer not to say
Do you consider yourself to have a disability?	-	16	2
Do you have a disability as defined by the Equality Act?	-	15	3
At least one of my dependents has a disability.	-	17	-

The below data is drawn from HR records rather than via the annual staff survey:

Pregnancy & Maternity	
Number of pregnant employees during 2018/19	0
Number of employees taking Maternity Leave during 2018/19	1

A listed body in Wales must collect and publish on an annual basis the number of men and women employed, broken down by the following categories:

Job	Men	Women	Total
Administrator	0	0	0
Support Officer/Assistant	1	4	5
Officer	1	3	4
Head / Lead	4	4	8
Chief Operating Officer	0	1	1
Commissioner	0	1	1

Pay & Grade	Men	Women	Total
20,400 – 22,681 / A	0	0	0
23,721 – 27,519 / B	1	4	5
28,819 – 34,957 / C	1	3	4
36,622 – 44,581 / D	4	3	7
45,518 – 53,008 / E	0	1	1
56,234 – 66,898 / F	0	1	1
90,000* / Commissioner	0	1	1

*Pay Level set by Welsh Government

Contract Type	Men	Women	Total
Permanent	5	10	15
Fixed Term	1	3	4
Temporary	0	0	0

Working Pattern	Men	Women	Total
Full time	6	11	17
Part time	0	2	2
Compressed hours	0	0	0

Recruitment

A listed body in Wales must collect and publish on an annual basis the number of people who have applied for jobs with the organisation over the last year.

The Commissioner monitors her recruitment process on an on-going basis to ensure that all measures are undertaken to try and increase the diversity of her staff.

Application forms are already available in alternative formats and recruitment adverts are placed widely using a variety of media. The Commissioner has a formal Dignity at Work Policy and adopts good practice regarding its recruitment process; all information containing protected characteristics within application forms is seen by HR only and is not shared with the selection panel. In addition, reasonable adjustments are available to all candidates requesting them.

During 2020/21, the Commissioner recruited for one post via external recruitment.

The below table details the number of candidates who applied for the role:

Role	Number of candidates
Data and Research Analyst	15

All candidates are provided with the opportunity to complete a Diversity Monitoring form at point of application, however not all candidates choose to complete and submit a form. The Commissioner received 13 completed Diversity Monitoring Forms associated with external recruitment conducted during 2020/21.

Number of applications for jobs within 2020/2021 received from the following protected groups:

Age	Number of candidates
16-24	1
25-34	5
35-44	4
45-54	1
55-64	1
65 & Over	0
Prefer not to say	1

Gender	
Male	4
Female	8
Prefer not to say	1

Is your gender identity the same as the gender you were assigned at birth?	
Yes	13
No	0
Prefer not to say	0

Sexual Orientation	
Bisexual	2
Gay / Lesbian	1
Heterosexual / Straight	9
Asexual	0
Other	0
Prefer not to say	1

Relationship Status	
Married	7
Divorced	0
Civil Partnership	0
Single	2
Co-habiting	4
Separated	0
Widowed	0
Prefer not to say	0

Religion	
No religion or belief	8
Christian (all denominations)	4
Buddhist	0
Hindu	0
Jewish	0
Muslim	0
Sikh	0
Any other religion or belief	0
Prefer not to say	1

National Identity	
Welsh	6
Scottish	0
English	0
Northern Irish	0
Irish	1
British	6
Gypsy or Irish Traveller	0
Other	0
Prefer not to say	0

Ethnic Origin	
White	13
Mixed/Multiple ethnic groups	0
Asian	0
Black/African/Caribbean	0
Other – please specify	0

Disability	Yes	No / N/A	Prefer not to say
Do you consider yourself to have a disability?	1	12	0
Do you have a disability as defined by the Equality Act 2010?	1	12	0

Dependents	
Children under 18	4
Children under 25 and in full time education	1
Person aged 60+	0
Other dependents	0
None	7
Prefer not to say	1

At least one of my dependents has a disability	
Yes	0
No	6
Prefer not to say	1
Not applicable	6

No data relating to pregnancy and maternity was collected in relation to recruitment activity for 2020/21.

A listed body in Wales must collect and publish on an annual basis the number of employees who have applied to change position within the authority, identifying how many were successful in their application and how many were not.

No members of staff applied to change position within the organisation.

Learning & Development

A listed body in Wales must collect and publish on an annual basis the number of employees who have applied for training and how many succeeded in their application.

As stated in the Commissioner's Learning and Development Policy, the Commissioner aspires to be a learning organisation and will nurture the skills and knowledge that staff will need to succeed in their roles. This policy therefore supports a culture of learning and developing excellent staff at all levels. Employees are encouraged to take advantage of learning and development opportunities which are relevant to their jobs and personal development.

The Commissioner will:

- provide a challenging work environment, where staff are encouraged to develop and acquire new skills and experience.
- provide a range of development opportunities for staff consistent with the strategic and operational needs of the Commissioner.
- deliver to all new staff a basic understanding of the role, function, policies and procedures of the Commissioner at induction.
- undertake and agree with all staff individual training and development plans as part of the performance appraisal process.
- review individual and Commissioner plans at least annually; assess effectiveness of training interventions and feed this back into subsequent planning.

All employees have equality of opportunity regarding training. Due to the impact of the COVID-19 pandemic, there were less opportunities for training as training providers were adapting how to deliver their courses online.

The Commissioner approved the one application received for learning and development activity during 2020/21.

A listed body in Wales must collect and publish on an annual basis the number of employees who completed the training.

The training was completed by the member of staff who applied for the training.

Throughout 2020/21, there were team training sessions for all staff dedicated to mental health and wellbeing.

All staff attended sessions on the following topics:

- Strong mental health
- Positive mindset
- Tips for working at home
- Resilience
- Stress and burnout
- Gut health
- Immune health
- Overcoming worries

Grievance Procedures

A listed body in Wales must collect and publish on an annual basis the number of employees involved in grievance procedures either as complainant or as a person against whom a complaint was made.

The Commissioner had one employee involved in grievance procedures as complainant during 2020/21.

Disciplinary Procedures

A listed body in Wales must collect and publish on an annual basis the number of employees subject to disciplinary procedures.

The Commissioner had one employee subject to disciplinary procedure during 2020/21.

Leavers

A listed body in Wales must collect and publish on an annual basis the number of employees who have left an authority's employment.

During 2020/21, three employees left the Commissioner's employment.

As all employee equality data is anonymised, no specific data relating to the protected

characteristics of these employees is available. However, the Commissioner does hold information relating to age and gender for HR purposes relating to these specific employees;this information is provided below.

Age	
16-24	-
25-34	2
35-44	1
45-54	1
55-64	-
65 & Over	-

Gender	
Male	2
Female	2

