



Older People's Commissioner for Wales  
Comisiynydd Pobl Hŷn Cymru

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# Strategic Equality Plan: Annual Report 2012/13

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An independent voice and  
champion for older people

# The Older People's Commissioner for Wales

The Older People's Commissioner for Wales is an independent voice and champion for older people across Wales. The Commissioner and her team work to ensure that older people have a voice that is heard, that they have choice and control, that they don't feel isolated or discriminated against and that they receive the support and services that they need.

The Commissioner and her team work to ensure that Wales is a good place to grow older, not just for some but for everyone.

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# 1. Introduction

This is the second annual report I have produced following the implementation of the Equality Act 2010 and it is the first to report on my Strategic Equality Objectives. I took up the role of Older People's Commissioner for Wales in June 2012.

As Commissioner, I am an independent voice and champion for older people aged 60 years and older, as defined in the Commissioner for Older People (Wales) Act 2006. My role is underpinned by the United Nations Principles for Older Persons (see Appendix B) and promoting equality and human rights is implicit to my statutory role.

This report details action I took in 2012/13 to comply with the statutory equality duties set out in The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. I have previously said that I strongly welcome the Welsh Government's decision to adopt more challenging duties for listed authorities in Wales than in the rest of the UK. My aspirations, as Commissioner, go beyond mere compliance with legislation and fairness, respect, equality, dignity and autonomy are at the heart of my work and workplace.

Older people are not a homogenous group. They represent the full diversity of Wales - this diversity is what makes us the nation we are and it is to be celebrated. I am proud to be a Commissioner not just for older people, but for all older people. All have an equal right to lead lives that have value, meaning and purpose and to have choice and control over their lives.

For many older people Wales is a good place to grow older, but I know from speaking to older people across Wales and across the full spectrum of diversity that, for many of them, they face discrimination that undermines the quality of their lives and their sense of self-worth, as well as limiting access to services and just treatment. Sometimes the discrimination faced is from individuals and sometimes it is more systemic within services and systems themselves and this needs to end.

Discrimination is not only illegal, it is morally wrong. It strips people of their humanity - both those who experience discrimination and those who inflict such treatment on others.

This Strategic Equality Plan annual report outlines the progress that has been made against the Strategic Equality Objectives set out by my predecessor, Ruth Marks. When I took up post in June 2012, I made the decision to refresh these objectives and make them more ambitious to demonstrate how seriously I take the practices and principles which underpin equality and fairness. The refreshed

Strategic Equality Plan, which is being published alongside this annual report, replaces the current Plan and outlines how I am ensuring that my team and I - as we go about our business - engage with, understand and include older people in all their diversity.

A handwritten signature in black ink that reads "Sarah Rochira". The signature is written in a cursive, flowing style.

**Sarah Rochira**

**Older People's Commissioner for Wales**

## 2. Summary and structure of the report

The Commissioner is a listed authority under the Equality Act (Statutory Duties) (Wales) Regulations 2011. She must adhere to the general duty to promote equality laid out in the Equality Act 2010 and, by April 2012, had to publish a Strategic Equality Plan incorporating specific objectives. She must report annually on progress and this second annual report must be published no later than 31st March 2014.

This is the first report to focus on the specific Welsh duties and the Commissioner's Strategic Equality Objectives.

Section 3 introduces the Commissioner's role.

Section 4 focuses on the Commissioner's core business.

Section 5 considers Year 1 progress against the Strategic Equality Objectives set by the previous Commissioner in order to meet the General Equality Duty.

Section 6 outlines the way ahead for the remaining years to 2016 and, most importantly, refers to her refreshed Strategic Equality Plan.

The appendices contain information referred to throughout the report.

### 3. Introduction to the Older People's Commissioner for Wales

The Commissioner is 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.

- **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.

- **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.

- **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.

- **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 National Assembly in Cardiff Bay. 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.

These illustrate the types of activity that has or may be undertaken by the Commissioner:

- 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
- Reviewing arrangements for advocacy, complaints, and whistle-blowing in a devolved context
- 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
- Undertaking examinations (investigations)
- 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 our casework and the work led by the Communications and Engagement team in delivering events and producing publications. The majority of our business

involves working with others to affect changes in policies and practices.

The current and future work of the Older People's Commissioner for Wales is taken forward within her '[Framework for Action 2013-17](#)'. Work on equality during the reporting period is covered in greater depth within '[Standing Up, Speaking Out: Impact and Reach Report 2012/13](#)'.

## 4. Core business

The Commissioner has a range of core responsibilities as a public sector organisation which are tailored according to its size and the nature of its business. These functions include:

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

### 4.1 Casework

The Commissioner provides direct support to individuals through her casework. In 2012/13 more than 1,000 people contacted the Commissioner through this service. This was by email, letter, telephone or – on occasion - face to face contact (usually as the result of reasonable adjustment being made to meet a person's needs).

All enquiries by individuals to the Commissioner are managed through a Business Management System (BMS) by an administrator, who then refers the caller to the most appropriate Case Officer. The age of either the caller and/or the older person to whom the call applies is recorded on our BMS system as is both the gender and language preference of the caller so we can correspond or engage in people's preferred language.

Previously, careful consideration has been given as to whether there should be formal and automatic seeking of information about additional protected

characteristics of the callers and/or those that represent the subject matter of the calls. Whilst wanting to ascertain the reach of our service, it is clear that the majority of the callers contact the Commissioner at a time of acute crisis in their lives. Some of the callers can be worried, upset or so focused on the substance of their issue that any form of compulsory monitoring or questioning over and above the questions necessary to determine the issue could impose a barrier between the caller and the case worker.

On balance, it has been decided to limit our automatic monitoring of caller diversity to gender and language. However, in advising an individual, if a caller's enquiry substantially related to a protected characteristic this would also be recorded on the BMS system. For example, if the call related to difficulties in obtaining a blue badge this would be recorded as disability.

The five most common issues we were contacted about in 2012/13 were Care (28.2%), Housing (10.9%), Financial Issues (10.6%), Health (10.1%) and Community Services (7.4%).

## 4.2 Communications and Engagement

Since coming into post the Commissioner has been focused on engaging with a wide variety of older people and the work Communications and Engagement team has been of critical importance in:

- Increasing the profile of the Commissioner and her staff in communities throughout Wales through the Commissioner's 'Engagement Roadshow' during which the Commissioner and staff meet with older people and others who work with and for them. In 2012/13 the Commissioner and her team met with more than 135 groups of older people in local communities across Wales, reaching more than 4,000 older people.
- Ensuring that the Commissioner's work includes those who are 'hard to reach' ('easy to ignore') because they are socially excluded. These would include care home residents, people dependent on home based social care, people who are hospital in-patients, and people with protected characteristics.
- Producing a bi-monthly newsletter which is made available to stakeholders both electronically and in hard copy together with accessible versions
- Having a website which follows accessibility guidance (AAA compliance)
- Producing publications that are in appropriate languages and formats and that follow plain language standards
- Ensuring that all staff are aware of the Commissioner's approach to

communications including training on style guides and accessibility issues, leading to the production of a communication guide

### 4.3 Policy and influencing

The Commissioner's Well-being and Empowerment Team influence policy and decision-making at the highest level in Wales. They represent and promote the interests of older people to public bodies and service providers, including local authorities, health boards and the Welsh Government.

The Well-being and Empowerment Team keep themselves informed of developments not just in relation to age but also in relation to issues relating to other protected characteristics. In 2012/13 they were involved in informing work relating to:

- Blue Badge Scheme
- Framework on Independent Living for Disabled People
- Phase 3 of the Older People's Strategy
- The People's NHS
- Refreshed Carers Strategy
- Strategy for End of Life Care
- Together for Mental Health Strategy for Wales
- Violence Against Women and Domestic Abuse (Wales) Bill
- Welsh Language Standards

In promoting the interests of older people with protected characteristics, the Well-being and Empowerment Team listen to what such people have to say so that they provide an accurate representation and do not make unfounded assumptions. They proactively seek out the opinions of those older people who may be affected by a proposed or actual policy or practice.

## 5. Progress on the General Duty through Strategic Equality Objectives

The 3 aims of the general equality duty are to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality 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
- Sex
- Race – including ethnic or national origin, colour or nationality
- Disability
- Gender reassignment
- Pregnancy and maternity
- Sexual orientation
- Religion or belief – including lack of belief
- It applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

For the purposes of the Equality Act, language (including the Welsh language) is not a protected characteristic. However, the Commissioner considers language need on a par with other characteristics. The Commissioner is covered by the Welsh Language Act and has a [Welsh Language Scheme](#). Through her work, the Commissioner also considers the impact of poverty and rurality on equal access to services.

This section outlines the **specific** equality objectives which were drafted to help the Commissioner fulfil her general equality duty. These objectives were set by the previous Commissioner (Ruth Marks) and this 2012/13 report outlines progress made against them. Alongside this annual report, the current Commissioner (Sarah Rochira) has published a refreshed Strategic Equality

Plan and Equality Objectives which set out the way ahead for future years and it is against these objectives that she will report in future years.

## The objectives and progress made

2012/13 is the first year of the Commissioner's Strategic Equality Objectives.

### 5.1 Ensure that all the Commissioner's functions including direct and indirect services promote equality of opportunity

#### Objective 1

Using optional checklists, monitor diversity amongst people accessing our website and for those attending the Commissioner's events.

- Within two years – Draw up checklists for web users and event attendees
- Within three years – Actively promote the completion of these questionnaires with the aim of achieving 10% completion
- Within four years – Increase the number of event checklists completed to 20% of attendees

Progress:

We will be re-launching our website, following an update, in March 2014 and once this is done we will be able to conduct better surveying and monitoring of the diversity of those accessing the website.

#### Objective 2

Undertake a readership /user survey of our newsletter plus a strategy to increase use for older people with certain protected characteristics.

- Within one year - instigate a survey of current users to include a voluntary option to record an individual's protected characteristic(s)
- Within one year - Develop and activate strategies to address the gaps in newsletter reach to include creative alternatives to the newsletter where appropriate
- Within two years - identify gaps in newsletter take-up amongst identified groups of older people with a focus on older people in care homes (the majority of whom would qualify as disabled people under the Equality Act 2010 and a disproportionate number of whom are women) and older people from minority ethnic communities.
- Within four years – focus on older people associated with religious or belief

based organisations, and older people identifying themselves as lesbian, gay or bisexual

Progress:

Due to the re-launch of the website in March 2014, the readership/user survey has been deferred to 2014/15 so we can undertake a joint survey about the newsletter and the website.

### **Objective 3**

Develop a tool to assist the Commissioner in undertaking Impact Assessments which would then be applied to the Commissioner's functions including all key decisions.

- Within one year - the tool will be developed and integrated into the Commissioner's decision-making processes

Progress:

A new tool has been developed that discourages 'box ticking' and encourages people to discuss and consider the impact that their work may have on those with protected characteristics – both positively and negatively. This can be seen in the [Refreshed Strategic Equality Plan 2012-16](#).

### **Objective 4**

Assess facilities and the management of external events leading to the adoption of existing good practice guidance on equalities in general and the production of specific guidance relating to age, but applying to all protected characteristics through an older age lens.

- Within one year – identify, adapt, and adopt existing guidance on incorporating equality best practice in events management
- Within two years - completion of an internal facilities equality audit
- Within two years – completion of an audit on incorporating best practice in equality when managing own events and those in which we arrange in partnership with others
- Within three years - consult on and develop guidance on good practice on incorporating age equality in event organisation – this could be done utilising the Commissioner's specific power to issue guidance
- Within four years seek feedback on how the guidance had been used to enhance good practice.

Progress:

When planning external events during 2012-13, the Disability Wales toolkit was followed, entitled 'Planning an accessible event'.

The following headlines have been identified as a checklist:

- Event publicity – use a range of methods appropriate for the target audience
- Event date and time – will time off work be needed? Do timings take account of public transport timetables?
- Accessible venue – is it easily accessible by public transport, adequate car parking?
- Accessible buildings – provision of ramps and lifts
- Clear signage
- Support to enable participation – translation, palantypists, audio loop, sign language interpreter
- Accessibility of material – easy read, braille, audio
- Accessibly presentations by speakers
- Catering arrangements – dietary requirements

We are now building on this for future events in the coming years.

**5.2 Through effective and continuing engagement, ensure that the Commissioner's work is informed by the experiences and opinions of those who have protected characteristics and share our evidence base with those covered by both general and specific duties**

**Objective 1**

Develop further our evidence base on the barriers faced by older people with additional protected characteristics building on the evidence base already developed around age:

- Within one year - develop a strategic level engagement plan for older people from Black and Minority Ethnic communities
- Within two years - develop a strategic level engagement plan to help engage with older Welsh speakers
- Within three years - develop a strategic level engagement plan for older disabled people

- Within four years - focus on older people identifying with a religion or recognised belief under the Equality Act 2010
- Communications led working Group to ensure that local level engagement strategies are inclusive of older people in their diverse identities – year one will focus on rural West Wales

Progress:

The Commissioner's Engagement Roadshow was launched in June 2012 to ensure that there was on-going, direct engagement with the full diversity of older people and with those who represent and support them. The Engagement Roadshow has ensured that there is a proactive and strategic approach to using the voices of older people.

Our original aim was to develop a strategic level plan to engage with older people from Black and Minority Ethnic communities. We decided, instead, to develop a plan for engagement with older people from a wider range of protected groups, i.e. going wider than originally planned, and this has meant that in 2012/13 we also began work planned for Years 2, 3 and 4. Our first phase of work has been to proactively increase engagement with known. In 2012/13 the Commissioner or other members of staff met with older people at the following events/meetings:

- Launch of Stonewall report on needs of older LGB people
- Mardi Gras, Cardiff
- Alzheimer's Society Dementia Café, Pontypridd
- Cae Bryn Dementia Care Centre
- Alzheimer's Society Dementia Café, Taffs Well
- Withybush Hospital (dementia - The Butterfly Scheme)
- Dementia Cafe (Alzheimer's Society), Carmarthen
- Hafan Dementia Care, Glanamman
- Indian Gujarati Elderly Group, Cardiff
- Nelson House Residents, Butetown
- BAWSO - Older People's Project Open Day, Butetown
- Cardiff's Minority Ethnic Elders Group and Older Person's Forum, Cardiff
- Minority Ethnic Communities Health Fair, Cardiff

- Mela Multicultural Festival
- Somali Integration Society meeting, Cardiff
- Older Women, Whitchurch Community Centre
- WI Fellowship Group, Llanfair Talhairn
- Welsh Women's Aid
- Safer Wales
- Grandparents Raising Grandchildren Support Network
- Lewis Boys School - Intergenerational lunch, Bargoed

The Commissioner and staff also meet with a wide variety of older people at general engagement events.

## Objective 2

Ensure that our evidence base around age and additional associated protected characteristics is made widely available to most relevant authorities covered by the general and specific duties to promote equality. The Commissioner would be in a unique position to obtain and disseminate this information from perspectives on older age

- Within one year - we will ensure that our evidence base on age equality is available on our website and in hard copy and that all public authorities covered by the specific duty in Wales and some key bodies covered by the general duty are alerted to the evidence base
- Throughout years one to four - ensure that the evidence base is updated at least annually as we obtain fresh evidence of barriers and best practice through our strategic and local level targeting strategies

Progress:

We have drafted ten factsheets that cover the overlap between age and other protected characteristics, as well as rurality, poverty and the Welsh Language. They can be found [here](#). Of course, many older people face multiple discrimination and our next step is to build a more nuanced picture of the types of discrimination experienced by older people with multiple protected characteristics.

The factsheets are on our website and are being widely distributed amongst public bodies in Wales, especially as part of free training on 'ageism' that we have been delivering and continue to deliver. We are constantly updating our

evidence base and resources for older people and others. Our website will be updated at the end of March 2014 and there will be a new webpage dedicated solely to equality and human rights.

### **Objective 3**

During years three and four, in the context of our functions and powers, develop and share best practice guidance on fair and effective treatment for older people amongst those that provide direct services for older people in Wales, which will include guidance relating to those with protected characteristics additional to age. Evidence received by the Commissioner through our reviews, work programmes and general conversations suggests that current practice can vary enormously both within and between organisations

- In year three - seek the opinions of public service organisations on the appropriate style and content of any such guidance including whether it might be better to customise guidance around specific subjects or audiences such as OPCW's guidance on adult protection or the production of a product covering all issues and services in a single document
- In year 4 - depending on the outcome of these deliberations, produce relevant guidance

Progress:

This objective was not a Year 1 objective.

### **Objective 4**

Generate opportunities to discuss and debate equality and diversity and disseminate best practice with organisations of strategic significance to the Commissioner as part of our statutory function. Such guidance is needed in the context that older people are disproportionately higher users of public services and are therefore more vulnerable to service cuts.

- Within years one and two - we will build on efforts to promote better understanding of age equality amongst public service organisations and their representative bodies. This will remain topical as we await the introduction of the abolition of age discrimination in goods and services. Many will look to the Commissioner alongside the Equality and Human Rights Commission to provide practical guidance on the inter-relationship between the goods and services and public duty aspects of the Equality Act 2010.
- As new evidence of barriers around older people with additional protected

characteristics emerge during the four years of the strategy, we will look to creative ways of sharing the information through partnership working and targeted meetings

**Progress:**

On 1 October 2012, new provisions in the Equality Act 2010 came into force, extending the ban on age discrimination to cover services, public functions and private clubs and associations - with some notable exceptions, some of which benefit older people (such as the retention of beneficial concessions) and some which do not (such as the use of age in calculating insurance premiums). In Year 1 we did not provide practical guidance on the inter-relationship between the goods and services and public duty aspects of the Equality Act 2010 but instead advised people through our casework on a case by case basis. In Year 2 we will be providing older people with resources, such as factsheets and template letters, to help them challenge age discrimination in the provision of goods and services. We will continue to challenge individual instances of discrimination through our casework.

**Objective 5**

The need to promote good relations between older people and those with other protected characteristics is critical especially at a time of economic uncertainty and social upheaval. There are clear dangers of generation being pitted against generation. Yet there continue to be inspirational examples of intergenerational activity throughout Wales. The Children's Commissioner and Older People's Commissioner have already issued a joint statement warning of the dangers of fostering generational conflict and ignorance. Both organisations have signed a Memorandum of Understanding and meet on a regular basis.

- Older people express concern to the Commissioner about the future prospects facing younger generations. The Commissioner will ensure that the Children's Commissioner and decision-makers are aware of these concerns
- Within two years, the Commissioner will collect evidence of emerging gaps in good relations between older people and other parts of society
- Within two years, the Commissioner will gather examples demonstrating the promotion of good relations between older people and others in society
- Within the four years of the strategic plan, the Commissioner will hold further discussions with the Children's Commissioner about promoting solidarity across the generations

Progress:

This objective was not a Year 1 objective.

### **5.3 Ensure that the Commissioner's policies, practices, and procedures reflect best practice in promoting equality of opportunity including the treatment of staff**

#### **Objective 1**

Increase the diversity of our staff by reviewing our recruitment processes including our application form, how, and where we advertise.

- Within one year - review and update the voluntary sheet recording equality information which accompanies application forms.
- In years two to four – consider further changes to recruitment strategy and application processes. Opportunities to further broaden the staff intake will be limited due to budgetary constraints on additional posts, the size of the organisation, and the low turnover of staff.

Progress:

In 2012/13 we completed a review and update of the voluntary monitoring sheet for equality information and this was rolled out during that year. The monitoring form was reviewed again in early 2013 following guidance from Stonewall Cymru regarding sexual orientation.

Our job application form was updated so that shortlisting and interview panels have no personal information regarding candidates and forms are anonymous. Recruitment in 2013 targeted Welsh language speakers and we used a variety of Welsh Language recruitment websites and publications to advertise posts. There is further potential to encourage applications from under-represented sections of the community, e.g. Black and Minority Ethnic people, in the future.

#### **Objective 2**

Train our staff on the purpose, benefits and application of Impact Assessments

- Within one year - staff will be trained so that they are able to utilise the Impact Assessment tool which will be developed simultaneously

Progress:

All Directors have received training in the use of the new equality impact assessment tool and it is their responsibility to train their teams to use it.

### Objective 3

Carry out Impact Assessments on all our Human Resources and procurement policies and practice and improve how we do this.

- Within two years – all new Human Resources and Procurement policies.
- Within four years – all Human Resources and procurement policies.
- Impact Assessments will be publically available on our intranet within the four year period of the strategy
- Within two years - review and update our procurement practices.

Progress:

There were no newly created human resources policies in 2012/13, however during 2014/15 all HR policies requiring updates will also undergo equality impact assessment using a phased approach.

### Objective 4

Publish our values and equality objectives on the website. Make reference to these in the terms and conditions offered to suppliers.

- Next 12 – 18 months. Publish our values and objectives on the website
- Within three years – engage with suppliers around our expectations in relation to equality

Progress:

During 2012/13, the current Commissioner's objectives and priorities for the organisation were set out in her Framework for Action, which is also published on our website. Priority 5 is specifically around tackling prejudice, inequality and discrimination.

The Commissioner has limited purchasing power to influence all suppliers to change their own procedures and limited capacity to 'test' suppliers' positions on equality. There is perhaps scope for public bodies to do something collaboratively on this which may be delivered through Value Wales.

### Objective 5

The Commissioner introduced her pay and reward strategy in 2009-10 which includes a pay spine and banding. This strategy will be reviewed within the next 2-3 years to include an equal pay review.

Progress:

During 2013 the Commissioner implemented a restructuring process which amended the pay spines and banding. During the restructuring process, employees were consulted on the new pay spine. Once this new pay spine has been in place for 2 years, and new roles have been able to bed in, then it will be reviewed and an equal pay audit undertaken at the same time.

### **Objective 6**

Continue to collect diversity and equalities data on all the protected characteristics, analyse the data and use it to inform our work.

- In every year of the four year Strategic Equality Plan information will be included within our annual Equality Report.

Progress:

Data is being collected annually with regard to the protected characteristics of staff via an online equality survey. Limited detail is published due to the small staff numbers so that individuals cannot be identified.

All applicants are also encouraged to complete and submit diversity monitoring forms as part of the recruitment process. Data is recorded and collated on an annual basis.

See Appendix C for details.

### **Objective 7**

Create opportunities to discuss equality and diversity within the work place.

In each of the four years of the strategy we will:

- Create opportunities for discussion within Team meetings and Away Days; make use of intranet discussions.
- Identify good practice from other organisations.
- Share our own good practice on the website.
- Further develop the use of the staff survey.
- Arrange 'awareness raising sessions' with guest speakers.
- Monitor the uptake of learning and development opportunities amongst all staff.

Progress:

In 2012/13, equality and human rights were the focus of one of our Away Days.

In addition, all staff received human rights training by Mike Lewis of Hawliau Consultancy and in-house 'Equality in Practice' training from Anna Buchanan. We also had team meetings, one of which was attended by a lady who was physically disabled and who spoke about the barriers she had to overcome, and another where we were given an in-depth presentation on sexual orientation. One of our members of staff shared very meaningfully about a learning disability and how that is managed in their day to day work.

See Appendix C

#### **5.4 Assessing impact**

Initially, a basic form of assessment was adapted and used to road test a sample of internal human resources policies and procedures as well as major policy initiatives including the two major Reviews. This was a tool adapted from one used by an organisation of a similar nature. However, it was felt that the tool was still too much of a 'tick box' exercise and a new tool has been developed that is now included in the refreshed Strategic Equality Plan. This tool lends itself to deeper consideration of equality matters through discussion, research and engagement (much of which is ongoing through the Commissioner's day to day work).

#### **5.5 Equality information**

In 2011, the Commissioner developed her own evidence base reflecting older people in all their diversity. This evidence base was shared with the Welsh Government and published on our website so that other public sector organisations could utilise it to assist with the drawing up of their own Equality Plans and Objectives. At the end of 2012/13 the Protection, Scrutiny and Human Rights Team starting building on that evidence base and the Commissioner has now published 10 older people and equality factsheets. These factsheets identify areas in which the Commissioner will build deeper knowledge and understanding in the coming years – both amongst staff and at a national level.

#### **5.6 Employment information**

The Commissioner has been collecting employment data from the outset on the groups required at the time, and the Workforce Profile figures as at 31st March 2013 are provided in Appendix C.

Under-reporting (mainly in the form of non-disclosure for various reasons) remains an issue because we are such a small organisation with fewer than 30 staff members.

## 5.7 Pay differences

The first Commissioner introduced her pay and reward strategy in 2009-10 which includes a pay spine and banding. During 2013 the new Commissioner implemented a restructuring process which amended the pay spines and banding.

During the reporting period, the Commissioner employed a total of 31 staff. Pay differences by band are only recorded on the basis of gender given the small number of staff in the organisation, and the small number of people with additional characteristics within this. In this period, the Commissioner employed twenty one women and ten men. Seven of the positions offering the highest remuneration were held by women and three by men. More detail is provided with a gender breakdown according to pay banding in Appendix C.

## 5.8 Staff training

Employees attended a broad range of training, including general topics such as Manual Handling and IT training, alongside role specific training such as website development or safeguarding. All training undertaken during 2012/13 by the Commissioner's employees was completed.

All employees receive training regarding equality and protected characteristics during their first year of employment as part of their induction programme. This is naturally biased to age due to the nature of the organisation.

Specific equality related training was conducted in April 2012 in addition to employee involvement throughout 2012/13 in the development of the equality objectives and an Equality Impact Assessment Tool for the Commissioner. Employees also attended events such as 'Equality 2020', the EHRC's Equality Exchange and the British Institute of Human Rights 'Human Rights Tour'.

The Commissioner's employees received training relevant to their roles on Mental Health Awareness from 'Time for Change' and an awareness raising session on sexual orientation, covering terminology, hate crime and issues for older LGBT delivered by Stonewall Cymru during 2012/13. A number of training sessions are also scheduled for the current year to raise awareness of different protected characteristics, equality and Human Rights issues.

All employees are also widely encouraged to attend engagement events with older people who also have a range of protected characteristics.

Monitoring of those who have had training requests turned down is not currently undertaken but is negligible.

## 5.9 Procurement

The majority of services provided under contract to the Commissioner are direct services for the Commissioner's own business rather than services provided as intermediaries to the general public. Procured services include:-

- Tangible goods and services which enable the Commissioner to function effectively
- Advisory and intelligence gathering services
- Auditing and legal advice
- Translation, proofing, typesetting, design, and printing services

Where contracted parties are undertaking work which directly impacts on the Commissioner's ability to carry out her interface with the general public, they are made aware of our Equality Plan and references are made to expectations in both the specification and subsequent contracts. Some of the Commissioner's contracts, depending on the relevant thresholds, are subject to formal tendering.

## 5.10 Annual reporting

This annual report was signed off by the current Commissioner in March 2014.

The statutory requirement for reporting is that an annual report must be published by 31st March of the year following the year being reported upon i.e. for 2013-2014 the report must be published by 31st March 2015.

In order to provide timely information, the Commissioner intends to have future reports written, approved and published by the early summer so that we are reporting as closely as possible to the year under review.

## 5.11 Publishing

The Commissioner publishes information on her performance in her annual report on equality monitoring and in her corporate annual report.

This annual report on equality will be submitted to the Equality and Human Rights Commission and published on the Commissioner's website.

## 5.12 Welsh Ministers' reporting

Welsh Ministers have a specific duty to publish a report on how devolved listed bodies in Wales are meeting their general duty.

By gathering the information required, and by producing annual reports, together with developing and publishing other documents such as the Strategic

Equality Plan and related Equality Objectives, guidance documents and impact assessments, the Commissioner will be contributing to the national report and in doing so, it is hoped will demonstrate best practice in many areas.

### **5.13 Review**

The Strategic Equality Plan must be reviewed every 4 years. The appointment of a new Commissioner in June 2012 provided the opportunity to review and refresh the Action Plan and Strategic Equality Objectives before the end of the 4-year period. The new Commissioner felt that the Plan and Objectives could be stronger and more ambitious.

From now on, the Strategic Equality Objectives and Action Plan are to be reviewed each year, so that progress can be noted in preparation for the Annual Report. Some actions may cease if they are completed, others may be updated and new ones added.

### **5.14 Accessibility**

The Commissioner's documents are published bilingually, in hard copy and online.

In order to ensure that accessibility issues are considered, in accordance with guidance issued under the Strategic Equality Plan and the Welsh Language Scheme, a standard statement is included on documents aimed at the general public.

## 6. The way ahead – refreshed Strategic Equality Plan 2012/16

The Commissioner's refreshed Strategic Equality Plan can be found [here](#). This Plan was published for consultation in October 2013 and takes effect from 1 April 2014, replacing the previous one. It provides more challenging objectives for the Commissioner and her staff and outlines more effectively where responsibility lies for objectives being met. The overarching aim of the refreshed Plan is to ensure that the Commissioner and staff members have equality and human rights at the forefront of their thinking and deeply embedded in their ways or working.

# Appendix A: Outline of Equality Objectives 2012/13

The refreshed Strategic Equality Plan for 2012-2016, published alongside this annual report, outlines the Commissioner's refreshed equality objectives and they replace these objectives from 1 April 2014.

Aim	Objective
<p><b>Ensure that all the Commissioner's functions including direct and indirect services promote equality of opportunity</b></p>	<p><b>Objective 1</b></p> <p>Using optional checklists to monitor diversity amongst people accessing our website and for those attending the Commissioner's events:</p> <ul style="list-style-type: none"> <li>• Within two years – Draw up checklists for web users and event attendees</li> <li>• Within three years – Actively promote the completion of these questionnaires with the aim of achieving 10% completion</li> <li>• Within four years – Increase the number of event checklists completed to 20% of attendees</li> </ul> <p><b>Objective 2</b></p> <p>Undertake a readership /user survey of our newsletter plus a strategy to increase use for older people with certain protected characteristics.</p> <ul style="list-style-type: none"> <li>• Within one year - instigate a survey of current users to include a voluntary option to record an individual's protected characteristic(s)</li> <li>• Within one year - Develop and activate strategies to address the gaps in newsletter reach to include creative alternatives to the newsletter where appropriate</li> <li>• Within two years - identify gaps in newsletter take-up amongst identified groups of older people with a focus on older people in care homes (the majority of whom would qualify as disabled people under the Equality Act 2010 and a disproportionate number of whom</li> </ul>

	<p>are women) and older people from minority ethnic communities.</p> <ul style="list-style-type: none"> <li>• Within four years – focus on older people associated with religious or belief based organisations, and older people identifying themselves as lesbian, gay, or bisexual.</li> </ul> <p><b>Objective 3</b></p> <p>Develop a tool to assist the Commissioner in undertaking Impact Assessments which would then be applied to the Commissioner's functions including all key decisions.</p> <ul style="list-style-type: none"> <li>• Within one year - the tool will be developed and integrated into the Commissioner's decision-making processes.</li> </ul> <p><b>Objective 4</b></p> <p>Assess facilities and the management of external events leading to the adoption of existing good practice guidance on equalities in general and the production of specific guidance relating to age, but applying to all protected characteristics through an older age lens.</p> <ul style="list-style-type: none"> <li>• Within one year – identify, adapt, and adopt existing guidance on incorporating equality best practice in events management</li> <li>• Within two years - completion of an internal facilities equality audit</li> <li>• Within two years – completion of an audit on incorporating best practice in equality when managing own events and those in which we arrange in partnership with others</li> <li>• Within three years - consult on and develop guidance on good practice on incorporating age equality in event organisation – this could be done utilising the Commissioner's specific power to issue guidance</li> <li>• Within four years seek feedback on how the guidance had been used to enhance good practice.</li> </ul>
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<p><b>Through effective and continuing engagement, ensure that the Commissioner's work is informed by the experiences and opinions of those who have protected characteristics and share our evidence base with those covered by both general and specific duties</b></p>	<p><b>Objective 1</b></p> <p>Develop further our evidence base on the barriers faced by older people with additional protected characteristics building on the evidence base already developed around age:</p> <ul style="list-style-type: none"> <li>• Within one year - develop a strategic level engagement plan for older people from Black and Minority Ethnic communities.</li> <li>• Within two years - develop a strategic level engagement plan to help engage with older Welsh speakers.</li> <li>• Within three years - develop a strategic level engagement plan for older disabled people.</li> <li>• Within four years - focus on older people identifying with a religion or recognized belief under the Equality Act 2010.</li> <li>• Communications led working Group to ensure that local level engagement strategies are inclusive of older people in their diverse identities – year one will focus on rural West Wales.</li> </ul> <p><b>Objective 2</b></p> <p>Ensure that our evidence base around age and additional associated protected characteristics is made widely available to most relevant authorities covered by the general and specific duties to promote equality. The Commissioner would be in a unique position to obtain and disseminate this information from perspectives on older age.</p> <ul style="list-style-type: none"> <li>• Within one year - we will ensure that our evidence base on age equality is available through our website and in hard copy and that all public authorities covered by the specific duty in Wales and some key bodies covered by the general duty are alerted to the evidence base.</li> </ul> <p>Throughout years one to four - ensure that the evidence base is updated at least annually as we obtain fresh</p>
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evidence of barriers and best practice through our strategic and local level targeting strategies.

**Objective 3**

During years three and four, in the context of our functions and powers, develop and share best practice guidance on fair and effective treatment for older people amongst those that provide direct services for older people in Wales, which will include guidance relating to those with protected characteristics additional to age. Evidence received by the Commissioner through our reviews, work programmes and general conversations suggests that current practice can vary enormously both within and between organisations

- In year three - seek the opinions of public service organisations on the appropriate style and content of any such guidance including whether it might be better to customise guidance around specific subjects or audiences such as OPCW's guidance on adult protection or the production of a product covering all issues and services in a single document
- In year 4 - depending on the outcome of these deliberations, produce relevant guidance

**Objective 4**

Generate opportunities to discuss and debate equality and diversity and disseminate best practice with organisations of strategic significance to the Commissioner as part of our statutory function. Such guidance is needed in the context that older people are disproportionately higher users of public services and are therefore more vulnerable to service cuts.

- Within years one and two - we will build on efforts to promote better understanding of age equality amongst public service organisations and their representative bodies. This will remain topical as we await the introduction of the abolition of age discrimination in goods and services. Many will look to the Commissioner alongside the Equality and Human Rights Commission to provide practical guidance on

	<p>the inter-relationship between the goods and services and public duty aspects of the Equality Act 2010.</p> <ul style="list-style-type: none"> <li>• As new evidence of barriers around older people with additional protected characteristics emerge during the four years of the strategy, we will look to creative ways of sharing the information through partnership working and targeted meetings.</li> </ul> <p><b>Objective 5</b></p> <p>The need to promote good relations between older people and those with other protected characteristics is critical especially at a time of economic uncertainty and social upheaval. There are clear dangers of generation being pitted against generation. Yet there continue to be inspirational examples of intergenerational activity throughout Wales The Children's Commissioner and OPCW have already issued a joint statement warning of the dangers of fostering generational conflict and ignorance. Both organisations have signed a Memorandum of Understanding and meet on a regular basis</p> <ul style="list-style-type: none"> <li>• Older people express concern to the Commissioner about the future prospects facing younger generations. The Commissioner will ensure that the Children's' Commissioner and decision-makers are aware of these concerns</li> <li>• Within two years, the Commissioner will collect evidence of emerging gaps in good relations between older people and other parts of society</li> <li>• Within two years, the Commissioner will gather examples demonstrating the promotion of good relations between older people and others in society</li> <li>• Within the four years of the strategic plan, the Commissioner will hold further discussions with the Children's Commissioner about promoting solidarity across the generations.</li> </ul>
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<p><b>Ensure that the Commission's policies, practices, and procedures reflect best practice in promoting equality of opportunity including the treatment of staff</b></p>	<p><b>Objective 1</b></p> <p>Increase the diversity of our staff by reviewing our recruitment processes including our application form, how, and where we advertise.</p> <ul style="list-style-type: none"> <li>• Within one year - review and update the voluntary sheet recording equality information which accompanies application forms.</li> <li>• In years two to four - consider further changes to recruitment strategy and application processes. Opportunities to further broaden the staff intake will be limited due to budgetary constraints on additional posts, the size of the organisation, and the low turnover of staff.</li> </ul> <p><b>Objective 2</b></p> <p>Train our staff on the purpose, benefits and application of Impact Assessments</p> <ul style="list-style-type: none"> <li>• Within one year - staff will be trained so that they are able to utilise the Impact Assessment tool which will be developed simultaneously (see reference under Aim 1)</li> </ul> <p><b>Objective 3</b></p> <p>Carry out Impact Assessments on all our Human Resources and procurement policies and practice and improve how we do this.</p> <ul style="list-style-type: none"> <li>• Within two years – all new Human Resources and Procurement policies.</li> <li>• Within four years – all Human Resources and procurement policies.</li> <li>• Impact Assessments will be publically available on our intranet within the four year period of the strategy</li> <li>• Within two years - review and update our procurement practices.</li> </ul> <p><b>Objective 4</b></p> <p>Publish our values and equality objectives on the website.</p>
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	<p>Make reference to these in the terms and conditions offered to suppliers.</p> <ul style="list-style-type: none"> <li>• Next 12 – 18 months. Publish our values and objectives on the website</li> <li>• Within three years – engage with suppliers around our expectations in relation to equality</li> </ul> <p><b>Objective 5</b></p> <p>The Commissioner introduced her pay and reward strategy in 2009-10 which includes a pay spine and banding. This strategy will be reviewed within the next 2-3 years to include an equal pay review.</p> <p><b>Objective 6</b></p> <p>Continue to collect diversity and equalities data on all the protected characteristics, analyse the data and use it to inform our work.</p> <ul style="list-style-type: none"> <li>• In every year of the four year Strategic Equality Plan information will be included within our annual Equality Report.</li> </ul> <p><b>Objective 7</b></p> <p>Create opportunities to discuss equality and diversity within the work place.</p> <p>In each of the four years of the strategy we will:</p> <ul style="list-style-type: none"> <li>• Create opportunities for discussion within Team meetings and Away Days; make use of intranet discussions.</li> <li>• Identify good practice from other organisations.</li> <li>• Share our own good practice on the website.</li> <li>• Further develop the use of the staff survey.</li> <li>• Arrange 'awareness raising sessions' with guest speakers.</li> <li>• Monitor the uptake of learning and development opportunities amongst all staff</li> </ul>
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# Appendix B: UN Principles for Older Persons

The United Nations Principles for Older Persons were adopted by the UN General Assembly (Resolution 46/91) on 16 December 1991. Governments were encouraged to incorporate them into their national programmes whenever possible. There are 18 principles, which can be grouped under five themes: independence, participation, care, self-fulfilment and dignity.

## Independence

1. Older persons should have access to adequate food, water, shelter, clothing and health care through the provision of income, family and community support and self-help.
2. Older persons should have the opportunity to work or to have access to other income-generating opportunities.
3. Older persons should be able to participate in determining when and at what pace withdrawal from the labour force takes place.
4. Older persons should have access to appropriate educational and training programmes.
5. Older persons should be able to live in environments that are safe and adaptable to personal preferences and changing capacities.
6. Older persons should be able to reside at home for as long as possible.

## Participation

7. Older persons should remain integrated in society, participate actively in the formulation and implementation of policies that directly affect their well-being and share their knowledge and skills with younger generations.
8. Older persons should be able to seek and develop opportunities for service to the community and to serve as volunteers in positions appropriate to their interests and capabilities.
9. Older persons should be able to form movements or associations of older persons.

## Care

10. Older persons should benefit from family and community care and

protection in accordance with each society's system of cultural values.

11. Older persons should have access to health care to help them to maintain or regain the optimum level of physical, mental and emotional well-being and to prevent or delay the onset of illness.
12. Older persons should have access to social and legal services to enhance their autonomy, protection and care.
13. Older persons should be able to utilize appropriate levels of institutional care providing protection, rehabilitation and social and mental stimulation in a humane and secure environment.
14. Older persons should be able to enjoy human rights and fundamental freedoms when residing in any shelter, care or treatment facility, including full respect for their dignity, beliefs, needs and privacy and for the right to make decisions about their care and the quality of their lives.

### Self-Fulfilment

15. Older persons should be able to pursue opportunities for the full development of their potential.
16. Older persons should have access to the educational, cultural, spiritual and recreational resources of society.

### Dignity

17. Older persons should be able to live in dignity and security and be free of exploitation and physical or mental abuse.
18. Older persons should be treated fairly regardless of age, gender, racial or ethnic background, disability or other status, and be valued independently of their economic contribution.

Further information on United Nations Principles for Older Persons can be found here: [www.un.org/ageing/un\\_principles.html](http://www.un.org/ageing/un_principles.html)

# Appendix C: Workforce profiles as at 31/03/13

## Headcount Information

1. 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 2012/13 the Commissioner received 20 responses out of a possible 25. However, due to our size, where figures account for less than 10%, details are removed to prevent individuals from being identified.

### Number of people employed by Protected Characteristic:

Age	
16-24	-
25-34	10
35-44	5
45-54	3
55-64	-
65 & Over	-
Prefer Not to Say	-

<b>Gender / Sex</b>	
Male	5
Female	15
MTF Transgender	-
FTM Transgender	-
Prefer Not to Say	-

<b>Sexual Orientation</b>	
Bisexual	-
Gay / Lesbian	3
Heterosexual	16
Other	-
Prefer Not to Say	-

<b>Religion or Belief</b>	
No religion or belief	9
Christian (all denominations)	9
Buddhist	-
Hindu	-
Jewish	-
Muslim	-
Sikh	-
Any other religion or belief	-
Prefer not to say	-

<b>Race (inc. ethnic or national origin, colour or nationality)</b>	
White English	-
White Scottish	-
White Welsh	17
White Northern Irish	-
White British	-
White Gypsy or Irish Traveller	-
White Irish	-
White Other	-
Mixed/Multiple Ethnic Group – White & Black Caribbean	-
Mixed/Multiple Ethnic Group – White & Black African	-
Mixed/Multiple Ethnic Group – White & Asian	-
Other mixed/multiple ethnic background	-
Asian – Indian	-
Asian – Pakistani	-
Asian – Bangladeshi	-
Asian – Chinese	-

Asian - British	-
Other Asian Background	-
Black – Caribbean	-
Black – African	-
Black – British	-
Black – Other (please specify)	-
Other ethnic group (please specify)	-
Prefer not to say	-

<b>Disability</b>	<b>Yes</b>	<b>No / N/A</b>	<b>Prefer Not to Say</b>
Do you consider yourself to have a disability?	3	16	-
Do you have a disability as defined by the Equality Act?	3	15	-
At least one of my dependents has a disability.	1	7	12

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

<b>Pregnancy &amp; Maternity</b>	
Number of pregnant employees during 2012/13	5
Number of employees taking Maternity Leave during 2012/13	6

**2. 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:**

<b>Job</b>	<b>Men</b>	<b>Women</b>	<b>Total</b>
Administrator	1	2	3
Support Officer	2	3	5
Officer	4	9	13
Manager	1	3	4
Head / Senior Advisor	1	2	3
Deputy	-	1	1
Commissioner / Programme Board (PB) Lead	1	1	2
<b>Total</b>	<b>10</b>	<b>21</b>	<b>31</b>

<b>Pay &amp; Grade</b>	<b>Men</b>	<b>Women</b>	<b>Total</b>
15,750-19,144 / A	1	2	3
20,104-24,433 / B	2	3	5
25,655-31,184 / C	4	9	13
32,743-39,799 / D	1	3	4
42,287-53,261 / Head or Senior Advisor	1	2	3
56,456-71,275 / Deputy	-	1	1
76,176- 93,735* / Commissioner or PB Lead	1	1	2

\*Pay Level set by Senior Salaries Review Body

<b>Contract Type</b>	<b>Men</b>	<b>Women</b>	<b>Total</b>
Permanent	8	15	23
Fixed Term	1	6	7
Temporary	1	-	1

<b>Working Pattern</b>	<b>Men</b>	<b>Women</b>	<b>Total</b>
Full Time	7	18	25
Part Time	2	3	5
Compressed Hours	-	1	1

## Recruitment

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

The Commissioner is committed to increasing the diversity of her staff by reviewing the Commissioner's recruitment processes including the application form, how, and where we advertise.

Application forms are already available in alternative formats and recruitment adverts are placed widely using a variety of media. The Commissioner has a formal Equal Opportunities and Diversity 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 and reasonable adjustments have been provided for previous candidates.

The Commissioner will also give consideration to make further changes to the recruitment strategy and application processes to assist in diversification of the workforce; this may include development of a more targeted recruitment approach to candidates who have protected characteristics. However, opportunities to further broaden the staff intake will be limited due to budgetary constraints on additional posts, the size of the organisation, and the low turnover of staff.

During 2012/13 the Commissioner recruited for, and filled, five posts via external recruitment methods. All internal and external candidates are provided with the opportunity to complete a Diversity Monitoring form at point of application, however not all candidate choose to complete and submit a form. The Commissioner received 89 completed Diversity Monitoring Forms associated with external recruitment conducted during 2012/13.

#### Number of applications for jobs within 2012/2013 received from the following protected groups:

Age	
16-24	4
25-34	38
35-44	18
45-54	21
55-64	8
65 & Over	-
Prefer Not to Say	-

<b>Gender</b>	
Male	36
Female	53
MTF Transgender	-
FTM Transgender	-
Prefer Not to Say	-

<b>Sexual Orientation</b>	
Bisexual	2
Gay / Lesbian	4
Heterosexual	78
Other	-
Prefer Not to Say	5

<b>Religion of Belief</b>	
No religion or belief	11
Christian (all denominations)	44
Buddhist	1
Hindu	-
Jewish	-
Muslim	4
Sikh	3
Any other religion or belief	20
Prefer not to say	6

<b>Race (inc. ethnic or national origin, colour or nationality)</b>	
White English	12
White Scottish	1
White Welsh	50
White Northern Irish	-
White British	11
White Gypsy or Irish Traveller	-
White Irish	1
White Other	3
Mixed/Multiple Ethnic Group – White & Black Caribbean	-
Mixed/Multiple Ethnic Group – White & Black African	-
Mixed/Multiple Ethnic Group – White & Asian	2
Other mixed/multiple ethnic background	2
Asian – Indian	1
Asian – Pakistani	-
Asian – Bangladeshi	1

Asian – Chinese	1
Asian - British	2
Other Asian Background	-
Black – Caribbean	-
Black – African	1
Black – British	-
Black – Other (please specify)	-
Other ethnic group (please specify)	-
Prefer not to say	1

<b>Disability</b>	<b>Yes</b>	<b>No / N/A</b>	<b>Prefer Not to Say</b>
Do you consider yourself to have a disability?	2	87	-

No data relating to pregnancy and maternity was collected in relation to recruitment activity for 2012/13.

**4. 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.**

The Commissioner recruited for, and filled, 2 posts via internal recruitment methods during 2012/13.

Applications were received from 2 internal candidates for these positions. Both candidates were successful.

All internal and external candidates are provided with the opportunity to complete a Diversity Monitoring form at point of application, however in this instance no forms were received and therefore a full range of data related to protected characteristics is unavailable. However, the Commissioner does hold information relating to age and gender for HR purposes relating to these specific employees; this information is provided below.

## Learning & Development

### **5. 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.**

The Commissioner holds Investors in People status and, 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.
- assess Commissioner and individual learning and development needs and draw up a Commissioner training and learning needs analysis.
- 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 and the Commissioner approved all employee applications for Learning and Development (training) activity during 2012/13.

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

Employees attended a broad range of training, including general topics such as Manual Handling and IT training, alongside role specific training such as website development or safeguarding. All training undertaken during 2012/13 by the Commissioner's employees was completed.

All employees receive training regarding equality and protected characteristics

during their first year of employment as part of their induction programme. This is naturally biased to age due to the nature of the organisation.

Specific equality related training was conducted in April 2012 in addition to employee involvement throughout 2012/13 in the development of the equality objectives and an Equality Impact Assessment Tool for the Commissioner. Employees also attended events such as 'Equality 2020', the EHRC's Equality Exchange and the British Institute of Human Rights 'Human Rights Tour'.

The Commissioner's employees received training relevant to their roles on Mental Health Awareness from 'Time for Change' and an awareness raising session on sexual orientation, covering terminology, hate crime and issues for older LGBT delivered by Stonewall Cymru during 2012/13. A number of training sessions are also scheduled for the current year to raise awareness of different protected characteristics, equality and Human Rights issues.

All employees are also widely encouraged to attend engagement events with older people who also have a range of protected characteristics.

### Grievance Procedures

**7. 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 Commission had no employees involved in grievance procedures either as complainant or as a person against whom a complaint was made during 2012/13.

### Disciplinary Procedures

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

The Commission had 2 employees subject to disciplinary procedures during 2012/13. 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.

## Leavers

### 9. 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 2012/13 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.

<b>Age</b>	
16-24	-
25-34	1
35-44	1
45-54	1
55-64	-
65 & Over	-
Prefer Not to Say	-

<b>Gender</b>	
Male	-
Female	3
MTF Transgender	-
FTM Transgender	-
Prefer Not to Say	-



