

Equality, Diversity and Inclusion Policy

Approved by: HEIW Executive Team

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Version 1

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1. Introduction

Health Education and Improvement Wales (HEIW) is committed to supporting, developing and promoting Equality, Diversity and Inclusion in all of its practices and activities. We aim to establish an inclusive culture, free from discrimination, based upon the values and behaviours developed by HEIW staff. These values and behaviours reflect our thoughts, feelings and understanding of how we will and will not behave towards others.

Our Values and Behaviour Framework are:

- Respect for all. In every contact we have with others
- Together as a team.
- Ideas that improve. Harnessing creativity and continuously innovating, evaluating and improving.

Our Values and Behaviours Framework is at appendix 1.

HEIW will ensure equality of opportunity and access for all by building upon the foundation of Equality and Human Rights Legislation and strive not only to comply with legal requirements, but also to use these to ensure that the organisation exemplifies best practice. HEIW acknowledges that our ability to recruit and retain the best people depends upon creating a positive, compassionate and inclusive culture.

HEIW values diversity and recognises that the organisation is greatly enhanced by the wide range of backgrounds, experiences, views, beliefs and cultures represented within its staff population. It aims to embrace diversity and proudly acknowledges that variety and difference are intrinsic to the wellbeing and future development of HEIW.

2. Purpose

The aim of this policy is to ensure equality and fairness throughout HEIW and to comply with the provisions of the Human Rights Act 1998, Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, Welsh Language Act 1993 and Welsh Language (Wales) Measure 2011, National Terms and Conditions of Service for all NHS Employees (Agenda for Change) and good practice guidance. HEIW also aims to be an exemplar employer through development and promotion of good practice. This policy specifically relates to workforce issues and is intrinsically linked to the following policies and schemes:

Policies

- All Wales Dignity at Work Process
- All Wales Grievance Policy and All Wales Disciplinary Policy
- Mental Health Policy
- Flexible Working Policy

Schemes

- Disability Confident Scheme
- Communication Access Symbol
- Employee assistance program
- Time to Change Pledge
- Stonewall Champion Scheme
- Dying to Work
- Anti-Violence Collaboration

HEIW opposes all forms of discrimination and recognises that some groups and individuals in society experience unfair discrimination in employment and in their contact with public services.

HEIW recognises and acknowledges that [discrimination](#) can take the form of treating people less favourably because of their:

age, colour, culture, disability (visible and non-visible), ethnic origin, gender, gender identity, language, marital or civil partnership status, nationality, carer status, pregnancy or maternity issues, responsibility for dependants, sexual orientation, social-economic circumstance, religion, or political beliefs.

It can also arise from failing to take account of differences between people and groups which can result in barriers to access to services and opportunities.

3. Policy Statement

In compliance with the public-sector equality duty section 149 of the Equality Act 2010, HEIW aims to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
- Advance equality of opportunity between persons who share a relevant protective characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

And to have due regard for advancing equality by:

- Removing or minimising disadvantages experienced by people due to their protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low

Protective Characteristics under the [Equality Act 2010](#)

- | | |
|-----------------------------------|----------------------|
| • Age | • Religion or belief |
| • Disability | • Race |
| • Gender identity | • Sex |
| • Pregnancy and maternity | • Sexual orientation |
| • Marriage and civil partnerships | |

Strategies, policies, practices and procurement processes within HEIW must ensure equality of opportunity, access and outcome for all, whilst ensuring that all employment practices are designed and delivered fairly with dignity and respect in accordance with Equality and Human Rights Legislation and embrace the expectation of [Wellbeing and Future Generations Act \(2015\)](#); [A Healthier Wales \(2018\)](#) and [Is Wales Fairer? \(2018\)](#).

4. Application of Policy

In the application of this policy, HEIW will:

- Seek to employ a workforce that is representative of all sections of society
- Take full account of the Welsh Language Standards and the promotion of the Welsh Language
- Create an environment of safety for employees to disclose disabilities (including neurodivergent employees) at an early stage. So, that implementation of appropriate workplace adjustments can be tailored to individual needs. Managers will be supported to understand the range and impacts of disabilities (visible and non-visible) and support needs of individuals.
- Create a supportive working environment which enables every individual to be their best (see the NHS Wales Principles, emerging NHS Wales promises/pledges/charter and HEIW values/behaviours). Specifically, we will create a culture of recognising, understanding and valuing every individual's unique difference.
- Create an environment where it is normal and appropriate for each individual to take ownership for challenging themselves and others to deal with and improve relationship conflict as soon as they can.
- Ensure that individuals/groups are appropriately challenged (and sanctioned) when issues of bullying, harassment, victimisation and unlawful discrimination are evident. This includes pay and benefits, terms and conditions of employment, leave for parents, requests for flexible working, selection for employment, promotion, training or other developmental opportunities, dealing with grievances, discipline, dismissal and redundancy,
- Support and challenge all colleagues (specifically leaders) with appropriate learning to ensure awareness of rights and responsibilities under the Equality, Diversity and Inclusion Policy. Responsibilities include creating a fair positive working environment, taking ownership for improving relationships and dealing with any issues of bullying, harassment, victimisation and unlawful discrimination.
- Review employment practices and procedures when necessary to ensure fairness, and to take account of changes in the law.
- Ensure all new and existing HEIW activity including policies, planning, procurement, strategies, guidance, resource material, events are assessed utilising the HEIW Equality Impact Assessment toolkit. To ensure that activities comply with legislation and good practice whilst enabling greater mainstreaming of equality so that it is considered at every opportunity.
- Monitor the composition of the workforce regarding information such as age, gender identity, race, sexual orientation, religion or belief and disability and act accordingly in terms of positive action and reporting.
- HEIW acknowledges its workforce in all of its intersectionality. This means that we will recognise the way in which power structures based on factors such as sex/gender, race, sexuality, disability, age and faith interact with each other and create barriers of overlapping discrimination and disadvantage.

5. Scope

This Equality, Diversity and Inclusion Policy applies to:

- All persons employed or engaged by HEIW including part time workers, temporary and agency workers and those holding honorary contracts
- Visitors, volunteers and contractors

6. Statutory References

Statutory References which frame and influence this policy include:

- [Welsh Language Act 1993](#)
- [Human Rights Act 1998](#)
- [Equality Act 2010 \(Statutory Duties\) \(Wales\) Regulations 2011](#)
- [Welsh Language \(Wales\) Measure 2011](#)
- [The Well-being of Future Generations \(Wales\) Act 2015](#)
- [National Terms and Conditions of Service \(Agenda for Change\) Equality and Diversity Statement](#)

7. Roles and Responsibilities

It is incumbent upon everyone associated with HEIW to behave with dignity, courtesy and respect and act in a manner that does not discriminate against another.

Individual Employees of HEIW are expected:

- To be aware of Equality, Diversity and Inclusion through completion of mandatory and role development equality, diversity and inclusion training i.e. 'Treating me Fairly', Unconscious Bias, Leadership and Development
- To promote Equality, Diversity and Inclusion as an integral part of the services they provide
- To actively encourage non-discriminatory practices and to report any incidences of behaviour that fail to comply with this policy

HEIW People Team are expected:

- To devise and recommend People policies, procedures and action plans to ensure that all legislative requirements are met, and best practice adopted
- To ensure consistency of the Equality, Diversity and Inclusion Policy with other policies and initiatives, making recommendations and providing advice on their implementation
- To advise staff and managers on legal compliance and ensure best practice in all matters relating to Equality, Diversity and Inclusion
- To ensure that recruitment, advertising, selection and appointment procedures, performance management processes and disciplinary grievance processes are fair, transparent and are consistently applied
- To monitor employment equality data on a regular basis and publish the findings of monitoring activity, as appropriate

HEIW Senior Management are expected:

- To provide leadership in the operation and implementation of the Equality, Diversity and Inclusion policy
- To investigate all matters of alleged discrimination, harassment and inappropriate behaviour promptly and thoroughly
- To ensure that recruitment, advertising, selection and appointment procedures, performance management processes and disciplinary grievance processes are fair, transparent and are consistently applied
- To treat all applications for flexible practices on a fair and equitable basis and to provide reasonable and objective reasons when such requests must be refused
- To ensure that Equality, Diversity and Inclusion are considered as part of all departmental planning processes

HEIW Executive Team are expected:

- To hold ultimate accountability for the Equality, Diversity and Inclusion policy
- To encourage, foster and promote a culture of Equality, Diversity and Inclusion in HEIW
- To integrate Equality, Diversity and Inclusion considerations into corporate planning

8. Training

Equality and Human Rights training is mandatory for all NHS staff. The Equality and Diversity module 'Treat Me Fairly' is one of the Core Competencies within the NHS UK Core Skills Training Framework (CSFT). This training is to be updated and completed on a three-yearly basis.

In addition to the above statutory and mandatory training, training, coaching and or mentoring will be available to all staff in relation to a broad range of Equality, Diversity and Inclusion topics including Unconscious Bias and Equality Impact Assessments. Managers will be expected to raise awareness with their teams and be actively involved in their own development and knowledge in relation to equality, diversity and inclusion awareness.

9. Communication

A variety of communication methods will be used to keep employees informed of news, initiatives and developments in relation to equality, diversity and inclusion.

The aim will also be to engage staff to encourage and foster an environment of questioning and safety, where relevant issues can be discussed. Staff engagement throughout the organisation will be key, with active encouragement of the engagement and participation in protected characteristic groups and those without.

The development of Inclusion Champions will be key in engaging staff and demonstrating commitment to the diversity, equality and inclusion agenda. If you are interested, please contact the HEIW Inclusion Lead on HEIW.Inclusion@wales.nhs.uk

Staff will be made aware of equality of opportunity, diversity and inclusion policies throughout their employment commencing with the HEIW recruitment process. Equality of opportunity, diversity and inclusion statements will be incorporated in all relevant documents such as advertisements, recruitment literature, job descriptions, person specifications and contracts of employment. It will also be available on the HEIW intranet.

10. Allegations of Discrimination, Harassment and Victimisation

HEIW has a zero tolerance for bullying, harassment and/or victimisation based on age, disability, gender identity, language, marriage (inclusive of same sex) and/or civil partnership, pregnancy, race, religion, belief & non-belief religion, sexual orientation.

Staff are actively encouraged to report discriminatory practices or behaviour, including those that could be regarded as hate crime, to their Line Manager, Senior Management Team, a member of the Executive Team, HEIW People Team, Inclusion Lead or their Trade Union Representative.

HEIW will treat seriously all complaints of discrimination or harassment related to any of the grounds set out in this policy irrespective of whether the complaint is made by an employee, manager, volunteer, visitor or any other relevant third party.

Written records will be maintained at all stages. Advice and guidance can be obtained from Line Managers, Trade Union Representatives, the HEIW People Team or from HEIW Workforce Inclusion Lead. All contact will be treated in complete confidence

Any individual who has raised a complaint or given evidence in a complaint of discrimination will not be [victimised](#).

11. Trade Union and other Staff Side Representatives

Trade Union and other Staff Side Representatives should:

- Work in partnership with management to tackle discrimination, prejudice and harassment at work
- Support staff in situations where concerns have been expressed
- Encourage staff to report their concerns through the appropriate channels and procedures where necessary
- Work in partnership to promote Equality, Diversity and Inclusion as high on the HEIW agenda

12. Non-Compliance

Any breach of this policy will be investigated and dealt with through the All Wales Disciplinary Policy and Procedure. Any employee found to have unfairly discriminated, harassed or victimised a third party, member of staff, colleague, volunteer or contractors may be dismissed.

Any breach in this policy by a third party e.g. contractor will result in that third party's employer being contacted and a formal complaint being made using that employer's procedures.

13. Implementation, Monitoring and Review

HEIW will ensure that this policy, together with its commitment to promoting equality, fairness and protecting individuals from discrimination, is communicated to both existing and potential members of staff, partner organisations, contractors and the wider community. It will be supported by a programme of action within our Strategic Equality Plan (SEP), progress against which will be provided on a regular basis to HEIW Executive Team and Board and through our published Annual Equality Reports. Review of this policy will take place initially 12 months after publication, and then three yearly.

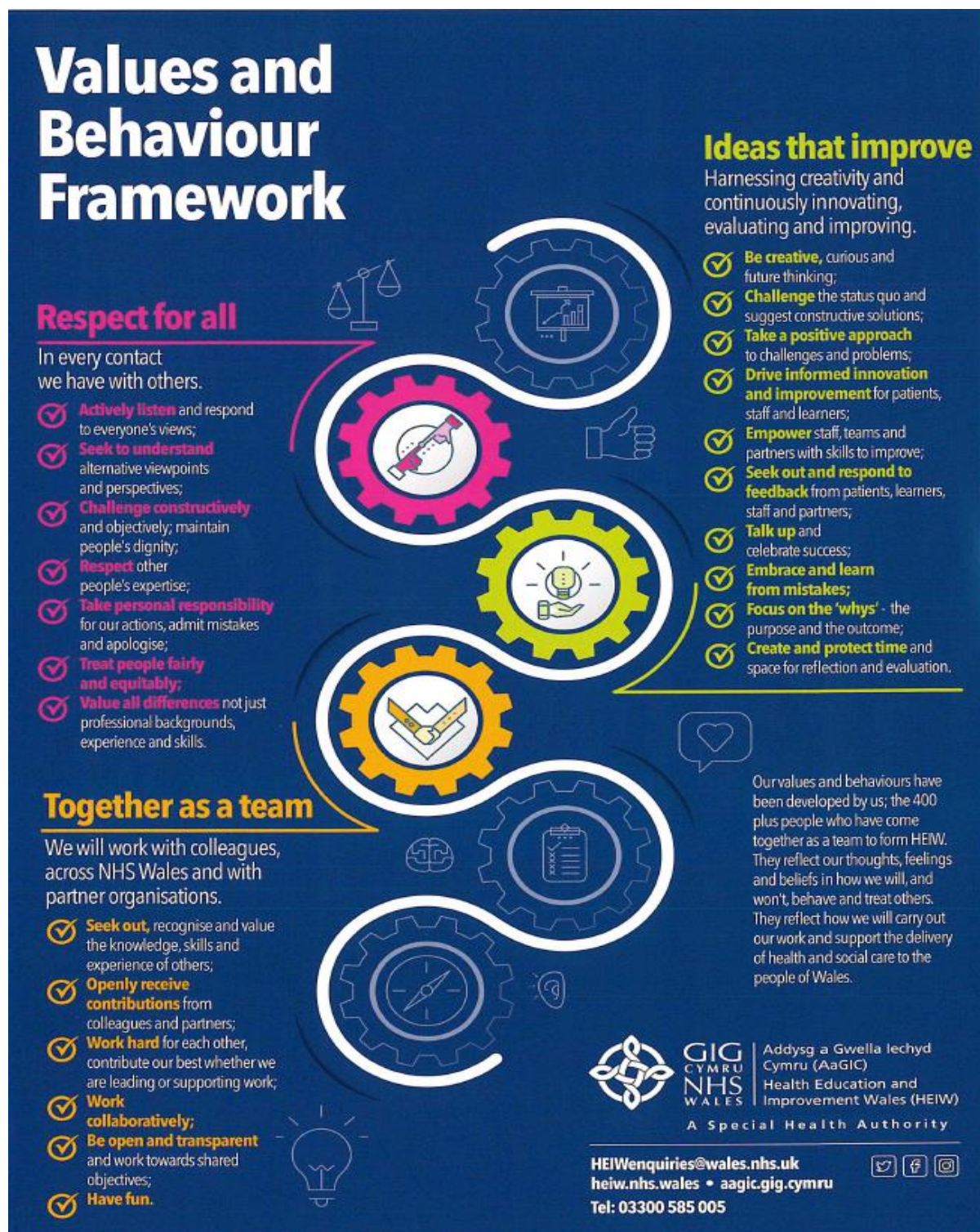
14. Equality Impact Assessment Statement

HEIW is committed to ensuring that, as far as is reasonably practicable, the way it treats its employees reflects their individual needs and does not discriminate against individuals or groups.

HEIW has undertaken an Integrated Equality Impact Assessment (EqIA) and received feedback on this policy and the way it operates. HEIW wanted to know of any possible adverse or differential impact that this policy may have on any groups in respect of: age, disability, gender identity; marriage (including same sex) or civil partnership, pregnancy and maternity issues, race, religion and or belief sexual orientation, transgender, carer, Welsh language, or other protected characteristics.

In exploring these possible adverse or differential impacts HEIW acknowledge the intersectionality of individuals. Meaning that due regard has been given to the way in which power structures based on factors such as: age, disability, gender identity, sexuality, race, religion, belief or non-belief and religion interact with each other to create barriers of overlapping discrimination and disadvantage.

The assessment found that there was an overwhelming number of positive impacts on individuals and groups. HEIW will make plans for the necessary actions required to minimise any stated impact to ensure that it meets its responsibilities under the equalities, Welsh language and human rights legislation.



Appendix 2

Glossary of terms

The following definitions of discrimination are derived from the anti-discrimination legislation:

Adverse Impact

This is a significant difference in patterns of representation or outcomes between equalities groups, with the difference amounting to a detriment for one or more equalities groups.

Differential Impact

Suggests that a particular group has been affected differently by a policy, in either a positive, or negative way

Definition of Disability

The Equality Act 2010 defines Disability as being: “An impairment, which has a substantial, long term adverse effect on a person’s ability to carry out normal day-to-day activities”.

Discrimination

Direct Discrimination

Treating people less favourably than others e.g. on the grounds of age, disability, gender, race, religion and belief, sexual orientation.

Indirect Discrimination

Applying a provision, criterion or practice that disadvantages people e.g. on the grounds of age, disability, gender, race, religion and belief, sexual orientation, and that can’t be justified as a proportionate means of achieving a legitimate aim. The concept of 'provision, criterion or practice' covers the way in which an intention or policy is actually carried out, and includes attitudes and behaviour that could amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and stereotyping. To find discrimination it will be sufficient to show that a practice is likely to affect the group in question adversely.

Diversity

This is defined as how differences between people are harnessed to drive forward creativity and excellence in performance. In the workplace this means recognising individual and group differences, which means more creativity and continuous improvement.

Harassment

This is unwanted conduct that has the purpose or effect of creating a negative or offensive environment for a complainant, or violating the complainant’s dignity or treating a person less favourably than another person because they have either submitted to, or did not submit to, sexual harassment or harassment related to sex or gender reassignment.

Human Rights

This is about fairness, respect, equality, dignity and autonomy in how people are treated and in the services that are provided. It is backed up by legislation, namely the 1998 Human Rights Act and is a binding international agreement that the United Kingdom has signed up to.

Policies

The term policy means the full range of formal and informal decisions made in carrying out a function or delivering a particular service. Policies may take the form of a clear written statement or may be implicit in management decisions or “custom” and “practice”. Policies may also take the form of a strategy or action plan.

Inclusion

Inclusion is often defined as the extent to which everyone at work, regardless of their background, identity or circumstance, feels valued, accepted and supported to succeed at work.

https://www.cipd.co.uk/Images/building-inclusive-workplaces-report-sept-2019_tcm18-64154.pdf

Intersectionality

The theory that the overlap of various social identities, as race, gender, sexuality, and class, contributes to the specific type of systemic oppression and discrimination experienced by an individual.

Positive Action

This is when measures are taken to reverse the effects of discrimination by the provision of facilities that meet the specific needs of disadvantaged groups in relation to their training, education or welfare, or job training targeted at people from groups that are under-represented in a particular area of work or encouragement for them to apply for that work.

Neurodivergent

Meaning that the brain functions, learns and processes information differently. Neurodivergence includes Attention Deficit Disorders, Autism, Dyslexia and Dyspraxia.

<https://archive.acas.org.uk/neurodiversit>

Non-binary

An umbrella term for people whose gender identity doesn't sit comfortably with 'man' or 'woman'. Non-binary identities are varied and can include people who identify with some aspects of binary identities, while others reject them entirely.

<https://www.stonewall.org.uk/help-advice/glossary-terms#n>

Race

Under the Equality Act it is unlawful to discriminate against anyone on grounds of race, colour, nationality, including citizenship or ethnic or national origin and Gypsy and Traveller Communities.

Religion, belief & non-belief Religion,

Religious groups cover a wide range of groupings the most of which are Buddhist, Christians, Hindus, Jews, Muslims, and Sikhs. Consider these categories individually and collectively when considering impacts.

Trans

An umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, transsexual, gender-queer (GQ), gender-fluid, non-binary, gender-variant, crossdresser, genderless, agender, nongender, third gender, bi-gender, trans man, trans woman, trans masculine, trans feminine and neutrois.

<https://www.stonewall.org.uk/help-advice/glossary-terms>

Victimisation

Discrimination or harassment of a person because they have made a complaint, supported someone else who has made a complaint or acted as a witness in a discrimination case.

HEIW EQUALITY IMPACT ASSESSMENT (EqIA)

Equality Impact Assessments

An equality impact assessment is a tool to assess the impact of policies, procedures, strategies and decisions on the ability of an organisation to perform the below public sector equality duties.

Public sector equality duty section 149 of the Equality Act 2010:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

And to have due regard for advancing equality by:

- Removing or minimising disadvantages experienced by people due to their protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low

To ensure HEIW policies, procedures, strategies and decisions are designed and delivered fairly in accordance with Equality, Welsh Language Legislation and Human Rights Legislation, please complete the below Equality Impact Assessment form. Highlight any positive and/or negative impacts included in section 4; actions to be taken to address any negative impacts and opportunities for further developing positive impacts that enhance section 149 of the Equality Act 2010 and Welsh Language Standards (2011), when detailing existing good practice in Section 10 of this form. Concluding with how actions are to be monitored and reviewed.

Appendix 3

HEIW EQUALITY IMPACT ASSESSMENT (EIA)

Title of Policy/ Procedure/ Strategy or Decision	Equality, Diversity and Inclusion Policy
Name of Group/Department/Team	Diversity and Inclusion Group
Name and role of lead individual(s) completing this EIA	Emma Kwaya-James HEIW Workforce Inclusion Lead
Contact Details	emma.kwaya-james@wales.nhs.uk
Date EIA initiated	May 2019
Date EIA agreed by accountable group/department	10th January 2020
Signed (lead individual(s)/ head or chair of accountable group)	

HEIW EQUALITY IMPACT ASSESSMENT TEMPLATE

1. The purpose and aims of the policy, procedure, strategy or decision required

Please provide a brief description of the policy/procedure, strategy, e-learning, guidance etc. Please include what is the overall objective or purpose of the policy/decision, what are the stated aims (including who the intended beneficiaries are), a broad description of how this will be achieved, what the measure of success will be, and the time frame for achieving this. Please also include a brief description of how the purpose and aims of the policy are relevant to equality and intended beneficiaries.

The purpose of HEIW Diversity and Inclusion policy is to set out the organisations policy on supporting and promoting equality, diversity, inclusion and human rights in relation to employment; service delivery, goods and service suppliers, contractors and partner agencies. HEIW opposes all forms of discrimination and recognises that some groups and individuals in society experience unfair discrimination in employment and in their contact with public services.

HEIW wants to ensure that no individual or group receives less favourable treatment either directly or indirectly.

Health Education and Improvement Wales (HEIW) is committed to supporting, developing and promoting equality, diversity and inclusion in all of its practices and activities. We aim to establish an inclusive culture free from discrimination based upon the values and behaviours developed by HEIW staff. They reflect our thoughts, feelings and beliefs in how we will and will not behave and treat others.

HEIW recognises and acknowledges that [discrimination](#) can take the form of treating people less favourably because of their: age, colour, culture, disability (visible and non-visible), ethnic origin, gender, gender identity, language, marital or civil partnership status, nationality, carer status, pregnancy or maternity issues, responsibility for dependants, sexual orientation, social-economic circumstance, religion, or political beliefs. It can also arise from failing to take account of differences between people and groups which can result in barriers to access to services and opportunities.

2. We have a legal duty to engage with people with protected characteristics under the Equality Act 2010 identified as being relevant to the policy.

- *What steps have you taken to engage and consult with stakeholders, both internally and externally?*
- *How have people with protected characteristics been involved in developing the policy, procedure, strategy and or decision from the start?*
- *How have/will proposals be communicated?*
- *What are the arrangements for engagement as the policy/procedure/strategy or decision is being implemented?*

Consultation and engagement

During the initial stages of development direct engagement was undertaken with HEIW Equality Champions who comprise of individuals with intersectional protected characteristics, People Adviser responsible for policy writing alongside Inclusion and Diversity Group, which comprise of individuals with intersectional protected characteristics inclusive of partner representation from Stonewall.

The second phase of consultation consisted of engagement with on-site and off-site workers, inclusive of Senior Leadership Team through Intranet bulletin and direct email communication totally 373 members of staff. As highlighted above it is difficult to accurately assess the number of individuals from protected characteristics however in reflection of National Census (2011) and number of staff invited to engage a cross reference of individuals from protected characteristics is probable.

The third phase of consultation involved direct contact with agencies and individuals as experts in the field of Equality, Diversity and Inclusion completed through email communication, inclusive of the following stakeholders:

Equality Human Rights Council
Stonewall
Diverse Cymru
Disability Wales
Race Equality Wales
NHS Wales National Equality Leads Group

The final stage of development to be undertaken in partnership with third sector partners to act as a critical friend before being reviewed by HEIW Policy Review Group for final sign off by Exec Team meeting.

3. Evidenced used/considered

Your decisions must be based on robust evidence. What evidence base have you used in support? Evidence includes views and issues raised during engagement; service user or citizen journeys, case studies, or experiences; and qualitative and experience based research, not just quantitative data and statistics.

Please list the source of this evidence:

- Identify and include numbers of staff, broken down by protected characteristics and other relevant information e.g. part time working (ESR)?*
- What research or other data is available locally or nationally that could inform the assessment of impact on different equality groups? Is there any information available (locally/nationally) about how similar policies/procedures/strategies or decisions have impacted on different equality groups (including any positive impact)?*
- Do you consider the evidence to be strong, satisfactory or and are there any gaps in the evidence?*

Most up to date information of staff at HEIW broken down into protective characteristics is sourced through ESR, unfortunately the information is not comprehensive as highlighted through the number of fields identified as unspecified. It is the intention of HEIW People Team alongside Data Team and Inclusion and Diversity Committee to undertake work to improve confidence amongst staff in populating protective characteristics. Increasing confidence in completion of ESR will also be included as an action point in HEIW's Strategic Equality Plan 2020-2024.

HEIW Diversity Detail @ 22 August 2019

(Exc Chair & Non Executive Directors) please note those with a figure less than 4 have a * as a value as part of GDPR

Gender	Headcount
Female	246
Male	127
Total	373

Data Source: ESR BI - NHS WF Profile Dashboard Diversity Detail

Disability	Headcount
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No	113
Not Declared	*
Prefer Not To Answer	*
Unspecified	242
Yes	12
Total	373

Data Source: ESR BI - NHS WF Profile Dashboard Diversity Detail

Ethnic Origin	Headcount
A White - British	86
CA White English	*
CC White Welsh	17
D Mixed - White & Black Caribbean	*
E Mixed - White & Black African	*
H Asian or Asian British - Indian	*
N Black or Black British - African	*
Unspecified	263
Z Not Stated	*
Total	373

Data Source: ESR BI - NHS WF Profile Dashboard Diversity Detail

Religious Belief	Headcount
Atheism	25
Buddhism	*
Christianity	72
Hinduism	*
I do not wish to disclose my religion/belief	23
Jainism	*
Other	8
Unspecified	242

Total	373
<i>Data Source: ESR BI - NHS WF Profile Dashboard Diversity Detail</i>	
Sexual Orientation	Headcount
Bisexual	*
Gay or Lesbian	*
Heterosexual or Straight	118
Not stated (person asked but declined to provide a response)	12
Undecided	*
Unspecified	238
Total	373
<i>Data Source: ESR BI - NHS WF Profile Dashboard Diversity Detail</i>	
Marital Status	Headcount
Divorced	7
Legally Separated	*
Married	103
Single	25
Unknown	11
Widowed	*
(blank)	223
Total	373
<i>Data Source: ESR BI - NHS WF Profile Dashboard Diversity Detail</i>	
Nationality	Headcount
Beninese	*
British	83
Dutch	*

Scottish	*
Welsh	24
(blank)	263
Total	373

Data Source: ESR BI - NHS WF Profile Dashboard Diversity Detail

Age Band	Headcount
21-25	*
26-30	14
31-35	23
36-40	46
41-45	66
46-50	60
51-55	72
56-60	51
61-65	28
66-70	7
>=71 Years	*
Total	373

Data Source: ESR BI - NHS WF Profile Dashboard Diversity Detail

Location - based on position detail	Headcount
082 Off Site	172
082 Ty Dusgu	201
Total	373

Data Source: ESR BI - Positions Analysis Dashboard

Other sources and reports which have influenced the development of this policy are:

- National Census (2011)
- [Addressing the barriers to BAME employee career progression 2017](#)
- [Race at Work Report](#)
- [EHRC creating a faith friendly workplace for Muslims](#)
- [EHRC Fair Opportunities for All](#)
- [EHRC Mental Health is your business Wales](#)
- A Healthier Wales (2018)
- [Is Wales Fairer? The state of equality and human rights 2018](#)
- Miller, D and Ewest, T (2014) The faith-friendly workplace: A contextual consideration of organisational frames in light of increased religious opacity, diversity and expression at work.
- [Athena Leadership Programme](#)
- [LGBT Stonewall - Britain Work Report](#)
- [Inclusive Leadership](#)
- [Why Inclusive Leadership is important for modern business](#)
- [Challenges for LGBT people in the workplace and how to overcome them](#)
- [Managing an age diverse workforce](#)
- [EHRC Pregnancy and maternity discrimination in the workplace: Recommendations for change'](#)
- [EHRC Measuring and Reporting on Disability and Ethnicity Pay Gaps](#)
- [EHRC Turning the tables: ending sexual harassment at work](#)
- [Increasing Black and Minority Ethnic Representative at Senior Level](#)
- [Welsh Government Disability Action Plan for Apprenticeships 2018-21.](#)
- [National Survey for Wales 2017-18 Poverty and deprivation, Welsh Government \(2019\)](#)

Statutory References which frame and influence this policy include:

- Welsh Language Act 1993
- Human Rights Act 1998;
- Equality Act 2010;
- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011;
- Welsh Language (Wales) Measure 2011;
- The Well-being of Future Generations (Wales) Act 2015;

- National Terms and Conditions of Service (Agenda for Change) Equality and Diversity Statement.
- HEIW signed up to Disability Confident Scheme March 2019
- Audit of physical space undertaken by RNIB and RBLI
- Engagement with third sector and private consultants i.e. accessibility of physical and non-physical elements of HEIW including digital
- Pilot organisation for Communication Access Symbol in recognition that not all disabilities are visible
- Employee assistance program
- Time to Change Pledge
- Mental Health Policy
- Flexible Working Policy
- Recruitment and selection training
- Leadership training
- Unconscious Bias training
- Compassionate inclusive leadership model being adopted by HEIW
- Stonewall Champion Scheme
- Dying to Work
- Anti-Violence Collaboration

It should be noted that this policy is directly related to HEIW staff on NHS terms and conditions. Staff who moved over from Cardiff University and who are still on Cardiff's University terms and conditions and not directly covered by this policy but rather on Cardiff's Equality and Diversity Policy (2011); Equality and Diversity Policy Framework.

4. Impact Assessment

Please complete the next section to show how this policy/procedure, strategy, e-learning, guidance etc. could impact upon protected groups as identified under the Equality Act 2010, compliance with Welsh Language Standards (2011) and HEIW's ability to perform its Public Sector Duty to:

1. *Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.*
2. *Advance equality of opportunity between people who share a protected characteristic and those who do not.*
3. *Foster good relations between people who share a protected characteristic and those who do not*

Please ensure positive impacts as well as negative are highlighted. Include any opportunities to advance equality and/or good relations, and for good practice to be further developed. Also include any opportunity to maximise contribution towards a more equal Wales under the Well-being and Future Generations Act.

Equalities and Welsh Language Impact Assessment

Protected Characteristic	Impact:			Reason for your decision (including evidence used). Include details of how it might impact on people from this group and how opportunities to advance equality and good relations have been maximised.
	P O S I T I V E	N E G A T I V E	N E G A T I V E	
Age main categories: under 16 16-24 25-34 35-44 45-54 55-59 60-64 65-74 75+				<p>ESR data gathered highlights a potential lack of age diversity across HEIW with no employees under 21 identified, largest age range population at HEIW 41 – 60 with most populated being 51-55 = 72</p> <p>Meeting the needs and challenges of an age-diverse workforce:</p> <p>Research carried out by CIPD (2015) highlighted the strong link between life stage and working experience on work priorities along with benefits such as knowledge-sharing, different perspectives and enhanced customer experience were identified as key benefits of age diversity.</p> <ul style="list-style-type: none"> Spontaneously, younger age groups focus on values such as trust, recognition and freedom, while older age groups focus on achieving work–life balance and flexibility.

				<ul style="list-style-type: none"> • There is widespread appreciation that both younger and older colleagues are able to add value in these areas. • Younger colleagues feel that older age groups can share practical experience and expertise, while older colleagues look to younger groups for skills training and new working methods. • Different perspectives are seen as a way of harnessing new ideas and working styles. <p>Research continue to highlight some of the key challenges in relation to age diversity being a lack of shared interest and values. Age discrimination has been stated in evidence as being innate at the recruitment stage. Older employees looking to change career and or enter more junior roles could be restricted by their age during the recruitment process.</p> <p>Is Wales Fairer? (2018) highlights that those aged 35–44 and 45–54 had the highest employment rates in 2016/17 (82–84%). The rates for those aged 16–24 (50.4%) and 55–64 (59.0%) were much lower.</p> <ul style="list-style-type: none"> • Pilot organisation for Communication Access Symbol in recognition that not all disabilities are visible • Employee assistance program • Time to Change Pledge • Mental Health Policy • Flexible Working Policy • Recruitment and selection training • Careers and Widening Access agenda • Leadership training • Unconscious Bias training • Compassionate inclusive leadership model being adopted by HEIW
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Disability				Neurodiversity
<p>Disability as defined in the Equality Act 2010:</p> <p>Those with any physical, sensory, learning, cognitive or mental health impairment or health condition which causes individuals to face barriers to employment, equal opportunities, access to goods, facilities or services lasting or expected to last 12 months or more, or terminal.</p>				<p>Neurodiversity refers to the different ways the brain can work and interpret information. It highlights that people naturally think about things differently. We have different interests and motivations and are naturally better at some things and poorer at others.</p> <p>Most people are neurotypical, meaning that the brain functions and processes information in the way society expects.</p> <p>However, it is estimated that around 1 in 7 people (more than 15% of people in the UK) are neurodivergent, meaning that the brain functions, learns and processes information differently. Neurodivergence includes Attention Deficit Disorders, Autism, Dyslexia and Dyspraxia.</p> <p>Acas states there is still a lack of understanding around most forms of neurodivergence, and misperceptions persist. It therefore recommends organisations to take steps that make their neurodivergent staff feel valued, part of the team and supported to contribute fully towards achieving the goals of the organisation.</p> <p>Creating a more inclusive workplace can:</p> <ul style="list-style-type: none"> • highlight the employer's commitment to diversity and inclusion • reduce the stigma around neurodivergence • make staff feel safe and empowered to disclose a neurodivergence • more likely that neurodivergent staff will be treated fairly by their managers and colleagues • open the organisation up to a pool of talent that may otherwise have been overlooked • help retain skilled staff and reduce recruitment costs <p>https://archive.acas.org.uk/neurodiversity</p>

			<p>Disability Confident Disability Confident is a scheme that is designed to help you recruit and retain disabled people and people with health conditions for their skills and talent. https://www.gov.uk/government/collections/disability-confident-campaign</p> <p>Communication - Communication is not simply about the ability to speak but also the ability to hear and understand what is said to us. This lies at the very core of human dignity. The impact of communication difficulties and disabilities is varied; some people may find it hard to ask a question, name an object or ask for help, while others may have speech difficulties that make them difficult to understand. Others may have problems processing information and difficulties with reading and writing. Some may use communication devices and require time to create their message. Communication disabilities leave millions without a voice, denying them equality of access and opportunity.</p> <p>Is Wales Fairer? (2018) highlights that non-disabled people in Wales are twice as likely as disabled people to be employed and the disability employment gap has widened in recent years. The report continued to highlight pay gaps between disabled and non-disabled people with median hourly earnings were higher in 2016/17 for non-disabled (£10.67) than for disabled (£9.72) employees, a disability pay gap of 8.9%. Earnings increased for non-disabled employees between 2013/14 and 2016/17. EHRC highlight that by raising the participation of disabled people organisations could reduce the annual cost of people being out of work by £100 billion.</p> <p>Is Wales Fairer (2018) identified that the employment rate for non-disabled people (73.4%) was more than twice the rate for disabled people (34.6%) in 2016/17. UK-wide research indicates that employment rates for disabled people vary considerably according to the type of disability or health condition, and that people with mental health conditions and those with learning difficulties have the lowest rates.</p> <p>A report by Citizens Advice Cymru (2017) found that its clients who were disabled or had a health condition encountered bad practice and discrimination by employers. Moreover, people with a disability or health condition who sought help on an employment-related problem were more likely</p>
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			<p>to require support on an issue relating to pay and entitlements or dismissal. Issues relating to sick leave, sick pay and unfair dismissal were more common among this group.</p> <p>In July to September 2018, The Office of national statistics reported that the employment rate for disabled people stands at 51.3% compared to 81.4% for non-disabled people. The research also highlighted that there is a real lack of representation (7%) of disabled people employed in senior management and board level positions.</p> <p>Actions already in place:</p> <ul style="list-style-type: none"> • HEIW signed up to Disability Confident Scheme March 2019 • Audit of physical space undertaken by RNIB and RBLI • Engagement with third sector and private consultants i.e. accessibility of physical and non-physical elements of HEIW including digital • Pilot organisation for Communication Access Symbol in recognition that not all disabilities are visible • Employee assistance program • Time to Change Pledge • Mental Health Policy • Flexible Working Policy • Recruitment and selection training • Leadership training • Unconscious Bias training • Compassionate inclusive leadership model being adopted by HEIW
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Gender Identity			LGBT in Britain – Work report (Stonewall 2018)
<p>A person's sex, including intersex people; internal sense of their own gender and gender expression, whether male, female or something else (for example non-binary people), which may or may not correspond to the sex assigned at birth; and aspects of how an individual expresses gender, including clothing, mannerisms and other aspects of expression.</p>			<ul style="list-style-type: none"> • Almost a third of non-binary people (31 per cent) and one in five trans people (18 per cent) don't feel able to wear work attire representing their gender expression. • One in eight trans people (12 per cent) have been physically attacked by customers or colleagues in the last year because of being trans. <p>Research undertaken by EHRC and published in 2018 highlights that whilst employers are meant to protect employees from sexual harassment at work there is evidence to suggest this is not happening. With too many people, according to EHRC being silenced by toxic workplace cultures, with very real fears of victimisation, and employers' responses being cited as inconsistent and, in many cases, risk being ineffective.</p> <p>Sexual harassment is unwanted conduct of a sexual nature, which is intended to, or has the effect of, violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.</p> <ul style="list-style-type: none"> • Examples include unwelcome physical contact, sexual comments, promises in return for sexual favours and displaying sexually graphic pictures. • Even if unwanted conduct is not intended to cause distress, it can still have the effect of violating a person's dignity or creating an offensive environment. <p>Whether or not unwanted sexual conduct violates a person's dignity or creates an offensive environment depends on the victim's perspective and whether their reaction is reasonable in all the circumstances.</p> <p>If there are any gaps in the evidence, how can we address these?</p> <p>Transgender people, whose sexuality often has nothing to do with the discrimination they encounter, face further stigma still due to a widespread lack of understanding of the issue. Many choose to leave their workplace in order to undergo their transition.</p> <p>https://www.theguardian.com/sustainable-business/lgbt-employees-discrimination-in-the-workplace-talkpoint</p>

				Actions already in place: <ul style="list-style-type: none"> • HEIW has signed up to Stonewall Diversity Champion scheme providing assistance in development of policies and practice; • Stonewall are lay members on Diversity and Inclusion Group • Flexible Working Policy • Leadership training • Unconscious Bias training • Transitional Policy – to be developed in partnership with Stonewall • Compassionate inclusive leadership model being adopted by HEIW
Marriage or civil Partnership				Actions in place – <ul style="list-style-type: none"> • policies being reviewed by external equality specialist i.e. Stonewall Cymru to ensure equity for LGBT staff.
Pregnancy and maternity				<p>EHRC (2016) report into discrimination against pregnant women and new mothers found that:</p> <ul style="list-style-type: none"> • around one in nine mothers (11%) felt they had to leave their job (if scaled up to the general population this could mean as many as 54,000 mothers a year) • one in five mothers said they were harassed by their employer and/or colleagues • more than half said they experienced negative consequences to their job opportunities and careers as a result of having a flexible working request approved, and • 4% (around 21,000 if scaled up to the general population) said they left their jobs because workplace risks were not tackled.

			<p>These experiences adversely affect the lives of individuals and their families, but also mean that businesses lose skilled and productive workers. These findings emerge from independent research which drew on the experiences of more than 3,000 mothers and more than 3,000 employers across Great Britain. The following 6 recommendations are born from this research:</p> <ul style="list-style-type: none"> • Leadership for change so that employers attract the best talent, create the conditions for their staff to perform well, and avoid the loss of skills and experience which can result from misconceptions and poor practice in relation to pregnant workers and new mothers. • Improving employer practice to promote family-friendly workplaces, effective management and open communication. • Improving access to information and advice so that women and employers understand their rights and obligations. • Improving health and safety management in the workplace so that employers manage risks effectively and women are not forced to choose between their job and their health or the health of their unborn child. • Improving access to justice by removing barriers to women raising complaints. • Monitoring progress to track the pace of change towards creating fairer workplaces. <p>Managing pregnancy and maternity in the workplace EHRC</p> <p>Actions already in place:</p> <ul style="list-style-type: none"> • Flexible Working Policy • Recruitment and selection training • Leadership training • Unconscious Bias training • Transitional Policy – to be developed in partnership with Stonewall • Compassionate inclusive leadership model being adopted by HEIW
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			<p>Action to be taken:</p> <ul style="list-style-type: none"> New policies currently being developed in relation to New and Expectant Mothers will need to have an equality lens and EIAs completed.
<p>Race</p> <p>Race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers.</p>			<p>NHS England Interim People Plan states the NHS must recognise its 'shortcomings' in inclusion and religious diversity. The plan sets out an action to support boards to set targets for BAME representation across their workforce (including at senior levels) which goes some way to making the NHS more reflective of its patient populations, religions and beliefs. The bigger challenge is to acknowledge, address and change the behaviours that result in so many BAME people feeling marginalised and excluded especially from obtaining leadership roles.</p> <p>In the UK today, one in 10 employed people are BAME, yet only one in 16 of top management positions and 1 in 13 management positions are held by BAME people. By 2051, the report states that one in five people in the UK will be from an ethnic minority background, representing a scale of consumer spending and political voting power that business and government alike cannot afford to ignore (<i>Race at the Top: a review of BAME leadership in the UK 2015</i>)</p> <p>As cited in A model employer: the case for workforce race equality transparency is a vital first step towards harnessing the power of a diverse workforce at all levels. As such, the Workforce Race Equality Standard data point to progress in some areas of workplace race inequality but there is still much more we must do, including removing barriers to recruitment and progression along the workforce pipeline for all ethnic groups in our NHS.</p> <p>GMC reports into Differential Attainment: Evaluating the impact of interventions aimed at addressing variation in progression associated with protected characteristics known as 'Differential Attainment' - Final Report - Submitted 13th August 2018</p>

			<p>https://www.gmc-uk.org/-/media/documents/gmc-differential-attainment-final-report-13_08_18-76652679.pdf</p> <p>Differential attainment refers to ‘systematic differences in outcomes when grouping cohorts by protected characteristics and socio-economic background’, according to the GMC. The biggest gaps in attainment during medical training are linked to race – with both UK BME and international medical graduates affected.</p> <p>https://www.bma.org.uk/collective-voice/policy-and-research/education-training-and-workforce/differential-attainment</p> <p>Race and sexual orientation (LGBT) LGBT in Britain – Work report (Stonewall 2018)</p> <ul style="list-style-type: none"> • One in ten black, Asian and minority ethnic LGBT staff (10 per cent) have similarly been physically attacked because of their sexual orientation and/or gender identity, compared to three per cent of white LGBT staff • One in eight black, Asian and minority ethnic LGBT employees (12 per cent) have lost a job in the last year because of being LGBT, compared to four per cent of white LGBT staff <p>Actions already in place:</p> <ul style="list-style-type: none"> • Careers and Widening Access agenda • Recruitment and selection training • Unconscious Bias training • Flexible Working Policy • Leadership training • Compassionate inclusive leadership model being adopted by HEIW
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			<p>Opportunity:</p> <ul style="list-style-type: none"> Policy has opportunity to foster good relationships and actively challenge discrimination through meaningful engagement with all affected parties, partnership working, setting up of or linking into 'protected characteristics' networks and training
<p>Religion or Belief</p> <p>Religion includes any religion as well as lack of religion. Belief means any religious or philosophical belief.</p>			<p>Is Wales Fairer? (2015) highlighted the low employment rates of Muslims in Wales – they are least likely to be working of all faith groups. This is despite the proportion of Muslim adults with a degree being slightly above the Welsh average.</p> <p>Miller and Ewest (2014) Faith-friendly organisations go beyond minimum legal requirements and seek to attract, welcome, support and retain people of all faiths.</p> <p>HEIW has the opportunity to pull on best practice in creating a faith-friendly organisation by:</p> <ul style="list-style-type: none"> Developing and promoting a workplace policy for religion and belief that embraces all beliefs and promotes a culture of respect Having an all-faith staff network that provides a forum for peer support and celebrates diversity Implementing all-staff training on different religions and beliefs to help create a culture change and explore stereotypes and assumptions about different faiths Exploring how employees can maintain their faith in the workplace Promoting different religious and faith events to encourage the integration of faith and work for all religions and beliefs. <p>Action already in place:</p> <ul style="list-style-type: none"> Careers and Widening Access agenda Recruitment and selection training Unconscious Bias training

			<ul style="list-style-type: none"> • Flexible Working Policy • Leadership training • Multi-use room accessible for all; availability of prayer mats and wash facilities; • Compassionate inclusive leadership model being adopted by HEIW
Sexual Orientation A person's orientation towards people of the same sex, the opposite sex or more than one gender.			Sexual Orientation (LGBT) LGBT in Britain – Work report (Stonewall 2018) Key findings: <ul style="list-style-type: none"> • Almost one in five LGBT staff (18 per cent) have been the target of negative comments or conduct from work colleagues in the last year because they're LGBT. • One in ten black, Asian and minority ethnic LGBT staff (10 per cent) have similarly been physically attacked because of their sexual orientation and/or gender identity, compared to three per cent of white LGBT staff. • Almost one in five LGBT people (18 per cent) who were looking for work said they were discriminated against because of their sexual orientation and/or gender identity while trying to get a job in the last year. • One in eight black, Asian and minority ethnic LGBT employees (12 per cent) have lost a job in the last year because of being LGBT, compared to four per cent of white LGBT staff. • Almost two in five bi people (38 per cent) aren't out to anyone at work about their sexual orientation. • More than a third of LGBT staff (35 per cent) have hidden or disguised that they are LGBT at work in the last year because they were afraid of discrimination. • One in eight lesbian, gay and bi people (12 per cent) wouldn't feel confident reporting any homophobic or biphobic bullying to their employer. One in five trans people (21 per cent) wouldn't report transphobic bullying in the workplace. https://www.stonewall.org.uk/lgbt-britain-work-report Actions already in place: <ul style="list-style-type: none"> • HEIW has signed up to Stonewall Diversity Champion scheme providing assistance in development of policies and practice;

			<ul style="list-style-type: none"> • Stonewall are lay members on Diversity and Inclusion Committee • Careers and Widening Access agenda • Recruitment and selection training • Unconscious Bias training • Flexible Working Policy • Leadership training • Compassionate inclusive leadership model being adopted by HEIW <p>Opportunity:</p> <ul style="list-style-type: none"> • Policy has opportunity to provide clear leadership and engagement in ensuring that actions to deal with potential discrimination as highlighted within Stonewalls research in robust manner whilst ensuring a culture of inclusion is promoted. Culture of inclusion to be promoted through accreditations such as Stonewall Diversity Program
<p>Carers</p> <p>A carer is anyone, including children and adults who looks after a family member, partner or friend who needs help because of health condition, physical, sensory, cognitive, learning, or</p>			<p>There are at least 370,000 carers in Wales. At 12 per cent, Wales has the highest proportion of carers in the UK, many of whom provide more than 50 hours of care a week. Census records tell us that there are over 30,000 carers under the age of 25 in Wales, 7,500 of whom are under the age of 16.</p> <p>Social Care Wales Preventative support for adult carers in Wales: rapid review (2018) report describes the challenges that carers can face multiple demands none more so than those who combine their caring responsibilities with paid employment. Many carers give up work when they feel they can no longer juggle work and caring, with others reducing their hours or changing to more flexible types of employment to accommodate a better work-life balance. Those who have spent years caring face significant challenges in returning to paid employment when their caring role ends</p> <p>CIPD (2016) report Creating an Enabling Future for Carers in the Workplace, highlights the demographic change in society with more complex family lives and increasingly demanding</p>

<p>mental health impairment and cannot cope without their support. The care they give is unpaid.</p>				<p>working lives. Highlighting an ageing population with people living longer, resulting in many employees finding themselves part of the ‘sandwich generation’ – balancing working commitment with caring for older family members and looking after their own children. Caring not only impacts on employees’ working lives, but can also affect employers through rising levels of absence. https://www.cipd.co.uk/knowledge/culture/well-being/enabling-carers</p> <p>Action already in place:</p> <ul style="list-style-type: none"> • Careers and Widening Access agenda • Recruitment and selection training • Unconscious Bias training • Flexible Working Policy • Leadership training • Flexible working arrangements • Compassionate inclusive leadership model being adopted by HEIW
<p>Welsh Language - In Wales, the Welsh and English languages will be treated on a basis of equality</p> <p>So;</p> <p>Any new policy must include a comprehensive impact assessment on the Welsh language.</p> <p>Wherever possible, any new policy ought to have at worst a neutral effect on the Welsh language.</p> <p>Opportunities to create more favourable conditions for the Welsh language to flourish ought to be sought when creating policies.</p> <p>Any new policies should be discussed with the Welsh Language Services Manager with regards to positive and negative impacts on the Welsh language</p>				

Welsh Language	Impact			To ensure the Welsh Language is treated equally action already in place:
	P O S I T I V E	N E G A T I V E	N E G L I G I B L E	
<p>Opportunities for persons to use the Welsh Language.</p> <p>Treating the Welsh language no less favourably than the English language.</p>				<p>To ensure the Welsh Language is treated equally action already in place:</p> <ul style="list-style-type: none"> • Bilingual recruitment and adverts • Bilingual social media • Involving staff through the medium of Welsh • Internal documents and policies bilingually • Bilingual phone greetings • Bilingual staff available • Welsh language and culture awareness training for all staff • Welsh language courses available for staff • All posts advertised with Welsh as desirable unless essential for post • Actively recruiting through Welsh language media and publications where Welsh is essential criteria

5. Please describe and provide evidence of potential impacts on different socioeconomic groups

In the implementation of this policy HEIW recognises that the socio-economic composition of its existing and potential workforce is diverse, with potential negative impacts of material deprivation being addressed within actions in place and/or opportunities identified section 6.

In respect of material deprivation findings from The National Survey for Wales 2017-18 Poverty and Deprivation highlight below a full list of significant factors linked with being in material deprivation:

- 16% of adults in Wales are materially deprived
- 39% of parents with three or more children are materially deprived.
- 49% of single parents are materially deprived.

- 4% of adults had gone at least one day without a substantial meal during the last fortnight, and 2% cannot afford to eat meat (or equivalent) at least every other day.
- People who provide care for family members or friends are more likely to be materially deprived.
- 37% of people in material deprivation are lonely compared with 12% of those who are not deprived.
- Material deprivation is less common in older people. 7% of pensioners are materially deprived

List of significant factors linked with being in material deprivation:

- | | |
|--|--|
| <ul style="list-style-type: none"> • Age between 25 and 44 • Being female • Being separated or divorced • Being in poor general health • Having low-level or no qualifications • Being unemployed • No-one working in household • Children in the household • Living in social housing • Not having use of the internet • Not having use of a car • Being a carer • Feeling lonely | <ul style="list-style-type: none"> • Feeling anxious • Having low life satisfaction • Being dissatisfied with accommodation • Living in rural areas • Living in the 20% most deprived areas of Wales • Living in a particular authority: for example, Wrexham or Conwy rather than Isle of Anglesey or Newport • Disagreeing that local people are asked before their local authority sets its budget • Not participating in sporting activity 3 or more times a week • Not attending arts events three or more times a year |
|--|--|

6. Please provide a summary of key impact findings on the organisations ability to perform Public Sector Equality Duty. Please include both negative impacts and opportunities to maximise positive impacts.

There are a number of positive actions currently in place which support this policy:

- HEIW signed up to Disability Confident Scheme March 2019
- Audit of physical space undertaken by RNIB and RBLI

- Engagement with third sector and private consultants i.e. accessibility of physical and non-physical elements of HEIW including digital
- Pilot organisation for Communication Access Symbol in recognition that not all disabilities are visible
- Employee assistance program
- Time to Change Pledge
- Mental Health Policy
- Flexible Working Policy
- Recruitment and selection training
- Leadership training
- Unconscious Bias training
- Compassionate inclusive leadership model being adopted by HEIW
- Careers and Widening Access agenda
- Bilingual recruitment and adverts
- Bilingual social media
- Involving staff through the medium of Welsh
- Internal documents and policies bilingually
- Bilingual phone greetings
- Bilingual staff available
- Welsh language and culture awareness training for all staff
- Welsh language courses available for staff
- All posts advertised with Welsh as desirable unless essential for post
- Actively recruiting through Welsh language media and publications where Welsh is essential criteria


Opportunities to maximise benefits:



- Developing and promoting a workplace policy for religion and belief that embraces all beliefs and promotes a culture of respect
- Having an all-faith staff network that provides a forum for peer support and celebrates diversity
- Implementing all-staff training on different religions and beliefs to help create a culture change and explore stereotypes and assumptions about different faiths



- Exploring how employees can maintain their faith in the workplace
- Promoting different religious and faith events to encourage the integration of faith and work for all religions and beliefs.
- Policy has opportunity to foster good relationships and actively challenge discrimination through meaningful engagement with all affected parties, partnership working, setting up of or linking into 'protected characteristics' networks and training
- Policy has opportunity to provide clear leadership and engagement in ensuring that actions to deal with potential discrimination as highlighted within Stonewalls research in robust manner whilst ensuring a culture of inclusion is promoted. Culture of inclusion to be promoted through accreditations such as Stonewall Diversity Program

7. How does the policy/procedure, strategy, e-learning, guidance etc. embed, prioritise the Well-being Goals and Sustainability Development Principle of the [Wellbeing of Future Generations \(Wales\) Act 2015](#).

Please describe and provide evidence below of how the 5 ways of working have been met, inclusive of the 7 well-being goals, to maximise the social, economic, environmental and cultural wellbeing of people and communities in Wales.

Sustainable Development Principle	
 <p>Long Term</p> <p>Balancing short term with long term needs</p>	<p>This policy will be reviewed 12 months from publication to ensure short term needs are reflective of long term aim and ambition of the organisation to be exemplar employer.</p>

 <p>Collaboration</p> <p>Working together to deliver objectives</p>	<p>This is the key driver with the need to work together to create effective change visible through shared initiatives and accreditations.</p>
 <p>Involvement</p> <p>Involving those with an interest and seeking their views</p>	<p>Engagement is at the core of this policy reflected in development and review which is scheduled 12 from publication in recognition of the need to engage more with those who share 'protected characteristics and those who do not</p>

 <p>Prevention</p> <p>Putting resources into preventing problems occurring or getting worse</p>	<p>Through the effective implementation of this policy and linked schemes and initiatives we can identify solutions and put measures in place to improve systems and experience</p>
 <p>Integration</p> <p>Considering impact on all wellbeing goals together and on other bodies</p>	<p>This policy aims to support the wellbeing goals across all areas</p>

8. If the policy, procedure, strategy and or decision is intended to increase equality of opportunity through positive action, does it appear to be lawful? ([EHRC Positive Action in the Workplace](#))

Briefly explain the reason for the answer, making reference to any relevant evidence
n/a

<p>9. Human Rights</p> <p><i>Is the policy, procedure, strategy, e-learning etc. likely to restrict or represent a missed opportunity to support Human Rights Act (The Human Rights Act - EHRC), UN Convention on the Rights of the Child (UNCRC) Rights of Children and Young Persons (Wales) Measure 2011 ?</i></p> <ul style="list-style-type: none"> <i>If yes, please state which rights and briefly explain the reason for your answer, making reference to any relevant evidence.</i>
<p>NO</p> <p><i>Please be advised that any restriction unless permitted by the Convention will make the policy, procedure, strategy or decision unlawful and therefore must not be implemented.</i></p>

10. Action Planning			
Actions to be taken to address negative impacts and maximise positive impacts	Potential Outcomes	Lead	Timescales
<p>Policy to be reviewed within one year of publication to ensure effective review through engagement and consultation</p> <p>Policies currently being developed in relation to New and Expectant Mothers will need to have an equality lens and EqlAs completed</p>	To ensure policy fit for purpose and to further maximise positive opportunities	<p>HEIW Inclusion Lead</p> <p>Policy Led</p>	

11. Monitoring Arrangements

- *What are the plans to monitor the actual and/or final impact? (The EIA will help anticipate likely effect but final impact may only be known after implementation).*
- *What are the proposals for reviewing and reporting actual impact?*

Thank you for completing this Equality Impact Assessment (EIA)

For further guidance, assistance and submission, please contact Emma Kwaya-James HEIW Inclusion Lead

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