



Llywodraeth Cymru
Welsh Government

REPORT

Welsh Revenue Authority equality report 2022

Annual report on our equality activities and data at the Welsh Revenue Authority (WRA) during 2020 to 2021.

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Welsh Revenue Authority

At the Welsh Revenue Authority (WRA), we're responsible for collecting and managing 2 devolved Welsh taxes; Land Transaction Tax and Landfill Disposals Tax, on behalf of the Welsh Government. The revenue we raise funds public services, like the NHS and schools, in communities across Wales.

We're committed to helping deliver a fair tax system for Wales through what we call 'Our Approach' - a Welsh way of doing tax. By working collaboratively with representatives, partner organisations, taxpayers and the public, we make sure taxes are collected efficiently and effectively.

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We base everything we do on our [Corporate Plan 2019 to 2022](#). This sets out our purpose, strategic objectives and longer-term ambitions. We report on our work annually - see our latest [Annual Report and Accounts](#).

We're a Civil Service organisation, the first non-ministerial department created by Welsh Government.

We're a small and multi-skilled organisation of more than 70 people, with talents, skills and experience spanning 14 different professions. We champion innovation, collaboration and shared decision-making. And we empower and entrust our people with high levels of responsibility and autonomy.

Up until February 2020 we were mainly based in Treforest, but our offices were severely flooded and this was shortly followed by the national lockdown restrictions resulting from the impact of coronavirus (COVID-19). Therefore our people have mainly worked from home since February 2020.

Our people are highly engaged, ranking highly in the annual Civil Service People Survey every year since we were formed. You can find out more about what our people think about working for us by looking at our most recent [People Survey results](#).

We're proud to rank so highly across the Civil Service for Inclusion and Fair Treatment (in the top 10 of over 100 employers every year), with our people's responses being particularly high to questions such as "I am treated fairly at work" and "I think the WRA respects individuals' differences".

For further information about the WRA, please visit gov.wales/wra

Our Approach

The WRA is committed to helping to deliver a fair tax system for Wales by introducing a new Welsh way of doing tax. By working collaboratively with representatives, partner organisations, taxpayers and the public, this partnership-led approach, which we have termed 'Our Approach', ensures that

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taxes are collected and managed efficiently and effectively.

Our Approach is made up of 3 Welsh terms: Cydweithio, Cadarnhau, Cywiro, and is inspired by [Our Charter](#), which consists of 8 shared beliefs, values and responsibilities.

Cydweithio – This literally means “to work together” and carries a sense of working towards a common goal.

Cadarnhau – This suggests a solid, robust quality that can be relied on. This is about providing certainty, being accurate and reinforcing trust.

Cywiro – This literally means “returning to the truth” and is about the way we work with you to resolve errors or concerns.

As Civil Servants, we also abide by the core values of the [Civil Service Code](#):

- honesty
- integrity
- impartiality
- objectivity

You can find out more information about Our Approach, Our Charter and our [Corporate Plan 2019 to 2022](#) on [our website](#).

Equality at the WRA

We published our first Strategic Equality Objectives (2019-2020) in April 2019. This was in agreement with the Equality and Human Rights Commission, as publishing an initial 1-year plan (as opposed to the usual 4-year plan) allowed us both to fall into step with the 4-yearly reporting pattern of other Welsh public bodies, but also allowed us to establish short-term objectives that suited a newly formed organisation.

In 2020, we began work with the Wales Public Body Equality Partnership and were pleased to be one of the founding organisations. This partnership was

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initiated in April 2019 by the WRA, Sports Wales and Natural Resources Wales and has since grown to include 10 public bodies in total.

The partnership consists of:

- Welsh Revenue Authority
- Sports Wales
- Natural Resources Wales
- Welsh Language Commissioner
- HEFCW (Higher Education Funding Council for Wales)
- Arts Council for Wales
- National Museum Wales
- HEIW (Health Education Improvement Wales)
- Velindre University NHS Trust
- Cardiff and Vale University Health Board

The partnership pooled resources into creating 5 joint strategic equality objectives and agreeing joint actions and measures for 2020 to 2024. These objectives would be worked on together throughout that period, and also influence organisation-specific objectives as appropriate to each body.

The partnership commissioned Diverse Cymru to conduct engagement and consultation on the partnership's behalf. We held consultation events throughout Wales and had 43 respondents to our consultation document. The results of this were fed into our final objectives.

The partnership's work and objectives were subject to an Equality Impact Assessment and followed the [Future Generation Commissioner's 5 Ways of Working](#).

You can find the final objectives, along with our WRA-specific goals, in our first 4-year [Strategic Equality Plan and Objectives \(2020 to 2024\)](#) which was published in April 2020.

Our Annual Equality Report

Today (31 March 2022) we're pleased to publish our Annual Equality Report 2022 (covering the period 1 April 2020 to 31 March 2021).

Our equality report has been overseen by our Tîm Arwain (Executive Team) and our Board.

Our equality data

Recruitment

As part of our recruitment process, we collect data on all 9 protected characteristics under the Equality Act 2010:

- age
- disability
- sex
- pregnancy and maternity
- marital status
- religion or belief
- race and ethnicity
- sexual orientation
- gender reassignment

Prospective candidates are asked to complete a self-declaration equality questionnaire when they apply for one of our jobs; only our HR team has access to this information.

Our HR team then anonymises the data and stores it securely by role the application relates to. We review this data at least twice a year to identify trends.

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Our people

We collect data on 8 of the 9 protected characteristics for our people. We record 4 protected characteristics on an individual's HR file:

- age
- sex
- pregnancy and maternity
- marital status

Only our HR team and those who support our system are able to access the above; we have measures in place to make sure that access is only granted with a significant business reason.

We ask our people to self-declare 4 other protected characteristics on their profile on our HR System:

- religion or belief
- disabled status
- race and ethnicity
- sexual orientation

We launched this self-declare option in October 2018. However, completion is not compulsory. We encourage our people to fill it out, explaining that if we have a strong set of data, it helps us create better people policies and understand how diverse we are as an organisation. We still have work to do to encourage more of our people to self-declare, with our declaration levels currently at 59%.

We do not currently record gender reassignment. We believe recording this information in such a small organisation could have a negative impact on individuals' privacy and the data set would be too small to be analysed.

Our tax services

When delivering our tax services, we collect data on age of taxpayers paying

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Land Transaction Tax.

We collect this information because it helps us make sure the right amount of tax is paid by the right person. We're not recording the information for equality purposes.

Our customer base is relatively small, mostly professionals such as lawyers and conveyancers. We've looked at what equality data is available already for these professional groups, such as that collected by their professional membership bodies, and use this to inform our decisions, such as when completing Equality Impact Assessments. Unless our customer base changes, such as if we were to take on a new revenue service, we do not expect to directly gather equality data from our customers.

Complaints

When receiving complaints, we do not ask anyone to give us any diversity data. Our aim is to encourage as much feedback as possible to improve our services. We believe asking people to complete diversity declarations forms could create barriers to people giving us feedback. We'll continue to review this approach.

If we receive a complaint about or referring to discrimination, or a negative impact on protected characteristics, it is recorded and sent to our Chief People & Communications Officer to review. We have not had any such complaints so far.

Our approach to privacy during data collection and publication

On 31 March 2021, we employed just over 70 people. Meaningfully interpreting diversity data is difficult in an organisation of our size, where just a small number of individuals can change organisation-wide percentages significantly. It also means we're unable to publish most of our diversity data relating to the 9 protected characteristics.

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As an organisation, we put great importance on protecting people's privacy and their data, in full compliance with the Data Protection Act 2018. This applies to our people, our customers, stakeholders, and those that apply for jobs with us. We do not publish data which could reveal an individual's or a small group of individuals' identities, to protect their privacy. This means we will not publish data with groups fewer than 10 people. But where we can publish data, we will do so, and where we cannot, we will provide a narrative.

We collect data for both people who apply for jobs with us, and for those employed by us. We review our equality data at Tîm Arwain, WRA's executive team, and at the WRA's Board. We take what we can from this data to consider how well we're doing and discuss areas for improvement.

Our people

We reviewed the diversity information held on applicants for our jobs and our current workforce as of 31 March 2021. What we can publish is contained below:

Employees by Grade

Grade	Female	Male
Senior Civil Service	---	---
Grade 6 and 7	10	10
SEO and HEO	10	10
Executive Officer (EO)	---	---
Team Support	---	---

Men and women are represented at every level of the organisation, from our

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apprentices to our Board.

Men make up 44% of our organisation, and women 56%. During similar periods, this was:

- broadly in line with the Civil Service, at 46% male and 54% female
- significantly more gender balanced than the public sector, at 33% male and 67% female
- somewhat more female than the working population of Wales, at 52% male and 48% female

On 31 March 2021:

- 2 of the 6 members of Tîm Arwain (our Executive Committee) were women
- 5 out of 9 members of our Board were female
- proportion of men and women is fairly even across grades, but with more women represented at lower grades

The gender split of our grades is something we keep under review. If it becomes a longer-term trend, we'll investigate further for possible reasons why this is, and what actions we can take.

Gender pay gap

Since 2017, employers with 250 or more employees have had to publish and report specific figures about their gender pay gap.

We are too small an employer to be required to publish our gender pay gap, but we do calculate it and present it annually to our Tîm Arwain for discussion and action.

Our calculations do show that our mean and median pay is significantly higher for men than for women. There are 3 reasons for this:

- a higher proportion of women in the grades below our median pay point (HEO and below)

- while the overall proportion of women in the five grades at and above our median pay point (SEO and above) is the same as for men, there are more men in the highest three grades within this
- less women at the highest 'spine point' in their pay scale than men

Our median pay sits within our SEO pay scale. When looking at staff by gender, at the grades below SEO, and SEO and above, the below table shows one main reason for our gender pay gap:

	Female	Male
SEO and above	20	20
HEO and below	20	10

At our size, these numbers can change significantly with only a few starters or leavers. During 2020 to 2021, we stopped recruiting for six months to focus on our response to COVID-19. With a normal amount of turnover, and because we were still recruiting some roles for the first time, we had a high vacancy rate of around 20%. At the time of writing, we're nearly fully staffed. Despite this, our proportions of staff by grade has not changed significantly, and it has remained relatively static since we were formed. This suggests underlying reasons for our gender imbalance by grade which we will be considering further in 2022 to 2023.

Our pay system is based on either 3 or 4 'spine points' (depending on grade), with our people progressing up these spine points after each year of service until they reach the top spine point of the scale. We have seen significantly more women join us on promotion than men historically, and so more women are in the lower spine points of their pay scale. However this is reducing year on year as women gain length of service and move through the spine points, which is in turn reducing our gender pay gap.

Having reviewed this pattern since 2018, we implemented a new pay on promotion policy in 2020, to more equally treat our staff who had been in a role on temporary promotion prior to being made permanent. This has had a positive

impact on our gender pay gap, and along with other changes, and we're pleased to say that at the time of writing, our gender pay gap has reduced.

The WRA is a small organisation, but with 14 teams representing as many different professions. Some of those professions are dominated by one gender in the UK workforce, such as in Digital, Data and Technology (male-dominated), or Human Resources (female-dominated). We had planned to undertake further analysis over whether the professional demographics of the WRA are having an impact on our gender representation across the organisation, and by grade in particular, during 2021 to 2022 but have had to postpone this work due to reprioritising to focus on our response to COVID-19.

Our pay scales are published on our website.

Employees by working pattern and contract type

Our employees by working pattern and gender is too small a data set to publish, however more women work part-time patterns than men.

We encourage a culture where people can work flexibly and value the impact of role modelling, with both male and female members of our Tîm Arwain openly working to flexible working patterns. We:

- have an open process for applying to work flexibly and we encourage line managers to talk to staff about the opportunities for alternative working arrangements
- provide the technology so that all our people can work outside of the office, at home, in another office, and on the move to help them maintain a work life balance - both before and after this current period of home working
- are proud to display the Happy to Talk Flexible Working on our website
- advertise all jobs, unless there is a specific business reason, as open for part-time, job share, or flexible workers

The WRA employs only a very small number of people on temporary contracts or as agency workers, and so is too small a data set to publish. The headcount of temporary and agency workers across the year are published in our Annual

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Employees by age

Compared to the wider Civil Service, the WRA has a significantly younger workforce:

	WRA	Civil Service
Median age	36	45
16 to 19	---	0%
20 to 29	20%	16%
30 to 39	35%	21%
40 to 49	20%	23%
50 to 59+	20%	29%
60 to 64	---	8%
65+	---	2%

To protect privacy, our figures have been rounded to the nearest 5%.

Job applicants

In 2020 to 2021, we received 306 job applications, conducted 74 interviews and appointed 19 new members of staff. We cannot publish any further breakdown of this data, but some insights we have gained were:

- **gender:** women were more likely to apply for roles, but men were more likely to be offered a role, unlike in previous years
- **age:** younger people (aged 16 to 34) were more likely to apply for roles and then be offered a role, even though they were slightly less likely to be invited to interview than older people (aged 35 and above)
- **ethnicity:** percentages of people declaring themselves as an ethnicity other than white were similar at application and job offer stage, even though they were slightly less likely to be invited to interview than candidate who declared their ethnicity as white. Applications, interviews and jobs offered to people declaring themselves as from Black, Asian or Minoritised Ethnic communities were higher than Wales' average demographics
- **disability:** people applying for roles with us and who declared a disability was much lower than the average for Wales, this may be due to candidates not feeling comfortable disclosing this information prior to employment
- **marriage and civil partnership, sexuality, religion or belief:** there was little variation between recruitment stages. Religion or belief had the highest number of applicants selecting “prefer not to say” across all equality questions, at 10%
- **gender reassignment, pregnancy/maternity:** these figures were too small to share or provide a narrative
- **people who have ticked “prefer not to say” for their protected characteristics:** very few individuals chose this option during recruitment, which is positive as it suggests that people trust us to hold and act appropriately with their data

Our Board

Our Board is made up of a Chair, the Chief Executive, 5 Non-Executive Directors, 2 Executive Directors and a Staff Elected Member, who is an employee appointed to the Board through a staff ballot. The Staff Elected Member is a full member of the Board in their own right, sharing their individual experience and views, and can be of any grade. We had a vacancy for one Non-Executive Director during 2020 to 2021, which is now filled.

Our Board had 9 members during this time, meaning that most diversity data

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cannot be published. One area we think is appropriate to share is the gender breakdown of our Board (as of 31 March 2021):

- 5 were female (5 at time of publication)
- 4 were male (5 at time of publication)

Training

We record on our internal HR System how many people have completed training and are able to compare that to their diversity characteristics. At the time of writing, this is not an area for concern. But this is something we'll continue to monitor.

We still have more work to do in encouraging people to record their training and also their diversity statistics to make this data more useful for our learning and development planning. This may also increase numbers to publishable levels.

Non-publishable data

There are some data sets which are too small to currently publish and to provide a narrative on.

This data is monitored internally by our HR team and is regularly reviewed. So far there hasn't been any cause for concern; but we will provide a narrative when we are able.

The relevant data is:

- men and women by job held
- people that have left the organisation
- people that moved internally or applied to do so
- people involved in grievances
- people involved in disciplinarys

Equality Impact Assessments

We have provided training for our people on completing Equality Impact Assessments (EqIAs), and have created our own advice and templates for this. As well as the protected characteristics covered by the Equality Act 2020, we also include impact on low income households. We are now more confident as an organisation in this process than in previous years, when we were still learning.

Changes to strategy or policy go to either our Tîm Arwain or Board. When a paper is submitted to either group, there is a mandatory question asking whether an EqIA is required, and if so, if it has been completed and any substantial impacts found. This has ensured that equality is duly considered in strategic decision making, and, more importantly, is more often discussed and is becoming part of our ways of working.

In 2020 to 2021, no EqIA found substantial negative impacts on any group.

Progress against our 2020 to 2021 objectives

Objective 1: increase understanding of equality across our organisation

All staff have completed equality training as part of their induction and we also provide specific training as needed, as well as other activities, information and events throughout the year to increase awareness. For example:

- Equality Impact Assessment training
- senior leaders receiving reverse mentoring
- an equality communications calendar, to share videos, articles, training and lived experiences with our people
- Mental Health Awareness training for line managers
- all-staff training on including diversity in our services, and the Social Model

of Disability

We also required all recruitment panel members to do unconscious bias training at least annually, before this training was removed from Civil Service learning platforms. We are currently looking at how we include more equality content in our own recruitment training.

We discuss equality often at our Tîm Arwain. The previous inequalities highlighted during 2020 to 2021, such as the disproportionate impact of COVID-19 on some groups and communities, and the Black Lives Matter movement, prompted us to see we needed to do more. We have made significant steps in increasing our understanding and collective responsibility for equality as senior leaders, and know we need to continue to do so.

Objective 2: better understand the diversity of our customers and our employees

We continue to use publicly available data to understand the diversity of our customers. We use publicly available data and feedback from customers to assess the impacts of our policies and processes on our customers.

Whilst we already capture a lot of data about taxpayers for the purposes of calculating and processing the tax returns and payments, none of this data is collected for the purposes of establishing the diversity of our customers. We're not able to collect diversity data via the tax return. Currently only age-related data is captured on tax returns, which could then be capable of providing us with such an analysis.

As a relatively new organisation, we are continually learning about our customers, both through data analysis, but also user research and engagement, and from this how we can improve our services to meet their different needs. Understanding our customer's needs is and will continue to be an important part of our approach. In terms of collecting our own diversity data about our customers in future, this is something we'll keep under review, and look for appropriate opportunities to do this.

We've continued to develop an understanding of the diversity of our people, which has been outlined above. We still have more work to do in encouraging people to record their diversity statistics to make the data more useful and potentially increase numbers to publishable levels.

Objective 3: increase the accessibility of our published information and end-to-end services, including our tax system

We've made positive progress against this objective.

We completed an accessibility review of our online services – our website, our tax system and both our online and paper forms. From this we developed an action plan to make several improvements to our tax system to make it more accessible – we published this as part of [our Accessibility Statement](#) in September 2020. Many of the changes were implemented in 2020 to 2021, and most remaining changes then completed in 2021 to 2022.

Ways in which we've made our online services accessible include using easy to understand, simple language, and also by allowing users to:

- changes colours, contrast levels and fonts
- zoom in up to 300% without the text spilling off the screen
- navigate most of these services using just a keyboard
- navigate most of these services using speech recognition software
- listen to most of the content using a screen reader (including the most recent versions of JAWS, NVDA and VoiceOver)

We also used the findings from our review to make improvements to the accessibility of our website, for example, through accessible PDFs and subtitling our videos. We've ensured that our new content is accessible and readable and have developed a plan to improve our existing content. We now use an HTML-first approach for our publications, such as this report or our Annual Report and Accounts, as we know this is more accessible than pdf publications.

We've continued to raise awareness of accessibility and assisted digital support,

and developed an enhanced support policy so our people able to help taxpayers who may need extra help. For example, we weren't always able to access our post during the pandemic, when our people were required to stay at home. Because that meant we could not process paper returns and claims sent to us as quickly, we set up new processes to support taxpayers and their agents, including enhanced support for those who found our digital services more difficult to use.

Finally, we have a consistent approach to responding to requests for assistance using digital services and provided additional training to our people.

Objective 4: increase the accessibility of our external events

We have not held any in-person events in 2020 to 2021, to protect public health. Prior to this, we were conscious about equality when hosting external events and only booked accessible venues.

We have had to adapt quickly to providing more online events, and have been learning how we make these more accessible. For example, we now have processes in place to provide captions for our online webinars, to support customers with hearing loss or deafness.

Objective 5: be considered a fair employer by our people and applicants for our jobs

We remained at the top of the top quartile for 'Inclusion and fair Treatment' in the Civil Service People Survey, ranking fourth out of over 100 organisations.

During 2020 to 2021 we were awarded Level 2 Disability Confident Status, backdated to 2018. We only had to take one action to meet the standards, which was to encourage our suppliers and partners to be a Disability Confident employer, which we've now included within our standard contracts, stating our commitment and encouraging them to consider it as well. Having only one action

outstanding reflected the positive progress we had made in this area over the last 2 years. Some of examples of the actions we had already taken in the period up to March 2021 included:

- offering a Guaranteed Interview Scheme, whereby applicants with disabilities who meet the role's minimum requirements are guaranteed an interview
- offering all new roles as flexible working/part-time/job share by default
- offering and making available to disabled people apprenticeships, internships, and graduate placements, and only offering paid internships to increase participation
- accepting job applications in alternative formats
- running Mental Health Awareness training for line managers
- obtaining and using our Occupational Health provider to support both new starters and our current people, along with an Employee Assistance Programme (EAP) website and phonenumber
- promoting the ability to join the Welsh Government's staff group for disabled people during induction and on our intranet
- DSE assessment undertaken and specialist equipment and adjustments put in place promptly
- providing opportunities for coaching, mentoring, reverse mentoring
- having valued, permanently employed disabled colleagues

We are working towards gaining Level 3 status. We had hoped to do so in 2021 to 2022 but we have had to reprioritise our work to support hybrid working and the impacts of COVID-19. We now expect to be ready to apply for Level 3 in 2022 to 2023.

In 2020 to 2021, we made changes to our recruitment web pages, job alerts, documentation and processes to make applying for jobs with us more accessible. We also spoke with a Disabled People's Employment Champion for their advice on further improving our processes. Other changes we have made are:

- analysing job adverts for gendered language
- moving our interviews and pre-employment processes online, to reduce the risk of spreading COVID-19, particularly to increase inclusion for applicants and our people who are more vulnerable

- introduced pre-interview chats for all interviewees, to both help with checking the technology works, but also to ask about any reasonable adjustments they may need
- updating guidance for hiring managers on how to conduct interviews online

At the time of writing, we have also adopted the Civil Service Workplace Adjustment Passport process for our people. Many of our people join us from, or move on to, other civil service departments. This process reduces the burden on people who need adjustments to do their role, as this makes the process of considering and implementing adjustments quicker and easier.

Objective 6: remove barriers to joining and thriving in the workforce by encouraging flexible working

Flexible working is considered part of our culture and is valued by our staff, with the majority of staff working flexibly. We use the Happy to Talk Flexible Working logo on our job applications and on our website, and we discuss with hiring managers the possibilities for part-time, job-share, or flexible working arrangements with each role we advertise.

We advertise all our jobs, unless there is a specific business reason not to, as available as part-time, flexible working, or as a job-share. We have changed the wording on our job adverts to more clearly state that we welcome – not just consider – requests to work flexibly, and hope this will have a positive impact.

Of course, 2020 to 2021 saw us moving to working at home in a way we had not done before, both due to COVID-19 but also due to the flooding as a result of Storm Dennis, which saw our main office close. As a cloud-based organisation, with all our staff already able to work partly from home previously, this was not as much of a challenge for us as for other organisations. However, supporting our people and adapting to hybrid working is still a significant challenge for us. Some of the changes we've made were:

- new process for all our people to complete an online H&S review of their home working environment and equipment
- all assessments reviewed individually and actioned, for example by ordering

- additional equipment such as laptop risers, or lumber support
- additional specialist online assessments arranged, where needed
- additional guidance for staff on lone working and home working
- launching a Wellbeing Channel for our people to find and share wellbeing advice and activities, and widening the reach of our staff-run Wellbeing Committee
- ran online and, when safe and socially distanced, in-person wellbeing activities to support the mental health of our people

We've been reflecting and learning internally on the best support for those returning to the workforce – such as after parental leave – and new starters. We've found that our previous approaches did not best fit with a hybrid working environment, especially for new starters or those who started their leave before we started working from home. We will continue to learn from our people who have first-hand experience of this in 2022 to 2023, to make joining or returning to us the best experience it can be.

Objective 7: identify and remove bias and unfairness from our pay system

We are proud to have been an accredited employer with the Living Wage Foundation since 2020.

We monitor and regularly review our gender pay gap as well as look for signs of other pay gaps, although our small size as an employer prevents us from meaningfully calculating an ethnicity or disability pay gap, for example.

In 2020, we introduced a change to our pay on promotion rules, as we noticed a trend that was having an indirect negative impact on women. We have seen improvements as a result but still have more to do to close the pay gap.

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