



Awdurdod Cyllid Cymru
Welsh Revenue Authority

Strategic Equality Plan and Equality Objectives 2019-2020

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Cydweithio | Cadarnhau | Cywiro

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About Us

The Welsh Revenue Authority (WRA) is the new tax authority for Wales, formed in October 2017 as the first non-ministerial department created by Welsh Government. We are responsible for collecting and managing the first devolved Welsh taxes, Land Transaction Tax (LTT) and Landfill Disposals Tax (LDT), on behalf of Welsh Government.

These new taxes which replaced Stamp Duty Land Tax and Landfill Tax, respectively in Wales from April 2018, are designed and made in Wales and tailored for the needs and priorities of Wales. The revenue raised from these taxes, an estimated £1bn over four years, will help support Welsh public services, including the NHS, schools and in communities across Wales.

We have a Board of six Non-Executive Directors, three Executive Directors and a Staff Elected Member, who are responsible for the strategic direction, oversight and governance of the WRA. The Board is supported by an Audit and Risk Committee and a People Committee, the latter of which has specific oversight for diversity and inclusion matters.

We are a small, specialist organisation, with over 65 people representing 16 professions, from tax specialists through to data and digital services, to name just a few. We are still recruiting and expect to have around 80 people by the end of 2019. All our employees are Civil Servants.

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 taxes are collected and managed efficiently and effectively.

Our Approach is made up of three welsh terms: Cydweithio, Cadarnhau, Cywiro, and is inspired by [Our Charter](#), which consists of eight 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 and Objectivity. Alongside *Our Approach* and *Our Charter*, these three standards guide our people in their day to day work, and equally apply to our approach to equality.

Our Duties

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society; for example, when using public services like those we provide at the WRA. The Equality Act brought together previous anti-discrimination laws into a single Act to make it easier to understand and to strengthen protection. In the circumstances that the Equality Act applies; for example, in the workplace and when using public services as previously mentioned, it is illegal to discriminate against anyone because of nine **protected characteristics**:

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

You can find out more about the Equality Act [here](#).

The Public Sector Equality Duty within the Equality Act requires public bodies, such as ours, to have due regard to the need to the following in exercising their functions:

- eliminate discrimination
- advance equality of opportunity
- foster good relations between different people when carrying out their activities

These are referred to as the “general duties”. Listed public bodies in Wales (including ours) must also comply with 14 “specific duties”, as set out in the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. The specific duties in Wales cover:

- Equality objectives
- Strategic equality plans
- Engagement
- Assessing impact
- Equality information
- Employment information
- Pay differences
- Staff training
- Procurement
- Annual reporting
- Publishing
- Welsh Ministers’ reporting
- Review
- Accessibility

You can find out more about the specific duties in Wales on the Equality and Human Rights Commission’s [website](#).

As part of meeting our requirements under the Equalities Act 2010 and Wales 2011 Regulations, we will publish a strategic equality plan and equality objectives, which will be reviewed every four years, as well as an annual equality report which will contain both diversity data and progress made against our equality objectives. This is our first strategic equality plan and equality objectives, and covers the period 1 April 2019 to 30 March 2020. We will publish our first annual equality report in April 2020.

We are still establishing our processes and policies as an organisation, including within our equality environment. Our first plan and objectives are therefore focused on doing activities for the first time, or putting in place the required structures for us to fully understand where we can best focus our future plans and objectives.

Because most established organisations have fallen into the same four-yearly pattern of publication and review from 2012 onwards, this initial plan and objectives will cover a one year (1

April 2019 to 30 March 2020) period only, rather than the usual four years. Our intention is that these initial, scoping and establishing plan and objectives will allow us to better produce a four-yearly plan and objectives in April 2020.

This first plan and objectives was overseen by the our Board as a whole, although future plans and objectives may be overseen by the Board's 'People Committee'.

Equality at the WRA

We were proud to have come first across more than 100 Civil Service organisations for “Equality and Fair Treatment” in the 2018 Civil Service People Survey. Diversity and inclusion is not simply about policies and intentions for us, what we truly value is *equality of outcome*.

This means that we aim to employ people who represent the diverse communities we serve, but we also aim to engender a cultural environment where everyone, regardless of background, can thrive. We recognise the importance of role models, particularly for those in underrepresented groups at senior levels. Our intention is that representation will breed positive diversity and a culture of inclusion. We will hold ourselves to that measure.

As a relatively new organisation, we recognise that we have work to do to establish an environment where equality is engrained in our work, which we can continue to be proud of in years to come. We have implemented a number of processes so far, as well as identifying areas for improvement. The main areas of focus are as below:

Recruitment

As a Civil Service organisation, we apply the Civil Service Commission principles of open and fair recruitment, on merit. We have also used a number of methods to promote equality through our recruitment processes; for example, we:

- Advertise externally by default, unless the timeframe or particular skill set requires a Civil Service or internal applicant, to promote equality of opportunity – including our Board
- Advertise all roles as available for full-time or part-time applicants (which has resulted in people at every level of the organisations working alternative patterns)
- Promote our status as a Disability Confident – Committed employer on our vacancies page
- Operate a guaranteed interview scheme for disabled applicants who meet the role’s minimum requirements
- Remove name, gender, address, age and names of educational institutions to avoid bias during selection for interview
- Ensure all recruitment panels are of mixed gender
- Ensure all candidates know what the process involves (for example, if there will be any sort of assessment or exercise) and actively ask if they require any adjustments or alternatives
- Pay on appointment is to fixed scale points, which are published on our website

One area we believe has had a particularly positive impact is that all our recruitment correspondence comes from a named individual in our HR team. By taking this approach, the candidate can contact directly and confidentially with any concerns or queries they may have, in English and in Welsh, as they wish. Through this individual-level approach, we hope to encourage candidates to share with us any barriers they may have to being successful so that we can remove them wherever possible.

Training

Our Board and 'Tîm Arwain' (our executive committee) have received briefings on their responsibilities under the Equality Duty; however we recognise that we have more to do to roll out awareness to all levels of the WRA.

All staff are asked to undertake unconscious bias training on an annual basis, as part of formal learning and development. Our induction process covers content on fair treatment and our zero-tolerance approach to bullying and harassment. We are currently sourcing training for our staff on completing Equality Impact Assessments, as this is an area where we assessed that understanding was low.

We have recently launched a self-recording mechanism for training on our HR system with all staff required to record all training interventions. This allows us to monitor uptake of interventions, ensure that all staff have undertaken the relevant unconscious bias training, as well as identify where there may be gaps and further training required. Though the recording mechanism is new, our intent is that this will provide us with a better picture of overall training needs to allow us to assess, identify and address training needs.

Procurement

Our procurement and contract management policy adheres to the Public Contracts Regulations 2015 and further adheres with the principles of the Wales Procurement Policy Statement.

Using the 'framework first' policy ensures that we are adopting a collaborative approach to our expenditure, with National Procurement Service Frameworks used wherever possible. All requirements with a value of £5,000 or more will be sourced using Sell2Wales, with all requirements with a value of £25,000 advertised to ensure open and accessible competition and to encourage bids from SMEs (Small and Medium Sized Enterprises – any business with fewer than 250 employees)

We ensure procurement activity is sustainable, considering whole life costs, and we will sign up to the [Code of Practice: Ethical Employment in Supply Chains](#) by April 2020. This will require us to make a commitment to ensure ethical employment practices throughout our supply chains, and encourage payment of the Living Wage by our suppliers.

We follow a structured contract management process which is proportionate to the contract complexity and scope and ensures effective contract performance monitoring. Currently, over 80% of undisputed invoices are paid within 5 days and 97% within 30 days, with equivalent payment terms required as part of our standard terms and conditions of contracts.

Policies and Processes

The WRA was created through the Tax Collection and Management (Wales) Act 2016. During the passage of the Bill, an Equality Impact Assessment (EQIA) was carried out to evaluate if the creation of the WRA would be likely to have any adverse effect on protected groups.

The findings presented in the EQIA were that it was unlikely that the establishment of the WRA would have a differential impact on eight of the nine protected characteristics under the Equality Act 2010: age; gender; transgender; marriage or civil partnership; pregnancy and maternity/paternity; race; religion and belief or non-belief; or sexual orientation.

It did state that the WRA should be mindful of potential differential (albeit minimal) impact for people using our services who had visual or hearing impairments, or were physically disabled in a way which would mean they could not use standard computer equipment to submit tax returns and other documentation. We will explore this area further as an Equality Objective in 2019-2020 (#3: *Increase the accessibility of our published information and end-to-end services, including our tax system*).

Equality is built into our change process going forward. We have a dedicated team in place to manage change, who maintain central control of the purpose and progress of any change within our organisation. Changes cannot progress without the owner confirming that they have completed an EQIA, a step which was implemented in February 2019 and so will require reviewing for effectiveness over the next year.

The EQIA process prompts the change owner to consider the impact of their change on different groups, including all nine protected characteristics. As we gain more information about the

demographics of our customers, we may need to review previously completed EQIAs in the light of new data.

You can find a longer report on the findings of the Equality Impact Assessment [here](#) (pages 47-49).

Our Equality Objectives

In deciding our first one-year equality objectives, Tîm Arwain – representing all areas of WRA – formed the working group, alongside the HR team, to form and agree these objectives. They were then agreed by the WRA Board on 20 March 2019.

We also asked for the views and assistance of some external groups, such as the Welsh Government's Disability Awareness and Support Network, Disability Cymru, and the Low Income Tax Reform Group.

These groups provided us with invaluable insight into where we might have the best impact in forming our objectives, which was particularly valuable to us as a new organisation, and also the first non-ministerial department of Welsh Government, with little in the way of baseline equality data. When forming our next objectives, we will consult more widely over a longer period of time. We will also look to see how we might best allow members of the public to share their views.

Our 2019-2020 equality objectives are:

	Objective	Measure of success (by April 2020)
1	Increase understanding of equality across our organisation	<ul style="list-style-type: none">• All staff have completed equality training• Relevant staff have completed EQIA training• Equality issues discussed at Board and Tîm Arwain quarterly, and shared to all our people through Tîm Arwain• The Social Model of Disability is adhered to and promoted
2	Better understand the diversity of our customers and our employees	<ul style="list-style-type: none">• Complete research into the demographics of our customers, allowing smarter use of EQIAs• 80% completion rate of staff diversity declarations on our HR System

3	Increase the accessibility of our published information and end-to-end services, including our tax system	<ul style="list-style-type: none"> • Complete a review of our current systems and communication channels for accessibility, including non-digital methods • Have a plan to improve the accessibility of our website • Understand what help people need to use our online services, training our staff to support assisted digital requests if needed • Develop an approach to identifying taxpayers who may need additional support due to access, communication or other needs, and start work on reviewing how we can support them when using our services
4	Increase the accessibility of our external events	<ul style="list-style-type: none"> • Guidance and standards for running accessible events created • Standards applied to all external events
5	Be considered a fair employer by our people and applicants for our jobs	<ul style="list-style-type: none"> • Remain in the top quartile of employers for 'Equality and Fair Treatment' in the Civil Service People Survey • Begin work to reach a higher level of Disability Confident status • Adopt the Civil Service Workplace Adjustment Passport scheme • Conduct a review of our job adverts and recruitment process, focusing on the experience of disabled people

6	Remove barriers to joining and thriving in the workforce by encouraging flexible working	<ul style="list-style-type: none">• Flexible working is considered part of our culture/the norm• Positive levels of flexible working arrangements agreed and used by our people, with particular consideration to the experience of those with caring responsibilities• Technology in place to support working from other locations/in different ways• Processes and guidance in place to support those returning to the workforce
7	Identify and remove bias and unfairness from our pay system	<ul style="list-style-type: none">• Conduct an equal pay audit and have a Gender Pay Gap action plan in place, as well as other specific plans if other pay gaps are identified (for example, disability or ethnicity pay gap)• Become an accredited employer with the Living Wage Foundation

Our Equality Data

When Using Our Services

Currently, we only routinely collect data relating to one protected characteristic (age) from taxpayers paying LTT, and no data relating to protected characteristics is collected relating to the payment of LDT.

We collect this information because it is required to ensure the right amount of tax is paid by the right person. Sometimes more information for particular cases is needed; for example, whether a couple is married or not for the calculation of LTT. In that case, we only ask for the information that is necessary to come to a decision, and it is only noted on that particular case's records.

Tax decisions are made without bias and based on the legislation applied to the particular facts of each case. We have decision making governance to ensure appropriate representatives from across our organisation are involved in decisions. Taxpayers also have a statutory right to have their decision reviewed and can appeal to a tribunal, where they do not agree with our decision.

During Recruitment

When we are recruiting, we collect data on all nine protected characteristics through a self-declared equality questionnaire. This form is only seen by our HR team and never shared further. We anonymise the data, store it securely, and review trends at least twice each year.

During Employment

When working at the WRA, we collect data on eight of the protected characteristics. These are age, gender, pregnancy and maternity/paternity, and marriage or civil partnership are recorded on individuals' HR files, which are accessible only to our HR team.

Religion or belief and non-belief, race, disability and sexual orientation are self-declared by the individual on their profile on our HR System, which is only accessible to HR and in that case in an anonymised format. We encourage completion of the diversity declaration, but it is not mandatory. We launched this self-service declaration feature in October 2018 and still have work to do to encourage more people to self-declare.

We do not currently record whether an individual is transgender or not, although we may add this to our self-service declaration in the future. For example, if we become a larger organisation that

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could undertake meaningful data analysis of the difference of work experience for those with or without this characteristic. At our current size we decided it wasn't necessary and could have a negative impact on individuals' privacy, which was and remains our priority.

When Receiving Feedback or Complaints

When receiving complaints, we do not ask individuals to provide us with any diversity data. This is because we want to encourage as much feedback as possible to allow us to improve our services, and we felt asking individuals to complete a diversity declaration could discourage feedback. This is something we will keep under review. If we receive a complaint which refers to discrimination or an otherwise adverse impact due to a protected characteristic, it is recorded and flagged to our Head of HR for review. We have not received any complaints in this category to date.

Our Approach to Privacy during Data Collection and Publication

At the time of writing, we currently employ over 65 people. Because of this, most data we collect on our workplace demographics is not appropriate for publication, as it would allow for the identification of individuals. In most circumstances, this will mean that if a group of less than five individuals would be identified, we would not publish those data. Protecting people's privacy, including compliance with the General Data Protection Regulation (GDPR), is of high importance to us, with our people just as it is in delivering our services.

Where data are large enough to ensure individual privacy, we will publish them. Where data are too small to be published, we will provide a narrative instead, where we can do so meaningfully while still upholding confidentiality. We will publish our equality information for the first time by April 2020, in our first annual equality report (see 'Our Next Steps').

Our Next Steps

We will soon start work on creating our next strategic equality plan and equality objectives, which will be published in April 2020. They will cover the period 1 April 2020 until 30 March 2024, although we may revise their contents earlier if they become out of date. If you feel that you could contribute to this work, either individually or as a group you are part of, then please get in touch (see 'Contact Us').

Our first annual equality report will also be published in April 2020 and cover the period 1 April 2018 to 30 March 2019.

Contact Us

Thank you for taking the time to read our first strategic equality plan and equality objectives. You can contact us in confidence if you would like to discuss any part of this document. Our Head of HR can be contacted via hr@wra.gov.wales or 03000 254 000. You can also write to us at:

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