Awdurdod Cyllid Cymru
Welsh Revenue Authority

Annual Equality Report 2020 and Strategic Equality Plan 2020-2024

disability confident
COMMITTED

happy to talk flexible working

Living Wage for Wales

Cydweithio | Cadarnhau | Cywiro

gov.wales/wra

Contents

This document is also available in Welsh.

The Welsh Revenue Authority

The Welsh Revenue Authority (WRA) helps deliver a fair tax system for Wales. Since 2018 we've been responsible for the collection of Landfill Disposals Tax (LDT) and Land Transaction Tax (LTT) – the first taxes raised in Wales for Wales in 800 years. We're helping to raise over £1 billion in our first four years to directly fund Welsh public services such as in health, schools, and social care.

We're a Civil Service organisation, the first non–ministerial department created by Welsh Government. We're small and specialist with around 80 members of staff and 16 professions, mainly based just outside of Cardiff in Treforest. We trust our people with a high level of autonomy and empower them to make decisions and to improve our organisation.

Our people are highly engaged, rating highly in the annual Civil Service People Survey, with particularly high ratings from our staff for Inclusion and Fair Treatment. You can find out more about working here 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 (first in 2018, sixth in 2019), with our staff responses the highest across over 100 Civil Service organisations to the question "I am treated fairly at work".

" We trust our people with a high level of autonomy and empower them to make decisions and to improve our organisation. "

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.

You can find out more information about **Our Approach**, **Our Charter**, and our Corporate Plan 2019–2022 on our website.

Equality at the WRA

Most of the Welsh public sector have published their Strategic Equality Plans on a four-year cycle since 2012.

As a new organisation we knew we still had much to do, so we published our initial Strategic Equality Objectives for 2019–2020 only.

This was agreed with the Equality and Human Rights Commission, particularly as a one-year plan would allow us to fall in sync with the rest of the Welsh public sector's four-yearly reporting schedule. We also wanted to give ourselves enough time to set up our equality processes, and get a better understanding of ourselves, our people, and our equality environment at the WRA, before committing to longer term plans.

This report:

- combines our Annual Equality Report 2020 (covering the period 1 April 2018 to 31 March 2019) and our Strategic Equality Plan for 2020–2024

- includes our Strategic Equality Objectives for 2020–2024

- includes our progress with last year's Strategic Equality Objectives at the time of writing in February 2020

Our first plan and objectives were overseen by our Board; however, this plan has been overseen by the Board's People Committee. Our People Committee consists of three non-executive directors from the Board, and is advised by the Chief Executive Officer and Chief People Officer, and is supported by a secretariat.
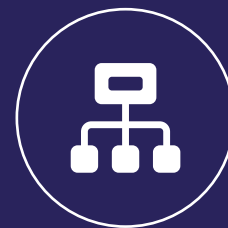
Our equality data

Recruitment

As part of our recruitment process, we collect data on all nine 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 applied for. We then review this data at least twice a year to look for trends.

Our people

We collect data on eight of the nine protected characteristics for our people.

We record four protected characteristics on someone'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 four other protected characteristics on their profile on our HR System:

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- 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.

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

Our tax services

When delivering our tax services, we collect data on:

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- age of taxpayers paying 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 are not recording the information for equality purposes.

We haven't carried out any analysis of these taxpayer data sets for equality purposes yet. During the year ahead, we plan to collect this data and perhaps explore asking for more information to understand our customer base.

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 will 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 Officer to review. We haven't had any complaints like this so far.

Our approach to privacy during data collection and publication

On 31 March 2019, we employed 66 people. Because of our small size most of the data we collect on our people, or on people who apply for jobs with us, is too small a data set to publish.

We won't publish data which could reveal an individual's or a small group of individuals' identities. This means we won't publish data with groups fewer than five people.

We have 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.

If the data is large enough to publish then we will. Where the data is too small to publish then we will provide a narrative.

Our people

We reviewed the diversity information held on applicants for our jobs and our current workforce as of 31 March 2019. What we are able to publish is contained below:

Employees by Grade

	Female	Male
Senior Civil Service	---	---
Grade 6 & 7	10	10
SEO & HEO	10	10
EO	10	---
Team Support	---	---

Men and women are represented at every level of the organisation.

Men make up 42% of our organisation, and women 58%. 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 35% male and 65% female
- somewhat more female than the working population of Wales, at 52% male and 48% female

On 31 March 2019:

- four of the seven members of Tîm Arwain (our Executive Committee) were women
- four out of ten members of our Board were female
- proportion of men and women is fairly even across grades

Some grades (for example EO) have a higher proportion of women, but due to our small size, this could be equalised or reversed with only a small number of people joining or leaving at that grade, and so is perhaps insignificant. 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. The calculation used for gender pay gap reporting can easily produce distorted figures when applied to an employer as small as the WRA, and to publish it could be misleading and unhelpful. Instead, we review and analyse our pay gap at the end of each financial year and submit our analysis and recommendations to our Tîm Arwain and People Committee for discussion and action.

Our calculations do show that our mean and median pay is higher for men than for women. The reason for this is mostly because significantly more women have joined us on promotion than men, who in turn were much more likely to join us at the same grade as their previous role. Our pay system is based on either three or four '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.

Therefore, men were more likely to have been in their current grade for longer, and be closer to the top of the scale, whereas women at the WRA are more likely to have recently joined their current grade and be at the lower spine points. A smaller impact on our gender pay gap is a higher number of women at some lower grades, and more men in the very highest grades.

Due to our numbers, this could change or reverse with only a few starters or leavers in particular posts but is still worth monitoring in case it becomes a longer term trend, as this would perhaps suggest some bias rather than chance.

Somewhat ironically, this does mean that our gender pay gap has been mostly created by promoting women. However, unless our assumptions are wrong, this will mean that our gender pay gap will narrow over the next two to three years (the time it takes an employee to reach the top of their pay scale). We will therefore continually monitor this, and if it were not to address itself in that time it would show the potential for bias in our system and we would investigate that.

We are beginning work with Chwarae Teg to become a FairPlay Employer this year (2020) and we hope to work with them to address our pay gap and help promote further the inclusion of women in all areas of our business. Our pay scales are published on our website.

Employees by working pattern

Our employees by working pattern and gender is too small a data set to publish. But 9% of our organisation worked part-time as of 31 March 2019. Of that percentage, more women than men work part-time or flexibly.

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.

At the WRA, 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
- have removed 'core hours' for our people
- 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

Employees by age

Compared to the wider Civil Service, the WRA has a significantly younger workforce. These proportions do broadly reflect the age bandings of people who apply for WRA jobs:

Age	WRA	Civil Service Statistics
16–19	---	0.35%
20–29	14.29%	14.04%
30–39	42.86%	21.39%
40–49	28.57%	24.03%
50–59+	14.29%	30.94%
60–64	---	7.24%
65+	---	1.93%

Job applicants

Diversity data for job applicants is held by the WRA from 1 June 2018 onwards. Before that date (such as for Quarter 1 of 2018–2019) the WRA did not have its own recruitment system and instead used the Welsh Government's system. Diversity data for job applicants was collected during Quarter 1 by the Welsh Government but to protect individuals' privacy this has remained with the Welsh Government.

A total of 243 applications were received, for a role where someone was appointed between 1 June 2018 to 31 March 2019. Of these:

- 61 were invited to interview
- 13 were either appointed or passed the interview and were placed on a merit list for 12 months in case another similar role became available
- roles ranged from Team Support to Grade 7

To reduce bias during recruitment, all references to the below protected characteristics are removed from job applications during the sift stage, with full applications only seen at interview.

Gender

We received slightly fewer applications (45%) from women, but women were statistically slightly more likely to pass sift and be appointed. Women are also far more likely to gain jobs with us on promotion, and men more likely to gain jobs at the same level as their current role. This will be monitored going forward as it seems to be a trend, but we are not yet sure why.

Age

Half (49%) of all applications received were from people aged 24 to 39, and this group were also more likely to pass sift and be appointed, as might be expected due to this being the largest age group of applicants. 12% of applications came from the over–50s group. This is the largest age group for current staff in the Civil Service, however that does not necessarily mean it is also the largest group for staff applying for jobs, as this may reflect more that many Civil Service organisations are long established and have many long–serving employees. However, we are monitoring this going forward.

Marriage/civil partnership

Slightly fewer applications (45%) were received from people who were married or in a civil partnership, but people who were not married or in a civil partnership were much more likely to pass sift and be appointed. This may be a result of the increased level of applications received from younger people.

Disability

Very few applications have been received from disabled people (less than 5%), which compares unfavourably to the general Welsh population (around 12% disabled according to the last Census). This could either be because people who are disabled choose not to declare their disability when applying for a role with us, or that disabled people are disproportionately choosing not to apply for a role with us. In either case, this is an area for further investigation.

Race, religion or belief, pregnancy/maternity, sexual orientation, gender reassignment

Numbers are too small to publish, but there does not seem to be any bias or reason for concern in our recruitment process in these areas.

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, five Non–Executive Directors, two 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.

Our Board has ten members, meaning that most diversity data cannot be published. One area we think is appropriate to share is the gender breakdown of our Board (as of 31 March 2019).

On age, we have a positive age distribution on our Board.

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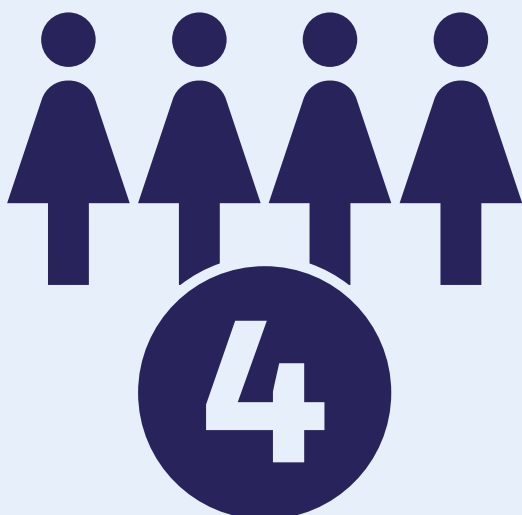
Training

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 will 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:

- people that have left the organisation
- people that moved internally or applied to do so
- people involved in grievances
- people involved in disciplinaries

Equality Impact Assessments

Since our last report, we have created templates for Equality Impact Assessments (EqIA) and written guidance for our staff.

We have supplied external training for key staff in order to embed the EqIA process across the organisation, in policy making, budgeting, and change programmes.

We are now in a position to begin completing EqIAs and finalising the process within the WRA. Our plan for fully embedding this process in our organisation is therefore well underway, but with recognisable steps left to complete.

Our legislation, Tax Collection and Management (Wales) Act (TCMA) was subject to an EqIA.
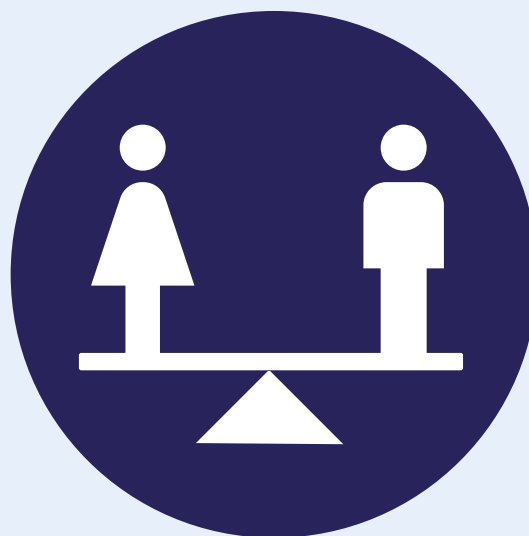
Strategic Equality Plan

In 2019 we produced our first one year Strategic Equality Plan. 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 initiated in April 2019 by the WRA, Sports Wales, and Natural Resources Wales and has since grown to include ten 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 has met monthly and pooled resources into creating five joint strategic equality objectives. It has agreed joint actions and measures over the next four years. These objectives will be worked on together over that time period and will also influence organisation-specific objectives as appropriate to each organisation.

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 document. The final objectives you can find in the next chapter.

The partnership's work and objectives were subject to an Equality Impact Assessment and followed the Future Generation Commissioner's Five Ways of Working.

Our 2019 Objectives

Our 2019 objectives	Action points	Our progress
Increase understanding of equality across our organisation	• 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.	• All staff have completed equality training as part of their induction and we require staff to re-train annually if they are taking part in recruiting new people. • We provided key staff with training on EqIAs from Diverse Cymru, and have created templates and guidance. We are now beginning our first EqIAs. • We discuss equality and diversity at our People Committee, Tîm Arwain and Board, but not as often as we planned at Board. • While we follow the Social Model of Disability, we acknowledge that we have more work to do in promoting it and fully embedding it.
Better understand the diversity of our customers and our employees	• Complete research into the demographics of our customers, allowing smarter use of EqIAs. • 80% completion rate of staff diversity declarations on our HR System.	• We still have work to do on encouraging the completion rate for staff diversity on our HR System. So far, over 50% of our staff have made a declaration on our system.

Our 2019 objectives

Our 2019 objectives	Action points	Our progress
Increase the accessibility of our published information and end-to-end services, including our tax system	• Complete a review of our current systems and communication channels for accessibility, including non-digital methods. • Develop 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.	• We have completed a review of our online services – our website, our tax management system and both our online and paper forms. We have put an action plan together based on the recommendations which we are beginning to work through ahead of publishing our Accessibility Statement. • We have used the findings from our review to start making improvements to the accessibility of our website, for example, through accessible PDFs and subtitling our videos. We ensure that our new content is accessible and readable and have a plan in place to improve our existing content and train our staff. • Our helpdesk staff use information from our newly added customer surveys for our online services to better understand where people need help and make appropriate improvements from feedback. • We have developed a consistent approach to responding to assisted digital requests and trained our customer facing staff. • We have raised awareness of accessibility, assisted digital and developed an enhanced support policy internally so our staff feel more prepared in identifying taxpayers who may need extra help.
Increase the accessibility of our external events	• Guidance and standards for running accessible events created. • Standards applied to all external events.	• We are conscious about equality when hosting external events and only book accessible venues. • We have drafted standards and guidance for making our events more accessible.

Our 2019 objectives

Our 2019 objectives	Action points	Our progress
Be considered a fair employer by our people and applicants for our jobs	• Remain in the top quartile of employers for 'Inclusion 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.	• We remained at the top of the top quartile for 'Inclusion and fair Treatment' in the Civil Service People Survey, ranking sixth out of over 100 organisations. • We have more to do to be ready to reach a higher level of Disability Confident status, and will continue the progress of this objective and its action points into the next year. • We are currently beginning work on reviewing job adverts and recruitment processes, but will not complete it before the time of this publication. Involving our relevant staff networks we will focus on the experience of disabled people in our recruitment process. We will build on the findings from our work on the accessibility of our internet and services to customers.
Remove barriers to joining and thriving in the workforce by encouraging flexible working	• 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.	• 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 are reviewing our guidance on processes for those returning to the workforce to provide the best experience we can, especially around parental leave. This will be something we will explore further in 2020.

Our 2019 objectives

Our 2019 objectives	Action points	Our progress
Identify and remove bias and unfairness from our pay system	• 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.	• In spring 2020 we became an accredited employer with the Living Wage Foundation. • In 2020 we are working with Chwarae Teg as part of their FairPlay programme to help us better understand our gender pay gap and our gender equality environment at the WRA. • We monitor and regularly review our gender pay gap as well as look for signs of other pay gaps.

Our objectives 2020 – 2024

Shared long term objective	Long term outcome	Intended outcome by 2024	Outcome measure	Steps that we will take to meet the intended outcome
Increase workforce diversity and inclusion	• Our organisations will reflect a fair and inclusive environment, where all people feel valued and can have equal opportunities to fulfil their potential within their organisation.	• By 2022, we will have aligned our own employment data reporting to match that of the Welsh Government in both format and reporting dates. • By 2024 we will have evidence of how we reach out to minority groups and those living in poverty to gain employment with us.	• Employment data. • Engagement profile data.	• Standardise data collection to enable benchmarking to ensure consistency of analysis and reporting of data. • Remove barriers and enhance recruitment and selection policies, procedures and practices through the lens of equality. • Ensure values and behaviours promote a fair, equal and inclusive environment throughout the organisation. • Develop shared initiatives to target unrepresented groups to increase employability, for example, work experience, mentoring opportunities, apprenticeship, academy, and internships.

Our objectives 2020 – 2024

Shared long term objective	Long term outcome	Intended outcome by 2024	Outcome measure	Steps that we will take to meet the intended outcome
Eliminate pay gaps	• Disclosure of information is part of organisational culture, staff understand why data is collected, ensuring that necessary data is only collated (GDPR).	• Accurate data across the public sector which provides analysis across protected characteristics.	• Employment profile data. • Pay gap methodology and analysis. • Professional development opportunities. • Uptake of different work patterns at different levels.	• Share and standardise systems for collating and analysing data across bodies, supporting staff to disclose information. • Agree a standard methodology for defining and collating pay gaps, interpreting/communicating. • Standard rounding methodology. • Share strategies for workforce planning. • Join together to create workforce development opportunities. • Joint management and leadership training (HR Group). • Share practice on work patterns and ways of working.

Our objectives 2020 – 2024

Shared long term objective	Long term outcome	Intended outcome by 2024	Outcome measure	Steps that we will take to meet the intended outcome
Engage with the community	• Diverse communities throughout Wales will be actively engaged in our organisations' work. Strategies, policies, and decisions will be co-produced with diverse individuals. People's experiences and views will shape our organisations.	• By 2024 we will be able to demonstrate and evidence co-production of our strategies, policies, service changes and decisions.	• Engagement profile data. • Documented evidence of engagement and participation. • Consultation and engagement protected characteristic data is produced/published, including supplementary evidence such as surveys, and case studies as appropriate.	• Offering shared events and engagement opportunities. • Engage directly with diverse communities to enable representation at shared events. • We will explicitly identify contributions from our engagement and co-production in our strategies, policies and decisions (you said – we did).
Ensure equality is embedded into the procurement /commissioning process and is managed throughout delivery	• Equality is embedded into procurement principles which are operational and evidenced.	• Principles are in place with updated organisational policies. • Procurement data will be in place and will evidence diversity of procurement.	• Publish agreed procurement principles and procurement data.	• Agree a set of procurement principles for organisations to commit to. • Revising organisational policies to reflect principles. • Work together to train and support staff to deliver the principles. • Share practice.

Our objectives 2020 – 2024

Shared long term objective	Long term outcome	Intended outcome by 2024	Outcome measure	Steps that we will take to meet the intended outcome
Ensure service delivery reflects individual need	• People and shared good practice actively influences delivery of services to meet individual needs.	• By 2024, we will be able to evidence operational systems and ways of working that ensure individual needs are understood and respected whilst accessing and receiving services. • By 2024 we will have collaborative systems in place for co-producing. • A framework for adopting and sharing good practice.	• We will monitor and report complaints, concerns and feedback from people using our services to identify areas for improvement. • Surveys. • Questionnaires. • Citizen Journeys. • Co-production evidence.	• Share learning and examples of positive changes to services, demonstrating dignity, respect and understanding of communication and access needs. • To have in place shared mechanism for co-production. • To have in place a framework for recording examples of and sharing and adopting good practice. • Offer collaborative awareness training around understanding service users.