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Archwilydd Cyffredinol Cymru Auditor General for Wales

Equality Report 2018-19



WALES AUDIT OFFICE SWYDDFA ARCHWILIO CYMRU



This report on compliance by the Auditor General for Wales and Wales Audit Office with the Equality Act 2010 General Duty covers the period 1 April 2018 to 31 March 2019. It has been prepared in accordance with the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

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This document is also available in Welsh.

Foreword

We are committed to providing a work environment that values the diversity of all people, both our own staff and those with whom we come into contact during our work. We fully support the rights of people to be treated with dignity and respect.

This report on our compliance with the General Duty of the Equality Act 2010, and on progress made towards delivering the equality objectives set out in our <u>Strategic Equality Plan</u>, covers the reporting period 1 April 2018 to 31 March 2019.

Overall, we consider that we were effective in the steps we took towards meeting most of our equality objectives.

We now have well-established external engagement arrangements which we used to invite views on topic areas for the Auditor General's future work programme and to consult on a more specific list of potential study proposals.

Alongside preparing for undertaking an audit examination or study that has a primary focus relevant to the General Equality Duty, we delivered several other examinations and studies which included equality considerations.

We updated our <u>Code of Audit Practice</u> to provide enhanced prescription on how auditors must give due regard to the General Equality Duty. Equality considerations are also now given higher prominence at key stages of our procurement processes.

We undertook a series of equality and human rights impact assessments of relevant policies and practices during the year. Those assessments did not identify any obvious potential for discrimination or other adverse impact but did recommend that we do more to proactively monitor related workforce statistics and provide evidence that policies are being applied fairly and consistently.

The notable exception to our success was the progress made towards our objective to take a strategic approach to addressing our structural gender pay differences, alongside pay differences in relation to other equality characteristics.

While no significant pay differences were identified within individual Wales Audit Office pay bands for any equality characteristic, our structural gender pay gap has widened and our analysis of employment information shows that we need to undertake further work to increase the diversity of our workforce in the medium to longer term, particularly at the more senior levels. We also need to explore why job applicants that share certain equality characteristics are notably less successful than others.

The Board will be reviewing its approach to addressing our structural pay differences and workforce diversity in September 2019 with a view to refining its strategic focus and setting specific targets for improvement.



Adrian Crompton Auditor General for Wales



Bill Richardson Equality Champion and Non-Executive Board Member, on behalf of the Wales Audit Office

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Programme of equality work

In 2018-19, we continued to develop our overall programme of work to help ensure that the Auditor General and Wales Audit Office can fully meet their equality duties and objectives. Overall, we consider that we were effective in the steps we took towards meeting most of our equality objectives.

Impact assessments

We undertook a series of equality and human rights impact assessments of relevant policies and practices during the year. Those assessments did not identify any obvious potential for discrimination or other adverse impact but recommended that we need to do more to proactively monitor related workforce statistics and provide evidence that policies are being applied fairly and consistently.

Workforce diversity and pay gaps

Analysis of our employment information by equality characteristics shows that our overall gender pay gap has widened and we need to undertake further work to increase the diversity of our workforce in the medium to longer term, particularly at the more senior levels. We also need to explore why job applicants that share certain equality characteristics are less successful than others.

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In 2018-19, we continued to develop our programme of work to ensure that the Auditor General and Wales Audit Office can fully meet their equality duties and objectives. Overall, we consider that we were effective in the steps we took towards meeting most of our equality objectives

We are committed to providing a work environment that values the diversity of all people, both our own staff and those with whom we come into contact during our work, and we fully support the rights of people to be treated with dignity and respect.

The Auditor General and Wales Audit Office are required to follow the framework of protection against discrimination, harassment and victimisation and the public sector equality duties brought in by the Equality Act 2010 and related legislation. We also have a responsibility to uphold the rights set out in the Human Rights Act 1998.

The Auditor General and the Wales Audit Office have jointly prepared a <u>Strategic Equality Plan</u> for the period 2018 to 2022, which sets out nine specific objectives to help them better perform their equality duties.

During 2018-19, an Equality Steering Group:

- a Ensured that the necessary arrangements and programme of work were in place to meet the Auditor General's and Wales Audit Office's equality and human rights duties and strategic equality objectives; and
- b Helped ensure those arrangements and programme of work were fully implemented and delivering the required outcomes.

We have also established an Equality Interest Group (recently renamed Pawb) to ensure effective engagement with employees representing the interests of protected groups, when designing and implementing the programme of equality and human rights work, and when undertaking impact assessments.

In 2018-19, we continued to develop a programme of work to ensure the Auditor General and Wales Audit Office could fully meet their equality and human rights duties and objectives. Overall, we consider that we were effective in the steps we took towards meeting most of our equality objectives, apart from Objective 5 (which relates to addressing our structural gender pay differences, alongside structural pay differences in relation to other equality characteristics). Exhibit 1 provides more detail on the effectiveness of steps taken and progress made towards meeting our equality objectives.

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In December 2018, as part of its commitment to streamline the Wales Audit Office committee structure and improve the clarity of roles, responsibilities and accountabilities, Management Committee approved a proposal to disband the Equality Steering Group from 1 April 2019.

Instead, the Committee agreed to directly receive quarterly monitoring reports on progress made towards meeting the commitments set out in our Strategic Equality Plan.

Exhibit 1: equality objectives

Summary of the effectiveness of steps taken and progress made towards meeting our equality objectives in 2018-19.

We will engage with people that represent the interests of protected groups when considering:

- a. what programmes of value for money examinations and studies we will undertake; and
- b. the approach to be adopted in value for money examinations and studies that are relevant to the General Equality Duty.

Assessment: Effective

We have well-established external engagement arrangements via the Equalities and Human Rights Coalition – a network of over 100 third sector organisations working in the equalities and human rights field in Wales. The Coalition is facilitated by the Wales Council for Voluntary Action.

From May to July 2018, the Auditor General undertook a public consultation inviting views on topic areas for his future work programme. In late November 2018 through to January 2019, we then ran a further <u>Consultation on a more specific list of potential future study proposals</u>.

We provided details of both consultations to members of the Coalition and have arranged to attend a Coalition meeting in early 2019-20 to discuss the finalised programme and some of the emerging priority topics for future years.

During the period, Wales Audit Office staff met on two separate occasions with staff of the Equality and Human Rights Commission (EHRC) in Wales to discuss our work and EHRC Wales was included in our consultation exercises.

Through our end-of-year annual quality review arrangements, we examined the working records of the development of our programme of value for money work and of relevant projects and were satisfied that (a) appropriate efforts had been made to obtain the views of representatives and (b) adequate regard had been given to such views in the development of the programme and in the approaches adopted in each project.

Assessment: Effective

In April 2018, we held a meeting with the Director of EHRC in Wales, to discuss where there appears to be greatest scope for the Auditor General's value for money work to help Wales meet its seven key equality challenges.

Through subsequent discussions with EHRC and our ongoing engagement with the Coalition, we have identified several topics that have a potentially relevant focus and will be identifying at least one as a priority as we confirm our plans for 2020-21 and 2021-22. As part of this process, in September 2019 we will be hosting a shared learning seminar entitled Making an Equal Wales a Reality which will enable us to gather further perspectives and inform the scoping of our study.

Alongside preparing for undertaking at least one examination or study that has a primary focus relevant to the General Equality Duty, we delivered several other examinations and studies during 2018-19 which included equality considerations.

Early in 2018-19, we published two reports on issues that were of particular relevance to the interests of protected groups; reports on <u>Overcoming Language and Communication</u> <u>Barriers in Public Services</u> and on <u>Strategic Commissioning of</u> <u>Accommodation Services for People with Learning Disabilities</u>. In both cases, study teams had engaged with organisations representing the interests of protected groups throughout the work. We also published in October 2018 our report on <u>Outpatient Follow-up Services</u>. Our work has highlighted a range of issues, including in ophthalmology services about the risk of sight loss. During that work, and since publication, we have engaged with RNIB Cymru about this issue.

During 2018-19, we also progressed a study on the wellbeing of young people, engaging with a range of third-sector organisations involved in the issues we have been considering, which have included mental health, homelessness, young carers, young parents and skills/employability. Flowing from that study, we worked with our <u>Inspection Wales</u> partners and the Children's Commissioner's office to run two shared learning seminars on <u>Involving Young People in Decision-making</u> in March 2019.

We will undertake at least one value for money examination or study that has a primary focus relevant to the General Equality Duty during the fouryear period covered by the Plan.

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We will revise the Auditor General's Code of Audit Practice to ensure the prescription in the Code enables us to better perform the General Equality Duty when undertaking our audit work.

Assessment: Effective

A revised <u>Code of Audit Practice</u> was published on 1 May 2018. Paragraph 26 of the revised Code provides enhanced prescription on how, when exercising the Auditor General's functions, auditors must also perform the General Equality Duty.

Through our end-of-year annual quality review arrangements, we examined samples of audits and checked the extent to which auditors had complied with the Code.

Work is currently underway to update our supporting guidance for auditors to provide more information on how operational staff should record equality issues during audit work.

In addition, our 'project initiation' document template now requires value for money examination and study teams to identify where a particular audit might support the Auditor General in discharging his commitments and responsibilities in relation to equality.

Alongside our core studies and other audit work, we continue to use our <u>good practice</u> programme to support consideration of issues relevant to equality in Wales. We will implement a People Strategy that, among other things, gives due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations, drawing on our workforce information in respect of the protected characteristics.

Assessment: Effective

Our <u>People Strategy</u> was launched in April 2018 and updated in July 2019. It is supported by a Delivery Plan setting out actions to deliver the three priorities identified in the plan. One of those priorities is to increase the diversity of our workforce, particularly at the more senior levels.

Related actions completed during the past year have included:

- launching a revised and updated Equality and Diversity Policy which covers both employer (Wales Audit Office) and service provider (Auditor General) aspects and places emphasis on the importance of questioning and raising awareness of where unconscious bias might influence our decisions;
- changing our recruitment processes to more proactively encourage applications from under-represented groups, including through working proactively with third-sector organisations and offering a guaranteed interview scheme;
- signing up to the <u>Leonard Cheshire Change 100</u> and <u>Chwarae Teg FairPlay Employer</u> initiatives; our first Change 100 internship will be in the summer of 2019;
- running a gender-neutral language training session, hosted by Stonewall Cymru, for HR staff and Equality Champions; and
- maintaining our place in the top 150 of the Stonewall Workforce Equality Index with a ranking at 131 out of 445 organisations.

Assessment: Limited effectiveness

We carried out a range of activities during the year designed to help reduce our gender and other structural pay differences, including revising our recruitment and assessment approaches and use of language in our job adverts, and advertising all management band and senior leadership team vacancies on an external basis, as well as internally.

However, as of 31 March 2019, our overall gender pay gap had widened to 21.6%. The distribution of women and men across pay bands remains the immediate explanation for this gap (see Appendix 2 for further information).

In part, our gender pay gap is influenced by the significant success we have had in recent years in attracting female candidates to join our rolling and expanding programme of graduate trainee recruitment. Over the same period, we have also worked hard to respond to cost pressures and reduce our audit fees in real terms, including through reducing the number of senior positions in the organisation, which in turn has reduced the number of opportunities for female staff to progress to higher pay bands.

Relative to the broader Welsh population, we also underperform in respect of BAME (Black, Asian, Minority Ethnic) representation throughout the organisation.

The Board will be reviewing its approach to addressing our structural pay differences and workforce diversity in September 2019 with a view to refining its strategic focus and setting specific targets for improvement.

We will take a strategic approach to addressing our structural gender pay differences, alongside structural pay differences in relation to other protected and related characteristics. When procuring externally sourced services, we will:

- a. include requirements relevant to performance of the General Equality Duty in our tender award criteria; and
- b. comply with the General Equality Duty when stipulating the performance standards to be included in the contract agreement.

Assessment: Effective

In 2018-19, we updated our invitation to tender template document and developed an equality procurement checklist for tender evaluation, in order that equality considerations are given higher prominence at key stages of the procurement process.

For relevant procurements, we have also started to include questions in invitations to tender that ask how operators propose to help us perform the Duty and have incorporated successful bidders' proposals in contract specifications.

Throughout the year, we have frequently utilised government framework agreements where appropriate and where these thoroughly meet the Duty.

We are in the process of developing a procurement strategy to cover all aspects of our responsibilities under the General Equality Duty. We will foster good relations between Wales Audit Office staff sharing relevant protected characteristics and those that do not by providing senior and other staff equality 'champions' and supporting the work of relevant staff networks.

Assessment: Effective

In 2018-19 we issued an Equality Champions and Allies Charter which has been published on our intranet. Equality Interest Group (EIG) members and members of the Board and Executive Leadership Team are equality champions.

The EIG Chair proactively attended team meetings across the organisation in 2018-19 to raise awareness of who the Equality Champions are, provide updates on key equality and diversity matters and engage staff in understanding its importance to delivering our overall ambitions.

The Chairs of our LGBT+ and Women's networks sit on the EIG and are supported by the group.

Lunch and learn seminars have continued to be held across a range of topic areas throughout the year, led by our Equality Champions.

In October 2018 we undertook a staff survey using the same core questionnaire as used in the Civil Service People Survey (CSPS). It was reassuring to note that for questions related to equality, responses from our staff were more typical of a CSPS 'high performing' organisation:

- 87% of staff feel treated with respect by the people they work with;
- 82% of staff feel that the organisation respects individual differences (eg cultures, working styles, backgrounds, ideas, etc);
- 81% of staff feel the organisation is committed to creating a diverse and inclusive workplace; and
- 72% of staff agree there is real commitment at the Wales Audit Office to continuing to improve performance on equality and diversity.

Assessment: Highly effective

In 2018-19, we maintained accessibility accreditation for our website and validation of meeting international Web Content Accessibility Guidelines success criteria, including through testing by individuals with a range of physical and learning disabilities.

We also continued to install additional software on our website which provides further options for improving accessibility, including through enlarging selected text and reading it aloud, blocking on-screen distractions, and converting selected text into MP3 format.

Guidance is available to all staff on the preparation of accessible publications.

We are also currently replacing our corporate palette to ensure we are colour contrast compliant and are considering the extent to which we proactively prepare easy-read versions of our published documents, rather than on request.

We will provide information about our work, including via our website, in a way that is accessible and avoids putting people who have impairments at a substantial disadvantage.

Assessment: Effective

As outlined previously for Objectives 1 and 2, from May to July 2018, the Auditor General undertook a public consultation inviting views on topic areas for his future work programme. In late November 2018 through to January 2019, we then ran a further consultation on a more specific list of potential future study proposals.

We have also arranged to attend an Equality and Human Rights Coalition meeting in early 2019-20 to discuss the finalised programme and some of the emerging priority topics for future years.

In April 2018, we held a meeting with the Director of the EHRC in Wales to discuss where there appears to be greatest scope for the Auditor General's value for money work to help Wales meet its seven key equality challenges.

Our planned shared learning seminar entitled Making an Equal Wales a Reality provides a further opportunity for gathering external feedback on how our work has contributed or could contribute to performing the General Equality Duty.

With regards to individual pieces of work, we have received a number of examples of positive feedback on the impact of our Speak my language report, including from Conwy Council which held a deaf awareness day in May 2018 to promote a new digital interpretation service and to launch a new deaf awareness staff e-learning module, drawing on the results of our work.

We are currently establishing arrangements through our postproject learning process for more proactively seeking the views of representatives of protected groups on how individual pieces of work that have already been undertaken and that were relevant to the General Equality Duty have addressed the needs of protected groups and to help us identify where we could do more.

We will improve the extent and quality of information such as external feedback that we gather regarding how our work has contributed or could contribute to performing the General Equality Duty.

Impact assessments

We undertook a series of equality and human rights impact assessments of relevant policies and practices during the year. Those assessments did not identify any obvious potential for discrimination or other adverse impact but recommended that we need to do more to proactively monitor related workforce statistics and provide evidence that policies are being applied fairly and consistently.

The Auditor General and the Wales Audit Office must¹:

- a assess the likely impact of relevant policies and practices (current, revised or new) on their ability to comply with the General Equality Duty;
- b publish reports of those assessments where they show a substantial impact (or likely impact) on their ability to meet the General Equality Duty; and
- c monitor the impact of particularly relevant policies and practices on their ability to meet the General Equality Duty.

They also have a responsibility to uphold the rights set out in the Human Rights Act 1998.

Impact assessments, which also include Welsh language considerations, are undertaken by our Law and Ethics Team to ensure consistency and a strong base of technical expertise. Following preparation of each draft assessment report, the report and the draft policy or practice to which it relates are provided to our Equality Interest Group for review, to seek further perspectives and comply with the engagement provisions.

A list of the full impact assessments completed between 1 April 2018 and 31 March 2019 and the key outcomes from those assessments is provided in Appendix 1.

A key theme arising from the assessments in 2018-19 was that the Wales Audit Office should be more consistent in its monitoring of workforce statistics that relate to relevant policies and practices, to identify any trends, significant disparities or signs of disproportionate impact on particular groups and provide evidence that the policies are being applied fairly and consistently. Another common theme that was identified through the assessments was that, when drafting policies and practices relevant to specific protected characteristics, it would be beneficial for authors to be more proactive in seeking the views of employees likely to be directly affected by the policy, for example via our staff women's and LGBT+ networks, to complement the views and perspectives of the Equality Interest Group.

The following policies and practices (or revisions to those policies and practices) were screened during 2017-18 for relevance² but were not subsequently subject to a full impact assessment:

- a Trade Union Time Policy
- b Procedure for National Security and Safeguarding Checks³
- c Electric Vehicle Chargepoint Usage Procedure
- d Guidance on Accessing Sensitive or Personal Internet-based Material
- e Real Time Recording Guidance

- 2 To assess whether either the policy (where no impact assessment had previously been undertaken) or the revisions made (where the policy had already been impact assessed) were likely to have a significant effect on the Auditor General's or Wales Audit Office's ability to perform the General Equality Duty.
- 3 The Procedure for National Security and Safeguarding Checks and the Guidance on Accessing Sensitive or Personal Internet-based Material were prepared in alignment with UK Government policy, so full impact assessments were deemed unnecessary.

Workforce diversity and equal pay

Analysis of our employment information by equality characteristics shows that our overall gender pay gap has widened and we need to undertake further work to increase the diversity of our workforce in the medium to longer term, particularly at the more senior levels. We also need to explore why job applicants that share certain equality characteristics are notably less successful than others.

Our employment information analysed by equality characteristics for 2018-19 is provided in Appendix 2 of this report. To perform our equality duties effectively in terms of pay and conditions, the scope of our pay gap analysis also covers the broad range of equality characteristics considered by our diversity monitoring questionnaire.

The main issues identified from the analysis of our employment information are described in the following sections of narrative. In terms of overall pay gaps, the position is summarised in Exhibit 2, with benchmarking provided in Exhibit 3. In Exhibit 4, we have also summarised our data on the proportion of job applicants that share certain equality characteristics that were invited to interview and that were successfully appointed over the last three years.

The Wales Audit Office applies rigorous pay alignment arrangements to ensure jobs of equal worth are pay-aligned. Subject to satisfactory performance, all employees will progress to the top pay point of their pay band⁴ within a fixed period⁵. No significant pay differences were identified within individual Wales Audit Office pay bands for any equality characteristic in our analysis of employment information.

Gender identity

As of 31 March 2019, 58% of Wales Audit Office employees that completed our diversity monitoring form identified themselves as female. Over the last three years, 51% of job applicants that completed our diversity monitoring form identified themselves as female and achieved a higher success rate at interview than applicants that identified themselves as male.

However, as of 31 March 2019, we had an overall negative gender pay gap of 21.6%. This represents a widening of the pay gap compared to the relatively steady position over the last three years (17.4% in 2018 – see Exhibit 2); the mean basic full-time equivalent annual salary of those staff who identified themselves as female is now over £10,000 less than that of staff who identified themselves as male.

- 4 The Wales Audit Office pay scale comprises 10 main pay bands bands 1 to 7 and bands A to C, alongside pay bands for trainees and work placements. Bands 6 and 7 are management pay bands and bands A to C are senior leadership team pay bands.
- 5 Two years for work placements, three years for band 1, four years for trainees and bands 2 to 7, five years for band C and six years for bands B and A.

The distribution of women and men across pay bands is the immediate explanation for this gap; 76% of female staff are employed in pay bands below band 5 compared to a figure of 56% for male staff. The effect of this distribution is illustrated in the salary quartiles chart provided in Appendix 2. Benchmarking of our mean gender and ethnicity pay gaps against comparator organisations is provided in Exhibit 3⁶.

Alongside the impact of in-year turnover and departures through a voluntary exit scheme, another factor that may have contributed to the widening of the gender pay gap this year is the increase in response rates to our diversity monitoring questionnaire; our response rate to the gender identity question in 2019 was 92%, compared to 86% in 2018.

It should be noted that, in part, our gender pay gap is influenced by the significant success we have had in recent years in attracting female candidates to join our rolling and expanding programme of graduate trainee recruitment (over two-thirds of our current group of graduate trainees identify themselves as female).

Over the same period, we have also worked hard to respond to cost pressures and reduce our audit fees in real terms, including through reducing the number of senior positions in the organisation. On the few occasions when vacancies have arisen in senior positions, we have looked to redistribute the work across the organisation rather than recruit, which in turn has reduced the number of opportunities for female staff to progress to higher pay bands.

The median pay gap we calculated is similar at 21.2%. By contrast, the gender pay gap for median earnings of full-time employees in the wider UK population in 2018 was 8.6%⁷; a gap which rose to 17.9% when part-time employees were included.

In our diversity monitoring questionnaire and in accordance with guidance from the equality charity Stonewall, we also include the question 'Do you identify as trans?' However, no figures can be provided in this Report in respect of responses to this question without risking unfair processing of personal information through deduction.

⁶ Further benchmarking data is available via the UK Government's <u>Gender Pay Gap Service</u> website.

⁷ Source: Office for National Statistics, <u>Annual Survey of Hours and Earnings 2018</u>

Ethnicity and national identity

2.9% of employees identified themselves as being from a BAME background, with a further 3.8% choosing the option 'prefer not to say'. This is similar to published figures for the Welsh Government⁸ (2%), but lower than the proportion of the Welsh population from a BAME background, which is currently around 4.8%. It is also lower than equivalent figures for the populations of South East Wales (6.2%) and Mid and West Wales (4.3%), where two of our three main offices are located⁹, but slightly higher than the equivalent figure for North Wales (2.5%), where our third main office is located¹⁰.

The corresponding figures for job applicants over the last three years were more encouraging at 13.0% and 2.3% respectively. However, while the smaller sample size should be acknowledged, it is nonetheless noteworthy that a significantly lower proportion of job applicants who identified themselves as BAME were invited to interview (13.9%) and successfully appointed (2.2%) when compared to applicants who identified themselves as White (27.2% and 8.3%).

A similar picture is seen for job applicants who described their national identity as 'Other' as opposed to 'British' or 'Welsh' (13.3% and 2.9%), although it should be noted that nearly 30% of job applicants who described their national identity as 'Other' had their applications rejected due to visa restrictions.

Our overall negative pay gap for staff who identify themselves as being from a BAME background is now 29.4%; as of 31 March 2019, the mean basic salary of those staff who identify themselves as BAME was £13,000 less than that of staff who identify themselves as being from a white background. By comparison, the mean basic salary ethnicity pay gaps reported by the accountancy firms PwC, Deloitte, KPMG and EY in their most recent UK pay gap reports were between 12.9% and 14.4%, but the National Assembly Commission reported pay gaps in the region of £12,000 for most BAME ethnic categories (see Exhibit 3).

Again, the distribution of staff across pay bands is the immediate explanation for our gap; no Wales Audit Office staff who identify themselves as being from a non-white background are employed in pay bands 5 and above.

While acknowledging that, due to the small numbers involved in BAME categories, the data is sensitive to even small changes in these cohorts, we consider that the extent of this pay gap is a cause for concern as it is relatively high compared to pay gaps for different ethnic groups in the UK identified by the Equality and Human Rights Commission¹¹.

- 8 Source: Welsh Government Annual Employer Equality Report 2017-18
- 9 Source: Office for National Statistics; <u>Annual Population Survey Year ending 31 Dec 2018</u>
- 10 Our main offices are in Cardiff, Swansea and Abergele.
- 11 Source: Equality and Human Rights Commission <u>Research Report 108: The Ethnicity Pay</u> <u>Gap</u>

Sexual orientation

For those employees that completed our diversity monitoring form, 5.0% identified their sexual orientation as gay/lesbian or bisexual or said that they prefer to use a different term, with a further 5.0% choosing the option 'prefer not to say'. The corresponding figures for job applicants over the last three years were 5.4% and 3.5% respectively.

The figures both for employees and applicants are higher than those in published statistics for the Civil Service¹² (4.0%) and in estimates for the wider population; in 2017, an estimated 2.6% of the UK population aged 16 and over identified themselves as lesbian, gay, bisexual or did not consider themselves to fit into the heterosexual or straight, bisexual, gay or lesbian categories¹³.

While the smaller sample size should be acknowledged, it is noteworthy that a significantly lower proportion of job applicants who identified themselves as lesbian/gay, bisexual or said that they prefer to use a different term were invited to interview (18.2%) when compared to applicants who identified themselves as heterosexual/straight (25.6%).

Disability

8.3% of employees that completed our diversity form consider themselves to have a disability or impairment, with a further 3.3% choosing the option 'prefer not to say'. The corresponding figures for job applicants over the last three years were 4.4% and 2.9% respectively.

The figure for employees that consider themselves to have a disability or impairment is similar to the corresponding published statistic for the Civil Service¹⁴ (8.6%), but lower than estimates for the wider UK population; in 2017/18, 18% of the working age population of the UK were estimated as having a disability¹⁵.

While the smaller sample size should be considered, it is also noteworthy that a significantly lower proportion of job applicants who identified themselves as having a disability or impairment were invited to interview (15.2%) and successfully appointed (4.3%) when compared to applicants who did not consider themselves to have a disability or impairment (26.0% and 7.7%).

As part of our efforts to encourage more applications from people with impairments, we have signed up to the Disability Confident scheme and have secured Level 2 'employer' status, thereby gaining permission from Jobcentre Plus to use the Disability Confident badge in our job adverts.

¹² Source: Office for National Statistics <u>Civil Service Statistics 2018</u>

¹³ Source: Office for National Statistics Sexual orientation, UK: 2017

¹⁴ Source: Office for National Statistics.

¹⁵ Source: Department for Work and Pensions Family Resources Survey 2017-18

Religion

There is a strong correlation between the ethnicity pay gap and the negative pay gap of 9.1% identified through the analysis for staff who identified with a religion or belief other than Christian. Nearly three-quarters of staff who identified themselves as BAME also identified themselves with a religion or belief other than Christian.

Similarly, while the smaller sample size should be acknowledged, it is noteworthy that a significantly lower proportion of job applicants who identified with a religion or belief other than Christian were invited to interview (16.0%) and successfully appointed (3.2%) when compared to applicants who identified themselves as Christian (25.2% and 7.7%) or as having no religion or belief (28.2% and (8.5%).

Age

We have an overall negative pay gap for younger staff of 47.5%; the mean basic annual salary of those staff aged less than 35 years is around £24,000 less than that of staff aged 35 to 54 years, which represents a slight narrowing of the gap from the previous year. The distribution of younger staff across pay bands is the immediate explanation for this gap; only 2.7% of Wales Audit Office staff aged less than 35 years are employed in pay bands 5 and above.

Clearly, a pay gap in respect of age is to be expected due to skills and experience increasing with age. This is particularly the case in a professional service organisation that requires a substantial proportion of its workforce to be educated to postgraduate professional level and to have judgement skills honed by significant professional experience. And it should be noted that our figure is influenced by our significant expansion in recent years of our programme of graduate trainee recruitment, coupled with the cost saving measures we have taken including reducing the number of senior positions in the organisation and opportunities for younger staff to progress to higher pay bands.

However, as outlined in our last four equality reports, we consider that the extent of this pay gap is perhaps more marked than is to be expected and worthy of further consideration.

The related statistics for job applicants and for staff who recently applied to change position are more encouraging. Over the last three years, two-thirds of all job applicants were aged less than 35 years, and nearly two-thirds of staff aged less than 35 years that applied to change position were successful, significantly higher than the overall success rate for all staff who applied to change position (41%).

Carers

While not one of the protected characteristics, we consider that taking account of caring responsibilities is a relevant factor in performing our equality duties, as it has strong associations with the protected characteristics of disability, age, and pregnancy and maternity. We have therefore collected and analysed information in relation to carers.

In 2018-19, 28.0% of employees who completed our diversity questionnaire identified themselves as carers. The equivalent figure for job applicants over the last three years was 4.4%.

Published statistics suggest that around 7% of people in the UK provide informal care¹⁶, which indicates that we have a significantly higher proportion of carers in our workforce than the wider UK population, but a lower proportion amongst job applicants.

Furthermore, while the smaller sample size should be acknowledged, it is noteworthy that a significantly lower proportion of job applicants who identified themselves as having caring responsibilities were invited to interview (15.6%) and successfully appointed (0.0%) when compared to applicants who did not identify themselves as carers (25.7% and 7.9%).

The distribution of younger staff across pay bands is likely to be a key contributor to the large positive pay gap (25.3%) for staff who identified themselves as carers, with only 5% of those staff being aged under 35 years. Similarly, the lower proportion of carers among job applicants is perhaps to be expected since two-thirds of those applicants were aged under 35 years.

Marriage and civil partnership

The distribution of younger staff across pay bands is also likely to be a key contributor to the large positive pay gap (39.0%) for staff who identified themselves as being married or in a civil partnership. Just 10% of staff who identified themselves as being married or in a civil partnership were aged under 35 years.

Exhibit 2: pay gap trends

Line graph showing Wales Audit Office pay gaps¹⁷ for certain protected characteristics as of 31 March each year for the last four years.



17 The difference between the mean basic full-time equivalent salary of employees that share the characteristic A and that of employees that share the characteristic B, expressed as a percentage of the mean basic full-time equivalent salary of employees that share the characteristic B.

Exhibit 3: pay gap benchmarking

Benchmarking of our gender and ethnicity pay gaps as of 31 March 2019 against equivalent latest published data from selected organisations.

Organisation	Gender pay gap	Ethnicity pay gap
Wales Audit Office	-21.6%	-29.4%
National Assembly for Wales Commission ¹⁸	+6.6%	Not available ¹⁹
Welsh Government ²⁰	-8.0%	Not available
UK Civil Service ²¹	-9.8%	Not available
Audit Scotland ²²	-9.9%	Not available
National Audit Office ²³	-9.9%	Not available
PwC UK ²⁴	-12.2%	-13.5%
Deloitte UK ²⁵	-18.1%	-12.9%
Bank of England ²⁶	-18.1%	-10.5%
EY UK ²⁷	-18.6%	-14.1%
KPMG UK ²⁸	-21.7%	-14.4%

18 Source: Assembly Commission Diversity and Inclusion: Annual Report 2017-2018

- 19 While the Assembly Commission does not currently publish an overall ethnicity pay gap, it does publish mean basic FTE salary data by ethnic categories. The published data for 2017- 18 showed pay gaps in the region of £12,000 for most BAME categories.
- 20 Source: Welsh Government Annual Employer Equality Report 2017-18
- 21 Source: Office for National Statistics Civil Service Statistics 2018
- 22 Source: Audit Scotland Gender Pay Gap Report 2018
- 23 Source: National Audit Office Gender Pay Gap Report 2018
- 24 Source: PwC UK Diversity Pay Report 2018
- 25 Source: Deloitte UK 2018 Gender Pay Report and 2019 Ethnicity Pay Report
- 26 Source: Bank of England Annual Report and Accounts 2018-2019
- 27 Source: EY UK Pay Gap Report 2018
- 28 Source: KPMG UK Pay Gap Report 2018

Exhibit 4: proportion of job applicants that were invited to interview and were successful

Bar chart showing, for the last three years, the proportion of job applicants that share certain equality characteristics that were invited to interview or assessment centre and that were successfully appointed.



Proportion of applicants invited to interview or assessment centre

Proportion of applicants who were successfully appointed

Appendix 1

Impact assessments completed between 1 April 2018 and 31 March 2019 and the key outcomes from those assessments



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DISCIPLINARY POLICY

The impact assessment process did not identify obvious potential for discrimination or other adverse impact within the draft policy. However, several recommendations were made in terms of the policy's implementation, including that:

- the Wales Audit Office should monitor the workforce statistics that we have on disciplinary procedures and staff affected by disciplinary action, to see if there are significant disparities or evidence of disproportionate impact on particular groups;
- if disparities are found, we should investigate the possible causes in each case and take steps to remove any barriers;
- the HR team should keep records that evidence that the disciplinary policy is being applied fairly and consistently in practice; and
- the HR team should provide additional support and guidance to managers and staff on the processes of the disciplinary policy.

GENDER IDENTITY POLICY

It was recommended that, before finalising the policy, it would be beneficial to seek the views of the Wales Audit Office LGBT+ staff network group, Spectrum, for further consideration.

WALES AUDIT OFFICE BOARD CODE OF CONDUCT

The impact assessment recommended that the draft Code of Conduct be amended to include provision that the Auditor General or Board Chair will take into consideration Article 10 of the European Convention on Human Rights, which provides the right to freedom of expression, when receiving a request from a Board member wishing to engage in political activity.



network and/or using internal social media.

Several recommendations for amendments to the draft

MENOPAUSE GUIDANCE



No issues were reported in the equality impact assessment of the draft policy which covers both the service provider (Auditor General) and employer (Wales Audit Office) aspects of our operations.

It was, however, noted that revisions had already been made to the draft policy in response to early engagement with the Equality Interest Group, trade union representatives and staff network groups, to ensure that greater emphasis is placed on the importance of questioning and raising awareness of where unconscious bias might be influencing decisions.



It was recommended that, within the principles section of the draft policy, greater emphasis should be placed on considering making adjustments for fluctuating 'hidden disabilities' and for needs relating to other characteristics, including those of carers.

It was also recommended that, before finalising the Policy, the views of staff in operational roles who have already requested reasonable adjustments should be sought, to collect their views on whether the adjustments in operation are effective, and if not whether any related amendments should be made to the Policy.

Appendix 2

Our employment information for the year analysed by equality characteristics

We launched our current diversity monitoring question and category framework and e-recruitment system in November 2014. Consequently, 2018-19 represents the fourth full-year of employment information gathered using the framework.

Our workforce diversity and pay gap analysis covers the full range of equality characteristics included in our questionnaire. Where members of staff had not provided a response to individual questions on the questionnaire, these instances are classified as 'No data' in the tables.

In addition, while the Wales Audit Office is not listed as a relevant employer for the purposes of The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017, we have nonetheless reported our pay gaps using a similar format to that required by the Regulations, including through providing information on the proportion of employees by quartile pay bands for each protected and related characteristic covered by the analysis.

We also report on the following for the three-year period 1 April 2016 to 31 March 2019, to enable an increased sample size and the provision of a more meaningful analysis:

- the number of persons who applied for a job at the Wales Audit Office;
- · the number of staff who applied to change position; and
- the number of staff who left the organisation.

To prevent unfair processing of personal information through deduction:

- the figures in the tables for numbers of persons have been rounded to the nearest ten, and where the number is fewer than five (except where zero), the number is indicated by an asterisk '*';
- in the supporting pie charts, which show the relative proportions of employees and job applicants by category, figures are rounded to the nearest ten; and
- the figures in the tables for the following are indicated by an asterisk, where the underlying number of persons is fewer than five (except where zero):
 - proportion of job applicants that were invited to interview or assessment centre;
 - the proportion of job applicants that were successful; and
 - the proportion of staff who applied to change position and were successful.

No figures can be provided in respect of gender reassignment, or for grievance or disciplinary proceedings in respect of all equality characteristics, without risking unfair processing of personal information through deduction. Pregnancy, maternity and adoption information held by the Wales Audit Office is confined to records of maternity and adoption leave.

The Wales Audit Office does not currently gather employment information on the number of staff who have applied for, are successful or unsuccessful in their application for, and who have completed training, in a way that facilitates analysis by equality characteristic.

Gender

Question: Which term best describes your gender? ²⁹	Female	Male	l prefer to use my own term	Prefer not to say	No data	
Number of persons employed as of 31 March 2019	140	100	0	*	20	
Full-time	100	90	0	*	10	
Part-time (term time)	*	0	0	0	*	
Part time (other)	40	10	0	0	10	
Number of persons who applied for a job at the Wales Audit Office over the last three years (excluding current staff)	530	500	*	10	20	
Proportion invited to interview or assessment centre (27% for all applicants)	25%	26%	0%	17%	43%	
Proportion who were successful (8% for all applicants)	9%	6%	_	0%	10%	
Number of staff who applied to change position within the Wales Audit Office over the last three years	80	60	0	*	20	
Proportion who were successful (41% for all staff who applied)	43%	44%	_	50%	24%	
Number of staff who left the organisation over the last three years	30	40	0	*	10	
Employees Job applicants Female Male Prefer not to say						

29 Response rate 92% for employees and 98% for job applicants.

Question: Which term best describes your		
gender?	Female	Male
Proportion of staff that share the named characteristic that are employed in bands 1 to 4 and work placement and trainee bands as of 31 March 2019 ³⁰	76%	55%
Proportion of staff that share the named characteristic that are employed in bands 5 and above as of 31 March 2019	24%	45%
Mean basic full-time equivalent salary as of 31 March 2019	£39,243	£50,048
Mean pay gap	-21.6%	_
Median basic full-time equivalent salary as of 31 March 2019	£36,438	£46,238
Median pay gap	-21.2%	_



Proportion of employees by quartile pay bands

30 66% of all staff were employed in bands 1 to 4 and work placement and trainee bands as of 31 March 2019.

Age

Question: What is your age? ³¹	Less than 35 years	35 to 54 years	55 years or over	Prefer not to say	No data
Number of persons employed as of 31 March 2019	70	150	40	_	_
Number of persons who applied for a job at the Wales Audit Office over the last three years (excluding current staff)	700	280	40	20	30
Proportion invited to interview or assessment centre (27% for all applicants)	26%	23%	25%	20%	36%
Proportion who were successful (8% for all applicants)	8%	5%	8%	0%	8%
Number of staff who applied to change position within the Wales Audit Office over the last three years	50	100	20	_	_
Proportion who were successful (41% for all staff who applied)	65%	35%	7%	_	_
Number of staff who left the organisation over the last three years	30	20	20	_	-



31 Our age data is sourced separately within our HR system, other than for job applications, where the source is the diversity monitoring section of the application form (response rate 98%).

Question: What is your age?	Less than 35 years	35 to 54 years	55 years or over
Proportion of staff that share the named characteristic that are employed in bands 1 to 4 and technician and trainee bands as of 31 March 2019	97%	53%	56%
Proportion of staff that share the named characteristic that are employed in bands 5 and above as of 31 March 2019	3%	47%	44%
Mean basic full-time equivalent salary as of 31 March 2019	£26,759	£50,954	£49,174
Mean pay gap	-47.5%	_	-3.5%
Median basic full-time equivalent salary as of 31 March 2019	£22,331	£46,238	£46,238
Median pay gap	-51.7%	_	0.0%

Proportion of employees by quartile pay bands



Sexual orientation

Question: What is your sexual orientation? ³²	Heterosexual / straight	Lesbian / Gay / Bisexual / Other ³³	Prefer not to say	No data
Number of persons employed as of 31 March 2019	220	10	10	20
Number of persons who applied for a job at the Wales Audit Office over the last three years (excluding current staff)	940	60	40	40
Proportion invited to interview or assessment centre (27% for all applicants)	26%	18%	25%	40%
Proportion who were successful (8% for all applicants)	7%	7%	6%	11%
Number of staff who applied to change position within the Wales Audit Office over the last three years	130	10	10	20
Proportion who were successful (41% for all staff who applied)	42%	56%	63%	24%
Number of staff who left the organisation over the last three years	60	*	*	10



32 Response rate 91% for employees and 97% for job applicants.33 Sum of those that selected the categories 'Bisexual', 'Gay/lesbian', and 'I prefer to use a different term'.

35

Question: What is your sexual orientation?	Heterosexual / straight	Lesbian / Gay / Bisexual / Other
Proportion of staff that share the named characteristic that are employed in bands 1 to 4 and technician and trainee bands as of 31 March 2019	68%	67%
Proportion of staff that share the named characteristic that are employed in bands 5 and above as of 31 March 2019	32%	33%
Mean basic full-time equivalent salary as of 31 March 2019	£43,691	£41,337
Mean pay gap	_	-5.4%
Median basic full-time equivalent salary as of 31 March 2019	£40,071	£36,516
Median pay gap	_	-8.9%

Proportion of employees by quartile paybands


Marriage and civil partnership

years

Question: Are you married or in a civil partnership? ³⁴	Yes	No	Prefer not to say	No data
Number of persons employed as of 31 March 2019	130	110	10	20
Number of persons who applied for a job at the Wales Audit Office over the last three years (excluding current staff)	270	740	30	30
Proportion invited to interview or assessment centre (27% for all applicants)	23%	26%	27%	41%
Proportion who were successful (8% for all applicants)	7%	8%	0%	11%
Number of staff who applied to change position within the Wales Audit Office over the last three years	80	70	10	20
Proportion who were successful (41% for all staff who applied)	27%	62%	67%	24%
Number of staff who left the organisation over the last three	30	30	*	10

Employees
Job applicants
Married or in a civil partnership
Not married or in a civil partnership
Prefer not to say

34 Response rate 91% for employees and 97% for job applicants.

Question: Are you married or in a civil partnership?	Yes	No
Proportion of staff that share the named characteristic that are employed in bands 1 to 4 and technician and trainee bands as of 31 March 2019	55%	81%
Proportion of staff that share the named characteristic that are employed in bands 5 and above as of 31 March 2019	45%	19%
Mean basic full-time equivalent salary as of 31 March 2019	£50,010	£35,977
Mean pay gap	39.0%	_
Median basic full-time equivalent salary as of 31 March 2019	£46,238	£30,904
Median pay gap	49.6%	_



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Disability

Question: Do you consider yourself to have a disability or impairment? ^{35 36}	Yes	No	Prefer not to say	No data
Number of persons employed as of 31 March 2019	20	210	10	20
Number of persons who applied for a job at the Wales Audit Office over the last three years (excluding current staff)	50	960	30	20
Proportion invited to interview or assessment centre (27% for all applicants)	15%	26%	20%	42%
Proportion who were successful (8% for all applicants)	4%	8%	3%	8%
Number of staff who applied to change position within the Wales Audit Office over the last three years	10	130	10	20
Proportion who were successful (41% for all staff who applied)	33%	45%	33%	24%
Number of staff who left the organisation over the last three years	10	50	*	20
		•	Disability o	or impairme
Employees	Job applicants	•	-	ity or impair
			Prefer not	to say

- 35 The Auditor General and Wales Audit Office subscribe to the Social Model of Disability. The key definitions within the Model are:
 - Impairment is an injury, illness or congenital condition that causes or is likely to cause a long-term effect on physical appearance and/or limitation of function within the individual that differs from the commonplace.
 - Disability is the loss or limitation of opportunities to take part in society on an equal level with others due to institutional, environmental and attitudinal barriers.
- 36 Response rate 92% for employees and 98% for job applicants.

Question: Do you consider yourself to have a disability or impairment?	Yes	No
Proportion of staff that share the named characteristic that are employed in bands 1 to 4 and technician and trainee bands as of 31 March 2019	60%	68%
Proportion of staff that share the named characteristic that are employed in bands 5 and above as of 31 March 2019	40%	32%
Mean basic full-time equivalent salary as of 31 March 2019	£46,091	£43,417
Mean pay gap	6.2%	_
Median basic full-time equivalent salary as of 31 March 2019	£46,238	£40,071
Median pay gap	15.4%	_



Religion or belief (or lack of religion or belief)

Question: What is your religion or belief (including lack of religion or belief)? ³⁷	Christian ³⁸	Other religion or belief ³⁹	No religion or belief	Prefer not to say	No data
Number of persons employed as of 31 March 2019	120	10	100	20	30
Number of persons who applied for a job at the Wales Audit Office over the last three years (excluding current staff)	400	90	450	80	40
Proportion invited to interview or assessment centre (27% for all applicants)	25%	16%	28%	22%	33%
Proportion who were successful (8% for all applicants)	8%	3%	9%	5%	8%
Number of staff who applied to change position within the Wales Audit Office over the last three years	60	10	70	10	20
Proportion who were successful (41% for all staff who applied)	38%	14%	49%	62%	24%
Number of staff who left the organisation over the last three years	30	10	30	*	10



37 Response rate 91% for employees and 96% for job applicants.

38 All denominations.

39 Sum of those that selected the categories 'Buddhist', 'Hindu', 'Jewish', 'Muslim', 'Sikh' and 'Other'.

Question: What is your religion or belief (including lack of religion or belief)?	Christian	Other religion or belief	No religion or belief
Proportion of staff that share the named characteristic that are employed in bands 1 to 4 and technician and trainee bands as of 31 March 2019	64%	88%	72%
Proportion of staff that share the named characteristic that are employed in bands 5 and above as of 31 March 2019	36%	12%	28%
Mean basic full-time equivalent salary as of 31 March 2019	£44,642	£36,206	£42,447
Mean pay gap	_	-18.9%	-4.9%
Median basic full-time equivalent salary as of 31 March 2019	£40,071	£36,438	£40,071
Median pay gap	_	-9.1%	0.0%



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Caring responsibilities

Question: Do you have caring responsibilities? ^{40 41}	Yes	No	Prefer not to say	No data
Number of persons employed as of 31 March 2019	70	160	10	30
Number of persons who applied for a job at the Wales Audit Office over the last three years (excluding current staff)	50	970	20	30
Proportion invited to interview or assessment centre (27% for all applicants)	16%	26%	35%	33%
Proportion who were successful (8% for all applicants)	0%	8%	5%	7%
Number of staff who applied to change position within the Wales Audit Office over the last three years	30	110	10	30
Proportion who were successful (41% for all staff who applied)	39%	46%	29%	28%
Number of staff who left the organisation over the last three years	10	50	*	20



40 We define a carer as 'anybody who looks after a family member, partner or friend who needs help because of their illness, frailty or disability – all the care they provide is unpaid'.

41 Response rate 89% for employees and 97% for job applicants.

Question: Do you have caring responsibilities?	Yes	No
Proportion of staff that share the named characteristic that are employed in bands 1 to 4 and technician and trainee bands as of 31 March 2019	55%	73%
Proportion of staff that share the named characteristic that are employed in bands 5 and above as of 31 March 2019	45%	27%
Mean basic full-time equivalent salary as of 31 March 2019	£50,757	£40,517
Mean pay gap	25.3%	_
Median basic full-time equivalent salary as of 31 March 2019	£46,238	£40,071
Median pay gap	15.4%	_



National identity

Question: How would you describe your national identity? ⁴²	British	Welsh	Other ⁴³	Prefer not to say	No data
Number of persons employed as of 31 March 2019	120	110	10	*	30
Number of persons who applied for a job at the Wales Audit Office Office over the last three years (excluding current staff)	470	430	110	10	40
Proportion invited to interview or assessment centre (27% for all applicants)	24%	29%	13%	36%	35%
Proportion who were successful (8% for all applicants)	8%	8%	3%	0%	10%
Number of staff who applied to change position within the Wales Audit Office Office over the last three years	70	60	10	*	30
Proportion who were successful (41% for all staff who applied)	46%	40%	50%	50%	30%
Number of staff who left the organisation Office over the last three years	30	30	*	*	20



42 Response rate 90% for employees and 96% for job applicants.43 Sum of those that selected the categories 'English', 'Northern Irish', 'Scottish' and 'Other'.

Question: How would you describe your national identity?	British	Welsh	Other
Proportion of staff that share the named characteristic that are employed in bands 1 to 4 and technician and trainee bands as of 31 March 2019	68%	69%	64%
Proportion of staff that share the named characteristic that are employed in bands 5 and above as of 31 March 2019	32%	31%	36%
Mean basic full-time equivalent salary as of 31 March 2019	£43,882	£42,535	£42,996
Mean pay gap	3.2%	_	1.1%
Median basic full-time equivalent salary as of 31 March 2019	£40,071	£40,071	£46,238
Median pay gap	0.0%	_	15.4%



Ethnicity

Question: What is your			Prefer not to	
ethnicity? ⁴⁴	White	BAME ⁴⁵	say	No data
Number of persons employed as of 31 March 2019	220	10	10	30
Number of persons who applied for a job at the Wales Audit Office over the last three years (excluding current staff)	870	140	20	30
Proportion invited to interview or assessment centre (27% for all applicants)	27%	14%	23%	36%
Proportion who were successful (8% for all applicants)	8%	2%	5%	9%
Number of staff who applied to change position within the Wales Audit Office over the last three years	140	10	10	20
Proportion who were successful (41% for all staff who applied)	44%	0%	71%	27%
Number of staff who left the organisation over the last three years	60	*	*	20
Employees	a	Job pplicants	•	White BAME Prefer not to sa

44 Response rate 91% for employees and 97% for job applicants.

45 Sum of those that selected Black, Asian, Mixed/multiple and other Ethnic group categories in our diversity questionnaire.

Question: What is your ethnicity?	BAME	White
Proportion of staff that share the named characteristic that are employed in bands 1 to 4 and technician and trainee bands as of 31 March 2019	100%	66%
Proportion of staff that share the named characteristic that are employed in bands 5 and above as of 31 March 2019	0%	34%
Mean basic full-time equivalent salary as of 31 March 2019	£31,070	£44,033
Mean pay gap	-29.4%	_
Median basic full-time equivalent salary as of 31 March 2018	£28,512	£40,071
Median pay gap	-28.8%	_



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