

Equality Report 2024-25

October 2025

This report on compliance with the Equality Act 2010 General Duty covers the period 1 April 2024 to 31 March 2025. It has been prepared in accordance with the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

Audit Wales is the non-statutory collective name for the Auditor General for Wales and the Wales Audit Office, which are separate legal entities with their own legal functions. Audit Wales is not a legal entity. Consequently, in this Report, we make specific reference to the Auditor General or Wales Audit Office in sections where legal precision is needed.

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Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome correspondence and telephone calls in Welsh and English. Corresponding in Welsh will not lead to delay.

Mae'r ddogfen hon hefyd ar gael yn Gymraeg.

This document is also available in Welsh.

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Foreword

Statement from the Auditor General and Chair of the Wales Audit Office

Rydym yn falch o gyflwyno ein Hadroddiad Cydraddoldeb ar gyfer 2024-25.

We are pleased to present our Equality Report for 2024-25.

This Equality Report looks at the progress we made together as Audit Wales towards delivering our equality objectives between 1 April 2024 and 31 March 2025. It is the third annual report we will publish looking at the equality objectives we set in our joint Strategic Equality Plan for the four-year period 2022 to 2026. Overall, we consider that we have been effective in the steps we have taken so far towards meeting those objectives, but there is room for further improvement.

In my role as Auditor General, my reports can encourage beneficial changes in terms of equality, and tackling inequality is one of the four key themes that drives our performance audit work programme. We delivered a number of examinations and studies during 2024-25 which covered equality considerations and made recommendations for improvement, more detail on which is provided in the report.

The Wales Audit Office is 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.

Our staff survey results show that a large majority of staff feel Audit Wales is committed to creating a diverse and inclusive workplace which respects individual differences. They also indicate extensive awareness of and confidence in arrangements for handling allegations of discrimination, bullying and harassment.

During the year, we undertook a series of impact assessments of relevant policies and practices. It was reassuring to see that those assessments did not identify any obvious potential for discrimination but nonetheless made several important recommendations for improvement.

Looking forward, while we are pleased to report that our gender pay gap has narrowed considerably over recent years, it is also clear we need to continue to undertake work to further increase the diversity of our workforce in the medium to longer term.



Adrian Crompton

Auditor General for Wales



Dr Ian Rees

Chair, Wales Audit Office



Statement from Pawb

As members of Pawb, the Audit Wales employee equality interest group, we are proud to contribute to this year's Equality Report and reflect on the progress we have made together in fostering a more inclusive, respectful, and equitable workplace.

Pawb exists to represent the voices and interests of staff across all protected characteristics - acting as a bridge between employees and leadership. Over the past year, we have seen meaningful and sustained action from the Executive Leadership Team and Board to embed equality, diversity, and inclusion across the organisation - from how we recruit and support staff, to how we integrate equality into our audit planning and delivery, and how we communicate and engage with the public in our work.

We welcome the continued commitment to transparency and accountability demonstrated in this report. The narrowing of the gender pay gap, the introduction of more inclusive recruitment practices, and the expansion of management and leadership programmes are all encouraging signs of progress. We also commend the organisation's openness in recognising where further work is needed, particularly in increasing workforce diversity and addressing pay gaps across other characteristics.

Pawb has played an active role in shaping these developments. Our members have contributed to impact assessments, reviewed policies, organised equality-focused events such as our annual Pride Day, and championed our membership of the Hidden Disabilities Sunflower Programme. The review of Pawb in 2024-25 has strengthened our purpose and visibility, and we are excited to continue growing the group as a trusted space for dialogue and collaboration.

As we look ahead to the review of our Strategic Equality Plan and the development of new objectives for 2026-2030, Pawb remains committed to working with colleagues across Audit Wales to ensure that every voice is heard, every difference is respected, and every opportunity is accessible.



Introduction and context

- 1 The Auditor General for Wales is the statutory external auditor of the Welsh public sector. The Auditor General is responsible for the audit of most of the public money spent in Wales.
- 2 The Wales Audit Office provides resources, such as staff, for the exercise of the Auditor General's functions, and monitors and advises the Auditor General. The Wales Audit Office currently employs around 300 staff.
- 3 Together, as Audit Wales, we audit around £28 billion of income and expenditure. Our work supports the effective scrutiny of public money by the Senedd and locally elected representatives.
- 4 Our latest Annual Plan provides more detail on our overall strategic vision and areas of focus, the range of bodies that we audit, and how we follow the public pound in Wales.
- 5 The Auditor General's main functions involve examining and reporting on the stewardship of public money by Welsh public bodies. When undertaking this work, we consider how well public bodies are run and the effectiveness of the services they provide. In reporting on public bodies, and in making recommendations, the Auditor General is able to encourage beneficial changes in terms of equality.
- 6 The Wales Audit Office is committed to providing an inclusive 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.
- 7 As an employer of around 300 staff, the Wales Audit Office has a significant and direct impact on people in terms of equality. The Board recognises the importance of providing equal opportunity across the full range of employment factors, including recruitment, training, promotion, ways of working, and terms and conditions, including pay.

- 8 Both 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.
- 9 Together, as Audit Wales, we have prepared a Strategic Equality Plan for the period 2022 to 2026, which sets out four specific objectives to help us better perform our equality duties. In 2025-26, we will develop and consult on a new plan for 2026-2030.

Our equality objectives 2022- 2026



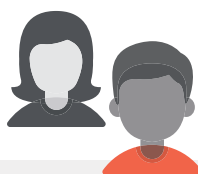
Ensure relevant and timely coverage is given to equality, diversity and inclusion matters in our programme of audit work



Embed a culture of inclusion, trust, and self-reflection, where everyone feels valued and respected



Better understand the diverse communication needs of our audiences and strengthen the accessibility of our outputs and messaging



Attract and retain talented people from all walks of life, and ensure our workforce is more representative of the diversity of our communities in Wales

- 10 Our Executive Leadership Team, with oversight from the Board:
 - a. ensures that the necessary arrangements and programme of work are in place to meet our equality and human rights duties and strategic equality objectives; and
 - b. receives quarterly monitoring reports on progress made, to ensure those arrangements and the programme of work are fully implemented and delivering the required outcomes.
- 11 We also have an established staff group, Pawb, which helps ensure effective engagement with employees representing the interests of protected groups. Pawb members act as equality champions who are available for staff to raise concerns and share ideas on how our policies and practices can be improved.
- 12 The views of Pawb are sought when:
 - a. Undertaking impact assessments of relevant policies and practices
 - b. Considering reports on progress towards meeting our equality objectives
 - c. Running our annual staff survey
 - d. Reviewing and revising our Strategic Equality Plan.

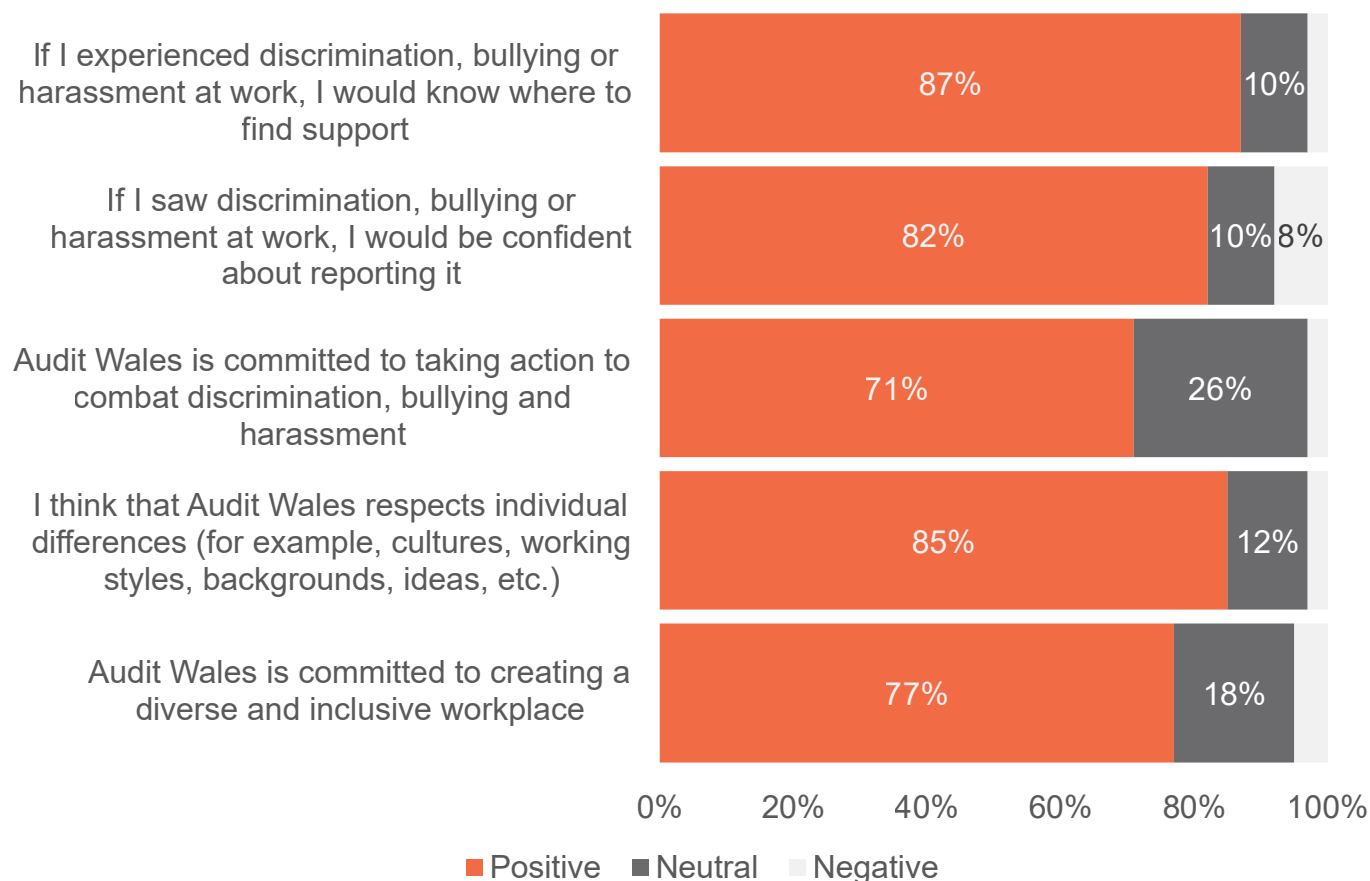


Staff survey results

Our latest staff survey results for questions that relate to equality were positive and indicate extensive confidence in arrangements for handling allegations of discrimination, bullying and harassment.

13 In October 2024, we ran our annual staff survey, which included some of the core questions that are used in the Civil Service People Survey (CSPS). Eighty percent of staff responded to the survey; a comprehensive sample which provided a wealth of insight on staff perceptions and the employee experience. A summary of responses from employees to staff survey statements that relate to equality is provided below.

Equality-related staff survey results



- 14 Two of these statements are identical to those used in the CSPA, so are suitable for external benchmarking. The equivalent median percent positive scores from the 2024 CSPA results are as follows:

2024 survey statement	Audit Wales	CSPA
I think that [my organisation] respects individual differences (for example, cultures, working styles, backgrounds, ideas, etc.)	85%	79%
[My organisation] is committed to creating a diverse and inclusive workplace	77%	78%

- 15 The results also indicate extensive awareness of and confidence in arrangements for handling allegations of discrimination, bullying and harassment. However, they nonetheless indicate a continuing need for work to ensure that all staff are aware of where to find support and are confident in reporting instances they see at work.



Progress made towards meeting our equality objectives

Overall, we consider that we were effective in the steps we took towards meeting our equality objectives, but there is room for further improvement across all objectives.

16 In 2024-25, we continued to develop and adapt our programme of equality work. Overall, we consider that we were effective in the steps we took towards meeting our equality objectives, but there is room for further improvement. More detail on progress made towards meeting the individual objectives is provided below.

Objective	Progress Made
 Objective 1 We will ensure relevant and timely coverage is given to equality, diversity and inclusion matters in our programme of audit work.	Tackling inequality remains one of the four key themes that underpins our <u>forward work programme</u> for performance audit. The Auditor General’s <u>Code of Audit Practice</u>, alongside supporting guidance, provides prescription for auditors on how to consider equality matters when undertaking local and national audit work. During the scoping and planning stages of all individual national studies and local performance work, our audit process requires audit teams to proactively consider where a particular audit might be relevant to tackling inequality and support the Auditor General in discharging his equality duties. In 2024-25, we carried out work on several national studies and local audits which considered equality, diversity, and inclusion matters and were either published during the year or subsequently. These included: • <u>Use of performance information in local government to understand user perspectives</u> • <u>Arrangements to deliver the affordable housing target and realise wider benefits</u> • <u>Delivery of active travel objectives and the management of associated funding</u> • <u>Cancer services in Wales</u> • Promoting access to <u>Bannau Brycheiniog National Park</u> and <u>Pembrokeshire Coast National Park</u>

Objective	Progress Made
Objective 1 We will ensure relevant and timely coverage is given to equality, diversity and inclusion matters in our programme of audit work.	When undertaking individual studies, we regularly consider opportunities at appropriate stages to invite input from relevant representative bodies. For example, in 2024-25, we engaged with the Wales Cancer Alliance during the planning and fieldwork stages of our work on Cancer services and following publication of our report. We also engaged with representatives of the homeless and those in temporary accommodation as part of our audit activity in the local government sector. More broadly, we continue to engage with <u>The Equality and Human Rights Coalition</u> – a network of third-sector organisations working in the equality and human rights field in Wales – to share information about our work programme and seek their views. The Coalition is facilitated by the Wales Council for Voluntary Action. We presented a work programme update paper to the Coalition for consideration and discussion at their meeting in January 2025. The paper provided an update on our current and planned future work programme and drew out relevant themes from national reports published since April 2024. Over the course of 2024-25, we also held meetings with colleagues from other external review bodies including the Equality and Human Rights Commission in Wales, the Office of the Children’s Commissioner and Estyn, to discuss our respective work programmes and/or particular projects. These meetings help ensure we avoid placing unnecessary or duplicate demands on public bodies and enhance the collective impact of our work, including in the equality and human rights field.
 Objective 2 We will better understand the diverse communication needs of our audiences and strengthen the accessibility of our outputs and messaging.	Towards the end of 2024-25, we commenced an internal review, working in partnership with the <u>communications agency FOLK</u>, to: • Better understand the communication needs of our diverse range of audiences. • Gather stakeholder views on whether relevant and timely coverage is being given to equality, diversity and inclusion matters in our audit programme. • Analyse how effective our existing communications are at engaging diverse audiences and addressing the needs of protected groups. • Develop guidance to help further embed inclusion through our communications processes. Following consideration of the recommendations of the review by the Executive Leadership Team, and further engagement with key internal stakeholders, a number of key actions were implemented immediately, including updated writing guidance for all staff and a review of imagery used in reports.

Objective	Progress Made
Objective 2 We will better understand the diverse communication needs of our audiences and strengthen the accessibility of our outputs and messaging.	A range of specific improvement actions will be implemented over the next year, relevant to both Objectives 1 and 2. These will include: • providing further guidance and training for authors and communications staff on engaging diverse audiences, • commencing the preparation and publication of easy-read versions of audit reports where that would be particularly beneficial, • further improvements to the accessibility of our website, • implementing new processes to gather continuous feedback from diverse groups on our outputs. Over the course of 2024-25, we also worked with contractors to review our arrangements for preparing and designing audit reports, including the associated training arrangements for staff. This work was undertaken alongside piloting the use of shorter, more accessible audit reports for local government and monitoring the impact of the changes by gathering feedback from staff and councillors. The overall aim of these projects is to make our reports shorter and easier to read, so that they better meet both our audience's accessibility needs and new audit quality requirements. More generally, a Digital Communication Officer continues to support staff across the organisation to ensure our outputs are accessible and meet the needs of various audiences. As part of our commitment to maintain high standards we also continue to develop and test our website accessibility. Following assessment by the Government Digital Service (GDS), we have achieved the GDS Standard for Accessibility; our Accessibility Statement is published on our website.
 Objective 3 We will attract and retain talented people from all walks of life, and ensure our workforce is more representative of the diversity of our communities in Wales	During 2024-25, we introduced 'individual storytelling' to Audit Wales recruitment campaigns, showcasing diversity among the staff team that is recruiting. Through these stories we highlight the range of benefits of working at Audit Wales and the inclusive working environment that we offer. As part of our continued efforts to encourage more applications from people with disabilities, we have signed up to the Disability Confident Employer Scheme and have retained Level 2 'employer' status, thereby gaining permission from Jobcentre Plus to use the Disability Confident badge in our job adverts. Audit Wales was also proud to announce its partnership with Hidden Disabilities Sunflower, a globally recognised initiative that supports individuals with non-visible disabilities. This collaboration marks a further step in our commitment to fostering inclusivity and ensuring that everyone, regardless of their disability, is recognised, understood, and supported.

Objective	Progress Made
Objective 3 We will attract and retain talented people from all walks of life, and ensure our workforce is more representative of the diversity of our communities in Wales.	In addition, we offer a Guaranteed Interview Scheme to applicants who consider themselves to have a disability and meet the essential requirements for advertised posts. During the reporting period we ran an extensive recruitment campaign for the latest round of graduate trainee and apprentice intake and received an excellent level of interest from candidates that share a wide range of protected characteristics. We successfully appointed the desired number of candidates and continue to explore ways through which we can further increase the number of applications we receive from candidates from more disadvantaged and diverse communities. We continued to run training sessions for recruiting managers and others involved in the recruitment process, to ensure that consistent standards and processes are being applied and to raise awareness of important equality related considerations such as unconscious bias. Stricter rules were also applied during the year to ensure gender balance in our interview panels and also the need to have the Chair trained in our recruitment process. Working jointly with our partners in Audit Scotland, in 2024-25 we introduced an Aspiring Leadership programme, which includes a focus on encouraging participation from people from under-represented groups. Similarly, work also commenced during the year on scoping and planning the provision of an 'Introduction to Leading People and Projects' course available to all Audit Wales staff who have just taken on roles with team management responsibilities, or who are interested in applying for such positions in the near future. During the reporting period, we continued to apply 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 band within a fixed period. No significant pay differences were identified within individual pay bands for any equality characteristic in our analysis of employment information. Over the past two years we have also relocated all three of our offices into smaller more modern premises as part of our 'future ways of working' project. The last move to newer office premises in West Wales was completed in April 2025. Full equality impact assessments are undertaken as part of option appraisals for each of these moves, with a view to removing any potential or existing barriers, being more inclusive, and giving staff more choice on how, when and where they work, within the context of overall business need.

Objective	Progress Made
 Objective 4 We will embed a culture of inclusion, trust, and self-reflection, where our staff and those with whom we come into contact during our work feel valued and respected.	Early in 2024, we introduced a significantly revised and updated mandatory Equality, Diversity and Inclusion (EDI) training programme for all staff. A series of refresher workshops for current Audit Wales staff were held, commencing in February 2024 and running through to September 2024. All staff attended one of those sessions and all future recruits will be required to attend equivalent sessions. The interactive sessions, which were facilitated by an external contractor, allowed groups of staff to share information and discuss their experiences in a safe and confidential environment. The sessions provided an opportunity for staff to discuss how the EDI agenda is evolving and help ensure a collective understanding of the part we all play in developing a welcoming and inclusive culture at Audit Wales. We have created a LinkedIn Learning Pathway to support continuous learning in relation to equality, diversity and inclusion. Both our Aspiring Leadership programme, and our 'Introduction to Leading People and Projects' course, place emphasis on equipping future managers and leaders with the skills they need to embed a culture of trust and inclusion. A review of the effectiveness of our equality interest group, Pawb, was carried out in 2024-25. Key recommendations from that review, which have subsequently been actioned, were • Pawb should meet six times a year (instead of every quarter) • Greater clarity is needed in the Terms of Reference on the role of members and attendees. • A clearer work programme for the group should be prepared, which is updated on an ongoing basis by the Chair and Secretary. • Further work is required on promoting and raising awareness of Pawb more generally across the organisation. • As part of our ongoing efforts to foster a supportive and inclusive workplace, we also conducted a survey at the end of 2024 to gather feedback on our staff networks to help us understand what is working well and where we can support their improvement. Staff network groups perform a critical role in promoting a culture of inclusivity, providing support for employees, and enhancing professional development. • Responses to the survey were completely anonymous. We also held focus groups for those people who wanted to participate in discussions. A paper on the findings was submitted to Pawb who approved all the recommendations.

Impact assessments

The impact assessments we carried out did not identify any obvious potential for discrimination or other adverse impact but made several recommendations for improvement.

- 17 To help us in meeting our equality commitments and duties, we:
 - a. assess the likely impact of relevant policies and practices (current, revised, or new);
 - b. publish reports on those assessments where they show a substantial impact or likely impact; and
 - c. monitor the impact of particularly relevant policies and practices.
- 18 We also have a responsibility to uphold the rights set out in the Human Rights Act 1998 and are mindful of the need to reduce the inequalities of outcome that result from socio-economic disadvantage in our strategic decisions.
- 19 Our impact assessments, which include Welsh language, sustainable development, and biodiversity and resilience of ecosystems considerations, are predominantly undertaken by our HR and Law and Ethics teams to ensure consistency and a strong base of technical expertise. Following preparation of each draft assessment, the report and the draft policy or practice to which it relates are provided to the Pawb staff engagement group, and where appropriate trade union representatives, to seek further perspectives.
- 20 A list of the full impact assessments completed between 1 April 2024 and 31 March 2025 and the key outcomes from those assessments is provided in **Appendix 1**.
- 21 The following policies and practices were also screened for relevance¹ but were not subsequently subject to full impact assessments from an equality perspective.
 - a. Access to the LinkedIn Learning skills development platform.

¹ To assess whether either the policy (where no impact assessment had previously been undertaken) or the revisions made (where the policy had already been assessed) were likely to have a significant effect on our ability to perform the General Equality Duty.

Workforce diversity and pay gaps

Our gender pay gap has narrowed and the proportion of younger staff has increased significantly over recent years, but we need to continue our work on increasing the diversity of our workforce in the longer term.

- 22 Our employment information for 2024-25 and for previous years, analysed by equality characteristics, is provided in the interactive data tool which accompanies this report.

[Click here](#) to access the data tool

- 23 Information on how we analyse our employment information by equality characteristic is provided in Appendix 2 to this report and in the Guidance Notes within the data tool. We also publish the data in spreadsheet Open Data format, as part of a Welsh Government initiative.
- 24 A summary of the key themes from the analysis of our employment information is provided in the following sections of narrative.
- 25 The Senedd is responsible for the appointment processes associated with the roles of Auditor General for Wales, Chair of the Wales Audit Office, and the other non-executive members of the Board. Both the Senedd and Audit Wales recognise a relative lack of diversity among our Board membership across the full range of protected characteristics and are keen to see further improvement in this area in the longer term.

Sex and gender identity

- 26 As of 31 March 2025, the legally recognised sex of employees was 54% female, and 46% male. Similarly, latest [UK Civil Service Diversity and Inclusion Dashboard](#) figures show that 54% of civil servants are women.
- 27 Our mean gender pay gap is 2.8%; the mean basic full-time equivalent annual salary of those staff whose legally recognised sex was female was £1,500 less than that of staff whose legally recognised sex was male. The distribution of women and men across pay bands is the immediate explanation for the gap, as illustrated in the salary quartiles charts provided in the data tool.
- 28 It should be noted that our reducing gender pay gap trend has been influenced by the significant success we have had over several years in attracting female candidates to join our rolling and expanding programme of graduate trainee and apprentice recruitment. Many of these successful candidates have subsequently achieved promotion to more senior roles.
- 29 We also calculate our median gender pay gap, which as of 31 March 2025 was £2,600 or 4.8%. This is significantly lower than the median gender pay gap reported by the [Office for National Statistics Annual Survey of Hours and Earnings](#) for all employees in the wider UK population in 2024 (13.1%), and also lower than that reported for full-time employees (7.0%).
- 30 As of 31 March 2025, 84% of employees have responded to the question 'What term do you feel best describes your gender?' in our diversity monitoring form. 54% answered female and 43% answered male, with the remainder answering either 'I prefer not to say' or 'I prefer to use my own term'.
- 31 Over the last three years, of the 97% of job applicants that completed our diversity monitoring form, 40% identified themselves as female, 59% identified themselves as male, and the remainder answered either 'I prefer to use my own term' or 'I prefer not to say'.
- 32 A lower proportion of the job applicants who identified themselves as male were subsequently invited to interview (18.8%) and successfully appointed (3.0%) when compared to applicants who identified themselves as female (23.1% and 3.8% respectively).
- 33 In our diversity monitoring questionnaire, we also include the question 'Do you identify as trans?' No figures can be provided in this report for responses to this question, or in respect of the protected characteristic of gender reassignment, without risking unfair processing of personal information through deduction.

Ethnicity and national identity

- 34 As of 31 March 2025, 94% of employees had answered the question on ethnicity in our diversity monitoring form. 93% had completed the question on national identity.
- 35 2.9% of those employees identified their ethnicity as an ethnic minorities category, with a further 2.2% choosing the option 'prefer not to say'.
- 36 57% declared their national identity as 'Welsh', with a further 41% choosing the option 'British'.
- 37 At face value, our ethnic minorities representation figure remains lower than the equivalent proportion of the Welsh population, which was 5.2% for the year ending 31 December 2023. However, the accuracy of our figure is heavily caveated by the number of non-declarations and 'prefer not to say' responses.
- 38 The corresponding figures for the 97% of job applicants that had completed this section of our diversity monitoring form over the last three years were far higher, with 35% identifying as being from an ethnic minority background, and 2% choosing the option 'prefer not to say'.
- 39 However, a significantly lower proportion of job applicants who identified themselves as being from an ethnic minority background were invited to interview (8.9%) and successfully appointed (0.8%) when compared to applicants who identified themselves as white (27.6% and 4.8% respectively). A similar picture in terms of success rates is seen for job applicants who described their national identity as 'Other' (as opposed to 'British' or 'Welsh').
- 40 Our overall pay gap for staff who identify themselves as being from an ethnic minority background is now 12.8%; as of 31 March 2025, the mean basic salary of those staff who describe their ethnicity as ethnic minority was £7,000 less than that of staff who identify their ethnicity as white. While acknowledging that the data is sensitive to even small changes in these cohorts, the extent of this pay gap, alongside our overall workforce ethnic minority representation, continues to be a focus area for our recruitment outreach approach.

Disability and carers

- 41 As of 31 March 2025, 94% of employees had answered the question on disability in our diversity monitoring form.
- 42 10.1% of those employees recorded that they have a disability, with a further 4.7% choosing the option 'prefer not to say'. By comparison, latest [UK Civil Service Diversity and Inclusion Dashboard](#) figures show that 13.6% of civil servants have recorded that they have a disability.
- 43 The corresponding figures for the 98% of job applicants that had answered the question on disability in our diversity monitoring form over the last three years were 6.1% and 3.0% respectively.
- 44 While acknowledging the smaller sample size, a higher proportion of job applicants who identified themselves as having a disability were invited to interview (26.4%) when compared to applicants who did not consider themselves to have a disability (20.5%). However, a lower proportion of applicants who identified themselves as having a disability were successfully appointed (2.3%) when compared to applicants who did not consider themselves to have a disability (3.5%). It should also be noted that for applicants who chose the option 'prefer not to say', 4.7% were successfully appointed.
- 45 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 characteristic of disability, alongside age, pregnancy and maternity. We therefore collect and analyse information in relation to carers.
- 46 As of 31 March 2025, 24% of the 93% of employees who completed this question in our diversity questionnaire identified themselves as carers, with a further 3% selecting 'Prefer not to say'. The equivalent figures for the 97% of job applicants who completed this question in our diversity questionnaire over the last three years were 7% and 2% respectively. The lower proportion of carers among job applicants is perhaps to be expected since 77% of those applicants were aged under 35.
- 47 [Published statistics](#) suggest that around 9% of the workforce in England and Wales are juggling caring responsibilities with work, which indicates that we have a significantly higher proportion of carers among our staff than the wider workforce, but a lower proportion amongst job applicants.

Sexual orientation

- 48 As of 31 March 2025, 83% of employees had answered the question on sexual orientation in our diversity monitoring form.
- 49 Of those employees, 85% identified as heterosexual or straight, 8% identified their sexual orientation as gay or lesbian, bisexual, or preferred to use a different term, with a further 7% choosing the option 'prefer not to say'.
- 50 The corresponding figures for the 87% of job applicants over the last three years that answered this question were 85%, 10% and 6% respectively.
- 51 The proportion of both employees and applicants that identified their sexual orientation as gay or lesbian, bisexual, or preferred to use a different term, are significantly higher than those in recent published statistics for the [Civil Service workforce](#) and from the [Census 2021](#).
- 52 Our overall pay gap for staff who identified their sexual orientation as gay or lesbian, bisexual or 'other' is 28.5%; as of 31 March 2025, the mean basic salary of those staff who describe their sexual orientation as gay or lesbian, bisexual or 'other' was £16,000 less than that of staff who identify themselves as heterosexual/straight. Again, the distribution of staff across pay bands is the immediate explanation for the gap, as illustrated in the salary quartiles charts provided in the data tool. However, the accuracy of our figures is heavily caveated by the number of non-declarations and 'prefer not to say' responses.
- 53 Significantly higher proportions of job applicants who identified their sexual orientation as gay or lesbian, bisexual or preferred to use a different term were invited to interview (29.7%) and were successfully appointed (5.0%) when compared with applicants who identified themselves as heterosexual/straight (19.7% and 2.8% respectively).

Age and marriage/civil partnership

- 54 Alongside the significant reduction in our gender pay gap, perhaps the most obvious change in our workforce over the last eight years is the rapid increase in the proportion of younger staff. In 2017, just under 25% were aged less than 35 years, compared with 2025, where just over 40% of the workforce are now in that age group. This marked change reflects the significant expansion of our programme of graduate trainee and apprentice recruitment over the period.
- 55 Our overall pay gap for younger staff is 36.1%; the mean basic annual salary of those staff aged less than 35 years is £23,000 less than that of staff aged 35 to 54 years. As illustrated in the data tool, this pay gap has narrowed since 2017-18, when it was 48.6%
- 56 The distribution of younger staff across pay bands is the immediate explanation for this gap. 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. However, the narrowing of the gap over the last eight years is an encouraging sign.
- 57 The distribution of younger staff across pay bands is also likely to be a key contributor to the large negative pay gap (30.3%) for staff who identified themselves as being married or in a civil partnership. Again, as illustrated in the data tool, the narrowing of the gap over recent years is an encouraging sign.

Religion or belief

- 58 As of 31 March 2025, 93% of employees had answered the question on religion in our diversity monitoring form.
- 59 Of those employees, 50% identified as having no religion or belief, 40% identified themselves as Christian (all denominations). The remaining 10% either answered 'prefer not to say' or identified with a religion or belief other than Christian. These figures broadly align with the latest statistics for the Welsh population from the Census 2021.
- 60 For job applicants over the last three years, 97% had answered the question on religion in our diversity monitoring form. 46% of those applicants identified as having no religion or belief, 27% identified as Christian, 21% identified with another religion or belief, and 6% answered 'prefer not to say'.



Appendices

- 1 Impact assessments completed between 1 April 2024 and 31 March 2025
- 2 Notes on our analysis of employment information by equality characteristic

1 Impact assessments completed between 1 April 2024 and 31 March 2025

Disciplinary Policy

The Disciplinary Policy sets out a set of principles and the process for handling alleged actions of misconduct and gross misconduct towards employees and workers. The Disciplinary Policy operates alongside a Social Media Policy and our Code of Conduct.

The revised Disciplinary Policy was subject to a full equality impact assessment. The key outcomes of the assessment were:

- no negative impact was identified for individuals with protected characteristics
- reasonable adjustments are offered for those with declared disabilities in investigations, hearings, and appeals.

Information relating to part-time workers, age, pregnancy, maternity, caring responsibilities and disability adjustments were all considered as part of the impact assessment. The Human Resources Team will monitor future employment cases to identify any trends as necessary.

Pay Policy

The Audit Wales Pay Policy is focused on transparency, fairness, and consistency, thereby ensuring that pay practices, responsibilities, and governance align with clear principles and that pay rewards individuals for their work, ensuring equal treatment for those with and without protected characteristics.

The policy aims to provide consistent application of key principles and to help minimise the risk of potential equal pay claims. The policy applies uniformly across the workforce, with pay uplifts and performance assessments handled separately under a Capability Policy. Appointments begin at the lowest pay level unless a justifiable business case can be made that is reviewed by Human Resources Team.

The revised Pay Policy was subject to a full equality impact assessment. As part of that process, yearly pay audits are conducted by Human Resources and are also undertaken as part of equality impact assessments carried out on pay proposals. Pay audits look at the impact of pay on persons with protected characteristics and external benchmarking is used to ensure competitive and equitable compensation.

West Wales office move

In April 2025, we finished setup of our latest office in West Wales, moving into smaller more efficient premises.

As part of the options appraisal process for the move, we carried out an assessment looking at the potential impacts of different locations, buildings and subsequent office layouts from an equality perspective.

The assessment played a key role in influencing our final decision and identified opportunities to improve in terms of disability, religion and environmental impacts. We also considered socio-economic issues that could have implications for age, gender and disability. We created a staff panel to oversee the design of the office, which Pawb was involved with, to make sure we were addressing the diverse needs of our workforce.

Dignity and Respect Policy

Further to the recent changes in employment legislation and recommended best practice, Audit Wales updated our Dignity and Respect Policy and launched it on 3 July 2025.

The impact assessment considered updates to the Policy aimed at:

- Making the process of considering and highlighting concerns in this area much clearer.
- Supporting line managers in undertaking their role in this complex and sometimes delicate field.

To accompany the launch of this Policy all staff have been required to undertake a mandatory e-learning module concerning sexual harassment, with an additional module for line managers.

2 Notes on our analysis of employment information by equality characteristic

To perform our equality duties effectively in terms of pay and conditions, the scope of our pay gap analysis covers the broad range of equality characteristics considered by our diversity monitoring questionnaire.

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 the format required by the Regulations, including through providing information on the proportion of employees by quartile pay bands.

We report on the following over a three-year rolling period, to enable an increased sample size and 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.
- The number of staff who left the organisation.

In the data tool, to prevent unfair processing of personal information through deduction, figures 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 shown as five.

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.

We do 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.



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Rydym yn croesawu gohebiaeth a
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