

# Strategic Equality Plan 2026-2030

April 2026



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# Foreword

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**Mae'n bleser gennym gyflwyno ein Cynllun  
Cydraddoldeb Strategol ar gyfer 2026-2030.**

**We are pleased to present our Strategic Equality Plan  
for 2026-2030.**

This Strategic Equality Plan sets out the key things that we are committed to doing over the next four years in order to help eliminate discrimination, advance equality of opportunity and foster good relations.

We published our previous [Strategic Equality Plan](#) in September 2022, setting out the key things that we intended to do over the period 1 April 2022 to 31 March 2026 to help meet the General Equality Duty. In that time, we made good progress in delivering a programme of work that helps us meet our legal duties and achieve our equality objectives. Progress made on delivering that programme of work was reported each year in our annual equality reports. Our [Equality Report for 2024-25](#), published in October 2025, highlighted meaningful and sustained action to embed equality, diversity, and inclusion across the organisation – from recruitment and staff support, including equality considerations in our audit work, through to our engagement with the public.

We are pleased with the progress we have made but recognise that there is still room for us to improve. As such, we have developed a revised suite of three equality objectives which we believe will help us better perform the General Equality Duty over the next four years.

We have not developed these objectives in isolation. Towards the end of 2025, we developed initial proposals for what our revised equality objectives should be, after reviewing the effectiveness of steps taken and progress made towards meeting the previous objectives. We then ran a public consultation on our proposals from 8 December 2025 to 30 January 2026. The Consultation was published on our website, promoted through social media and circulated directly to a broad range of stakeholders, including those representing individuals with protected characteristics. All responses to the consultation were carefully considered when finalising the content of this Plan.

We look forward to working collaboratively with colleagues both inside and outside the organisation to realise the aims and objectives set out in this strategy.



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**Adrian Crompton**  
Auditor General for Wales



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**Dr Ian Rees**  
Chair, Wales Audit Office

## Statement from Pawb



As Pawb, the Audit Wales staff equality interest group, we welcome the Strategic Equality Plan for 2026-2030. We fully support the objectives set out in this plan and believe they focus on the right areas to help Audit Wales continue to strengthen equality, diversity and inclusion across the organisation.

Pawb members have been actively involved throughout the development of this plan. We have provided feedback on the proposed objectives, contributed lived-experience insight across a range of protected and other characteristics, and helped shape the key steps underpinning the final commitments. We value the openness with which our perspectives have been sought and the thoughtful way in which they have been considered.

Since the publication of the last Strategic Equality Plan, we have seen meaningful improvements across the organisation. These include more consistent impact assessment arrangements, enhanced accessibility of our outputs, strengthened support for staff networks, and continued efforts to diversify recruitment pipelines. We have also seen a positive cultural shift, with greater awareness of equality considerations, more open conversations about lived experience, and stronger feelings of inclusion reflected in staff feedback.

Looking ahead to the next four years, Pawb wants to see momentum continue. In particular, we hope to see:

- Further improvements in the quality and completeness of our diversity data.
- A more diverse workforce.
- A proactive and inclusive approach to emerging challenges and opportunities, including the use of AI and digital tools.
- Continued investment in building an inclusive and supportive organisational culture.

Pawb remains committed to working with colleagues across Audit Wales to support the delivery of this plan. We will continue to act as a critical friend, a source of lived-experience insight, and a champion for equality, diversity, and inclusion across the organisation.

## Equality and Audit Wales

- 1 The Auditor General for Wales is the 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 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 £29 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 about who we are, what we do, 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 can 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, 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 and seek to maximise our contribution to achieving the seven Welsh well-being goals, including that of a more equal Wales.
- 9 As the Auditor General and the Wales Audit Office are separate legal entities, each are required to develop their own equality objectives. However, as we work together in the same organisation we have agreed to create a joint Strategic Equality Plan for Audit Wales.

## Our framework of aims for meeting the General Equality Duty

**For each of these aims, we set out the key actions that we will continue to take and improve on over the next four years.**

- 10 The Equality Act 2010 covers nine protected characteristics: age; disability; gender reassignment; race; religion or belief; sex; sexual orientation; marriage and civil partnership; and pregnancy and maternity.
- 11 The Equality Act introduced the Public Sector Equality Duty, which is often known as the General Equality Duty. Under this Duty, like other public authorities, we must, in exercising our functions, have due regard to the need to:
  - a. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act;
  - b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 12 Our framework of five aims for helping us perform the General Equality Duty is set out in the exhibit below. For each of these aims, the key actions that we currently undertake and intend to continue to undertake and improve on over the next four years are set out on the following pages.



**Aim 1** Ensure relevant and timely coverage is given to equality, diversity and inclusion matters in our programme of audit work



**Aim 2** Understand the diverse communication needs of our audiences and continue to strengthen the accessibility of our outputs



**Aim 3** Fully embed equality and human rights considerations in our internal planning and decision making



**Aim 4** Attract and retain talented people from all walks of life, and ensure our workforce is representative of the diversity of our communities in Wales



**Aim 5** Embed a culture of inclusion, trust, and self-reflection, where everyone feels valued and respected



# Aim 1

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

### Why is this important?

- The Auditor General's work programme is regarded as influential in changing the policies and practices of public bodies.
- Through our audit work, we are keen to play our part in tackling inequality in Wales.

### What key actions will we continue to take to help achieve this aim?

- Tackling inequality will remain one of the key themes that underpins our [forward work programme](#) for performance audit.
- The Auditor General's [Code of Audit Practice](#)<sup>1</sup>, alongside supporting guidance, will provide prescription for auditors on how to consider equality matters when undertaking local audit of accounts work, local performance audit work and national studies.
- During the planning of all individual national studies and local performance work, our audit teams will consider where a particular audit might be relevant to tackling inequality and support the Auditor General in discharging his equality duties.
- We will consider whether public bodies are acting in accordance with the sustainable development principle so that they can contribute to the national well-being goals, including 'An Equal Wales', through their setting of well-being objectives and the steps they take to meet them.
- When undertaking studies, we will consider opportunities at appropriate stages to invite input from relevant representative bodies or directly from people with lived experience.

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1 The Code is underpinned by four widely recognised principles – being public focused, independent, proportionate and accountable.

- We will engage with The Equality and Human Rights Coalition – 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.
- Periodically, we will meet with colleagues from other external review bodies, including the Equality and Human Rights Commission in Wales, to help ensure we avoid placing unnecessary or duplicate demands on public and other bodies and enhance the collective impact of our work.
- We will keep track of actions taken in response to relevant audit recommendations.
- We will stay alert to opportunities to share audit learning on issues relevant to equality with wider audiences, including to inform policy development and scrutiny.



## Aim 2

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### Understand the diverse communication needs of our audiences and continue to strengthen the accessibility of our outputs

#### Why is this important?

- In order to maximise the impact of our work, we must communicate clearly and accessibly with a range of audiences, taking account of specific needs and required adjustments.

#### What key actions will we continue to take to help achieve this aim?<sup>2</sup>

- We will continue to seek advice and accreditation from external bodies that specialise in accessibility needs and the related lived experiences of people with protected and other equality characteristics.
- We will reflect on how well recent changes to our arrangements for preparing and designing audit reports are progressing, informed by staff and stakeholder feedback; the overall aim of these changes has been 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.
- Our Communications Team will support staff across the organisation to ensure our outputs are accessible and meet the needs of various audiences, including in relation to neurodivergence.
- We will continue to develop and test our website accessibility against the updated [WCAG 2.2 website accessibility standard](#) and maintain the [Government Digital Service Standard for Accessibility](#).
- We will ensure all our reports are available in Welsh and English.
- We will take account of language accessibility and the potential for digital exclusion by ensuring that we provide the option for requests for alternative format and/or language versions of our publications.
- On a case-by-case basis, we will consider whether routine publication in other languages/formats would be appropriate for target audiences for specific outputs.

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2 Some of the actions noted under aim 1 are also relevant.



## Aim 3

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### Fully embed equality and human rights considerations in our internal planning and decision making

#### Why is this important?

- Embedding equality in decision-making leads to fairer outcomes, reduces discrimination, and fosters a more inclusive environment that benefits both individuals and the wider organisation.
- We aspire to be a model organisation for the public sector in Wales and beyond.

#### What key actions will we continue to take to help achieve this aim?

- We will assign executive level sponsorship and oversight of this Plan with a link Board member to provide non-Executive scrutiny and support.
- We will take account of equality and human rights considerations, including intersectionality, as part of our arrangements for assessing the likely impact of internal policies and practices (see **Appendix 1**).
- We will maintain a suite of questions that relate to equality, diversity and inclusion within our overall staff survey (see **Appendix 2** for more detail), thereby generating ongoing insight on staff perceptions to inform decision making.
- We will seek and take account of the views of Pawb, our staff equality interest group, when:
  - Undertaking impact assessments of relevant policies and practices.
  - Reporting on progress made towards meeting our equality objectives.
  - Developing our annual staff survey.
  - Reviewing and revising our Strategic Equality Plan.

- When procuring services, we will:
  - Include requirements relevant to performance of our equality duties in our tender award criteria.
  - Comply with our equality duties when stipulating the performance standards to be included in contracts.
- We will undertake diversity monitoring and ongoing development of an interactive data tool<sup>3</sup> which provides detail to decision makers on the diversity of our workforce and job applicants, and on our pay gaps for gender pay (see **Appendix 3** for more information) and a range of other equality characteristics.

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<sup>3</sup> We are committed to making further improvements to our approach to collecting and analysing diversity information over the period of this Plan, as set out under Objective 1.



## Aim 4

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

#### Why is this important?

- Attracting people from different backgrounds is likely to improve the quality of our work by bringing forward new ideas, perspectives and ways of working.
- An Audit Wales workforce that reflects the society it serves is more likely to be trusted and respected by the wider public.

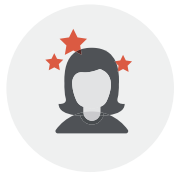
#### What key actions will we continue to take to help achieve this aim?<sup>4</sup>

- We will regularly review all recruitment campaigns to ensure fairness throughout our recruitment process.
- We will include 'individual storytelling' in our campaigns, showcasing diversity among the workforce and highlighting our range of benefits and the inclusive working environment.
- We will 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 considerations such as unconscious bias.
- We will apply strict rules to ensure gender balance in our interview panels.
- We will take advantage of outreach opportunities to highlight Audit Wales as an inclusive employer and attract candidates from more disadvantaged and diverse communities.
- We will offer a Guaranteed Interview Scheme to applicants who consider themselves to have a disability and meet the essential requirements for advertised posts.

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4 Some of the actions noted under aim 3 are also relevant. We are committed to making further improvements to our outreach and recruitment approaches over the period of this Plan, as set out under Objective 2.

- We will continue to sign up to the Disability Confident Employer Scheme (currently Level 2 employer status and working towards Level 3 leader status).
- We will continue to secure accreditations and memberships with: Living Wage Employers, Working Families, Hidden Disabilities Sunflower, and Scope.
- We will run a number of projects to support all colleagues with their development and career growth, including a Leading People and Projects course.
- We will continue to apply rigorous pay alignment arrangements to ensure jobs of equal worth are pay aligned.



## Aim 5

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

#### Why is this important?

- Individuals and teams are more likely to achieve their full potential and thrive in an organisation that includes people in a way that is fair for all, respects and values everyone's differences and empowers and enables each person to be themselves.

#### What key actions will we continue to take to help achieve this aim?<sup>5</sup>

- We will apply a Dignity and Respect policy and an Equality, Diversity and Inclusion policy, which have both recently been reviewed under our impact assessment arrangements, including to take account of the new legal duty to take reasonable steps to prevent sexual harassment and create a safe working environment.
- We will provide a recently refreshed mandatory Equality, Diversity and Inclusion training programme for all staff and promote knowledge and understanding of our statutory equality duties via a range of mechanisms (see **Appendix 4** for more detail).
- We will support Pawb in ensuring effective engagement with employees representing the interests of protected groups.
- We will support Pawb members in acting as equality champions who are available for staff to raise concerns and share ideas on how our policies and practices can be improved.
- We will ensure better support for our existing relevant staff network groups through awareness raising, renewed focus and encouraging participation.
- We will continue to support a network of mental health first aiders and well-being champions who are all volunteers from inside the organisation.

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5 Some of the actions noted under aims 3 and 4 are also relevant.

- We will continue to provide access to a 24/7 employee assistance programme offering staff access to confidential counselling and emotional support when needed.
- We will maintain a suite of questions that relate to equality within our overall staff survey, including on awareness of and confidence in arrangements for handling allegations of discrimination, bullying and harassment.
- Subject to operational requirements, we will support employees who wish to undertake related community or charity activities.

## Our equality objectives for 2026 to 2030

**We are also committed to three new equality objectives for the period 2026-2030 to help us better perform the General Equality Duty.**

- 13 On the following pages we provide a description of:
  - a. The rationale for each new objective with reference to relevant information that we hold.
  - b. How each new objective aligns with our overall framework of aims for meeting the General Equality Duty.
  - c. The relevance of each new objective to the nine protected characteristics.
  - d. The key steps we intend to take to fulfil each new objective.
  - e. How long we expect it will take to fulfil each new objective.
  - f. The arrangements we will put in place for monitoring progress made towards fulfilling each objective and the effectiveness of key steps.
- 14 Progress made towards fulfilling each of these three new objectives will form a particular focus for oversight and monitoring by our Executive Leadership Team and Board over the course of the Strategic Equality Plan period. We will report publicly on our compliance with the General Equality Duty and on progress made towards fulfilling our equality objectives through our annual equality reports.
- 15 To establish this suite of new equality objectives for 2026 to 2030, our Executive Leadership Team reviewed whether:
  - a. Previous objectives and key steps should be retained, revised or removed.
  - b. Any new objectives and key steps should be added to reflect our current circumstances.

- 16 This initial review was carried out taking account of:
  - a. Input from Pawb, our staff equality interest group, and a working group of key individuals from across the organisation.
  - b. Our latest [Equality Report](#) and [employment information analysed by equality characteristics](#).
  - c. Our latest staff survey results.
  - d. The current content of our strategic and operational risk registers.
  - e. An analysis of our operating environment as summarised in our [Annual Plan for 2026-27](#).<sup>6</sup>
- 17 The outcome from those discussions was then subject to further consideration and input from Pawb and the Wales Audit Office Board.
- 18 To help meet the statutory engagement provisions<sup>7</sup>, we then ran a [public consultation on our proposals](#) from 8 December 2025 to 30 January 2026. The Consultation was published on our website, promoted through social media and circulated directly to a broad range of key stakeholders, including the [WCVA-facilitated Equality and Human Rights Coalition](#).
- 19 We received 14 responses to the consultation – a small but reasonably representative sample of key stakeholders. These included unitary authorities, NHS bodies, central government bodies, third sector organisations with an interest in equality, and The Equality and Human Rights Commission (EHRC) Cymru on a compliance advisory basis.
- 20 Most of the responses received were very positive about our proposals, with widespread endorsement, constructive commentary and suggestions for further improvement. Several respondents stressed the importance of Audit Wales setting a strong example in its Strategic Equality Plan for the wider public sector in Wales and highlighted that our audit programme is highly influential in shaping equality-related priorities, systems and culture across public bodies.
- 21 All responses to the consultation were carefully considered, with further input from Pawb, when finalising the content of this Strategic Equality Plan.

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6 This includes having sight of the [EHRC Equality and Human Rights Monitor 2023: Is Wales Fairer?](#), the [Anti-racist Wales Action Plan: 2024 update](#), the [Disabled People's Rights Plan for Wales 2025 to 2035](#), and the [LGBTQ+ Action Plan for Wales](#)

7 Under regulations 4, 5, and 15 of [The Equality Act 2010 \(Statutory Duties\) \(Wales\) Regulations 2011](#)

# Objective 1

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**We will improve our approach to collecting and analysing diversity information from staff and job applicants. As part of this work, we will introduce the collection and analysis of socio-economic background data.**

## Why are we doing this?

We currently collect and analyse data from staff and job applicants on protected and other equality characteristics to inform our strategic decision-making. We report externally on our workforce and job applicant diversity, and on our pay gaps, through an [interactive data tool](#) which accompanies our annual Equality Reports.

While refinements have been made to our process for collecting data from new starters via a new onboarding system, there remains scope for further improvement to our approach to collecting and analysing diversity information.

As can be seen via the data tool, the number of non-declarations, especially for current staff, ranges between approximately 5% and 15%, depending on the particular protected characteristic. Through this objective we aim to increase response rates, enhance the breadth and quality of data and ensure staff feel safe, confident and informed when providing that data.

While improvements have already been made, detailed examination of recruitment processes in 2024-25 also showed that there was insufficient granularity in the monitoring of success rates by protected characteristic at each of our recruitment stages, potentially hindering the identification of any discriminatory barriers in the process.

In addition, we do not currently collect socio-economic background data for either our staff or job applicants. This hinders our ability to act in the spirit of the [Socio-economic Duty](#).

## How does this align with our overall framework of aims?



Aligns with Aim 3:

**Fully embed equality and human rights considerations in our internal planning and decision making**

## Which protected characteristic(s) is this objective relevant to?

This objective covers all protected characteristics, but for current members of staff we hold complete data sets for age and legally recognised sex. It is especially important for the disability, race and sexual orientation characteristics, where the accuracy of our analysis is most heavily caveated by the number of non-declarations and 'prefer not to say' responses. This objective also covers socio-economic background as an additional characteristic. For external reporting purposes, no figures or analysis can be provided in respect of gender reassignment without risking unfair processing of personal information through deduction.

## What are we going to do and when?

Key steps:	Timeframe for delivery				
	2026-27	2027-28	2028-29	2029-30	
Review, update and implement a revised set of voluntary diversity monitoring questions as part of our recruitment application form, to include socioeconomic, care experience, and Welsh speaking background/skills data collection.	█				
Develop our approach for collecting this data from existing employees.		█			
Incorporate reports on new data categories within our <u>workforce diversity and pay gaps data tool</u> for regular accessible reporting and ease of analysis both internally and externally.		█	█		
Utilise this data analysis more regularly as part of recruitment, workforce planning and other relevant strategic discussions.			█	█	

## How will we monitor our progress?

- Monitoring trends in the proportion of non-declaration and ‘prefer not to say’ responses in our existing diversity data categories, both for job applicants and current staff.
- Monitoring trends in completion rates for new data sets on socio-economic background, care experience and Welsh speaking background/skills, both for job applicants and current staff.
- Monitoring the success rates of candidates by protected characteristic at each of the recruitment stages, to help identify whether there are any discriminatory barriers in the recruitment process.
- Monitoring the extent of use of this data analysis in informing strategic decision making.

# Objective 2

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We will tailor our outreach and recruitment approaches, with a focus on increasing workforce representation of individuals from ethnic minority communities, Welsh speaking backgrounds, and people with disabilities.

## Why are we doing this?

As reported in our [Equality Report for 2024-25](#), our ethnic minorities representation figure remains lower than the equivalent proportion of the Welsh population. While acknowledging that the data is sensitive to even small changes, our workforce ethnic minority representation remains a focus area.

In addition, 10% of our employees currently record that they have a disability. By contrast, latest estimates from the Department for Work and Pensions' [Family Resources Survey](#) indicate that, for working-age adults, the proportion of disabled people in the UK is 24%.

In our annual [Welsh Language Reports](#), we have also indicated that we need to increase representation in our workforce of individuals from Welsh speaking backgrounds to be able to effectively deliver a bilingual audit service, in accordance with the [Welsh Language Standards](#). There is some crossover in this area with our equality objectives since language is legally considered an aspect of the 'race' protected characteristic.

## How does this align with our overall framework of aims?

Aligns with Aim 4:



**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.**

## Which protected characteristic(s) is this objective relevant to?

This objective is focused on the protected characteristics of race and disability but is potentially relevant to all protected characteristics. It also focuses on Welsh speaking background as a specific characteristic.

## What are we going to do and when?

Key steps:	Timeframe for delivery			
	2026-27	2027-28	2028-29	2029-30
Undertake a holistic review of the Audit Wales recruitment approach, where a key driver is ensuring that selection decisions remain fair and focused on appointing the right person for the role, while advancing our aim to build a workforce that is more representative of the communities we serve.	█	█		
Implement new application templates and updated recruitment processes following the review, including guidance to candidates and assessors to help reduce and eliminate cultural obstacles and discriminatory barriers at all stages.		█	█	
Increase collaboration between the HR team and the Trainee Coordinator to deliver an expanded and co-ordinated programme of outreach activities.	█	█	█	█
Broaden the outreach and promotion of vacancies by using a wider range of specialist job boards and targeted advertising channels, ensuring vacancies reach diverse audiences and support our commitment to inclusive recruitment.		█	█	█

## How will we monitor our progress?

- Monitoring trends in the proportion of individuals from ethnic minority communities, Welsh speaking backgrounds, and people with disabilities, both for job applicants and current staff.
- Monitoring the success rates of candidates by protected characteristic at each of the recruitment stages, to help identify whether there are in the recruitment process.
- Monitoring trends in the proportion of applications sourced from specialist job boards (e.g., disability, ethnicity, Welsh language, early careers).
- Undertaking checks that appropriate external advertising channels have been used for each recruitment campaign.
- Monitoring correlations between outreach activities and application numbers from target underrepresented groups.

# Objective 3

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**We will take account of equality considerations, including bias and reasonable adjustments, when exploring the potential use of Artificial Intelligence (AI).**

## Why are we doing this?

We reported in our 2025 [Interim Report](#) that, since March 2025, Audit Wales has been running an initiative to explore the potential use of Microsoft Copilot in enhancing efficiency, productivity, and digital confidence across the organisation.

Overall, several promising use cases have been identified for further exploration, subject to retaining human judgement and oversight. Provisional recommendations are for expansion to consider more opportunities to use AI in a controlled way to help enhance the productivity and efficiency of our work.

While the broader audit sector has publicised evidence of the benefits of using AI, there is also some evidence, including that identified by the Equality and Human Rights Commission, of the use of AI conflicting with the General Equality Duty.

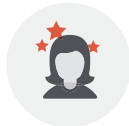
AI is an area of rapid change with the potential to have significant impacts on how we work. The prospective use of functionality such as meeting transcription, processing of biometric data, and undertaking sentiment analysis need careful and ongoing consideration from an equality perspective.

## How does this align with our overall framework of aims?



Aligns with Aims 3 and 5:

**Fully embed equality and human rights considerations in our internal planning and decision making.**



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

## Which protected characteristic(s) is this objective relevant to?

This objective is potentially relevant to all protected characteristics but is likely to be particularly relevant to age, disability, race and sex.

## What are we going to do and when?

Key steps:	Timeframe for delivery			
	2026-27	2027-28	2028-29	2029-30
Undertake a review of equality-related learnings from the initiative to explore the potential use of Microsoft Copilot, with input from the Law & Ethics Team and Pawb	█	█		
Review the adequacy of arrangements for evaluating protected characteristic-related bias in AI outputs and ensure that adequate arrangements are in place.	█	█		
Seek external professional and legal advice on taking account of equality considerations when using approved AI applications and considering new use cases.		█	█	
Develop further guidance for staff, informed by the external advice, and make any necessary process and resourcing adjustments.			█	█

## How will we monitor our progress?

- Law & Ethics Team and Data Protection Officer oversight and reporting on quality of related Equality and Data Protection Impact Assessments.



# Appendices

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- 1 Equality impact assessment arrangements**
- 2 Identification, collection and publication of relevant information**
- 3 Gender pay gap**
- 4 Promoting knowledge and understanding**

# 1 Equality impact assessment arrangements

To help us meet the General Equality Duty, 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.

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.

Our impact assessments take account of intersectionality, and also include Welsh language, sustainable development, and biodiversity and resilience of ecosystems considerations. The assessments 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.

A summary of the full impact assessments completed for each financial year and the key outcomes from those assessments is provided in our annual equality reports. We also provide a list of policies and practices that were screened for relevance<sup>8</sup> but not subsequently subject to full impact assessments from an equality perspective.

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<sup>8</sup> 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.

## 2 Identification, collection and publication of relevant information

Each year we run an annual staff survey, which includes some of the core questions that are used in the Civil Service People Survey. In 2025 we achieved an 84% response rate: a comprehensive sample which provided a wealth of insight on staff perceptions and the employee experience, including in relation to equality. We publish a summary of our results in our annual equality reports, with comparisons to available external benchmarks.

Our equality reports also include a summary of the key themes from an annual analysis of our employment information across all protected characteristics. More detail on our employment information is published via an [interactive data tool](#) which accompanies each equality report and enables trend analysis and cross-characteristic comparisons for employee diversity, pay gaps, job applicant diversity and job applicant success rates.

We also publish the data in [spreadsheet Open Data format](#), as part of a Welsh Government initiative.

Our policy for initiating the use of AI includes requirements for arrangements for the evaluation of bias in AI outputs. The adequacy of those arrangements will be addressed as part of Objective 3.

### 3 Gender pay gap

We continue 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.

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.

No significant pay differences were identified within individual pay bands for any equality characteristic in our analysis of employment information in 2025.

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 nonetheless report our pay gaps using the format required by the Regulations, including through providing information on the proportion of employees by quartile pay bands.

As set out in our [Equality Report for 2024-25](#), we are pleased to report that our gender pay gap has narrowed considerably over recent years. Our mean gender pay gap as of 31 March 2025 was 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 that accompanies our report](#).

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 2025 (12.8%), and that reported for full-time employees (6.9%).

Our reducing gender pay gap trend (also illustrated in the data tool) 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.

Taking all the above into account, as part of the process of preparing this Strategic Equality Plan, we have decided not to publish an equality objective or related action plan in relation to addressing the causes of any gender pay difference.

## 4 Promoting knowledge and understanding

Over the period of this Plan, we will promote knowledge and understanding of our statutory equality duties amongst our staff via a range of mechanisms. These include:

- A mandatory equality, diversity and inclusion (EDI) training module, delivered as part of our induction programme and through periodic refresher workshops for all staff.
- The Auditor General's Code of Audit Practice and supporting guidance, which provide prescription on how to consider equality matters when undertaking audit work.
- Training sessions for recruiting managers and others involved in recruitment, to ensure that consistent standards and processes are being applied and to raise awareness of important considerations such as unconscious bias.
- Specific training programmes for staff undertaking other roles of particular relevance, including those relating to line management, communications and procurement.
- An overarching and comprehensive Equality Diversity and Inclusion Policy, supported by a range of other equality-related policies and guidance, including on preparing accessible publications and engaging diverse audiences; recruitment and selection; undertaking impact assessments; making reasonable adjustments; procurement; and upholding the rights set out in the Human Rights Act 1998.
- A Digital Communication Officer who continues to support staff across the organisation to ensure our outputs are accessible and meet the needs of various audiences.
- The proactive work of Pawb, our staff equality interest group, 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.

- Communicating with staff in relation to our accreditations and memberships with: Living Wage Employers, Working Families, Hidden Disabilities Sunflower, and Scope.
- Raising awareness and encouraging participation in our relevant staff network groups.
- Ongoing dissemination of information relating to a 'diversity calendar' of internationally and nationally recognised equality events.



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We welcome correspondence and telephone calls in Welsh and English.

Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg.