

STRATEGIC EQUALITY PLAN

OBJECTIVES 2019-22



MAY
2019

Introduction

Qualifications Wales regulates awarding bodies offering qualifications in Wales. We are an independent body focused on publicly funded qualifications, including GCSEs, A levels and vocational qualifications.

Degrees are not part of our work, but we work with universities and colleges to make sure they understand qualifications so that learners can progress into higher education. We make sure qualifications are the best they can be for learners, teachers and employers, helping people adapt in a rapidly changing world. We work with awarding bodies to extend the availability of qualifications through the Welsh language.

Under the Qualifications Wales Act (2015) we have **two principal aims**:

- 1. Ensuring that qualifications - and the Welsh qualification system - are effective for meeting the reasonable needs of learners in Wales;*
- 2. Promoting public confidence in qualifications and in the Welsh qualification system.*

This means that we place the learner at the heart of our activities.

We also have a responsibility to look across the qualifications system to check that it is working in the interest of learners, and to act or advise others to do the same, if necessary. Part of our work is to ensure that qualifications within the system are valued, secure and respected internationally. We have powers and duties to regulate awarding bodies and we can make positive interventions to secure improvements to qualifications or the qualifications system.

At Qualifications Wales, we protect the value of qualifications, making sure that standards are maintained, grades are awarded fairly and that qualifications continue to be developed as the needs of learners change.

As the trusted experts in qualifications, we also consider the needs of employers, the higher education sector and professions - and we provide Welsh Government Ministers with advice on relevant issues.

Our approach to our work

We are outward-looking, so engage, communicate and collaborate to strengthen our ability to promote public confidence in the Welsh qualifications system, and to meet the needs of learners in Wales. We describe our regulatory style in our QW Strategy as below:

- We invite, listen and respond to the views of learners;
- We listen and respond to stakeholder feedback, views and concerns appropriately;
- The way in which we make regulatory decisions and engage with stakeholders is proportionate to the potential impact of the regulatory action;
- Consultations are transparent and meaningful;
- We take a collaborative approach and draw on the knowledge and expertise of stakeholders as appropriate;
- We seek to establish and maintain effective relationships with key stakeholders;

- We produce clear, informative, targeted and timely communications; we review the impact of our communications and seek to find ways to improve our approach;
- We work with other regulators wherever possible, being mindful of the impact on awarding bodies that are regulated by more than one regulator;
- We carry out regulatory impact assessments as appropriate to assess the costs, benefits and risks associated with a policy or course of action.

Our work is underpinned by **our values:**

- Collaborative in the way that we work;
- Thoughtful in the approaches we take;
- Positive in our outlook;
- Learning from experience and others.

Our purpose is met when regulated qualifications taken in Wales are trusted and valued by learners, employers and education providers and are recognised throughout the UK and internationally – this is our overarching vision, which is achieved when our **regulatory objectives** are met:

- Regulated qualifications taken by learners in Wales are valid, reliable and awarded to an appropriate standard;
- Regulated qualifications in Wales are inclusive and promote equality of opportunity for learners;

- Regulated qualifications and the qualifications system are responsive to changing needs and circumstances, particularly in regard to the long-term benefit of Wales and its learners;
- Regulation is proportionate, transparent, consistent and targeted, to support a qualification system that is sustainable in the long term;
- Information reasonably required to deliver consistent and quality-assured regulated qualifications is available and accessible;
- Appropriate governance is in place to ensure accountability and regulatory compliance.

Our responsibility to equality

We are subject to the Equality Act 2010 and the Wales-specific equalities duties set out in the 2011 Regulations. This means that we must consider how we can positively contribute to a fairer society in Wales in our day-to-day activities through paying due regard to eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations. We are committed to operating in a way that embraces differences. Equality considerations are built into the design of our policies and the delivery of our services and kept under review. People should not be put at a disadvantage by any of the following (also known as ‘protected characteristics’ or ‘protected groups’):

- gender
- race
- faith or belief
- sexual orientation
- age
- pregnancy and maternity
- being married or in a civil partnership
- being a disabled person
- being transgender

Our organisational duty is to ensure that in carrying out our functions we do not discriminate – directly or indirectly against anyone because of one of these protected characteristics.

As the qualifications regulator for Wales we also have a role in monitoring how awarding bodies comply with their duties under equalities legislation and do not disadvantage any learner with a protected characteristic - this includes providing disabled people with effective access to qualifications. This is reflected in the Standard Conditions of Recognition section D2.1 and D2.2. This means that awarding bodies must minimise the extent to which disabled people are disadvantaged in attaining a qualification because of their disabilities, while at the same time ensuring that the qualifications require the demonstration of the necessary knowledge, skill and understanding so as to maintain public confidence.

As a public body in Wales we are required to publish a Strategic Equality Plan and Equality Objectives, which help us to better perform our general duties, and report on the steps that we have taken or intend to take to achieve each objective, including the timescales and the monitoring arrangements. We need to review these regularly and at least every four years. We published our first set of objectives in June 2016 and, having delivered these and reviewed our progress, are now ready to publish our second set of objectives for the period 2019-22.

Our equalities work 2016 - 2018

The Qualifications Wales Board approved our first Strategic Equality Plan in April 2016; it was published in June 2016.

The purpose of our equality objectives was to strengthen our performance of the public-sector equality duty and ensure we made progress in advancing equality and inclusion for protected groups in Wales.

We identified objectives to help us better meet our duties and grouped these under six main headings:

- 1. Our People**
- 2. Our Working Environment**
- 3. How We Engage**
- 4. Our Regulatory Activity**
- 5. Our Expenditure**
- 6. Our Performance**

We published our first annual equality report for the period April 2016 to August 2017; the report can be seen [here](#).

Developing our new objectives

In developing our first set of objectives we considered all the aspects of our work where we had an impact on people and formed our objectives from this analysis. We focused on how we integrated equalities into setting up the new organisation and establishing our ways of working.

With the opportunity to review our objectives, we have decided for the next period to focus on specific areas. Having delivered most of our initial objectives, we consider that having a positive approach to equality is part of the way we operate. We will continue to consolidate these good practices, but will also focus on a few targeted areas where we feel there may be scope for further improvement.

We have selected the areas we want to focus on by talking to our staff, our senior leadership team and our Board to generate ideas. We have also met and discussed our approach with groups representing people with different protected characteristics, and will continue to do this. We will monitor delivery through our staff Wellbeing and Equalities Group and our operational plan.

All of our objectives are aimed at promoting equality and inclusiveness for people with any of the protected characteristics. However we may choose to focus on a particular protected characteristic in a given year or at a point in time.

Details about our staff pay are available in our annual accounts. We appoint on merit, and our staff move up pay scales through annual increments. Our flexible family-friendly staff policies enable those caring for children or other family members to manage a good work-life balance.

Gender pay information is published in our Annual Accounts, including gender pay gap data. We will continue to monitor recruitment patterns and pay data to identify any concerns and take appropriate action. The information we hold does not indicate any unequal treatment on the grounds of gender although we typically receive more applications from women than men. Our objective relating to workforce diversity will positively impact all protected characteristics, including gender.

Support and engagement

When developing our new objectives, we held several engagement and discussion sessions, both internally with staff and Board members, and with external organisations.

We have engaged with those staff responsible for delivering areas of work contained within the plan, with our Wellbeing and Equality Group and with members of staff who have expressed interest in being involved. Feedback was positive and in support of the continual development of our inclusive culture.

Externally, we have met with organisations including Race Council Cymru, Age Cymru, Remploy and Stonewall. The feedback received was very positive and supportive of our approach. Through this engagement we have formed relationships where we can work together for the benefit of those with protected characteristics in Wales.

We would like to thank everyone who has been involved in the development of and for providing feedback about our objectives.

Our equality policy

Our **principal aims** are:

a) ensuring that qualifications, and the Welsh qualification system, are effective for meeting the reasonable needs of learners in Wales; and b) promoting public confidence in qualifications and in the Welsh qualification system.

Within these aims, we are committed to:

- Promoting diversity, recognising that people are all different and that this diversity brings wider perspectives that help us better understand and meet learners' needs;
 - Treating people fairly, so that everyone has equal opportunities and equal access – be that in recruitment, HR policies, staff development, taking part in consultations, obtaining information from us, using our facilities or attending our events;
 - Refusing to tolerate discrimination, victimisation, bullying or harassment (direct or indirect, intentional or unintentional) against any person on any grounds whatsoever, including, but not limited to, those protected characteristics listed within the Equality Act 2010;
 - Providing opportunity for our policies and decisions to be informed by both the views of and potential impact on people with different characteristics;
- In regulating awarding bodies, requiring that qualifications are developed to minimise disadvantages to people with protected characteristics and that fair arrangements are put in place to enable people with a disability to take qualifications;
 - Using our approach to equalities to incorporate the human rights principles of equality, diversity, dignity and respect;
 - Recognising children's rights and the United Nations Convention on the Rights of the Child through seeking to understand and take account of the views of children in relevant decisions or policies.

In considering diversity, we also include those individuals who may be disadvantaged due to their socio-economic position and their level of achievement in qualifications, as well as those who may be disadvantaged due to characteristics protected in the Equality Act. In doing so, we have taken account of the recommendation in the *Is Wales Fairer?* report (2018) from the Equality and Human Rights Commission that public bodies should consider including inequalities resulting from socio-economic disadvantage within Equality objectives.

Our equality objectives 2019-22

Focus areas – for the period from 2019 to 2022, we will focus on the following five objectives:

1. Our regulatory work – we have the opportunity to consider equality at a number of stages within the qualification lifecycle. From the design of qualifications through to setting relevant criteria, monitoring compliance and making sure new and existing awarding bodies meet our standards. We will work consistently to make sure that our criteria for new qualifications, regulatory policies, approach to recognition and approval of qualifications, and monitoring compliance all support equality in the qualifications system.

2. Engaging with and informing the qualifications system – we work across the education system in Wales and have many opportunities to formally and informally engage with a range of stakeholders. We recognise that listening, seeking feedback and taking relevant actions will improve qualifications for learners across Wales and promote public confidence. We will actively consider where, how, and with whom we engage when we are reviewing issues, gathering feedback and planning. This allows us to make sure that we are taking decisions that have benefited from a wide range of views. We will make sure we have the mechanisms in place to achieve this and that we continue to communicate clearly, effectively and transparently.

3. Workforce and Board diversity – we would like our workforce and Board profile to reflect the diversity of the population in Wales. We know that diversity within our organisation will help us to better understand different viewpoints and challenge our own development and the decisions we make. When recruiting staff, we will advertise and promote opportunities through a range of role appropriate channels to appeal to the broadest range of applicants. In terms of our Board, all members are appointed through the Public Appointments system, but we will work with Welsh Government to promote and encourage diversity through Board appointments.

4. Inclusive culture – having an inclusive culture makes it easier for people to work together and be open about their differences. It adds value to the organisation, our work and our wider influence into the qualifications system. We will continue to actively work with our staff and Board to embed our values, to make sure our organisation is inclusive and a great environment for everyone. This will include making sure our staff policies are relevant and fit for purpose. We will also continue our work in promoting an active and healthy lifestyle.

5. Continually improving how we operate as an inclusive organisation – we have incorporated our approach to equality into the practical arrangements concerning how we operate as an organisation. This includes our facilities, our IT, our staff training and staff policies, our approach to procurement and grant expenditure and our engagement with visitors and the organisation of events. We aim to maintain our approach and continually improve where appropriate.

Our objectives in more detail

Below are more details about what we will do to deliver the areas of focus outlined above.

1 - Our regulatory work

Objective – Regulated qualifications are designed and assessed in a way that is fair for all learners.

How will we achieve the objective?

1. We will develop our requirements for qualifications to ensure there are no unreasonable barriers to access;
2. When reviewing qualifications for approval, we will focus on equality issues as part of our approval process;
3. The law requires awarding bodies to comply with the Equality Act 2010. In addition, as the regulator and to reinforce this requirement, we require Awarding Bodies to comply with our Standard Conditions of Recognition, and follow other regulatory and guidance documents such as Fair Access by Design;
4. We will require all awarding bodies to report to us that they have appropriate procedures in place to ensure compliance with our Standard Conditions of Recognition;
5. We will take appropriate and proportionate action where non-compliance is identified within an awarding body;
6. We will check that all awarding bodies have appropriate procedures for applying reasonable adjustments in their qualifications for learners with disabilities;
7. We will complete both regulatory and equality impact assessments on major pieces of work;
8. We will review Fair Access by Design – the guidance relating to how to address accessibility within qualification assessment design; we will also ensure staff and expert panels refer to the guidance when reviewing qualifications;
9. We will be active members, along with fellow regulators, of the Access Consultation Forum to consider equality issues;
10. Where we procure services from an awarding body/ies to develop new qualifications, we will require them to give due consideration to equality in their stakeholder engagement during their qualification development;
11. Where we identify any systematic equality issues outside our own remit, we will report these to the appropriate bodies.

How will we know if we are making progress?

- We will review whether all awarding bodies are compliant with our Standard Conditions of Recognition and where shortcomings are identified, check that they are all addressed promptly;
- Where objectives have clear completion dates, we will include these in our business plan and monitor delivery.

2 - Engaging with and informing the qualifications system

Objective – We communicate, engage, consult and conduct research with diverse groups, benefiting from a wide range of views.

How will we achieve the objective?

1. We will build consideration of equalities issues into the planning and design of our research programme;
2. We will have the appropriate mechanisms to engage specific groups where required for the purpose of research, engagement, consultation and other relevant communication;
3. We will use our developing data infrastructure to monitor qualifications data in Wales -for example, how take up of qualifications is changing over time for different groups of students. We will consider how awarding bodies could provide us with evidence that their qualification assessments are fair and unbiased;
4. We will embed our new ethical review processes for research, which builds consideration of equalities into the design and management of research projects;
5. We will complete a research project to consider how learner engagement can best inform our work and include an equalities dimension in this work;
6. We will review our use of online surveys to see whether their accessibility could be improved;
7. We will review how we collect informed consent to participate in research, focusing on enabling participation. In particular, we will focus on how we collect informed consent from young people and learners with disabilities;
8. We will review our organisational consultation guidance to ensure it highlights equalities and in particular that the needs of people with protected characteristics are taken into account when designing a consultation;
9. We will continually seek out new ways to engage and communicate with groups with protected characteristics through a range of channels;
10. We sense-check our communications to ensure they are easy to understand for each target audience;
11. We will ensure a full range of visible diversity across our promotional content.

How will we know if we are making progress?

- We will develop a strong track record of engaging relevant groups on equality, considering what action to take as a result and communicating this;
- We will develop a better understanding of qualification use by groups of learners;
- We will collect regular feedback on our activity and take action as a result;
- We will develop a track record of considering equalities issues in relation to the research that we conduct;
- We will amend our guidance and documentation covering equalities and enabling participation;
- We will increase our level of understanding of the viewpoints of people with protected characteristics (on relevant matters);
- We will have an increased number and range of channels used for communications;
- We will regularly review of membership of relevant stakeholder reference groups.

3 - Workforce and Board diversity

Objective – Our workforce and Board reflects the diversity of the population in Wales that we regulate for and work amongst.

How will we achieve the objective?

1. We will collect and monitor data on applications, appointments and promotions;
2. We will monitor movement in our gender pay gap and continue to refine our recruitment process to encourage greater diversity of applications;
3. We will work with bodies representing those with protected characteristics to consider our job advertisement and recruitment practices, identify any barriers that may exist and take action on these with an aim of increasing the diversity of applications;
4. We will work with the same bodies to consider our environment and policies to ensure that when appointments are made that they are sustainable, that expectations are met and staff are retained;
5. We will run recruitment training that will ensure employees with a responsibility for recruitment understand equalities legislation and their responsibility for ensuring that our recruitment is fair and open;
6. We will sign the Equality and Human Rights Commission Working Forward Pledge to support pregnant women and new parents and identify the appropriate actions for our organisation;
7. We will run an annual work placement scheme, working with either Remploy (to assist people with disabilities who may be experiencing difficulties entering work) or with local secondary schools (aiming to assist young people who are not going on to further study but may be experiencing difficulties entering work);
8. We will work with the Public Appointments Unit to promote our Board member vacancies and opportunities widely and positively to increase our Board diversity;
9. We will conduct equality impact assessments for individual and groups of HR policies;
10. We will work to achieve the Disability Confident Employer status.

How will we know if we are making progress?

- We will see an increase in the number of applications from those with protected characteristics;
- We will conduct regular reviews with staff who have been appointed to ensure that they can thrive and thereby ensure that equalities/inclusion do not become reasons given for resignation;
- There will be positive outcomes / opportunities for work for those that undertake work placements with us.

4 - Inclusive culture

Objective – We continue to build a culture where people feel that the organisation values them as individuals, appreciates their differences and makes good use of the range of experiences and insight available.

How will we achieve the objective?

1. We will organise regular training and presentations from external groups to continually challenge our thinking and approach;
2. We will seek the views from external groups on our office environment and policies to make sure unintentional barriers are avoided;
3. We will provide equalities training to all staff and Board members every three years;
4. We will encourage staff with proficiency in the Welsh language and those learning to feel comfortable speaking Welsh to each other in the workplace;
5. We will develop and implement our desired positive staff 'behaviours' to support our organisational Values;
6. We will achieve the Bronze corporate health standard and continually monitor the agreed action plan.

How will we know if we are making progress?

- We will have consistently high and improving scores in our annual staff survey for questions relating to culture and inclusion and fair treatment;
- We will seek feedback from the trade union at Partnership Council, and hope to hear that its members consider our culture is inclusive;
- Where feedback from external groups needs to be translated into actions, we will implement these and measure progress against them.

5 - Continually Improving how we operate as an inclusive organisation

Objective – we maintain the progress we have made in embedding equality into how we operate, and we take opportunities to continue to improve.

How will we achieve the objective?

1. We will review training needs and provide staff refresher training when appropriate;
2. We will continue to provide access for staff to an Employee Assistance Programme;
3. We will continue to provide flexible IT and working arrangements;
4. We will maintain an office that is fully accessible for staff and visitors;
5. We will continue to consider equalities issues in our procurement activities and grant schemes;
6. We will continue to provide staff DSE assessments and consider requests for additional tools or working arrangements;
7. We will maintain an AA accessible website;
8. We will develop and implement a voluntary Welsh Language Scheme;
9. We will maintain and develop relationships with external partners who can support and advise us in relation to this plan.

How will we know if we are making progress?

- We will have consistently high and improving scores in our annual staff survey results for questions relating to the working environment;
- We will regularly review any feedback obtained from staff and visitors that relate to protected characteristics, and if we identify further actions, we will monitor progress against them;
- We will monitor our performance and provide an annual report to our Board and relevant internal management structures leading to a published annual report of our activity;
- We will monitor our compliance against our Welsh Language Scheme;
- High-quality relationships with external partners who can support and advise us in relation to this plan.

Monitoring and review

We will monitor our progress against the objectives and supporting actions on an ongoing basis, which will lead to the publication of an annual report. The report will summarise our progress and any changes to our future work. Our Board is accountable for the equality objectives, with our staff being responsible for the delivery of the actions.

Feedback

We welcome feedback about our work, including the objectives and actions set out in this document, on an ongoing basis. If you would like to share any feedback or would like to discuss any aspect of our work, please contact the Corporate Governance team on corporategovernance@qualificationswales.org