

Audit Wales equality objectives – consultation March 2022

Audit Wales invited views and comments on their draft equality objectives for the Auditor General for Wales and the Wales Audit Office for the period 2022-2026.

“Once finalised, the objectives will be incorporated into a joint Audit Wales Strategic Equality Plan which will be published in April 2022.”

We responded to the four questions in the consultation.

Q1 To what extent do you agree with our proposed equality objectives for the four-year period 2022 to 2026?

Agree

There are multiple references to the intention to “engage with a range of people and organisations that represent the interests of protected groups”. This is welcome. As a group representing the protected characteristic of sex, and specifically those born female, can we therefore expect engagement with you?

Specifically there is an intention to “Seek the views of representatives of protected groups on how individual pieces of work that have already been undertaken and that were relevant to the General Equality Duty have addressed the needs of protected groups.” We hope this means that women’s groups in Wales such as Merched Cymru will be consulted.

Q2 Do you think we should include any additional equality objectives for that period?

Yes

There is mounting evidence that the PCs of sexual orientation and gender reassignment have different and sometimes competing needs. Therefore you should not assume that LGBT is a homogenous group and that consulting with your LGBT network is always sufficient. You should ensure that you also consult with representatives of gay rights groups such as LGB Alliance Cymru. Lesbians, being female, and gay men, being male, also have different issues, different health needs and different safety concerns.

Q3 Do you have any views on the steps we propose to take in order to fulfil each of our proposed equality objectives?

Yes

“Review our recruitment and assessment approaches and use of language in our job adverts, with a view to removing any potential barriers that relate to particular protected characteristics”. It is important to ensure the characteristics are correctly identified and tracked. Sex remains key and should not be conflated with gender reassignment or replaced by gender or gender identity.

The 2018 strategy equality plan refers to the gender pay gap for “staff that identified themselves as female” compared with “staff that identified themselves as male”. If this refers to surveys in which all data are self-reported this is understandable but there is a risk it is taken to mean that anyone may identify as either sex. It is not clear from the new plan.

The 2021-22 annual plan says (point 33) refers to the finding of the Equality and Human Rights Commission that “challenges to women’s safety and career progression persist in Wales”. The Equality Act says a woman is a female of any age. The PCs of sex and gender reassignment are two separate PCs. Both actions and monitoring should ensure this distinction is maintained.

Q4 Do you have any views on how we propose to monitor the progress made towards fulfilling each of our proposed equality objectives?

Yes

You intend to “Seek the views of representatives of protected groups on how individual pieces of work that have already been undertaken and that were relevant to the General Equality Duty have addressed the needs of protected groups.” We hope this means that women’s groups in Wales such as Merched Cymru and representatives of LGB people such as LGB Alliance Cymru will be consulted.

Fair Play For Women

3 March 2022