



Llywodraeth Cymru
Welsh Government

PUBLICATION

Workforce equality, diversity and inclusion strategy: 2021 to 2026

The new strategy sets out ambitious plans and targets for shaping our organisation for the future.

First published: 10 June 2021

Last updated: 10 June 2021

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Foreword by the Permanent Secretary



I am delighted to present the new equality, diversity and inclusion strategy for the Welsh Government. Please take the time to read and discuss it – the new strategy sets out ambitious plans and targets for shaping our organisation for the future.

Our Let's Talk Respect campaign has emphasised the importance of treating one another with dignity and respect right across the organisation.

This commitment, together with being fair and inclusive, is relevant to every one of us. As an organisation we are more successful and creative when we are diverse – bringing together different views, ideas and experiences not only helps us make decisions more effectively but it also helps ensure our policies reflect the needs of everyone in Wales.

We have made considerable progress since the first Diversity and Inclusion

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Action Plan of 2016, including appointing an Equality Champion for the Board, senior diversity champions and supporting our active networks and peer support groups.

We have reached the targets we set for the percentage of Black, Asian and Minority Ethnic and disabled staff in our organisation and we have taken steps to embed the social model of disability.

But there is much more still to do. We are a long way from being representative of the communities of Wales in our organisation, particularly in the Senior Civil Service.

We also need to do more to ensure that everyone is able to make their best possible contribution and to feel able to be themselves at work.

The senior team and I are fully committed to improving equality, diversity and inclusion across the Welsh Government and of course our HR department has a huge role to play in this.

But success will depend on all of us playing our part – ensuring genuine equality of opportunity and challenging discrimination should be part of our day to day approach to our work.

We must all be ready to call out inappropriate behaviour and to promote dignity and respect for everyone in our organisation. And we should expect our leaders at all levels in the Welsh Government to take seriously the wellbeing and inclusion of their teams and to challenge all inappropriate behaviour.

I look forward to working with you all as we implement the Equality, Diversity and Inclusion Strategy together.

Context

We know that in very many ways Welsh Government is already a great place to work.

Our People Survey is benchmarked against 100+ civil service organisations and

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consistently performs above the average, often significantly so. Surveys during the coronavirus pandemic also show very high levels of colleagues feeling supported and appreciating the care and commitment in the organisation's approach to safe working.

Focussing on equality and diversity specifically, the People Survey 2020 showed that 84% of responding staff were positive about Welsh Government respecting individual difference – up by 5 percentage points from the 2018 survey and above the wider Civil Service score.

A question asking if the organisation promotes the dignity and respect of all staff had a positive score of 84% compared to 78% in the People Survey Snapshot 2020.

We are proud of the work we have already done to support equality, diversity and inclusion but are committed to doing more. As an organisation we will not tolerate discrimination or harassment in any form and we will take urgent action to promote a culture of challenge which supports colleagues to call out inequality when they see it.

Over the last few years we have seen increases in percentages of disabled and minority ethnic staff working in Welsh Government and of women working in the SCS, but these increases have been small. The pace of change is not helped by limited external recruitment but we think we can and should do better.

We also want to see much better progression rates for underrepresented groups internally.

Starting point

In December 2020, our starting point was this:

Disabled people made up less than 6% of the organisation, compared to 22.7% of the Welsh working age population, and report experiencing barriers in recruitment and in the workplace (evidence provided by DAAS as part of the Barriers to Recruitment project, 2019).

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Whilst we recognise that not all disabled people are able to work (and so reaching 22.7% in Welsh Government would be an unlikely prospect), when we are thinking about underrepresentation we refuse to ease our figures by looking at the smaller percentage of economically active disabled people.

We know that some people who are looking for work are not included in the economically active figure and we recognise that many disabled people are not actively seeking work because of the barriers they face in employment, not because they cannot work or don't want to work.

We will not benchmark against an unequal status quo. We also recognise that some people may meet the legal definition in the Equality Act but do not consider themselves to be a disabled person.

- Ethnic minority staff made up less than 3% of the organisation compared to 6.2% (**Footnote 1**) of the Welsh working age population and some colleagues still report experience of conscious and unconscious bias and discriminatory behaviour.
- Women made up just over 40% of the SCS in an organisation which is 59% female.
- Minority sexual orientation staff are not thought to be generally underrepresented compared to the Welsh population but more staff did not declare their sexual orientation or selected 'prefer not to say' compared to most other protected characteristics (**Footnote 2**).

We are mindful that many staff have multiple protected characteristics and their experience may be shaped by all of them in combination (intersectionality **Footnote 3**), as well as by other factors such as working part time or being a carer.

As we write this strategy we are living through an unprecedented period. We have changed all our ways of working to adapt to a global pandemic.

This has given us greater geographical equality in our work than we have ever seen before and allowed huge advances in virtual and remote working. But the pandemic has brought to the fore persistent inequalities in our society.

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Similarly, we have a considerable distance to travel before persistent societal inequality is removed from our own organisation.

We need to change our own organisation in order to help drive change in wider society. We know we can't change the make-up of the organisation overnight. But neither are we willing to wait decades for change to continue at its current pace.

Our vision

The year is 2030. Welsh Government is an organisation which fully reflects the diversity of Wales at every level, is anti-racist and anti-discrimination of all types. People who work here are encouraged and supported to develop and reach their potential, knowing they will not be discriminated against or made to feel uncomfortable because of who they are.

They understand the importance of equality, diversity and inclusion, how to apply the social model of disability and why they need to prioritise inclusive leadership as well as applying the principles to their policy or operational work.

People treat others with courtesy, dignity and respect. All of our people understand why we have a diverse organisation and the Welsh Government is seen as an exemplar because its approach to equality, diversity and inclusion has demonstrable business benefits as well as making it a place where people from all of our communities want to work.

This strategy complies with the provisions of the Equality Act 2010 which protects certain groups against discrimination on the grounds of their protected characteristics.

Becoming a more diverse organisation, with both diversity of lived experience and thought, will quite simply give us a wider perspective and a richer skill set with which we can deliver ministerial priorities and make a difference for the diverse citizens of Wales.

It will also enable the people of Wales to understand that the organisation is

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representative of them.

We can make a real difference in 5 years but we can't do that alone.

Equality in our workplace is not an issue for underrepresented groups themselves to address or just an HR concern, it is something which needs to become part of everyone's normal – making our organisation a great place to work for our colleagues and ultimately ourselves.

We ask everyone to commit to making Welsh Government the workplace we want it to be.

The targets

Our overall objective – as set out in Welsh Government's current **Strategic Equality Plan** – is that by 2024 Welsh Government will be an exemplar employer, increasing diversity by:

- addressing in particular the under-representation of disabled people and people from minority ethnic communities at all levels of the organisation and the underrepresentation of women in senior roles
- removing barriers
- supporting apprenticeships from diverse communities
- enabling staff from all backgrounds to reach their potential, creating equality of opportunity for all.

To focus our work we have set ambitious targets. We know these will not be easy to achieve but they reflect the levels of underrepresentation in our organisation and our commitment to organisational change.

The specific focus on some groups is due to known barriers experienced and levels of underrepresentation seen in our organisation.

This does not mean that other protected characteristics are disregarded or of lesser value or that we are not committed to equality for all of our staff. It merely reflects a targeted and appropriate response for the staff population in our

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organisation as currently understood.

In external recruitment:

- by 2026 we aim for 20% of people we appoint to be disabled and 20% will be from ethnic minority backgrounds
- by 2030, we aim to increase this so that 30% of people we appoint will be disabled, in order to make bigger inroads into the very large scale underrepresentation of disabled people in our organisation. The 30% target for 2030, and the actions we need to take to achieve it, will be reviewed in the light of lessons learnt whilst working to achieve the 2026 target but we want to be clear now that our ambition is to reach 30% appointment of disabled people by 2030
- more than 50% of appointments to the SCS between now and 2026 will be women.

In internal recruitment, our aspirations are:

- to promote disabled staff at a level which exceeds their population share, to address current under-representation at all levels of the organisation
- to promote ethnic minority staff at a level which exceeds their population share, to address current under-representation at all levels of the organisation
- for more than 50% of promotions to the SCS to be women.

Meeting these very ambitious targets will be extremely challenging and will be dependent on continued focus and investment. However, we would prefer to have stretching targets that we will struggle to achieve than to lack ambition on this very important issue.

How have we developed the strategy?

The strategy has been co-produced in conjunction with our staff diversity networks, Diversity and Inclusion Steering Group members and Trade Union

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Side (TUS) and the same will be true of the annual Delivery Plans. It has also been influenced by the Gender Equality Review. All staff were given the opportunity to contribute and we thank all those who provided helpful perspectives in meetings or in written responses. Your contributions have helped improve the strategy.

Further staff engagement on the strategy will be undertaken as part of the involvement and engagement on the Future Workforce Strategy.

The following principles underline the strategy:

- Establishing an inclusive culture which values strength in difference.
- Treating everyone with dignity and respect in an organisation where discrimination, harassment, victimisation and unwelcome behaviour or language will not be tolerated by anyone.
- Fair and equal treatment, recognising that equality is more complex than treating people in the same way and that fairness is not always synonymous with consistency.
- Promoting equality of opportunity and equality of outcome irrespective of protected characteristics (**Footnote 4**), working pattern, caring responsibilities, grade, working location, trade union activities, political beliefs, social or educational background, language preference or any other factor.
- Sharing our good practice with others as part of a commitment to Fair Work across Wales and beyond.
- Developing a pipeline for both recruitment and promotion.

Our themes

The 3 strategic themes are:

- Theme 1 – Increasing diversity by addressing in particular the underrepresentation of disabled people and people from ethnic minority communities at all levels of the organisation and the underrepresentation of women in senior roles
- Theme 2 – Identifying and removing barriers

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- Theme 3 – Supporting staff from all backgrounds to reach their potential, creating equality of opportunity for all

The themes are underpinned by relevant goals which we share with the Diversity & Inclusion Strategy for Public Appointments namely:

- Goal 1: To gather and share data
- Goal 2: To build a robust pipeline
- Goal 3: To secure open and transparent recruitment practices
- Goal 4: To strengthen leadership.

How we will put the strategy into action

This section provides a summary of the key strategic themes underpinning our plans to achieve our vision.

The themes are interdependent and many of the actions under them will contribute to more than one theme.

Details are provided on each theme and its aims and the step changes that will be required in order for them to be realised.

Annual delivery plans will set out in more detail how we will take action to deliver the themes.

Theme 1

“ Increasing diversity by addressing in particular the underrepresentation of disabled people and people from ethnic minority communities at all levels of the organisation and the underrepresentation of women in senior roles. ”

We want to celebrate existing diversity and bring new diversity into the organisation. The only way we can change the overall diversity of the organisation is through external recruitment and so we have set challenging

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targets for that, but we also want to see changes in progression rates in the organisation.

Getting the buy in and understanding from recruiting line managers is also key.

Appointment will always be based on merit but there are steps we can take to influence the demographic profile of those who apply for roles, ensure the fairness and accessibility of our processes and make lawful interventions in respect of demonstrably underrepresented groups, in order to try and achieve more diverse outcomes.

Historically we have recruited (and promoted) far fewer staff from some groups than you would expect in a fair society, leaving us with entrenched underrepresentation.

Our starting point is so low for some groups that we need to do more than start recruiting proportionately; we need to encourage really high levels of recruitment from underrepresented groups.

Through outreach, barrier removal and lawful positive action (**Footnote 5**) we will do as much as possible to increase our appointments of individuals from underrepresented groups, targeting and prioritising available resource to deliver the best results within budget constraints.

1. We will invest in attracting the diverse staff of our future.

1.1 Externally we will invest in targeted outreach to attract those who we consider to be less likely to apply to Welsh Government and we will take steps to make our recruitment processes as accessible as possible, including exploring how we might recognise the value of lived experience when applying for posts.

We will need to prioritise and focus our outreach activity in the short term and will develop a longer-term outreach plan for both centrally-run and line manager-led recruitment.

1.2 Outreach will focus in particular on disabled and ethnic minority candidates in alignment to our targets but will also include other groups as indicated in the Delivery Plan (including those from lower socio economic backgrounds).

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1.3 We will develop a strategy to create a pipeline from all public, private and third sector organisations that in time will yield applications from diverse groups. As part of this, we will work closely with heads of profession to ensure they maximise all opportunities to carry out outreach and recruit diverse staff.

2. We will undertake positive action in recruitment in the following lawful ways.

2.1 In the relatively rare circumstances where we have two identically scoring candidates for a single post and one of them is from an underrepresented group whilst the other isn't, we will use the equal merit or tie break provision in the Equality Act 2010 to appoint the underrepresented candidate as a matter of principle.

2.2 In accordance with Civil Service Recruitment Principles Exception 2, we will explore specific external recruitment exercises to recruit talented and diverse disabled people to address our large scale underrepresentation in the organisation, seeking applications from a very wide range of disabled people, including those with mental health conditions and those who are neurodivergent.

2.3 We will also explore wider opportunities to recruit other underrepresented groups of people covered by Exception 2 (including veterans, ex-offenders and care leavers).

3. We will take steps to broaden the appeal of and applications to the Senior Civil Service (SCS).

3.1 We will take any actions which we can as an employer to remove the actual or perceived barriers which women at SEO, G7 and G6 (Senior Executive Officer (SEO) Grade 7 (G7) and Grade 6 (G6) are the grades leading up to Senior Civil Service (SCS)) tell us prevent aspiration or application to join the SCS, whether those relate to concerns about working conditions, working hours or developing the pipeline of future applicants.

3.2 We will further explore and address the similar or different issues faced by ethnic minority and disabled staff who may also be less likely to apply to, or are underrepresented in the SCS.

4. We are committed to meeting the needs of all who may experience different impact in our organisation – recognising that issues of equality, inclusion and well-being are or may be present for other groups who are not specifically prioritised elsewhere in this strategy. We undertake during the lifetime of the strategy to continue support for, in particular, carers and those with mental health issues and to test for the existence of disadvantage of differential experience on ground of:

4.1 Socio-economic background.

4.2 Protected characteristics not otherwise highlighted in this strategy such as faith/religion/belief (or lack of it), pregnancy/ maternity and age.

4.3 Any other characteristic or factor where there may be risk of inequality which we can remove by the steps we take as an employer.

4.4 For trans and non-binary people we are seeking ways to measure representation and address barriers to disclosure.

Theme 2

“ Identifying and removing barriers ”

The way we operate in our organisation can create or remove barriers. We need to identify and remove them; if we don't remove them they limit the potential of talented staff.

5. We will work in coproduction with colleagues in developing our ways of working and in carrying out effective equality impact assessment.

5.1 Impact assessment will apply for the introduction or significant review of all key internal policies and significant processes affecting our staff.

5.2 Impact assessment will be informed through obtaining the views of TUS and staff diversity networks and, where practicable, providing fora for wider engagement with those in underrepresented groups who may not belong to staff

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networks.

6. We will embed the social model of disability and its language to underpin all of our employment policies, practices and recruitment methods, removing the barriers which disable people with impairments.

6.1 We will deliver bespoke communications and training to support individual and organisational understanding and implementation of the social model, placing it at the centre of how we work as an organisation and embedding the principles in our contractual and specification requirements for suppliers of training.

6.2 We will bring all our HR or staff orientated policies, practices and language, in line with the social model.

6.3 We will evaluate the 2020 recruitment adjustment pilot and roll-out improved recruitment adjustment support across our recruitment at all levels.

6.4 We will remove methodological barriers in recruitment which may cause systemic structural disadvantage to candidates with impairments; this may include trialling alternative options for assessment as a reasonable adjustment. We will ensure timely provision of workplace adjustments for all staff, including new procedures to ensure day one support for new starters and supporting transition to new roles.

7. We aspire to become an anti-racist organisation and will take action in our employment policies, practices and recruitment methods to remove the barriers which result in race inequality.

7.1 We will work with ethnic minority people in the Welsh Government and ethnic minority communities to identify the change we need to take to become an anti-racist organisation.

7.2 We will take urgent action to promote a strong culture of challenge on anti-racism so that colleagues at all levels of the organisation feel supported to 'call it out'.

7.3 We will grow and strengthen our Black, Asian and Minority Ethnic

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Leadership programme to support more people from under-represented groups achieve their potential in our organisation.

7.4 We will expand our use of name-free recruitment (**Footnote 6**) using the opportunity of tendering for a new recruitment system (currently expected to be in place by 2022) to give us the flexibility to adopt that approach.

8. We will take every action we can to eliminate scope for unconscious bias.

8.1 We will use emerging best practice for training interventions which foster inclusive, bias-free recruitment and working environments.

8.2 Internally we will have processes in place which enable fair access to all roles, including temporary promotions that will help us tackle inherent bias and ensures effective recruitment.

Theme 3

“ Supporting staff from all backgrounds to reach their potential, creating equality of opportunity for all. ”

We want everyone to enjoy their work, operate in an inclusive working environment, in which every single member of staff has the opportunity to develop to the best of their ability and feel valued for their work and as individuals.

In addition, we will take specific steps to improve the lived experiences, inclusion and personal development of those that continue to be underrepresented in our organisation.

9. We will celebrate and make visible our existing diversity – the diversity that already exists in our organisation isn't always visible which means that those in underrepresented groups lack peers and role models, and the lack of visibility may, in some cases indicate that people do not feel safe to be open about who they are.

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9.1 During the period of this Strategy we will encourage wider reporting of diversity data by all staff. In particular, we will aim to reach reporting rates of 90% for sexual orientation and for gender identity (measuring all staff and SCS) as our reporting rates for both characteristics are currently below those for most other protected characteristics.

9.2 And we will also seek and support those at all levels of the organisation, including in particular senior staff, who are willing to be role models within our organisation and use network and communications tools to ensure effective reach.

10. We will offer high quality learning and development opportunities for groups underrepresented in our organisation including:

10.1 Vigorous marketing to underrepresented groups of talent and development opportunities which are open to everyone, including mentoring and coaching to encourage higher take up from these groups.

10.2 Continued delivery of Women into Leadership courses (in recognition of senior level underrepresentation).

10.3 Taking all possible steps to eliminate or minimise delivery inflexibility or inaccessibility which inhibits some disabled and part time staff, and some staff with parenting or caring responsibilities, from being able to take up development opportunities.

11. We will investigate the experiences of part time and job share workers to identify means to improve fairness in work and development opportunities – we have policies to allow flexibility of part time working in all posts (very rare exceptions are agreed on business grounds, but it is unusual) but those who work part time frequently report overload in full time posts and other challenges of part time working.

11.1 Underpinned by a research partnership with London Business School, we will seek the best means of improving lived experience for the 20% of staff who work (very varied) part time hours and share this with other public sector organisations.

12. We will support Smart Working. Smart Working is a business-focused approach that supports more flexibility, resilience and productivity in the way we work. It focusses on how you use your time, and where and how you work, to meet business need in the most flexible and productive way.

12.1 We will continue research to understand the (sometimes differential) impact of Smart Working during the pandemic.

12.2 We will retain the positives of Smart Working in the Covid context which have made the experiences of people working in different locations across Wales more inclusive.

12.3 We will support choice of working location (aligned to health and safety and business need).

13. We will continuously seek to improve the inclusivity of our working environments (whether that involves home, office, remote working or where ever the workplace might be) and our role as an employer in supporting wellbeing.

13.1 We will be an exemplar in ensuring office accessibility and inclusivity and accessible work tools – particularly accessibility of IT and communications channels for assistive software users.

13.2 We will learn from the experiences of enforced home working, including isolation and impact on mental health, cessation of or changes to normal childcare and education, and experiences of carers and those who live alone and do all we can as an employer to ensure that all staff have fair and equal chances of rewarding work, progression and development, not missing out because they are not working in the office or are affected by issues like juggling caring requirements with employment.

14. We will undertake internal evaluation and external assessment/ benchmarking to test the experiences and outcomes of different groups and the measures we have in place to support equality, diversity and inclusion.

14.1 We will take part in external benchmarking activity to the schedule set out in the Delivery Plan to ensure that, over the lifetime of this strategy we can carry

out benchmarking in relation to sexual orientation, gender reassignment, disability, race and sex. This will allow us to balance the value of benchmarking/assessment against the staff time spent in taking part.

14.2 We will use internal data sources including the People Survey to understand differential experience by protected characteristic (**Footnote 7**).

14.3 We will use Knowledge and Analytical Services' expertise, people analytics and staff feedback on lived experience to understand the differential experience of different groups.

14.4 We will start new analysis of leaver data to monitor for any worrying trends.

15. We will champion inclusive leadership throughout the organisation.

15.1 We will introduce non-executive roles on our leadership and decision making boards and open them to staff and stakeholders to ensure greater diversity in our decision making processes.

15.2 We will equip the SCS with the skills and confidence to enable them to role model behaviours that support equality, diversity and inclusion in both their leadership and policy/ operational delivery.

15.3 We will ensure that a contribution to enhancing equality, diversity and inclusion becomes a key performance indicator for the SCS so that it becomes integral to what we see as good performance as a senior leader.

15.4 We will recognise and reward those who further equality, diversity and inclusion by testing for this in recruitment and promotion Gateways.

15.5 We will equip our staff to act as advocates for equality, to understand and practice inclusive leadership and to lead with positive behaviours, challenging unwelcome and unacceptable behaviours if they see them.

16. We will equip our staff to understand equality, diversity and inclusion and to take ownership of their role in making a difference.

16.1 We will commission new training provision for staff, working in partnership

with staff with lived experience.

16.2 We will continue our reverse mentoring scheme and explore other more informal ways of sharing lived experience.

16.3 We will encourage staff to discuss what they are doing to foster equality, diversity and inclusion in their roles during regular check-ins.

17. Linked to our Let's Talk Respect communications campaign, we will raise awareness of support for anyone experiencing bullying and harassment.

17.1 In particular we will provide accessible information on the range of options and support available for those who want to resolve difficult situations without recourse to formal complaints.

Oversight and evaluation

Ownership of the Diversity & Inclusion Strategy sits with the Executive Committee of the Welsh Government Board (ExCo). Responsibility for delivery of the Strategy sits within our Corporate Services Directorate.

Progress will be overseen by the Diversity and Inclusion Steering Group (DISG). But we can't deliver this alone. Everyone who works for Welsh Government has a role to play in ensuring that equality, diversity and inclusion are at the heart of everything we do.

We will provide annual reports to Exco on progress. Potential ways of assessing this include:

- Reporting on lived experience across different groups in employee surveys
- Feedback from our diversity networks
- Workforce profile against diversity in Wales' working age population
- Looking in more detail at our focus on ethnic minority and disabled people and ensuring that some groups within those communities are not overlooked
- Reduction in our gender pay gap
- Performance against targets for recruitment and promotion, particularly

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senior grades.

- Diversity of participants on development programmes
- Reduction in People Survey bullying, harassment and discrimination scores
- Increase in People Survey engagement scores
- Increase in People Survey inclusion and fairness treatment scores
- Reduction in the number of bullying, harassment and discrimination related grievances
- Employee participation in equality, diversity and inclusion learning and development.

Footnotes

1. Data taken from Stats Wales website (source Annual Population Survey, Office for National Statistics) and correct as at December 2019 which is the latest data available.

2. In October 2020, 14.8% of staff had not disclosed their sexual orientation or selected 'prefer not to say' compared to 6.3% of staff for race and 7.9% of staff for disability. The 2020 Stonewall Staff Feedback Questionnaire found that 87% of Welsh Government LGB staff 'are confident to tell their employer' about their sexual orientation but only 42% and 24% 'are comfortable to disclose my identity' to colleagues and managers respectively.

3. Intersectionality means the way in which those with multiple protected characteristics (and sometimes other characteristics) may experience disadvantage in a complex and cumulative way, for example, if racism and sexism are experienced together. Some people who experience 'intersectionality' also experience a sense of belonging to a 'minority within a minority' such as, for example, a disabled person within the LGB community or vice versa. Everyone is different, and experiences of intersectionality, can be very different but inequalities experienced on one ground may often overlap with another ground and the effect may be more than the sum of its parts.

4. Protected characteristics as defined by the Equality Act 2010 are:

- age

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- disability
- gender reassignment
- marriage (including same sex marriage and civil partnership)
- pregnancy and maternity
- race (including ethnic or national origins, colour and nationality)
- religion or belief (or lack of it)
- sex
- sexual orientation.

5. Positive action refers to lawful measures which employers can choose to take in order to improve diversity and equal outcomes for underrepresented groups. The provision is the same for any underrepresented group, with the exception that the Equality Act 2010 allows more favourable treatment of disabled people in order to remove the barriers they experience. The limits and opportunities of positive action are defined in the [Statutory Code of Practice on Employment](#) which clarifies the provisions of the Equality Act.

6. Name-free recruitment allows us – as a matter of principle – to separate who a candidate is from what they have to offer in their selection for assessment, allowing us to reduce bias associated with known individuals or associations based on names. It should be noted, however, that in internal (and also senior external) recruitment some individuals may be identifiable from evidence provided and so name free recruitment may not always mean anonymous recruitment.

7. We recognise the limitations of the People Survey for some of our purposes. In particular, this UK civil service tool does not provide us with a means to identify numbers/experiences of staff with the protected characteristic of gender reassignment and it is based on the medical model of disability, not the social model of disability. We will continue to work with the UK government to seek improvements and will seek opportunities to compensate for the limitations of the survey through other approaches where possible.

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