

Strategic Equality Plan 2024–28



Comisiynydd y
Gymraeg
Welsh Language
Commissioner



Background

The principal aim of the Welsh Language Commissioner, an independent body established by the Welsh Language (Wales) Measure 2011, is to promote and facilitate use of the Welsh language. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organisations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles will underpin the work:

- In Wales, the Welsh language should be treated no less favourably than the English language
- Persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so.

Contact Details:

T: 0345 6033 221

E: post@cyg-wlc.wales

W: welshlanguagecommissioner.wales

Welsh Language Commissioner
Unit 2, Block C
Victoria Dock
Caernarfon
LL55 1TH

1. The Legal Context

1.1 The Welsh Language Commissioner (the “Commissioner”) is subject to the Equality Act 2010, and the general Wales-specific equality duty which came into force in 2011.¹ In light of this duty, the Commissioner must consider the requirement to:

- **Eliminate** discrimination, harassment, victimisation and any other conduct prohibited under or by the Act;
- **Advance** equality of opportunity between persons who share a relevant protected characteristic and those who do not; and
- **Foster** good relations between persons who share a relevant protected characteristic and those who do not.

1.2 The nine relevant protected characteristics are as follows:

- Age
- Disability — including neurodiversity, sensory disabilities, physical disabilities and hidden disabilities
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race – including ethnic or national origin, colour or nationality
- Religion and belief – including non-belief
- Sex
- Sexual orientation.

Specific equality duties

1.3 In order to assist bodies such as the Commissioner under the general duty, they must fulfil a number of ‘specific equality duties’. These include the need to set Equality Objectives and prepare a Strategic Equality Plan. The implementation of the plan must be reported on annually and those objectives reviewed at least once every four years.

1.4 In addition, there is a requirement to:

- Gather and monitor equality data
- Assess the impact of our policy decisions and procedures on equality
- Engage with protected groups
- Provide equality training for staff
- Consider equality in procurement.

¹ The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 (SI 2011/1064).

Socio-economic duty, anti-racism strategy and gender and LGBTQ+ equality action plans

- 1.5** A new duty called the socio-economic duty came into force in Wales on 31 March 2021. This new duty is intended to lead to better decision-making that will ultimately deliver better outcomes for those who are socio-economically disadvantaged.
- 1.6** ‘Socio-economic disadvantage’ according to Welsh Government² is defined as:

Living in less favourable social and economic circumstances than others in the same society.
- 1.7** The Commissioner is not one of the statutory bodies required to comply with this duty. However, the Commissioner is committed to acting in the spirit of the duty by embedding the principles within the new equality objectives to ensure that the impact of the Commissioner’s strategic decisions on socio-economically disadvantaged individuals is considered.
- 1.8** In addition, the Welsh Government has published its vision for an anti-racist Wales by 2030 and has published a comprehensive Action Plan³ to make that a reality. The Commissioner also commits to the aims of realising this vision and contributing to the creation of an anti-racist Wales through the objectives in this plan.
- 1.9** The Welsh Government has also published action plans to try to address the inequalities between genders⁴ and those that LGBTQ+⁵ communities currently face in Wales. The Commissioner also commits to ensuring equality between genders and for LGBTQ+ people through the objectives in this plan.

2. <https://www.gov.wales/sites/default/files/publications/2021-03/a-more-equal-wales.pdf>.

3. <https://www.gov.wales/anti-racist-wales-action-plan>.

4. <https://www.gov.wales/sites/default/files/publications/2020-03/advancing-gender-equality-plan.pdf>.

5. <https://www.gov.wales/sites/default/files/publications/2023-02/lgbtq-action-plan-for-wales.pdf>.

2. The Commissioner's Work

- 2.1** The Commissioner's vision is of a **Wales where people can live their life in Welsh**.
- 2.2** The Commissioner has a [corporate strategic plan](#) for the period 2022–25, which sets out the vision and values that underpin the organisation's work and sets out four strategic objectives to contribute towards achieving the vision. These objectives will be implemented through a series of measurable priorities over the three-year period of the plan.
- 2.3** These priorities underpin the activities and projects in the Commissioner's annual work plan:
- Ensuring fairness, justice and rights for Welsh speakers
 - Ensure that the Welsh language is a central consideration in policy and legislation
 - Maintain and increase organisation's compliance with their statutory duties
 - Increase the use of Welsh by organisations across all sectors.
- 2.4** The development of a new strategic plan for the period 2025 onwards will take place during the period of this plan and the Commissioner will ensure that this plan is embedded in the next strategic plan.
- 2.5** Our core values that underpin all our activities are:
- **Respecting** everyone is at the heart of everything we do
 - Being **open** with and **trusting** one another is fundamental to our workplace culture
 - **Fairness, honesty** and **consistency** are at the core of every aspect of our work
 - **Working with others** in an appropriate and progressive way is important to us.

3. How This Plan Was Developed

3.1 The new Strategic Equality Objectives for 2024–28 build on the objectives and work undertaken within the Strategic Equality Plan 2020–24, which are:

- Increasing workforce diversity and reducing pay gaps
- Community engagement
- Ensuring that procurement informs equality
- Ensuring services reflect individual needs.

3.2 The objectives within that plan were developed in collaboration with a number of other public bodies in Wales as part of the Wales Public Bodies Equality Partnership. The Commissioner remains a member of the partnership and in conjunction with them has agreed to develop objectives that are a continuation and progression of those original objectives. The Commissioner has chosen to do so based on broader themes and has developed a long-term goal and actions unique to the organisation.

Engagement and consultation

3.3 The Commissioner held a series of internal workshops facilitated by an external provider to gain officers' views on the achievement and performance under the previous plan and identify themes to be adopted within the next plan. The Commissioner's Advisory Panel also provided input in developing the draft objectives.

3.4 Public consultation on the draft objectives took place between 1 February and 1 March 2024 and online engagement sessions were held with the services of an external facilitator with a number of representative groups and the Commissioner will continue to consult with a number of them whilst putting the new plan into action.

4. Key Facts and Statistics of Welsh Speakers Aged 3 or Over in Wales (According to the 2021 Census)



538,300
(17.8%) of the population of Wales are Welsh speakers

86,756 
people with a disability can speak Welsh

There are **160,518** 
married Welsh speakers (960 of the same sex) and 647 in a **civil partnership** (442 of the same sex)

Percentage (%) who can speak Welsh by country of birth



22%
Born in Wales



7%
Born outside of Wales

Number and % of population who are Welsh speakers by age

Age group	Number	%
3 to 4	11,900	18.2
5 to 15	134,700	34.3
16 to 19	38,800	27.5
20 to 44	153,800	16.5
45 to 64	107,300	13.0
65 to 74	45,900	12.8
75+	45,800	15.1

Number of Welsh speakers providing unpaid care per hours per week

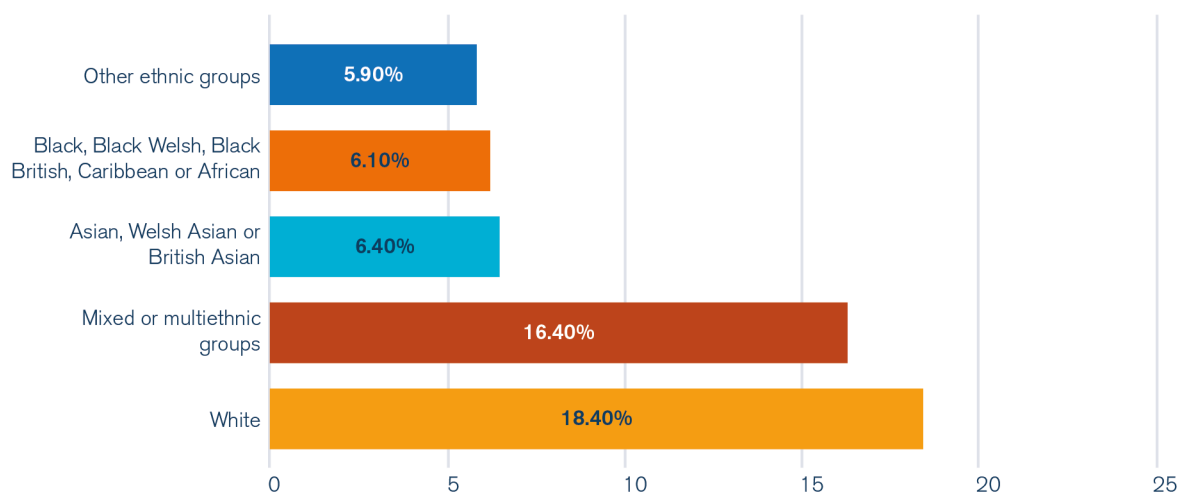
24,830
19 hours or less

8,615
Between 20 and 49 hours

13,048
50 hours or more



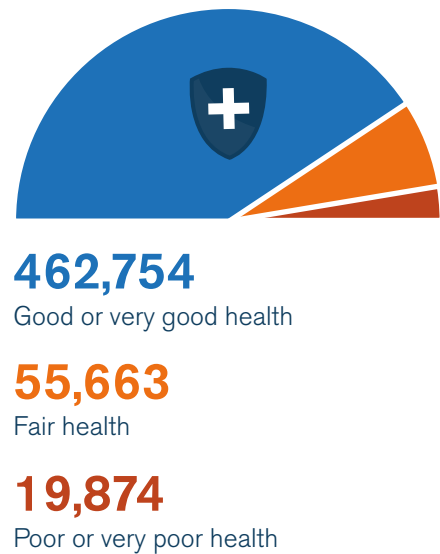
Percentage (%) of the population who can speak Welsh by ethnic group



Number of Welsh speakers by religion



Number of Welsh speakers by health

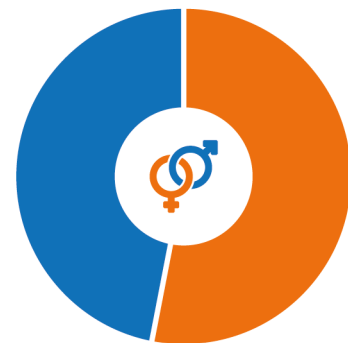


Number of Welsh speakers by socio-economic class



Higher managerial, administrative and professional occupations	42,141
Lower managerial, administrative and professional occupations	94,312
Intermediate occupations	45,809
Small employers and own account workers	43,838
Lower supervisory and technical occupations	21,581
Semi-routine occupations	42,788
Routine occupations	37,406
Never worked or unemployed	19,455
Full-time students	44,337

Ratio of Welsh speakers by gender



● Male ● Female

Welsh speakers are **less likely to be unemployed**



than those who can't speak Welsh (29.8% of Welsh speakers compared with 41.6% of non-Welsh speakers).

The following were voluntary questions in the Census and not everyone answered the question, but of speakers aged 16 years or over:

1,381 identify a different gender from the sex registered at birth.



349,178 describe themselves as 'Straight/Heterosexual' and



13,315 describe themselves as Gay, Lesbian, Bisexual or other sexual orientation (LGB+).

5. Strategic Equality Plan Objectives 2024–28

5.1 The Commissioner’s strategic equality objectives for 2024–28 build on the objectives and actions that have already been taken within the life of the 2020–24 plan. They are divided into four themes as follows, each of which applies to all protected characteristics. The Commissioner recognises the need to take an intersectional approach across the four themes to have full impact.



1. The workforce

We have a bilingual workforce that is representative of society and we work to prevent pay gaps.



2. The community

We engage with all sections of society and take proactive steps to promote equality and diversity through our work.



3. Way of working

Equality, diversity and inclusion are an integral part of our way of working.



4. Individual needs

All our activities are accessible and are available to everyone.

How will we achieve the objectives

Objective 1: The workforce

Long-term goal: We have a bilingual workforce that is representative of society and we work to prevent pay gaps of all kinds.

Actions:

- Record comprehensive employment equality data and, where appropriate, publish that data.
- Based on that data, work to target people within society who are currently under-represented within the workforce in order to attract them to work for us.
- Continue to monitor pay disparities between the sexes, and for groups that share other protected characteristics.
- Review the effectiveness of our recruitment processes and approach to encourage a wide range of candidates and ensure that the processes and requirements do not exclude people and are safe.

Objective 2: The community

Long-term goal: We engage with all sections of society and take proactive steps to promote equality and diversity through our work.

Actions:

- Record equality data from people who engage with us, including in relation to complaints, and where appropriate, publish that data.
- Based on that data, work to target people within society who are not currently engaging with us to understand why that is and to increase awareness of the Commissioner's work among people with protected characteristics.
- Ensuring that all parts of society are represented in our communication and that the Welsh terminology we use is appropriate and culturally sensitive.
- Conduct a consultation to ensure that the experiences of a wide range of people underpin the next strategic plan.

Objective 3: Way of working

Long-term goal: Equality, diversity and inclusion are an integral part of our way of working.

Actions:

- Establish an internal Steering Group to lead on the implementation of this plan and to implement a programme of work.
- Update our procurement processes and documents to ensure they continue to promote equality while also meeting new legislative requirements.
- Review and mainstream the Equality Impact Assessment regime and add consideration of the impact on socio-economic disadvantage to the process for strategic decisions.
- Provide further training to managers to embed the regime into the decision-making process.
- Provide further training to all staff on issues of equality as well as the socio-economic duty and anti-racism.

Objective 4: Individual needs

Long-term goal: All our activities are accessible and are available to everyone.

Actions:

- Ensure that the website is easy to use and continues to meet the expected standards of web content accessibility guidelines by holding an annual audit and updating the accessibility statement at least once a year.
- Explore new channels for publishing our work, including community press and stakeholder newsletters.
- Ensure that all communications are written in clear and coherent language and create easy-to-read versions of key documents such as this plan.
- Make reasonable adjustments based on individual needs, such as providing alternative versions of publications on request.

6. Monitoring, Evaluation and Review

- 6.1** Progress in relation to the delivery of the identified actions is continuously monitored at organisational level. A dedicated Steering Group led by the Director of Governance and Corporate Services will meet quarterly and prepare a quarterly report on matters arising to the Commissioner and Leadership Team.
- 6.2** Teams quarterly reports prepared for the Leadership Team on progress against the corporate action plan will focus on this progress also.
- 6.3** This plan will be evaluated during 2027–28 and a new Strategic Equality Plan will be produced by the end of March 2028.

7. Publication and Reporting

- 7.1** This plan will be published on the Commissioner’s website and an easy-to-read version of the objectives and actions will be available. Other formats will be available upon request.
- 7.2** The Commissioner will continue to report annually on the progress made during the year to achieve the objectives as part of its corporate Annual Report. It will be published on the website.

Appendix 1: Action Plan 2024–28

Objective	Activity	Timescale
1. The workforce	1. Record comprehensive employment equality data and, where appropriate, publish that data.	Annually
1. The workforce	2. Based on that data, work to target people within society who are currently under-represented within the workforce in order to attract them to work for us.	Ongoing
1. The workforce	3. Continue to monitor pay disparities between the sexes, and for groups that share other protected characteristics.	Annually
1. The workforce	4. Review the effectiveness of our recruitment processes and approach to encourage a wide range of candidates and ensure that the processes and requirements do not exclude people and are safe.	2024-25
2. The community	5. Record equality data from persons who engage with us, including in relation to complaints, and where appropriate, publish that data.	Annually
2. The community	6. Based on that data, work to target people within society who are not currently engaging with us to understand why that is and to increase awareness of the Commissioner’s work among people with protected characteristics.	Ongoing
2. The community	7. Ensuring that all parts of society are represented in our communication and that the Welsh terminology we use is appropriate and culturally sensitive.	Ongoing
2. The community	8. Conduct a consultation to ensure that the experiences of a wide range of people underpin the next strategic plan.	2024-25

Objective	Activity	Timescale
3. Way of working	9. Establish an internal Steering Group to lead on the implementation of this plan and to put the programme of work in place.	2024-25
3. Way of working	10. Update our procurement processes and documents to ensure they continue to promote equality while also meeting new legislative requirements.	2024-25
3. Way of working	11. Review and mainstream the Equality Impact Assessment regime and add consideration of the impact on socio-economic disadvantage to the process for strategic decisions.	2024-25
3. Way of working	12. Provide further training to managers to embed the regime into the decision-making process.	2024-25
3. Way of working	13. Provide further training to all staff on issues of equality as well as the socio-economic duty and anti-racism.	Annual programme
4. Individual needs	14. Ensure that the website is easy to use and continues to meet the expected standards of web content accessibility guidelines by holding an annual audit and updating the accessibility statement at least once a year.	Annually
4. Individual needs	15. Explore new channels for publishing our work, including community press and stakeholder newsletters.	2024-25
4. Individual needs	16. Ensure that all communications are written in clear and coherent language and create easy-to-read versions of key documents such as this plan.	Ongoing
4. Individual needs	17. Make reasonable adjustments based on individual needs, such as providing alternative versions of publications on request.	As needed



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W: welshlanguagecommissioner.wales