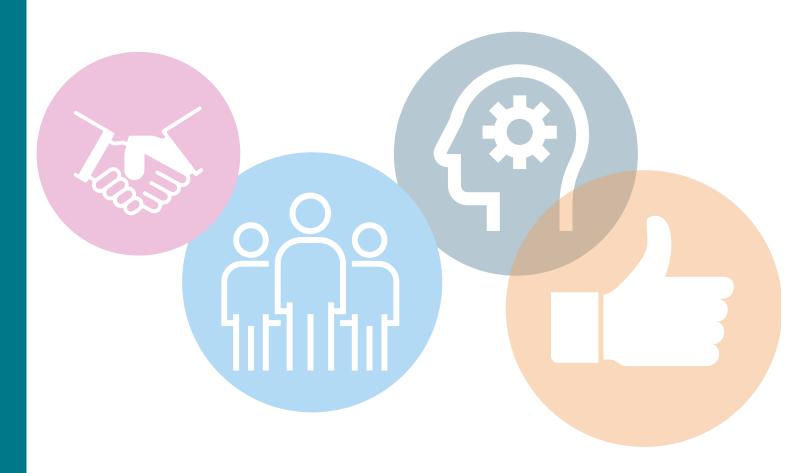


Career Choices Dewis Gyrfa Ltd

Public Sector Equality Duty Report

Reporting Period: March 2018 - April 2019











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Introduction and background

Who we are

Career Choices Dewis Gyrfa Ltd (CCDG) is a wholly owned subsidiary of the Welsh Government which was formed on 1 April 2013. Trading as *Gyrfa Cymru Careers Wales*, we provide the all age, independent and impartial careers information, advice and guidance service for the people of Wales.

CCDG delivers a remit set by the relevant Welsh Government Minister to support the Welsh Government's strategic objectives as identified in their Programme for Government and related Welsh Government policies. For the context of this report, CCDG is named in its trading name throughout.

The overall focus for our service is to help people make effective decisions and become independent in managing their Careers. This includes making realistic career decisions and plans, and ensuring successful progression and positive outcomes for individuals, who we support to gain appropriate training, further learning or employment.

Our work helps to develop the nation's skills base and to support the effectiveness of expenditure on education and training, thereby contributing to the economic and social well-being of Wales. We work to the principles enshrined in the Wellbeing of Future Generations Act 2015.

Why we exist

Career decisions are among the most important decisions people make throughout their lives and careers information, advice and guidance can help to:

- improve knowledge and awareness of learning opportunities and the labour market thereby improving the efficiency and effectiveness of the labour market
- improve self-awareness, raise individual aspirations and support people to make effective decisions about their careers;
- increase access to, and completion of, learning and training;
- motivate people to manage their careers and be resilient in adapting their plans when circumstances change;
- address inequality by focussing on the needs of individuals who are underrepresented in employment, learning or training and by challenging stereotyping; and
- improve the efficiency and effectiveness of the labour market

Our strategic vision and mission is outlined in Changing Lives document which sets out the future of Careers Wales 2017-20 https://careerswales.gov.wales/about-us/our-strategic-vision

Management of equality and diversity within Gyrfa Cymru - Careers Wales

This reporting period has been the sixth year of operation of Career Choices Dewis Gyrfa (CCDG) which trades as Gyrfa Cymru Careers Wales, as a wholly owned subsidiary of the Welsh Government, of working to a formal remit letter issued by Welsh Ministers, underpinned by the Governance Framework Document agreed between the Welsh Government and CCDG, and the 2018-19 Annual Business Plan.

Gyrfa Cymru – Careers Wales is committed to embedding the requirements of the Equality Act 2010 including the specific public sector duties set for Wales and mainstreaming Equality and Diversity throughout all aspects of our business and commits to eliminating unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act.

Gyrfa Cymru - Careers Wales further commits to advance equality of opportunity between people who share protected characteristics and those who do not.

Gyrfa Cymru - Careers Wales has adopted the principle that in the conduct of public business it will treat the Welsh and English language on the basis of equality. Gyrfa Cymru - Careers Wales' Welsh Language Scheme sets out how we implement this. Although Welsh Language is not included in the protected characteristics under the Equality Act, for the purpose of monitoring and reviewing our service offer and our ability to offer services to the population of Wales, it is included within the same processes and is included in our Equality and Diversity action plan and monitoring.

The Gyrfa Cymru - Careers Wales Diversity and Inclusion steering group continued to meet overseeing the organisation's Equality and Diversity action plan during 2018-19 with its membership drawing on managers representing departments from across the organisation. Terms of reference for the group were reviewed and confirmed by the Senior Management Team. The Action Plan will continue to be updated annually and amendments made as and when necessary as proposed by the steering group and agreed by senior management team.

Responsibilities for Equality and Diversity

Senior Management team comprises the company Chief Executive and Directors with a nominated Director as lead for Equality and Diversity. The aim of the Senior Management Team is for Equality and Diversity to underpin all Gyrfa Cymru - Careers Wales service delivery and the company is committed to strategies designed to ensure that everyone has a chance to fulfil their potential.

CCDG Board members receive quarterly performance reports, annual reports and specific HR reports.

The Senior Leadership Team comprises that above plus the Heads of Function covering all activities in the business.

The Diversity and Inclusion steering group comprises of managers who take responsibility for relevant actions noted in the Diversity and Inclusion action plan, report to the steering group

on behalf of their own lead responsibilities. The group will always comprise of representatives who will lead on management information, human resources, compliance, marketing, performance monitoring and management, service delivery and policy.

Learning and Development

Careers Wales continues to place a high priority on employee learning and development, ensuring that continuous professional development is valued throughout the company and all employees are encouraged to reflect on their learning needs and identify both formal and informal ways of improving their skills and knowledge.

Learning and Development opportunities for all staff are outlined in the annual learning and development plan. All employees are given the opportunity to discuss their learning and development requirements with their line manager, and these requests are fed back to the business improvement team for consideration and possible inclusion within the learning and development plan. Given limited budgets, all requests for training are considered on a business-needs basis. The Company has a learning management platform that all employees can access that contains a number of equality and diversity related learning pieces and take up of these is auditable.

Performance Management

As part of reviewing the Diversity and Inclusion action plan and carrying out quality assurance activities across the organisation it has been identified that the company could use data more effectively to target service delivery. The development of a Diversity and Inclusion dashboard is starting to support in this area.

Equality Objectives

Outcome focused equality objectives are published in the Diversity and Inclusion Action Plan. During 2017-18 the relevant steering group representatives reviewed the objectives and noted completed actions.

Advancing equality and diversity and eliminating discrimination in policy and strategy Equality Impact Assessment

Careers Wales utilise an Equality Impact Assessment tool. The form has accompanying guidance notes intended for completion for any changes in service offer and new or revised policies across all areas of work. An Equality Impact Assessment is in place during the reporting year for our remitted delivery of Changing Lives 2017 – 20.

Consultation

Due to the embedding of the organisational restructure and associated staff dynamics, the actions agreed have remained on the Diversity and Inclusion action plan for the following business year, as our action plan remains a "live document" that progresses in line with the stated working period between 2016 – 2020. Stakeholder consultation remains a priority and we are looking to work within a Welsh Public Bodies Forum to share best practice and form a co-ordinated Strategic Equality Plan to reflect key priorities for Wales going forward.

Accessibility

Careers Wales will promote equality and diversity and challenge stereotypes, within the context of our business, at every opportunity through our website (www.careerswales.com), social media and company marketing materials. We commissioned an accessibility audit to ensure that our new BETA site (www.beta.careerswales.gov.wales), which uses a different content management system, is compliant with the AA standard. Careers Wales will ensure the use of imagery and content that challenges stereotypes and is compliant with discrimination legislation including accessibility. Clients are able to access Careers Wales services by telephone, online chat, email or at centres.

Clients who do not speak Welsh or English are supported through an external contract to provide translation through the Language Line service.

In terms of physical accessibility of Careers Wales premises for staff and clients, the Careers Wales Health and Safety Manager has undertaken audits of each of the CW occupied buildings. CW ensures that all new premises comply with the requirements as detailed in the Equality Act 2010 and reasonable and practicable adjustments are made to current premises to ensure compliance with this legislation.

An audit of accessibility tools is also in the process of being carried out at CW premises to ensure that any specialist equipment, such as hearing loops, are present and operational. Any associated training needs will be identified then addressed.

Advancing equality and diversity and eliminating discrimination in service usage

Careers Wales is committed to enabling access for all in terms of service delivery. During the reporting year client data was collected for age, gender, ethnicity and disability. Careers Wales does not collect client data relating to gender re-assignment, (however it will provide individuals who do not wish to state their gender identity with the opportunity to note other or do not wish to say) pregnancy or maternity, marriage and civil partnership, sexual orientation and religion or belief.

As detailed in the Equality and Diversity Action Plan, Careers Wales aims to engage with organisations working with/representing such groups to determine how best to request and record such data from clients and how best to encourage individuals who identify themselves under one or more of these protected characteristics to readily provide this equality data. This is already underway with the formulation of an E&D Data Cube that can segment and inform our service delivery.

Customer Statistics

The tables below provide the baseline evidence and illustrate the percentage of clients accessing Careers Wales services categorised by age, gender, ethnicity and disability.

Careers Wales service delivery is defined as

- Face to face interviews
- Telephone interview/Careers Wales Connect contact
- Web chat / Social Media activity
- Email
- Group work

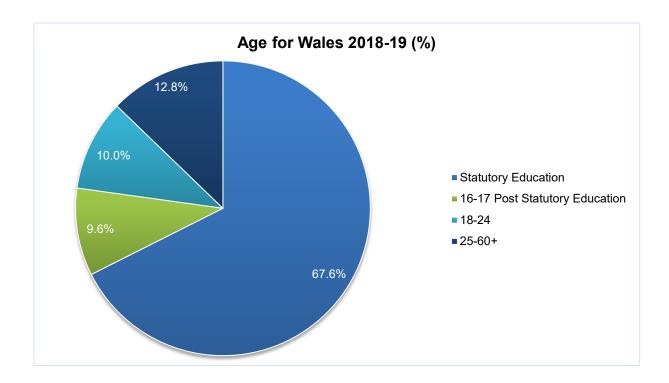
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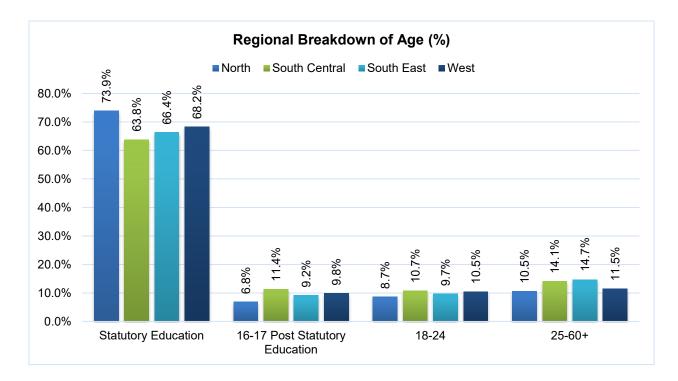
Careers Wales reports activity pan Wales and is split by 4 regions. The local authorities which make up each region are listed below. Boundaries for the operational delivery of Careers Wales services have changed. This year's report has been updated to reflect the new boundaries which are:

- North: Conwy, Denbighshire, Flintshire, Gwynedd, Isle of Anglesey, Wrexham
- South Central: *Cardiff, Bridgend, Merthyr Tydfil, Rhondda Cynon Taff, *Vale of Glamorgan Powys
- South East: Blaenau Gwent, Monmouthshire, Newport, *Caerphilly, Torfaen
- West: Carmarthenshire, Ceredigion, Neath Port Talbot, Pembrokeshire, Swansea

*Cardiff, Vale of Glamorgan and Caerphilly are the only Counties to have changed with Cardiff and the Vale of Glamorgan moving from South East to South Central and Caerphilly moving from South Central to South East

Age





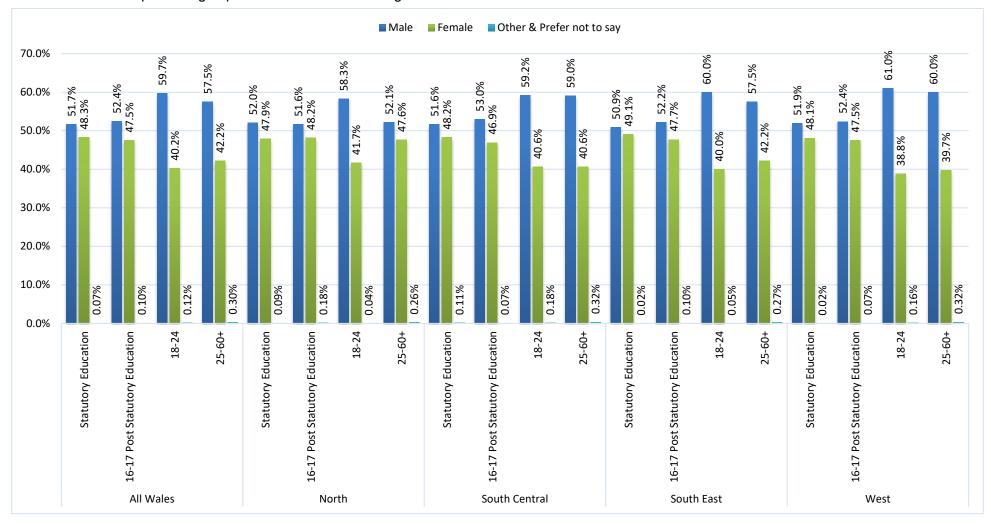
During April 2018 through to the end of March 2019 Careers Wales figures reporting on age have shown an increase in the percentage of customers within statutory education who use our services – this equates to 67.6% of our customers as a whole across Wales. This represents an 8.2% increase compared to 2017 – 18 and is in line with our commitment to deliver our "Changing Lives" remit.

Across Wales, the percentage of 16-17 year old post-statutory education clients (9.6%) accessing the service has reduced by -3.9% compared to 2017/18. Adult customers aged 18-24 and 25 - 60+ accessing the service has reported a slight reduction for 21018-19 compared to 2017-18 (-2.4% and -1.8% respectively)

Overall, there has been a reduction of -8.1% of customers aged 16 – 60+ accessing the service.

From a regional perspective the North (63.9%) and South East Wales (57%) has seen the largest increase of +10% and+9.4% respectively in statutory education customers compared to the 2017/18 data.

GenderMale/Female/Other percentage split of customers accessing Careers Wales services



The 2011 Census statistics shows the overall population of Wales as 3.06 million with a breakdown of 49% male to 51% female. The Careers Wales 'All Wales' figures across all age categories illustrate that in fact more males than females continue to access our services. This is reflected throughout each of the Careers Wales regions: https://statswales.wales.gov.uk/Catalogue/Business-Economy-and-Labour-Market/People-and-Work/Employment/Persons-Employed/EconomicActivityRate-by-WelshLocalArea-Year)

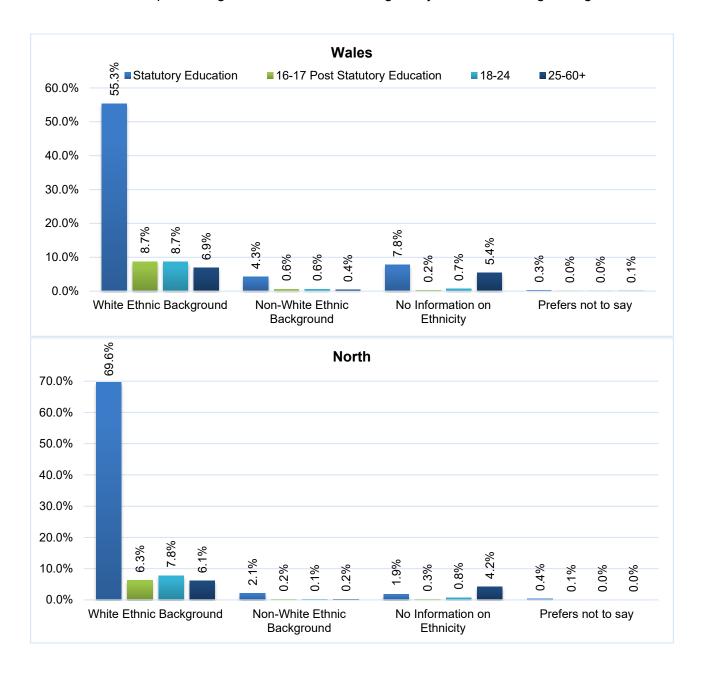
Ethnicity

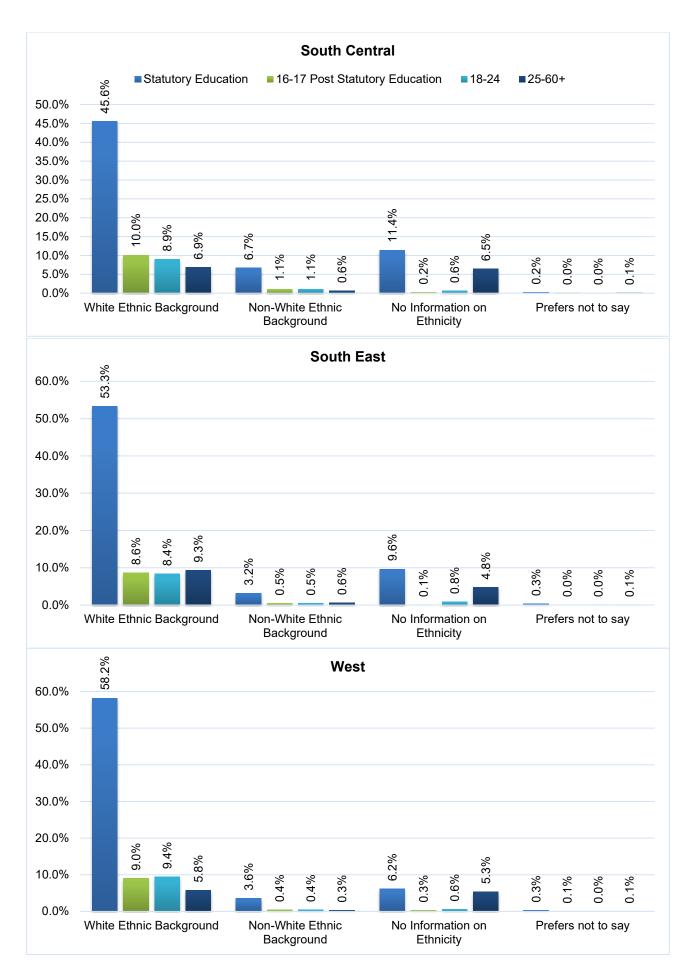
Careers Wales collects ethnicity data for all aged customers where available. Careers Wales gathers the most data for those customers within statutory education reflected in the figures across for this ages group across each of the ethnicity categories.

The largest percentage of customers who access Careers Wales Services continue to identify themselves as White British this is reflected throughout each of the regions and across all age categories.

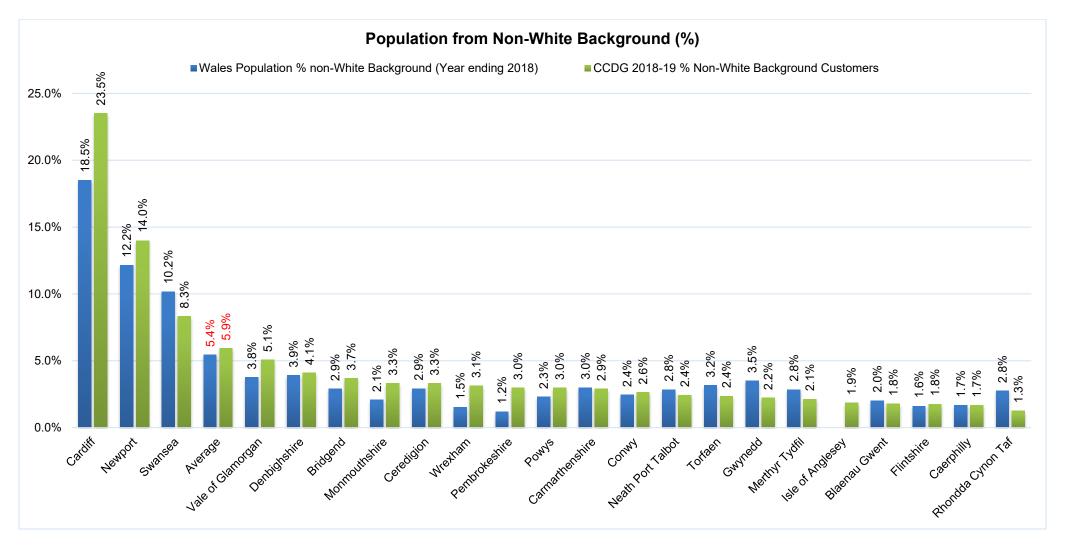
5.9% (an increase of 0.2% on last year) of all customers accessing our service across Wales identified themselves as other ethnic groups, with the largest percentages for all age categories situated in the South-Central region.

The tables below represent figures for all Wales and regionally across all the age categories.



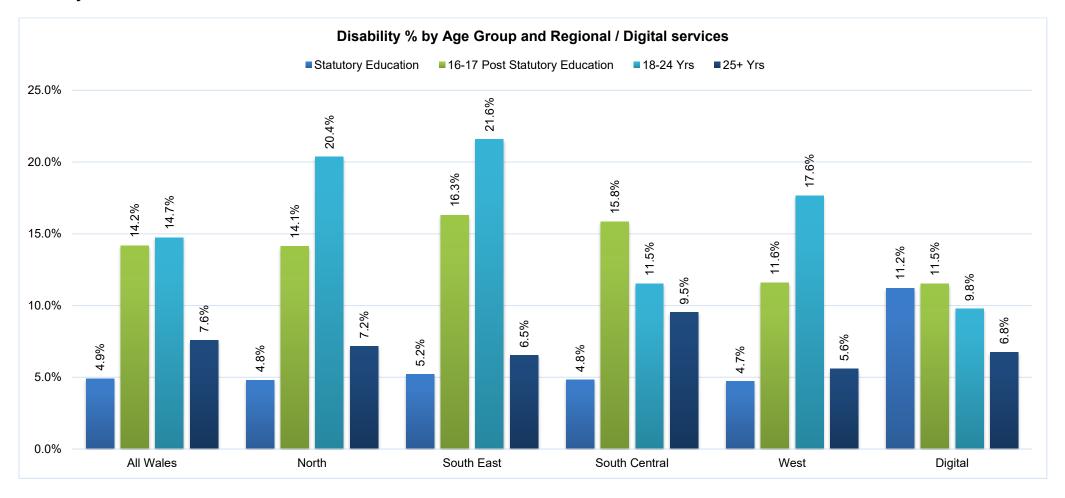


This is reflected favourably in terms of comparison with the statistics recorded at the end of March 2018 in the Local Labour Force Survey/Annual Population Survey: ethnicity, by local authority (ethnicity type, local authority) which reports that the percentage of people identifying themselves as from a non-white background is:



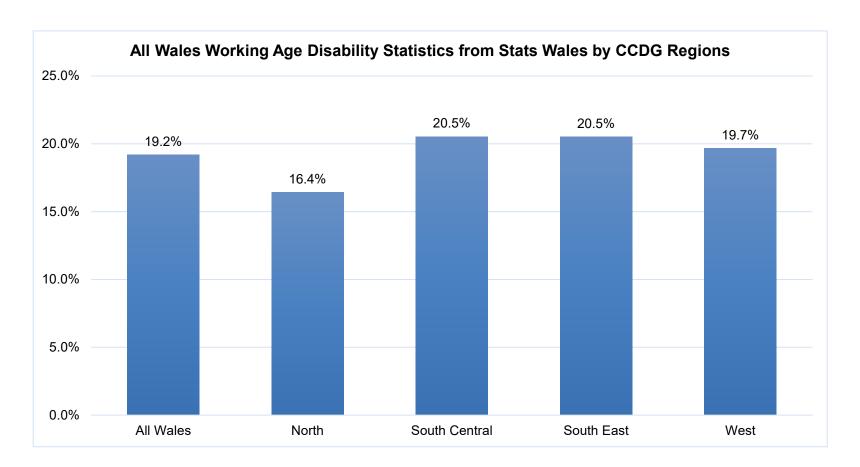
Source: https://statswales.wales.gov.uk/Catalogue/Equality-and-Diversity/Ethnicity/Ethnicity-by-Year-EthnicGroup year ending 2018

Disability



Across Wales 41.4% of customers accessing services are reporting as having a disability. The largest proportion is within the 18-24 year category with 14.7% and this is the age category reporting the highest rate of disability across North 20.4%, South East (21.5%) and West (17.6%) regions as standing out as having the highest numbers together with those who access our services digitally.

Welsh Government statistics illustrate that 19.2% of working age adults are living with a disability, 13.6% with a work limiting disability and 5.6% without a work limiting disability. Source: http://gov.wales/statistics-and-research/prevalence-disability/?lang=en



(Source https://statswales.gov.wales/Catalogue/Equality-and-Diversity/Disability/peopleofworkingagewithdisabilities-by-area-disabilitytype 2013)

Promoting equality and diversity eliminating discrimination in employment

Careers Wales consists of a diverse body of people with different perspectives, values and attitudes. Careers Wales is committed to promoting an inclusive environment where such differences are shared and explored; where any unfair treatment or discrimination is challenged and eliminated.

In addition to paying due regard to the principles set out in our equality duties in all our activities, we will also promote the principles of diversity throughout our service delivery and in our role as an employer. Diversity adds other dimensions to the equality agenda; by making sure that the different needs of individuals or groups are valued and celebrated.

As an Employer Careers Wales will:

- 1. Aim to create an environment that is an inclusive place to work where an individual's personal characteristics do not create barriers for them in any aspect of their work.
- 2. Ensure that all policies, procedures and strategies reflect Careers Wales' equality and diversity policy.
- 3. Expect that all staff treat each other with dignity and respect.
- 4. Expect all staff to ensure that they are aware of equality issues and take responsibility for their actions both individually and collectively. (this list is not exhaustive).

In January 2019, the HR department issued a staff survey aimed at capturing data against each of the protected characteristics and an internal report was written and widely circulated to managers. This will be repeated at three yearly intervals. General staff surveys have recently been run in addition to this specific survey.

Our current diversity profiles are as follows:

Job Role by Gender

Job Title	Female	Male	Total
Accreditation and Learning Co-ordinator	1	0	1
Acting Chief Executive	1	0	1
Administration Assistant	19	3	22
Assistant Accountant - Management Accounts	2	0	2
Assistant Accountant Payroll	1	0	1
Business Engagement Adviser	20	9	29
Careers Adviser	226	65	291
Careers and World of Work Co-ordinator	4	4	8
Compliance and Governance Team Leader	0	1	1
Content Lead	1	0	1
Courses in Wales Assistant	2	0	2
CWO Graphic Designer	2	0	2
CWO Project Manager	1	2	3
Data Checker	1	0	1
Data Processor	2	0	2
Director of Client Services	1	0	1
EAG Strategy Manager	1	0	1
Employability Coach	35	8	42
Engagement and Progression Coordinator	1	0	1
ESF Administrative Assistant	4	0	4
ESF Officer I2A TRAC Cynnydd	0	1	1
Facilities and Procurement Officer	2	2	4
Finance Officer	4	1	5
Graphic/Web Designer	2	1	3
H&S and Estates Team leader	0	1	1
Head of Digital & Communications	0	1	1
Head of Employment Advice	1	0	1
Head of Finance & Estates	0	1	1
Head of ICT	1	0	1
Head of People Development	1	0	1
Head of Quality & Planning	0	1	1
Head of Services to Stakeholders	0	1	1
Head of Services to Young People	1	0	1
Health & Safety/Estates Coordinator	1	1	2
Human Resources Co-ordinator	4	0	4
Human Resources Officer	3	0	3
ICT Helpdesk/Administrator	0	2	2
ICT Systems Engineer	1	3	4
ICT Team Manager	0	1	1
ICT Technician	0	5	5

Total	458	148	605
Trainee Systems Developer	0	1	1
Trainee Careers Adviser	41	13	54
Trainee Business Engagement Adviser	5	0	5
Team Manager	22	10	32
Systems Developer	1	2	3
STEM Mentor	2	0	2
Stakeholder Engagement Manager	1	1	2
Software Tester	1	0	1
Senior System Developer	0	1	1
Senior Researcher - North Wales Economic Ambition	1	0	1
Senior Marketing Co-ordinator	1	0	1
Senior Management Information Officer	3	1	4
Research and Evaluation Officer	2	0	2
Quality and Planning Manager	3	1	4
Project Manager	1	0	1
Product Development Manager	1	0	1
People Development Manager	1	0	1
Operational/Development Manager	11	1	12
MIS Team Manager	1	0	1
Marketing Co-ordinator	2	0	2
Management Accounts Team Leader	1	0	1
Learning & Development Co-ordinator	8	1	9
Information Web Content Manager	0	1	1
Information Co-ordinator	3	1	4

There is no role where there is currently cause for concern. In the largest group, Careers Advisers, the balance reflects the Company's overall balance.

Contract Type

Gender	Permanent Number	Permanent Percent	Fixed Term Number	Fixed Term Percent
Female	454	99.3%	3	0.7%
Male	148	100%	0	0%
Total	602		3	

Working Pattern

Working Pattern	Number	Percent
Full Time	442	73%
Part Time	163	27%
Total	605	100%

Gender/age profile of part time workers:

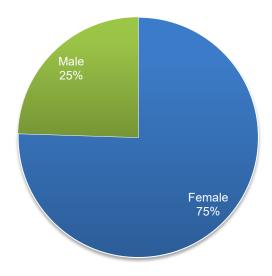
Modified hours are less popular with male employees than female -44% of female employees work modified hours compared to 14% of male employees.

This can, although does not at present, impact on gender pay gaps.

Looking at the age profile of those who have chosen modified working hours, women under 45 are more likely to choose reduced hours, whereas more men over the age of 50 are more likely to reduce their hours, although this is still a small number of the male population of employees.

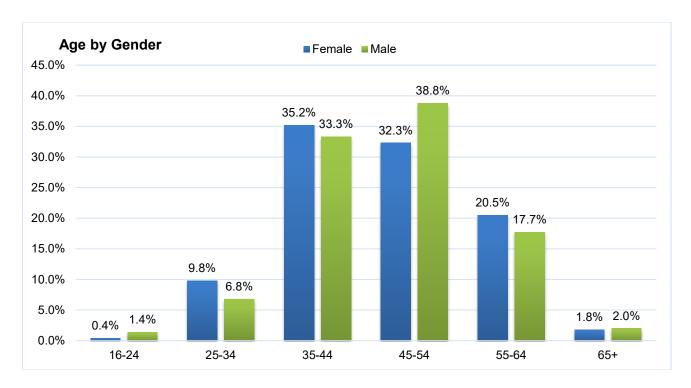
There has been an increase in the numbers of employees taking up a flexible working pattern.

Gender



Age Category by Gender:

Age Group	Female Number	Female Percent	Male Number	Male Percent	Total Number	Total Percent
16-24	2	0.40%	2	1.40%	4	0.70%
25-34	45	9.80%	10	6.80%	55	9.10%
35-44	161	35.20%	49	33.30%	210	34.70%
45-54	148	32.30%	57	38.80%	205	33.90%
55-64	94	20.50%	26	17.70%	120	19.80%
65+	8	1.80%	3	2%	11	1.80%
Total	458		147		605	



Low levels of turnover mean that changes to gender balances do not change rapidly.

Percentage of all employees aged over 50:

Gender	% Aged over 50
Female	40%
Male	37%
All company	40%

There are no significant changes to report in the age balance of the company, which shows a good distribution. The age profile over 50 shows a stable workforce that is low turnover resulting in an aging workforce. This is an area where health and wellbeing initiatives need to meet the needs of an older workforce.

Disability

All company	Number	Percent
Female	17	4.1%
Male	11	7.5%
Total	28	5.0%

The disability profile only includes those who have self-declared a disability.

Ethnicity

National Identity

The following descriptors are the current Office of National Statistics codes for England and Wales based on the 2011 UK Census.

Respondents were asked to choose the descriptor they most closely associated with their national identity:

Descriptor	Number Self Declaring	Percentage of Respondents
White Ethnic Background	381	63%
Other Ethnicity	8	1.3%
Prefer not to say or blank response	216	35.7%

Sexual Orientation

In Wales, Public Bodies are specifically required to collect statistics about the proportion of lesbian, gay and bisexual people in the workforce. Public bodies are required to publish this data annually, providing it doesn't identify individuals. The following definitions are those approved by Stonewall. Respondents were asked to choose the definition that they most closely associated with, however it is recognised that other descriptors are in common use.

Sexual Orientation	Number	Percent
Bisexual	7	1.6%
Gay man	1	0.5%
Gay woman/lesbian	0	0.0%
Heterosexual/straight	421	95%
Other	1	0.2%
Prefer not to say	12	2.7%
Total	422	100%

^{*}The following figures are from the April 2019 Employee Diversity survey - the response yield on this survey was 72.5% (442 responses from 610 employees).

Gender Reassignment - No employee has self-declared a gender reassignment

Applicants of Externally Advertised Vacancies

Number and gender of people who have applied for externally advertised vacancies

Vacancy	Male	Female	Total	Successful Male	Successful Female
Administration Assistant - EAG	0	1	1	0	0
Administration Assistant - North	0	0	0	0	0
BEA or Trainee BEA - July 2018	0	0	0	0	0
Careers Adviser / Trainee Careers Adviser (All Wales)	25	63	88	4	19
CWOW - Welsh Essential Sept 2018	5	7	12	0	1
CWOW - July 2018	15	0	15	1	2
ECs CWC	13	9	22	2	2
ICT Technician	3	0	3	0	0
Learning & Development Co-ordinator July 2018	1	2	3	0	1
Senior Marketing Co-ordinator EAG	1	2	3	0	1
STEM Mentors	2	3	5	0	2
Trainee BEA Sept 2018	6	9	15	0	3
Trainee BEA EAG August 2018	3	4	7	0	0
Trainee Careers Adviser / Careers Adviser EAG September					
2018	46	150	196	6	30
ICT Technician Jan 2019	2	0	2	0	0
Marketing Manager	6	22	28	0	2
STEM Mentor Conwy	1	3	4	0	1
BEA/Trainee BEA February 2019 (advertised twice)	6	4	10	1	1
TOTALS	135	279	414	14	65

[•] From the candidates who declared on the equal opportunities monitoring form, 33% were received from male applicants and 67% from female applicants and 0% from transsexual applicants.

Recruitment advertising can be seen to be attracting candidates of a good gender balance.

Applicants by protected characteristics

No information available at this time, but collection of this data is currently being considered by the HR team and will be included in discussions as part of the engagement work with stakeholder organisations.

Assessment Centres

These have been introduced to strengthen the recruitment process and have been a success. Candidates with a range of disabilities have attended the centres and feedback has been excellent (a review report has been written). All exercises have been impact assessed and candidates with disabilities have been encouraged to discuss reasonable adjustments to help them perform well in the tests. A range of adjustments have been made from escorts from public transport points, extra time on exercises, hearing loops and technology made available for those with visual impairments.

Pay Grade by Gender

Grade	Female Number	Female Percent	Male Number	Male Percent	Total
Grade 10	1	100%	0	0%	1
Grade 9	1	100%	0	0%	1
Grade 8	4	50%	4	50%	8
Grade 7	18	82%	4	18%	22
Grade 6	27	60%	18	40%	45
Grade 5	24	73%	9	27%	33
Grade 4	260	77%	77	23%	337
Grade 3	59	71%	24	30%	83
Grade 2	37	79%	10	21%	47
Grade 1	27	90%	3	10%	30
Total	458	75%	149	25%	

Grievance Processes

During 2017/18, 6 grievance cases were brought. None of these related to protected characteristics and none were upheld.

Pregnancy and Maternity

96% of employees taking maternity leave during this period have returned to work. This is likely to be largely down to the flexible working opportunities available and the family-friendly policies in existence. The Company has signed up to the Equality and Human Rights Commission Moving Forward Pledge on supporting pregnancy and maternity and is compliant in all categories.

Maternity Leave figures:

Region	No of Maternity Leaves
North	3
West	4
South Central	3
South East	13
Total	23

Equal Pay Analysis

Pay Structure and Policy

Careers Wales seeks to ensure that all employees are valued and receive proper recognition for their work and their contribution to the Company and to this end will:

- Set pay rates fairly and in a manner that does not discriminate.
- Develop and keep under review grading structures to meet both the Company's need for flexibility and employee needs for career development.
- Pay employees equitable and consistent remuneration in accordance with their grade salary, as defined by job evaluation (i.e. in accordance with their assigned duties and responsibilities).
- Make necessary adjustments to pay to take account of market rates in accordance with agreed procedures.
- Offer/provide employees with a contributory pension scheme.
- Provide a challenging work environment, where employees are encouraged to develop and acquire new skills and experience.
- Provide a range of development programmes for employees.
- Research and implement (where cost effective) non-contractual benefits.
- Endeavour within budgetary constraints to set pay rates that attract the best qualified people available to achieve the Company's mission.
- Endeavour within budgetary constraints to set pay rates that encourage the retention of high-quality employees.
- Communicate to employees the basic parameters for setting salary and the mechanism by which pay reviews are conducted.
- Provide details of the way in which salaries are calculated creating transparency for all employees.
- Promote details of an employee's total reward package.
- Negotiate pay increases with the Company's recognised trade union, Unison.
- Provide guidance for employees regarding the recovery of salary overpayments.

Equal pay review

- The Company has negated gender impact on pay by entering all employees on the same point of the incremental scale, not differentiating pay between works of equal value, and moving all employees through the incremental points at equalintervals.
- New employees or employees moving onto the salary grade structure always commence on the first incremental point of the grade for their role.
- There is no age-related pay.
- The incremental scales are short, and the top point is reached in 4 years.
- There is no salary point below minimum wage.
- No individual negotiation is entered into.
- Employees automatically progress through the incremental scale on the anniversary
 of their appointment until they reach the top rate for their role. This is not negotiable
 and is not performance related.

- Progression is not halted by family related leave (adoption/maternity/paternity etc.).
- Progression is also unaffected by periods of ill-health related absence.
- Some roles have trainee grades where there is no progression to the qualified grade until the required qualification is attained.
- The scale is linear and does not have different scales for corporate/delivery/technical roles.
- Equal payment is made for work of equal value as independently evaluated.
- Progression up the scale is by competitive application for promotional posts.
- There is an appeals mechanism for use by individuals or groups.
- The company has reported a zero gender pay gap.

Next Steps

Careers Wales will continue to work towards achievement of the 2016-19 Equality and Diversity Action plan and the steering group will continue to review and develop the plan as appropriate. With the overall aim of creating an infrastructure for equality throughout all areas of Careers Wales service delivery and in our role as an employer the Company will promote a culture where equality and diversity is mainstreamed, and action sustained and progressed.