



**Cyfoeth
Naturiol**
Cymru
**Natural
Resources**
Wales

Equality Impact Assessment (EqIA)

Natural Resources Wales Strategic Equality Plan 2015/19

Directorate: Organisational Development and People Management

Assessment date: March 2015

Review Date: Strategic Equality Plan is four yearly but will be reviewed, alongside the supporting Equality Action Plan, annually.



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This document should be completed after reading the Quick Start Guide from the Equality and Human Rights Commission

http://www.equalityhumanrights.com/sites/default/files/documents/PSD/equality_impact_assessment_guidance_quick-start_guide.pdf

Further information or guidance within Natural Resources Wales regarding the Welsh Language Scheme can be obtained by going to
<https://cyfoethnatoriolcymru.sharepoint.com/en-gb/ourorganisation/Pages/Welsh-Language-Scheme.aspx>

Further information or guidance within Natural Resources Wales can be obtained by contacting equalities@naturalresourceswales.gov.uk

Background

The Equality Act 2010 brought together previous disparate pieces of equality legislation to more effectively tackle disadvantage and discrimination. The Act sets out the following 'protected characteristic' groups: age; disability; gender reassignment; race; religion or belief; sex; sexual orientation; marriage and civil partnership; pregnancy and maternity.

The Equality Act requires due regard is given to advancing equality. This involves:

- removing or minimising disadvantages experienced by people due to their protected characteristic.
- taking steps to meet the needs of people from protected characteristic groups where there are differences with the needs of other people; and
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

Where we formulate new, or amend existing policy it will be in accordance with our Welsh Language Scheme and will consider how the decision can:

- have positive effects on opportunities to use Welsh
- have no detrimental effects on opportunities to use Welsh; and
- ensure that the Welsh language is treated no less favourably than the English language.

Assessment of Impact

An Equality Impact Assessment (EqIA) involves anticipating the consequences of Natural Resources Wales functions and policies on protected characteristic groups and the Welsh Language scheme. They need to make sure that as far as possible any potential adverse impacts are eliminated and that opportunities for maximising opportunities to promote equality are identified.

Reports on assessment must set out:

- the purpose of the policy, plan or project;
- a summary of steps that Natural Resources Wales have taken into account;
- results of the assessment; and
- decisions taken in relation to the results.

The assessment must:

- ensure the policy does not unlawfully discriminate;
- identify the potential for an adverse impact on these groups;
- identify how the policy could better advance equality of opportunity;
- identify how the policy will affect relations between different groups; and
- be monitored for impact on these groups from the start and as part of subsequent reviews.

The actual impact of a new policy will only be known once it has been introduced and implemented. It is therefore crucial that further equality impact assessments are carried out, at key stages of the monitoring process.

Carrying out an Equality Impact Assessment (EqIA) will help us meet our legal duties as well as bringing a number of benefits. It will:

- ensure that our decisions impact in a fair way. Where there is evidence that particular groups will be negatively affected by a decision, action should be taken to address this;
- make our decisions based on evidence. An EqIA provides a clear and structured way to collect, assess and put forward relevant evidence;
- make decision-making more transparent. A process which involves those affected by the policy and which is based on evidence is much more open and transparent. This is more likely to engender trust in decision-makers and in our decisions; and
- provide a platform for partnership working. A good EqIA offers an opportunity for us to work in partnerships with organisations to consider the impact on members of their shared communities and how they might best collaborate and co-ordinate with us.

Stage 1 – Initial Screening

The first stage of conducting an EqlA is to screen the policy, plan or project to determine its relevance to the various equalities issues. This will indicate whether or not a full impact assessment is required and which issues should be considered in it. The protected characteristics that you should consider in completing this screening in addition to the Welsh Language are:

- Age
- Disability
- Gender re-assignment
- Marriage and Civil Partnership
- Pregnancy or maternity
- Race
- Religion or belief
- Sex (male or female)
- Sexual Orientation

What are the aims of the policy, plan or project?

The Strategic Equality Plan 2015-19 and annual Action Plan sets out in more detail how our equality's work will deliver the Corporate Plan 2014-17 and beyond. It covers the work of the whole organisation at a high level and is part of a suite of nested plans, as follows:-

- Corporate Plan
- Business Plan
- **Strategic Equality Plan**
- Directorate Delivery Plan
- Team Plans
- Individual Plans

Specific actions from the over-arching Equality Action Plan can be found in the Directorate Delivery Plans. Individual plans set out objectives for each individual in the organisation.

Our purpose as Natural Resources Wales is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used.

Effects

What effects will the policy, plan or project have on people, either internally to Natural Resources Wales or externally?

- The Strategic Equality Plan is a four year high level plan, setting out our Equality Objectives and ambitions to be a truly inclusive provider of services and an employer of choice. Our annual Equality Action Plan describes the key target areas to focus on and is a living document, and will help deliver upon our Corporate Plan.
- Our Equality Action Plan will inform other plans such as Directorate Delivery Plans, Team plans and Individual Plans.
- We need to ensure Equality and Diversity is considered in all policies, plans and projects with the Business Plan setting out how we will achieve this at a high level and help embed this in our Directorate Delivery Plans and projects for example.
- The Strategic Equality Plan will affect all people in Wales; people using our services, visitors to the land and water we manage and other stakeholders as well as our staff.

Evidence

Is there any existing evidence of this policy, plan or project being relevant to any equalities issue?

Yes – There is lots of evidence from other Public Service organisations who have current Strategic Equality Plans that positive outcomes can be made from focusing on equality and diversity. Our own evidence adds to this for our first four year plan and includes information and knowledge gained when engaging with both staff and stakeholders at involvement events we held in Bangor, Llandrindod Wells, Merthyr Tydfil, Llandudno Junction and Cardiff. In addition we have comments which were made during public consultation which took place between October 2014 and January 2015.

We will review our Equality Action Plan on a regular basis and more information will be available on our staff and customers as the organisation matures, and as we complete further EqlAs. One of the key actions in the Strategic Equality Plan is data collection.

Stakeholders and Feedback

Describe the target group for the policy, plan or project and list any other interested parties. What contact have you had with these groups?

The target group includes our staff, partners, customers and service users, and other stakeholders. This is a high level document however, and more detailed assessments will be required for the plans that sit beneath the Strategic Equality Plan and Equality Action Plan.

We have worked closely with Diverse Cymru to help develop the Strategic Equality Plan.

During the summer of 2014, three external and three internal workshops were held with stakeholders and staff to help inform our Strategic Equality Plan Equality Objectives. Following these events, a public consultation was held between 27 October 2014 and 6 January 2015.

Overall, we have involved the people of Wales, our Board and our staff to develop the content of this Strategic Equality Plan.

Do you have any feedback from stakeholders? Particularly from groups representative of the various issues that this policy, plan or project is relevant to.

From our involvement events across Wales we received extensive feedback.

In addition to staff and members of the public, some 28 external organisations took the opportunity to meet us and comment:

Actif Woods Wrexham	Barnardo's Cymru	Caerphilly People First	Cardiff Wales LGBT Mardi Gras
Church in Wales	Chwarae Teg	Connah's Quay Town Council	Disability Wales
Equality and Human Rights Commission	Groundwork Caerphilly	Gwent Police	Higher Education Funding Council for Wales
Medrwn Mon	Open Spaces Society for Caerphilly County Borough	Powys People First	Rainbow Biz
Safer Merthyr	Sight Cymru	Snowdonia National Park (Mosaic Project)	South Wales Police
Teulu Ni	Time to Change Wales	Unique Transgender Network North Wales	Unllais Mental Health Agency
Visit Wales	Voluntary Action Merthyr Tydfil	Wales TUC Learning Services	Wye Valley AONB

The feedback received has been considered and whilst we know we cannot deliver on every aspect because in some areas we are not the service provider, but where we can act we will.

Some specific issues were raised:

“An example was given in respect of deforestation which was believed to be because of larch issues. Local community were not informed of what was happening and what the longer term plans were for the site (Bwlch Nant)”

“Need better promotion with local public to attend board meetings. Should consider why would people want to attend and how you attract people”

“Make sure information is available in as wide a variety of means as possible. Consider making use of networks with community groups to share messages. Need to think about social media; internet and newspapers amongst other methods”

“People don’t value how accessible Wales is”

“Carry out Equality and Diversity training with staff to improve their perceptions. Some areas where NRW operate may not be used to as diverse a community as larger towns and cities. Part of the training should be to enable staff to actually see the value of being more open and engaging with communities”

We have since also hosted Stonewall Cymru for a successful ‘Have Your Say’ event in February 2015.

Consultation and engagement should be ongoing and therefore as part of our objectives we will continue to listen to comments and continue to work with local groups (both internal and external) and liaising with other public authorities and other government sponsored bodies.

Impact

Could the policy, plan or project have a differential impact on staff, visitors or other groups on the basis of any of the equalities issues?

This is a high level document so the Strategic Equality Plan itself will not necessarily affect people directly, it will be the plans and projects and actions that are guided by this plan which will impact directly on people.

We have made progress as an organisation on addressing Equality and Diversity issues since we came into being in April 2013. During the past year we have:

- Employed an Equalities Senior Advisor
- Begun to restructure our teams resulting in a more place-based approach
- Set up an Equality and Diversity Forum with representatives from each Directorate across the whole business, including the Trade Union and staff networks. Our Executive Director for Organisational Development and People Matters chairs the

forum and we can demonstrate we have top-level buy-in from our Equalities Champions at both Board and Executive Team level.

1. The purpose of this forum is to lead and deliver the equality and diversity strategy described in our Corporate Plan
 2. We will monitor and review as a group the effectiveness of Equality Objectives and the Equality Action Plan
- With the support of Learning Disability Wales we will launch an Easy Read version of the Strategic Equality Plan and Equality Action Plan.
 - Where we receive requests for documents to be available in braille or in other languages or formats we will ensure that we are able to do this.

In our Outdoor Recreation and Access Enabling Plan 2015 – 2020 we have stated that:

- All outdoor recreational provision delivered, facilitated or funded by NRW will adhere to the principles of least restrictive access and be developed and delivered in accordance with the Equality Act 2010.
- We will ensure our sites, trails and related infrastructure are developed, built and maintained to industry standards and as a minimum, deliver our obligations under the Equality Act 2010.
- We will ensure appropriate staff are trained to a high standard to enable them to carry out their duties ensuring public and site safety and the delivery of our obligations under the Equality Act 2010.

In our Communities and Regeneration Enabling Plan 2015 – 2020 we aim to ensure:

- Community engagement work is developed and delivered in accordance with the Equality Act 2010.

We are also developing our people policies for staff, with due consideration of Equality and Diversity.

Local Discretion

Does the policy, plan or project allow for local discretion in the way in which it is implemented? If so, what safeguards are there to prevent inconsistent outcomes and/or differential treatment of different groups of people?

Although the Strategic Equality Plan does not specifically mention local discretion due to its high level nature, the Equality Action Plan encourages engagement with local communities.

Summary of relevance to protected characteristic issues

Protected Characteristic	Yes or No	If no, what is the rationale for the decision?
Age	Yes	See Part 2
Disability	Yes	See Part 2
Gender Reassignment	Yes	See Part 2
Marriage and Civil Partnership	No	Whether a person is in a marriage or civil partnership is unlikely to be relevant for the services we provide.
Pregnancy or Maternity	Yes	See Part 2
Race	Yes	See Part 2
Religion or belief	Yes	See Part 2
Sex (male or female)	Yes	See Part 2
Sexual Orientation	Yes	See Part 2

Summary of relevance to Welsh language issues

Welsh Language	No	<p>We have a Welsh Language Scheme in place, and we are committed in encouraging and supporting our staff to learn Welsh if they so wish.</p> <p>In 2016/17 we will implement standards for public bodies set by the Welsh Language Commissioner.</p> <p>The high level Strategic Equality Plan and Action Plan will be published bilingually.</p>
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Stage 2 – Full Impact Assessment

Age - identify the impact/potential impact of the policy, plan or project and change on different age groups. Include proposed measures to mitigate any adverse impacts or to make positive impacts.

Complete if you answered yes in Part 1

Staff: From our staff Equality and Diversity survey in 2013, 63% of our workforce are between ages of 35-55; 3% of our staff are under 25.

To encourage younger people to become part of our workforce we currently support nine Information and Communication Technology apprentices across Wales with another potential intake scheduled for next year. This group have helped develop mobile applications such as Flood Alert Wales and Bathing Water Quality.

We are also looking at providing future opportunities for:

- Forestry apprentices
- Agriculture apprentices, and
- Land-Based Engineering apprenticeships

One of the four outcomes part of our draft Education and Skills Enabling Plan 2015-2020 is that 'More learners will gain the skills required for progression to employment in the Natural Resource Management sector and will participate in continued professional development.

Customers: Moving towards a more digital approach may impact on older or younger people who do not have access to electronic media. We want to ensure we have facilities for visitors in the areas we manage that appeal to a wide range of age groups and that all ages can access our services. This can include puzzle trails and play areas for younger children, for example, and low gradient trails with frequent resting points which may be suitable for older people, parents with young children with buggies or those who find walking difficult.

The National Survey of Wales (2013) confirmed that 24% of the population do not regularly access the internet.

Disability – identify the impact/potential impact of the policy, plan or project and change on different disability groups. Include proposed measures to mitigate any adverse impacts or to make positive impacts.

Complete if you answered yes in Part 1

Staff: From our staff Equality and Diversity survey 3.8% of our workforce have declared a disability.

We are supporting our staff with disabilities. For example during the rollout of any new integrated business systems, the Assisted User Group will be involved to ensure those who require specialist equipment (i.e. Dragon and JAWS) to allow them to fully use the software are able to.

We will monitor our workforce and where possible try to be a representative organisation. However, we are also mindful that the number of external recruitment opportunities over the coming few years will be low.

Customers: In moving towards a more digital approach, we need to ensure that people with disabilities are able to access our services including access our recreational sites and other areas we manage.

Our Recreation and Access Enabling Plan 2015-2020 and our draft Communities and Regeneration Enabling Plan 2015-2020 also emphasise our wish to ensure our visitors and stakeholders with any of the protected characteristics are supported.

Gender Reassignment – identify the impact/potential impact of the policy, plan or project and change on people who are transgendered e.g. some people may take career breaks to have surgery. Include proposed measures to mitigate any adverse impacts or to make positive impacts.

Complete if you answered yes in Part 1

We are currently developing plans on how to collect data in a highly confidential manner which is trusted by all. It is envisaged that this will take time to develop but we will ensure that we do so

Staff: No specific data

Customers: No specific data

Pregnancy and maternity - identify the impact/potential impact of the policy, plan or project and change on women who are pregnant, on maternity and who wish to breastfeed. Include proposed measures to mitigate any adverse impacts or to make positive impacts.

Complete if you answered yes in Part 1

Staff: Data is constantly changing, but at 5 February 2015 NRW had 19 members of staff on maternity leave and 1 on paternity.

Our Total Rewards Package includes provision for paternity leave and career breaks to look after young children, as well as leave and provision for adoptive parents.

Customers: Like our staff, those who are pregnant / breastfeeding may have specific requirements in relation to services such as rest areas and baby changing facilities. Access to our outdoor facilities include routes suitable for buggies and further consideration will be given in future developments.

Race - identify the impact/potential impact of the policy, plan or project and change on different Black Asian and Minority Ethnic groups. Include proposed measures to mitigate any adverse impacts or to make positive impacts.

Complete if you answered yes in Part 1

Staff: From our staff Equality and Diversity survey 2.8% workforce identified themselves as BME (Black Minority Ethnic). We will monitor our workforce annually and where possible try to be a representative organisation. However, we are also mindful that the number of external recruitment opportunities over the coming few years will be low.

Customers: Research indicates people from BME backgrounds less likely to use the countryside for recreation; we need to collect more data and we have opportunities to work with specific under-represented communities to identify their needs in the future.

Religion or belief - identify the impact/potential impact of the policy, plan or project and change on people of different religious/faith groups and also upon those with no faith. Include proposed measures to mitigate any adverse impacts or to make positive impacts.

Complete if you answered yes in Part 1

Staff: From our staff Equality and Diversity survey, 24% workforce identified themselves as having a religion or belief, the majority of which were Christian.

We offer staff the facilities for staff to practice their faith in some of our offices such as in Aberystwyth and Ty Cambria, Cardiff. We are also developing our people policies which will include flexible working and can provide for time off for example, on specific religious days.

We have one staff network in our Multi-Faith Support Networks which is the Christian Fellowship. The Christian Fellowship creates a space where people can get together and support each other through prayer.

Customers: As part of our Equality Action Plan, we will collect data on religion, belief or non-belief but for now we do have opportunities to provide quiet, contemplative spaces on the land we manage for those following a particular religion or belief.

Sex (man or woman) – identify the impact/potential impact of the policy, plan or project and change on women and men. Include proposed measures to mitigate any adverse impacts or to make positive impacts.

Complete if you answered yes in Part 1

From our staff Equality and Diversity survey:-

Staff: 58% of the workforce are male, 42% female; women are less well represented at higher grades. We will monitor our workforce annually and where possible try to be a representative organisation. However, we are also mindful that the number of external recruitment opportunities over the coming few years will be low.

Customers: Generally little difference between male and female users apart from some specific recreational activities, which are more popular with men than women or vice versa (Wales Outdoor Recreation Survey 2011).

Sexual orientation - identify the impact/potential impact of the policy, plan or project and change on people who identify as lesbian, gay, bisexual or heterosexual people. Include proposed measures to mitigate any adverse impacts or to make positive impacts.

Complete if you answered yes in Part 1

Staff: From our staff Equality and Diversity survey, 2.5% identified themselves as Lesbian, Gay or Bisexual (LGB). We have a positive and established NRW LGBT+ Staff Network who act as a critical friend to the organisation, helping ensure we get things right.

Customers In our future plans and projects, we will work closely with our partner organisation 'Stonewall Cymru' to help advise us on LGB issues.

Natural Resources Wales is already a Stonewall Diversity Champion.



Actions

Tasks identified through the Assessment/Reassessment

See Equality Action Plan for actions. The plan is a living document which will be revised often by the Equality and Diversity Forum.

Monitoring and Review Arrangements

Describe the systems that you are putting in place to monitor the policy, plan or project's operation and outcomes in terms of the various equalities issues.

We will monitor the Strategic Equality Plan and our delivery of the Action Plan on a regular basis and report evidence arising from the findings.

State when a review will take place and how it will be conducted.

Regular staff surveys and HR data will provide information on our workforce regarding the nine protected characteristics, particularly through our new electronic recording system 'MyNRW'. This information will be available in April 2016 following one full year of the new integrated system.

We need to gather evidence about our customers – visitors and service users – and will aim to collect this through questionnaires and collection of visitor data.

Authorisation	Name and signature	Date
Policy, plan or project lead	Derek Carpenter	09 March 2015
Leadership Team (Acting)	Claire Begley	09 March 2015
Equalities Senior Advisor	Derek Carpenter	09 March 2015
Welsh Language Policy Advisor	Lyn Williams	09 March 2015

Please note: EqlAs will always be made available in full if requested by members of the public or stakeholder organisations, including meeting any requests for accessible versions.

Monitoring and reviewing

The EqlA process does not end with the introduction of the policy. It is not enough to make the changes expected to eliminate adverse impact or promote equality; it is also necessary to implement the resulting action plan and use the monitoring, evaluation and review processes to ensure that the anticipated impact is the actual impact and that actions are implemented. Failure to properly monitor the actual impact of an existing policy may leave a public authority open to legal challenge, as well as enforcement action from the Equality and Human Rights Commission or the Welsh Language Commissioner. The EqlA is a tool to assist public authorities in meeting their general duties. Those duties continue to bind public authorities in respect of policies and functions even where an EqlA has been carried out, and public authorities need to satisfy themselves on an ongoing basis that they are continuing to meet each of the general duties.



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