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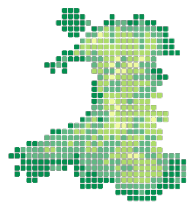
Democracy  
and Boundary  
Commission Cymru

# Strategic Equality Plan

2025 – 2028

This document is  
available in Welsh

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Democracy  
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## **Democracy and Boundary Commission Cymru (DBCC)**

### **Strategic Equality Plan 2025 –2028**

#### **1. Introduction**

The Democracy and Boundary Commission Cymru (DBCC) is committed to advancing equality, diversity, and inclusion in all aspects of its work. This Strategic Equality Plan (SEP) sets out our objectives and actions for 2025–2028, in line with the Public Sector Equality Duty (PSED) under the Equality Act 2010 and the Wales-specific regulations. It responds directly to recent correspondence with the Equality and Human Rights Commission (EHRC) and reflects our commitment to continuous improvement and alignment with other Welsh Public Bodies.

#### **2. Legal and Policy Context**

DBCC is subject to the Equality Act 2010 and the general and specific duties for Wales. We are committed to:

- Eliminating unlawful discrimination, harassment, and victimisation.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.

The nine protected characteristics as defined in the Equality Act 2010 are:

1. Age

2. Disability (including physical, sensory, mental health, neurodiversity, and hidden disabilities)
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race (including ethnic or national origin, colour, or nationality)
7. Religion or belief (including non-belief)
8. Sex
9. Sexual orientation

We also recognise the importance of the socio-economic duty, anti-racism strategy, and Welsh Government action plans on gender and LGBTQ+, and will act in the spirit of these frameworks.

### **3. Our Vision and Values**

Vision:

A Wales where democratic processes and boundary reviews are accessible, inclusive, and trusted by all communities, regardless of protected characteristic.

Values:

- Integrity and fairness in all decisions.
- Transparency and accountability.
- Collaboration with communities and partners.
- Continuous learning and improvement.

### **4. How This Plan Was Developed**

This SEP builds on feedback from the EHRC, sector best practice, and engagement with staff, stakeholders, and representative groups. It aligns with the approaches of peer organisations.

## **5. Strategic Equality Objectives and Actions**

All objectives and actions apply across all nine protected characteristics. We will take an intersectional approach, recognising that individuals may experience multiple forms of disadvantage.

### **Objective 1: Strengthen Inclusive Engagement in Boundary and Electoral Review Consultations**

Goal:

Ensure that consultations actively engage under-represented and seldom-heard groups, so all communities, including those defined by the nine protected characteristics have a fair opportunity to contribute.

Actions:

- Co-design consultation and engagement approaches with community partners and representative organisations for all protected groups.
- Provide consultation materials in accessible formats (e.g. Easy Read, BSL video).
- Pilot outreach sessions in partnership with community networks to reach groups identified as seldom-heard, including those with protected characteristics.
- Train staff on inclusive engagement and equality impact awareness, with reference to all protected characteristics.
- Develop a database of community networks for ongoing engagement, mapped by protected characteristic.
- Establish baseline data on respondents to the Senedd 2030 review, disaggregated by protected characteristic.

Performance Indicators:

- Percentage increase in engagement from at least three identified under-represented groups (by protected characteristic).
- Number and diversity of community partners involved.
- Number of accessible formats provided.

## **Objective 2: Improve Accessibility and Inclusivity of Electoral Information**

### **Goal:**

Make the Welsh Elections Information Platform fully accessible and inclusive particularly those with visual impairments including blind and partially sighted people.

### **Actions:**

- Apply accessibility standards across the platform and digital content, considering the needs of all protected groups.
- Develop plain-language, bilingual content reviewed by accessibility and literacy experts
- Conduct user testing with individuals from a wide range of backgrounds, including those with protected characteristics.
- Establish an Accessibility Advisory Group that includes relevant representation
- Implement a feedback mechanism for accessibility barriers, with data collected by protected characteristic.

### **Performance Indicators:**

- 100% compliance with relevant standards by 2027.
- User testing data and feedback included in reports to Senedd, disaggregated by protected characteristic.

## **Objective 3: Establish Baseline Data to Assess the Impact of DBCC's Remuneration Function**

### **Goal:**

Establish robust baseline data on the protected characteristics of individuals in elected office at local authority level, to assess whether remuneration and allowances influence participation, retention, and diversity.

### **Actions:**

- Collaborate with local authorities, WLGA, and Welsh Government to design a data-collection framework covering all protected characteristics.

- Conduct a data-mapping exercise to identify gaps and best practices for each protected characteristic.
- Analyse links between remuneration, participation, and diversity, with a focus on protected characteristics.
- Publish an equality analysis report with recommendations for future remuneration reviews and equality objectives, referencing all protected characteristics.

Performance Indicators:

- Minimum 70% response rate from elected members in baseline data collection (by protected characteristic).
- Publication of the first analysis report after the 2027 LG elections.
- +10% annual improvement in data completeness (by protected characteristic).
- Recommendations incorporated into the next remuneration review cycle.

**Objective 4: Foster a Diverse and Inclusive Workforce**

Goal:

Attract, recruit, and retain a workforce that reflects the diversity of Wales across all protected characteristics, and eliminate pay gaps.

Actions:

- Gather and review comprehensive workforce equality data, disaggregated by protected characteristic.
- Review recruitment and progression processes for inclusivity across all protected characteristics.
- Monitor and address pay disparities by protected characteristic.
- Provide equality, diversity, and inclusion training for all staff, covering all protected characteristics.

Performance Indicators:

- Workforce diversity metrics compared to census data (by protected characteristic).
- Internal review annual gender pay gap report
- Staff survey results on inclusion and belonging.

Note: In accordance with EHRC technical guidance on the Public Sector Equality Duty, disaggregated equality data will not be published, as the Commission's small workforce size means that disclosure would present a material risk of identifying individual staff members. Only aggregated information that does not enable identification will be reported

### **Objective 5: Mainstream Equality in Governance and Service Delivery**

Goal:

Embed equality, diversity, and inclusion in all DBCC policies, procedures, and service delivery, with explicit reference to all protected characteristics.

Actions:

- Mainstream Equality Impact Assessments, including all protected characteristics, socio-economic and anti-racism considerations.
- The SEP will be reviewed and updated at least every four years, or sooner if required by legislation or organisational change.

Performance Indicators:

- Annual progress reports to the EHRC and publication on the DBCC website
- Evidence of equality considerations in all major decisions (by protected characteristic).

### **6.Mapping SEP Objectives to the Well-being Goals**

The Well-being of Future Generations (Wales) Act 2015 sets out seven well-being goals for public bodies in Wales. The DBCC's Strategic Equality Plan (2025–2028) supports these goals through its equality objectives and actions. The table below demonstrates how each SEP objective contributes to the well-being of Wales.

<b>SEP Objective</b>	<b>Well-being Goals Supported</b>
<b>1. Strengthen Inclusive Engagement in Boundary and Electoral Review Consultations</b>	A More Equal Wales, Cohesive Communities, A Wales of Vibrant Culture & Thriving Welsh Language
<b>2. Improve Accessibility and Inclusivity of Electoral Information</b>	A More Equal Wales, A Healthier Wales, Cohesive Communities, A Wales of Vibrant Culture & Thriving Welsh Language
<b>3. Establish Baseline Data to Assess the Impact of DBCC's Remuneration Function</b>	A More Equal Wales, A Prosperous Wales, Cohesive Communities
<b>4. Foster a Diverse and Inclusive Workforce</b>	A More Equal Wales, A Prosperous Wales, A Healthier Wales
<b>5. Mainstream Equality in Governance and Service Delivery</b>	A More Equal Wales, A Globally Responsible Wales, Cohesive Communities

## **7. Publication and Accessibility**

- This plan will be published on the DBCC website, with accessible and easy-read versions available.
- Alternative formats will be provided on request.

## 8. Action Plan

### Objective 1: Strengthen Inclusive Engagement in Boundary and Electoral Review Consultations

Action	Responsible Officer	Timescale	Performance Indicators
Co-design consultation and engagement approaches with community partners	Senior Communications and Engagement Manager	Sept 2026	Increase in engagement; diversity of partners
Provide consultation materials in accessible formats	Senior Communications and Engagement Manager	On-going	Number of accessible formats
Pilot outreach sessions	Senior Communications and Engagement Manager	Dec 2026	Participation levels
Staff training on inclusive engagement	Head of Business	March 2027	Training completion and evaluation
Develop community network database	Senior Communications and Engagement Manager	June 2027	Database established
Establish baseline respondent data	Senior Communications and Engagement Manager	March 2028	Baseline dataset completed

### Objective 2: Improve Accessibility and Inclusivity of Electoral Information

Action	Responsible Officer	Timescale	Performance Indicators
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Apply digital accessibility standards	Head of Democratic Health	Oct 2026	100% compliance
Produce plain-language bilingual content	Senior Communications and Engagement Manager	March 2027	Expert validated content
Conduct user testing	Head of Democratic Health	June 2027	Feedback included
Establish Accessibility Advisory Group	Head of Democratic Health	Sept 2027	Group established
Implement feedback mechanism	Senior Communications and Engagement Manager	Dec 2027	Annual analysis

### **Objective 3: Establish Baseline Data on Remuneration Function Impact**

Action	Responsible Officer	Timescale	Performance Indicators
Collaborate to design data framework	Chief Executive	Dec 2026	Framework adopted
Conduct data-mapping exercise	Head of Democratic Health	June 2027	Gap analysis
Analyse remuneration links	Head of Democratic Health	Dec 2027	Analysis completed
Publish equality analysis report	Chief Executive	March 2028	Report published

**Objective 4: Foster a Diverse and Inclusive Workforce**

Action	Responsible Officer	Timescale	Performance Indicators
Review workforce equality data	Head of Business	March 2026 baseline; annual	Metrics compared with census
Review recruitment processes	Chief Executive	Sept 2026	Recommendations implemented
Monitor pay disparities	Head of Business	Annual from 2026	Pay gap analyses
Deliver EDI training	Head of Business	Dec 2026; refresh 2027	Completion rates

**Objective 5: Mainstream Equality in Governance and Service Delivery**

Action	Responsible Officer	Timescale	Performance Indicators
Embed EIAs	Chief Executive	June 2026	EIAs completed
Integrate socio-economic & anti-racism considerations	Chief Executive	Dec 2026	Updated templates
Review & update SEP	Chief Executive	March 2028	SEP updated
Provide evidence of equality considerations	Chief Executive	Ongoing	Annual reports