



Welsh Government  
Consultation – summary of responses

Consultation on Future Funding for Equality and  
Inclusion Grant Programme

30 November 2021

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

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## Background

The Welsh Government's current Equality and Inclusion (E&I) Funding Programme was launched in July 2016. The programme was developed to support Welsh Government's Equality Objectives 2016-20 and protected characteristics as defined in the Equality Act 2010.

The total programme budget is £1.6million for 2020-21. At present the programme consists of a grant for four representative organisations and three procured Inclusion Projects as follows:

### **Grants for representative bodies and the current lead agency for each:**

- All Wales Black, Asian and minority ethnic Engagement Programme EYST
- LGBT Equality in Wales – Stonewall Cymru
- Driving Forward Disability Rights in Wales – Disability Wales
- All Wales Gender Equality Project – Women's Equality Network (WEN) Wales

### **Inclusion projects (contracted services) and lead agencies:**

- Travelling Ahead, supporting Gypsies, Roma & Travellers – TGP Cymru
- The Asylum Rights Programme – The Welsh Refugee Council, partnered with EYST, TGP Cymru, Bawso, and Asylum Justice
- The All-Wales Hate Crime Report and Support Centre – Victim Support Cymru

Following grant bidding and procurement processes, the programme began on 1 April 2017, initially for a 3-year period. This was extended and is now due to conclude on 30 September 2021.

As the Scheme is also intended to cover funding from September 2021 which will be available to Black, Asian and Minority Ethnic organisations, as well as some others within the protected characteristics of Race, Disability and Gender, Welsh Government sought views on the future shape of the funding package.

## Consultation details

This consultation sought the advice and guidance of stakeholders, those who provide services, and individuals and communities who are either receiving those services or need them, to tell us what, if anything, needs to change with the E&I Funding Programme.

Views were sought on the following areas:

- Issues relating to the funding programme
- Funding period
- Distribution of funding
- Continuation of existing services for particular groups
- Budget splits
- Alignment with Welsh Government's Strategic Equality Action Plan 2020-2024
- Collaborative working
- Alignment to specific equality plans such as the Gender Equality, Race Equality and LGBTQ+ Action Plans
- Impact on Welsh Language

The consultation ran for 9 weeks from 15th February 2021 to 16th April 2021.

There were several ways stakeholders could respond to the consultation.

- Through a response form which could be submitted via email or by post
- Through an easy read response form which could be submitted via email or by post
- Through an online portal
- Through one of the digital consultation events

Welsh Government received a total of 39 responses to the consultation:

- 3 from individuals, 22 from third sector, 13 from public bodies and one from a private sector company. A full list of responders can be viewed where approval has been given in the Appendix.
- 23 organisations responded via the online portal, 3 sent letters, 2 responded via the easy read form and 11 via email.

In addition, notes taken at the digital consultation events, attended by 16 individuals, have also been fed into the analysis.

## Summary of consultation responses

### **Question 1 - Do you consider that this document summarises the main issues that should be considered in relation to this funding programme? Please outline any issues which you feel are missing or need further attention?**

All respondents agreed that the main issues have been summarised within the document. Two respondents felt that inequalities should be tackled across the board, rather than prioritise injustice for certain groups over others. There were several issues identified that respondents felt needed a bigger emphasis including:

- Inequality caused by poverty because it is felt socio economic deprivation underpins so much.
- Digital inclusion or exclusion as so often can be the case for many reasons e.g. Learning disability, poor broadband, low income.
- How the plan would consider supporting children and young people and if core organisations that receive support would need to consider the intersectional differences of young people
- Rurality - "Those who live in rural areas and share protected characteristics are at greater risk of being isolated. These groups are often not formally represented so greater outreach support in rural communities is required."

Women's equality came up in six responses as an area that requires greater focus, as a result of Sarah Everard's murder and the impact of COVID19 on women. The use of 'sex' versus 'gender' within the document was also highlighted as something that needs consideration when relating to women's equality.

"One of the main issues that appears to be ignored is the relevance of sex to women's oppression and experience of violence and discrimination. Sex, not, gender is the protected characteristic and women deserve to have their rights protected."

Five organisations highlighted that there needed to be a greater focus on the impact of COVID19 – both in terms of exacerbating inequalities in Wales but also in impacting the huge surge in demand for services and the impact it is having on organisations delivering their services efficiently. One charity suggested that a report commissioned by Welsh Government on the impact of Covid-19 on disabled people in Wales should be taken into account as part of the next steps.

The impact of Brexit, particularly with regards to Wales' EU communities and the impact it has on equality legislation, was highlighted by four respondents as an area that required greater attention. "Whilst this is referenced, we have concerns about how ongoing support will be provided to EU citizens once funded projects focussed on the EUSS have finished." Three respondents noted the need for linguistic equality and 'culturally competent support' for the diverse communities in Wales who do not speak English or have English as a second language.

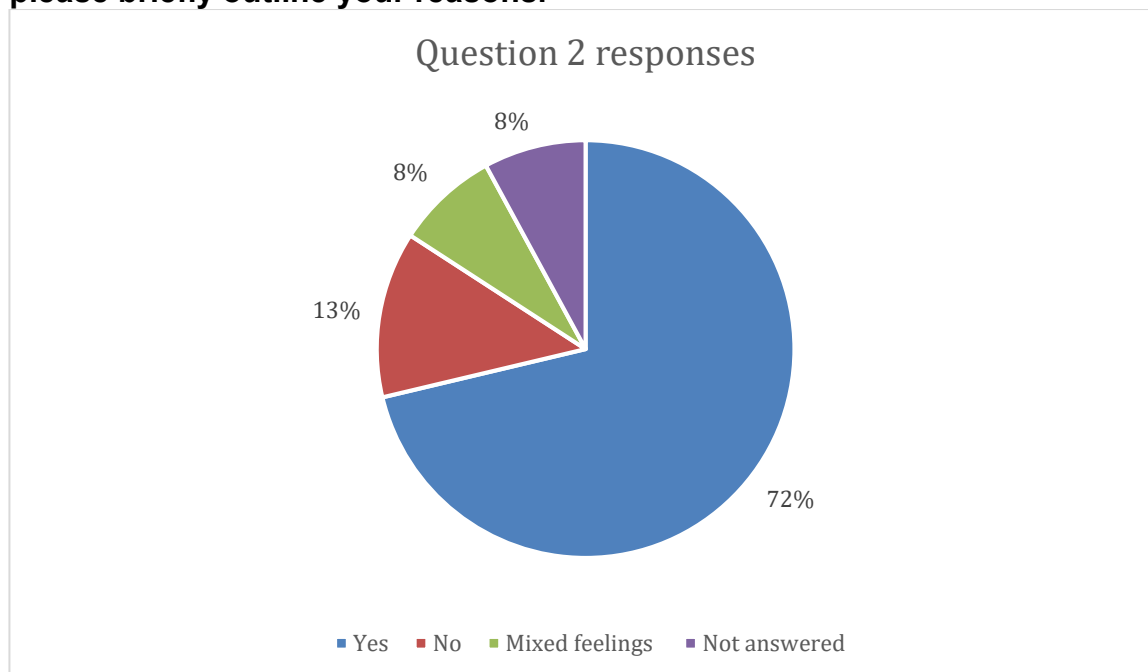
Three respondents queried how the impact of the funding will be monitored and made suggestions about how the funding could be awarded, in light of suggested regional inequalities across Wales.

One potential gap identified is the changing focus and language of UK Ministers in relation to equality. The new approach outlined by the UK Minister for Women and Equalities in December 2020 was highlighted as being in contrast to the approach of the Welsh Government which remains focused on equity, achieving equality of outcome and using mainstreaming tools such as equality impact assessments to inform policy and programme design.

One organisation suggested that 'religion' should be added to the areas most in need of funding in light of the rise in Islamophobia and anti-Semitism and one organisation suggested that 'faith' should be added alongside 'religion or belief' as a protected characteristic.

Other suggestions included making local authorities aware of which organisations have been funded and what services will be provided free for public bodies to take advantage of and mandating that organisations who are awarded grants make links with officers in each local authority to achieve outcomes and avoid duplication of effort.

**Question 2 - Do you support the proposal for a longer, 5-year programme? If not, please briefly outline your reasons.**

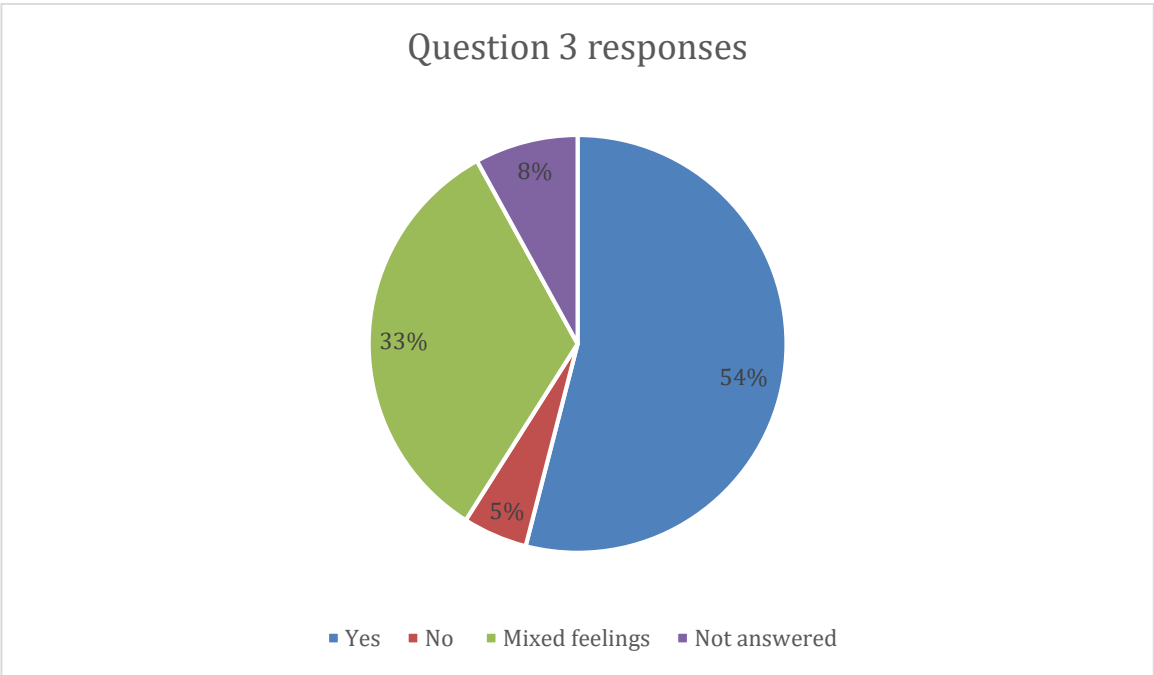


The majority of respondents (72%) are happy to support the proposed 5-year programme, recognising the need for security and stability to those awarded funding and acknowledging that long term funding is crucial to achieving impact at scale.

That being said, while supportive of the longer time period, four respondents still recognised the benefits of a shorter funding cycle to allow for greater agility. Nine respondents suggested a degree of flexibility would be beneficial where timescales were decided on an individual basis and several suggested that an ideal situation would be a mixed approach to fund both long- and short-term initiatives.

The main reason respondents are not supportive of the 5-year programme is because they feel it doesn't allow Welsh Government to be responsive to any change in the external environment, such as the ongoing COVID pandemic, and five respondents expressed concerns about the longer period shutting out grassroots organisations from the scheme. One organisation felt that it couldn't give a justified answer without knowing the impact of the funding to date over the current timeframe.

**Question 3 - Would you support Welsh Government providing core funding for some strategic equality organisations? If not, please briefly outline your reasons.**

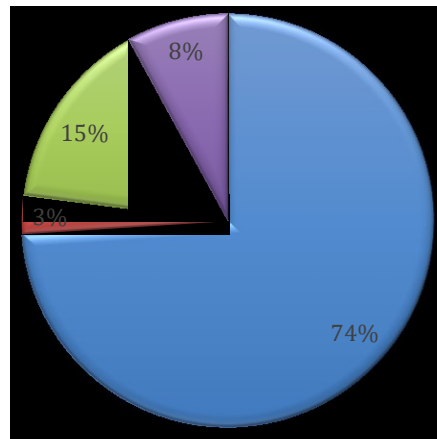


54% of respondents said they would support Welsh Government providing core funding for some strategic equality organisations. However, for 53% of respondents, this support is based upon full transparency of why an organisation has been chosen to receive core funding, evidence of the work they have done, and evidence of positive outcomes. 8% of respondents highlighted how third sector organisations often struggle to secure funding as it is usually project specific, so this allocation of core funding would be beneficial. The 5% who said no are concerned that one organisation may be chosen to represent an entire cohort of people with a protected characteristic. 10% also showed concern over chosen organisations having the ability to remain unbiased. Geographical conditions were also highlighted by respondents, with 5% pointing out that any chosen organisations should be working closely with local authorities to provide adequate provisions for all areas of Wales.



**Question 4 - Do you support the continuation of existing services for particular groups? Are there other services which you think should be provided in future? If not, please briefly outline your reasons.**

### Question 4 responses



■ Yes ■ No ■ Mixed feelings ■ Not answered

The majority of respondents (74%) said they would support the continuation of existing services for particular groups, providing there is tangible proof that the services are working. 8% of respondents however stated that their support depended on the assurance that funding and services would be made available in all areas of Wales, with a concern that South Wales is currently favoured.

8% of respondents highlighted their concerns about the lack of translation/interpretation services. There is also concern that stretching an already small pot of funding further would cause more damage.

“The work of the Asylum Rights Programme makes a huge impact on the lives of asylum seekers in Wales. As the E & I fund is relatively small, partners are concerned about dilution of services should the fund be spread more widely amongst other particular groups.”

In contrast, 42% of respondents think there isn't a broad enough spectrum of services for disabled people, victims of hate crime, asylum seekers and refugees, Gypsy, Roma and Travellers, and the LGBTQ+ community. 5% of respondents also showed concern for the blind who they feel have been totally isolated during the pandemic, with vaccine letters being sent in printed format etc.

Suggestions of additional services include:

- Interpretation and translation services
- Increased capacity for engagement with groups who are seldom heard, particularly in local authority areas where there are lower numbers and no existing support networks/mechanisms
- Development of local Community Champions who can help identify community tensions, support local authorities/public bodies engage with people with protected characteristics/people who experience socio-economic disadvantage and can

support public bodies communicate effectively and reach specific groups who are seldom heard

- Training – provision of training on “No recourse to public funds”
- Training Digital Champions who can support those who are digitally excluded
- Wider equality action in the area of mental health and wellbeing. For disabled people who feel left behind, especially during the pandemic with the example of blind people receiving letters about jabs etc in printed format.
- Education in schools – establishment of Diversity Role Models who work to create a safe space to explore difference and consider their role in creating a world where everyone feels accepted. Run workshops to feature LGBTQ+ or ally role models who speak about their lived experiences. Services range from staff-training, primary and secondary school workshops as well as parent and governor training.

**Question 5 - What should be the balance between procured services, core funding and grant-funded projects? How would you split the budget (currently £1.6million) between these areas?**

Responses to this question were mixed, with varied views on which is deserving of the most funding.

10% of respondents suggested ways of splitting the funding, whilst others were reluctant to comment due to a lack of knowledge on what services would be receiving the funding. 16% of respondents suggested that funding should be split based on where the need is and 10% of respondents are concerned that the suggested figure of funding isn't enough.

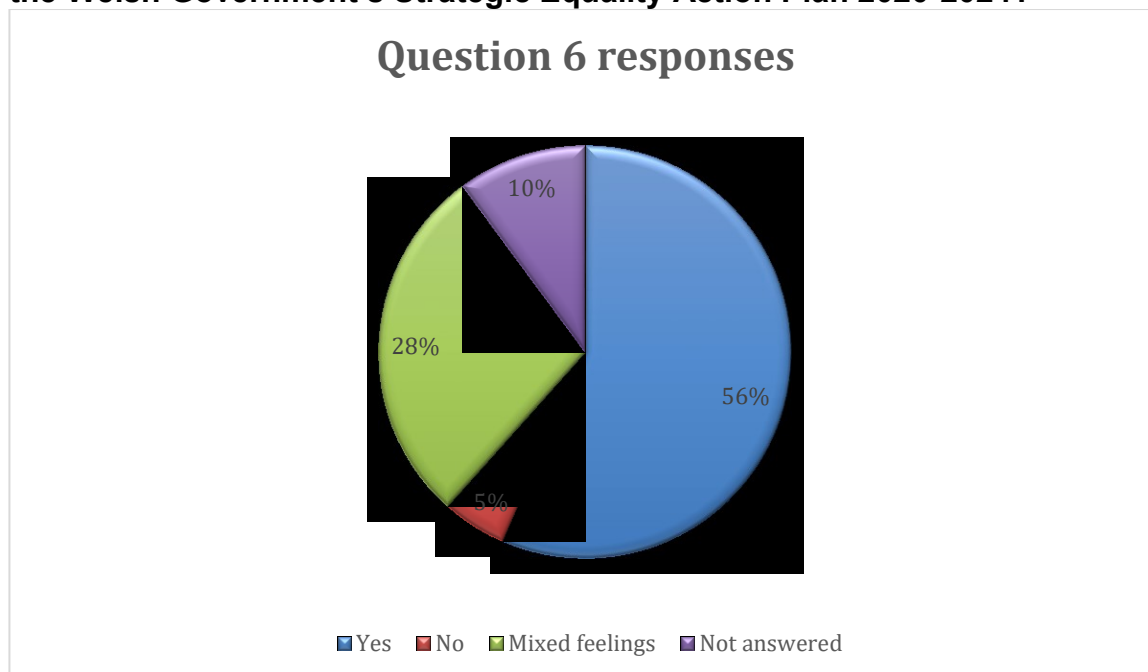
Examples of funding split suggestions:

"Funding should be weighted more towards grant-funded projects (40%) and then equally between procured services (30%) and core-funding (30%). We believe this would be balanced, fair and proportionate. Our rationale for weighting funding towards grant-funded projects is that they are likely to be small and varied, allowing a range of targeted projects on specific equality matters."

"Maximum of 10% for core funding - £160,000. Depends on commissioning model(s) used as to how to split the remainder. If an Alliance, then a mixture of procured and grant-funded (direct or indirect) could be done from within the Alliance from within the budget. If consortia or Anchor organisations, then a different approach may be needed."

"Grant funding- 50%, Procured services -30%, Core funding- 20%".

**Question 6 - Do you agree that this funding should align with the objectives set out in the Welsh Government's Strategic Equality Action Plan 2020-2024?**



56% of respondents answered yes, stating that funding should align with the objectives set out in the Welsh Government's Strategic Equality Action Plan for the next four years. A recurring principle was that this will ensure all services work towards the same shared goal of strengthening and advancing equality and human rights in Wales.

10% of organisations recommended that in doing so, funding bids should take place to demonstrate how activity would support these objectives, believing that funding should align with the Socio-economic Duty and the Wellbeing of Future Generations Act.

In a number of cases (28%), agreement of funding was based on a variety of factors such as committing to ongoing analysis of the effectiveness of plans in terms of achieving objectives and shaping positive community outcomes.

It was documented by 12% of participants that a degree of flexibility should be built into the commissioning and procurement processes for post 2024 when new plans come into force as well as the ability to adapt to *"any emerging issues that are not reflected in the Welsh Government's Strategic Equality Plan."*

It was also highlighted that funding patterns and objectives should be reviewed to ensure they are still relevant post COVID-19.

A common theme reported by three respondents was that funding should allow core organisations to work with and address the needs of specific populations with protected characteristics and those who experience socioeconomic disadvantage.

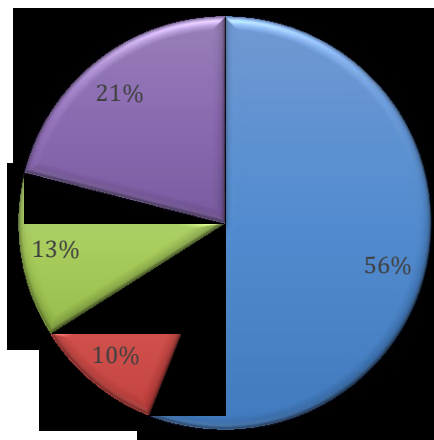
Answers reflected the need to target Local Authorities encouraging them to align their objectives with Welsh Government plans so that issues aren't just tackled at a national level.

For the 5% of respondents that did not agree that funding should align with the objectives set out in the Welsh Government's Strategic Equality Action Plan 2020-2024, reasons

focused on the misuse of 'sex' vs 'gender' definitions promoting the belief that the SEP plan is not equality act compliant.

**Question 7 - Do you think that some of the funding should be set aside to support wider equality action and collaborative working between equality organisations?**

**Question 7 responses**



■ Yes ■ No ■ Mixed feelings ■ Not answered

56% of participants answered yes, agreeing that funding should be set aside to support wider equality action and collaborative working between equality organisations with clear guidelines and expectations set so that organisations are clear on how they administer this.

The notion that funding of this nature is more important than ever in building community cohesion, particularly in light of COVID-19 and its national restrictions was relayed by 10% of respondents, with specific emphasis put on the financial stress and the demand to provide care, advocacy and service to marginalised communities over the last year.

A common reason for agreement noted by over half of respondents was specifically to focus on intersectionality including race, gender and disability which is a key aim for Welsh Government. 30% of respondents agreed that the ability to provide intersectional perspectives will be vitally important in addressing the wide and varying causes and impacts of inequality, including socio-economic disadvantage which often coincides with other forms of oppression and discrimination.

Two respondents stated their previous success as a result of current funding as a reason to earmark additional monies.

Whilst in agreement, respondents provided several caveats to their responses including the need to clearly define what wider equality and collaborative working means in this context. Other groups mentioned the need to provide a thorough outline regarding how funding would be used, how much of the proposed budget would be set aside and said it would be helpful to see funding committed to key themes of inequalities rather than solely by characteristic

By those that disagreed (10%), it was noted that new money should be found rather than drawing on existing funds and if existing funds are utilised then the majority should be reserved for service delivery and not consumed by organisational administration and bureaucracy. Clarity on how funding for this purpose would be used, and how much of the proposed budget would be set aside was also requested.

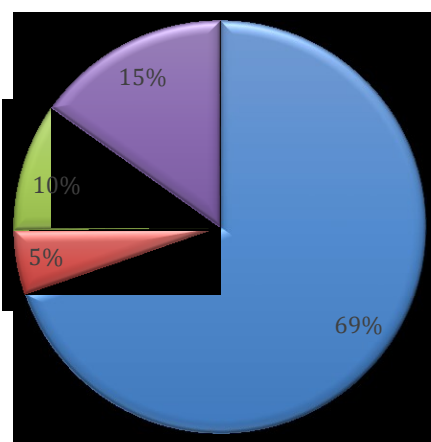
For the 13% of organisations that were unsure about funding for collaborative working between organisations, it was mentioned that they are still in agreement that collaborative working should take place in some form. A third sector organisation stated that a *“component of the bidding process could be to demonstrate intersectionality considerations and a commitment or requirement to work collaboratively across programmes.”*

In line with the above, other third sector organisations agreed that the funding programme should be a fair and transparent process whereby groups are able to bid for funds and that money is capped per organisation to ensure the widest possible impact. It was recommended that funding is directed towards new groups and projects so that these charities and community groups can build up the same resilience as other charities have been able to under this scheme.

An idea put forward by one charity in order to increase the budget for development and collaboration was to work with other funders such as The National Lottery and Community Fund to match funding. Their reason being that match funding on equality and inclusion would enable shared learning between funders, support policy development and build extra capacity within this sector.

**Question 8 - Do you agree that this funding should align with our specific equality plans such as the Gender Equality, Race Equality and LGBT+ Action Plans?**

**Question 8 responses**



■ Yes ■ No ■ Mixed feelings ■ Not answered

69% of participants agree that funding should align with specific equality plans such as the Gender Equality, Race Equality and LGBT+ Action plans. Third sector, as well as local authorities, were amongst those who agreed with no reasons against the proposal. Reasons for agreement include the fact that it reflects the objectives set out in the Welsh Government's Strategic Equality Plan, will facilitate delivery of outcomes, and will highlight considerations to aid the development of future action plans.

Respondents reiterated that partnered with alignment of funds, ongoing analysis of how effective plans are in terms of leading and shaping positive outcomes is needed to create future actions and targets. Emerging priorities and changes in the external environments need to be considered and a flexible approach to planning measured over time.

Alongside positive attitudes towards funding alignment, areas for consideration were put forward. These included recognition of intersectionality, diversity and inclusion around race, gender and disability as well as socioeconomic elements within local, regional and national communities.

It was also noted that clear budget parameters should be set to enable the delivery of action plans. Respondents suggested that it will be important to avoid making the application process for funding overly complex and that the key aims, objectives, communication methods and budget availability should be outlined in a clear / easy to understand approach.

Particularly from a local point of view, 12% of organisations and councils pointed out that "nobody knows their communities better than local people, and that community cohesion only happens if communities are enabled."

Therefore, interactions and relationships between Local Authorities, equality leads, and funded projects need to be focused on in order to reduce project duplication, maximise opportunities to benefit from local knowledge, and respond to emerging issues.



For the 5% of participants who disagreed with funding alignment, it is due to the inflexible nature of the arrangement and concerns that it does not consider the everchanging needs of individuals.

Two organisations recommended that strategies are put in place for loss of funding, recruitment of volunteers, and application processes to ensure the equitable participation of disabled people. One specifically noted that the proposed Disability Taskforce is an important step and one which needs both a fully co-productive approach and adequate resourcing.

One charity specifically believes it doesn't have enough information at present to form a view and believe the specific equality plans appear to have been drawn up without consultation beyond the groups that are likely to be funded to carry out the work. They queried the Welsh Government's lack of an action plan on sex equality and its framework around its 'woolly' concept of gender.

It was acknowledged throughout the survey answers that a logical approach to align equality plans in Wales will achieve deep rooted change. However, it was emphasised by 7% of participants that organisations should be allowed to shift priorities when required based on the needs of certain population groups.

**Question 9 - We would like to know your views on the effects that these proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

56% of organisations agreed that they do not think that these proposals would have a less favourable impact on opportunities for people to use the Welsh language.

Other respondents stated that they already had Welsh policies in place within their organisations and felt it important to “recognise the Welsh Language Standards as far as reasonably possible, when commissioning equality and inclusion services.”

There were several issues identified that respondents felt needed to be considered including access to translating services, funding to cover Welsh materials and services, “ringfencing” funding for promoting the use of the Welsh language, additional funding being made available for the delivery of services through the medium of Welsh, materials and training to be produced in Welsh and developing good practice.

One organisation pointed out the need for provision to offer the opportunity for Black, Asian and Minority Ethnic communities to benefit from learning Welsh. They also stated that the Welsh Government needed to consider the promotion of other languages.

One organisation in particular was very much in agreement that organisational services in Wales should be delivered bilingually but that they weren’t currently receiving funding to cover these costs.

**Question 10 - Please also explain how you believe the proposed policy approach could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

Several organisations had suggestions to benefit the Welsh language. Encouraging the use of consortiums to seek new collaborative partners who can contribute to the use of the Welsh language was one suggestion.

One respondent suggested including the Welsh language within the application criteria and suggested that it was a requirement for organisations to meet the Welsh language Standards' service delivery and demonstrate how they will promote the Welsh language as part of any applications.

Other suggestions from respondents included E&I contracts to have Welsh speaking delivery at the point of service for clients, project literature to be translated before circulating, PowerPoint or on-line presentations to be bilingual, on-line meetings to have Welsh translation facilities available and Welsh language statistics to be kept as part of the contract monitoring process.

When considering refugees in Wales one respondent responded that the priority for asylum seekers and refugees as non-native English speakers would be learning English, as English is the dominant language in Wales and their livelihood will likely depend on their English skills.

The costs of making services bilingual were identified as a concern for some respondents, particularly larger documents: *"...costs for a translated leaflet might be relatively conservative, but costs for translating online support modules are considerably higher."*

**Question 11 - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

Most organisations expressed that they were happy with the opportunities the consultation had given them to voice their suggestions and concerns.

Others had further suggestions and concerns to raise. These included:

- Consulting directly with disabled people on the programmes and proposals to ensure that the voice of those with protected characteristics is not lost.
- Increasing and developing partnerships between organisations to increase outcomes, whilst reducing costs.
- Ensuring the built environment and transport is accessible for partially sighted people.
- Providing clarity about who is to deliver similar objectives when they already exist within the third sector.
- Providing additional support to victims of COVID19 related crimes.
- Increasing local engagement by linking the organisations supported via the Equality and Inclusion Funding Programme with Local Authorities, for example via Equality Officers. This would help to ensure programme delivery where there are local needs, including how to deliver programmes in large rural counties
- Developing a monitoring framework for monitoring information and reports that can then be shared with Regional Community Cohesion Co-ordinators, who should have a hand in shaping the agenda.
- Changes to core funding such as adopting an intersectional approach across the funding and grant programme is essential and aligns with recommendations from the Gender Equality Review, Freedom and Flexibility and Digital inclusion.
- Ensuring mental health is at the heart of policies pertaining to the Future Funding for Equality and Inclusion Grant Programme going forward.

## Appendix

List of organisations which responded and agreed to have names published:

1. Staff Equality Network Powys County Council
2. NWREN
3. Ceredigion CBC
4. Royal College of Midwives Cymru
5. Equality and Human Rights Coalition
6. Safer Communities Network Wales
7. Chwarae Teg
8. Trivallis
9. Pobl Group
10. Wales Council for the Blind
11. Denbighshire CBC
12. EYST
13. Newport City Council
14. Sport Wales
15. Vale of Glamorgan CBC
16. Regional Cohesion Coordinator Cohort and West Gwent Authorities Caerphilly, Blaenau Gwent, and Torfaen
17. Flintshire CBC
18. Victim Support Cymru
19. Neath Port Talbot CVS
20. Fair Treatment for the Women of Wales (FTWW)
21. Regional Community Cohesion Coordinator for North West Wales
22. Wrexham CBC
23. LGBT Helpline Cymru
24. Welsh Refugee Council
25. RNIB Cymru
26. Blood Equality Wales
27. South East Wales Collective CVCs
28. Merched Girls Cymru
29. Disability Wales
30. Welsh Women Speak Out
31. WLGA
32. Leonard Cheshire Foundation
33. WEN Wales
34. Catholic Bishops of England and Wales
35. Carmarthenshire CBC