



# An Anti-Racist Wales

The Race Equality Action Plan for Wales

Emerging Vision, Purpose, Values and Envisaged Future by 2030

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# Section 1

### 1. Ministerial Foreword

For many of us, tackling racism and promoting race equality have always been important priorities. But over the past few years, prompted by the justifiable outrage over the killing of George Floyd in the United States, and growing divisions within our own society, we've come to realise that this issue is more pressing than ever. It is time for change, and an opportunity for change. Governments, public bodies, businesses and communities have no excuse for inaction.

We are collectively working towards Wales' well-being goals, which at its heart lies the unifying goal of creating a 'More Equal Wales'. For Wales, our vision is of a country that is proudly anti-racist, where everyone is treated as an equal citizen. Our purpose is to create meaningful change to the lives of Black, Asian and Minority Ethnic people. We want to do this in a way that is transparent and open, and in a way that acknowledges that we have a diverse population that actively contributes now and will do in the future, to our economy, health and all public services. All have the right to be equal citizens of Wales, and this is a legacy we must hand over to future generations.

We want to make sure that we continue to walk in the shoes of people with lived experience and that the experiences of individuals and communities keep percolating into all our thinking. It is only by listening and acting that we can achieve real change. We intend this to be a practical plan, outlining specific actions to be taken across all the key policy areas which emerged from our co-construction work. Once finalised, the Welsh Government will be committed to and held accountable for it.

The good news is that we have a good record of delivering tangible, progressive changes for other protected groups, for example our work on gender. But now, we are focusing on race and doing so in the recognition that it is personally and institutionally the most challenging for us in public services but, if we achieve change in this arena, then there will be wins not just for all other protected groups too but society as a whole. Our achievements here can set a standard and good practice for other equalities work.

The Race Equality Action Plan (the Plan) is being developed collaboratively. We are grateful for the effort many people and organisations across Wales have put into 'co-creating' this draft version. We have held events across the country to listen to people's experiences, and have worked hard to incorporate what communities, and the academic evidence, have told us.

This Government is fully committed to this work, as are the many groups and individuals that have helped us so far. But we still need your input. We must be sure we have included the right priorities, and are clear about how they'll be implemented. So, we invite you to look at this draft, and over the coming weeks to challenge us, and help us to refine the plan. We look forward to receiving your input by 17 June 2021, and to moving forward to implement the final version, later this year.

This is a time for change, and for us to have as many players helping us shape it and for those choosing to be spectators, to rally us on.



Mark Drakeford MS
First Minister of Wales

Mark Ore whitens



Jane Hutt MS
Deputy Minister
and Chief Whip

Dane Huth

### 2. Co-Chairs' Foreword

It is fair to say that as a society, we are collectively perturbed by racism. However, for too long, we have believed that racial inequality will disappear without sustained efforts to challenge and eradicate it. In many respects, we have become conditioned to living with racial inequality in a way that has made it a self-perpetuating aspect of reality that has blighted the lives of Black, Asian and Minority Ethnic (herewith ethnic minorities) members of our society.

The Race Equality Action Plan (the Plan) builds on previous Welsh Government initiatives on race equality. The urgency of the Plan was laid bare and intensified by the impact of the COVID-19 pandemic, and perhaps more acutely by the unparalleled visibility and reaction of the world to the killing of George Floyd in the USA. These two events brought the pernicious consequences of racism to the world's consciousness and heightened the need for sustained action to eradicate racial discrimination.

The Plan builds on the findings of the Welsh Government Socio-economic Subgroup report on COVID-19 and ethnic minority communities in Wales, and is distinguished by three inter-related features. Firstly, the Plan is built on the values of anti-racism. This means that a common theme that runs across all the chapters is the desire to strive for a nation in which there is zero tolerance for racism in all its guises. We considered this important because although most people in society are generally non-racist, the deleterious impacts of racism have persisted because being non-racist is not an action-oriented state. Indeed, people who categorise themselves as non-racist are often exposed to negative racial stereotypes of ethnic minority groups, and these stereotypes can often be activated in ways that influence their behaviours, even if unconsciously. Conversely, anti-racism is a conscious position wherein individuals, organisations and institutions commit to thinking actively and responding to the potential impacts of their existing structures, processes, policies and practices on racial and ethnic minorities. Such proactive behaviours help to keep racial discrimination in check and shift the burden of racism from the victims of such acts to everyone in society.

The second factor that distinguishes the Plan is that we followed the principles of co-creation in that the Plan is a culmination of open, critical and dynamic dialogues within and between groups, including Welsh Government officials, academics, race/ethnicity activists and workers, Trade Unions and Wales TUC, officials from local government and non-governmental organisations, community group leaders, religious leaders and, importantly, individual members of the multiple communities that comprise the breadth of the racial and ethnic minority groups in Wales. The outcome of this collaboration is a Plan which represents the viewpoints of all stakeholders.

The final feature that distinguishes this Plan is the emphasis on closing the implementation gap. In developing the Plan, members of the Steering Group were guided by the knowledge that previous Race Equality Plans with positive intentions have not resulted in meaningful improvements in the lives of ethnic minority groups. We were also mindful that the problem of implementation has marred the efficacy of the legislative framework (the 2010 Equality Act) which was designed to eliminate racial discrimination in society. We believe that the successful implementation of this Plan will benefit all citizens, now and in the future.

The guiding principle of this Plan is that the 'rhetoric' on racial equality should be translated into meaningful action, with organisations and institutions made accountable for turning this into reality as is common with other important policy areas. It is for this reason that the Plan identifies 'goals', 'actions' 'timelines', 'outcomes' and the role of the Accountability Group that will oversee the governance as critical to successful implementation.

We believe that the successful implementation of this Plan will benefit all citizens. An equitable employment market that increases the participation of racial and ethnic minorities will improve the overall productivity and growth of the Welsh economy, which will benefit all. A fairer education and training system will harness the potential of all people in Wales especially members of racial and ethnic minority communities whose populations are skewed towards the younger age groups and whose knowledge, skills and abilities will contribute to overcoming the likely impacts of an aging population. Finally, equalising racial opportunities and outcomes in healthcare and other social services will help to reduce the overall burden on the state and individuals and help to promote active citizenship. In these regards, the imperatives for fully implementing this Plan are derived not just from the moral and legal requirements, but also from the mutually beneficial nature of the outcomes: we all stand to benefit from racial equality.



Professor Emmanuel Ogbonna Cardiff University



Dame
Shan Morgan
Permanent Secretary,
Welsh Government

# 3. Acknowledgements

This Plan would not have been possible without the efforts of many people. We should start by acknowledging the support of the members of the Steering Group, Wales Race Forum and the Black Asian and Minority Ethnic COVID-19 Health Advisory group and sub-groups and our community mentors, who have given up so much of their time, and who provided tremendous expertise and support throughout the process.

The Plan also benefited from the rapid reviews of existing evidence provided by the Wales Centre for Public Policy and the academics who worked with it. We are also grateful for the help and facilitation provided by Ethnic Minorities and Support Youth Team Wales (EYST) in undertaking the Vision-setting events. We acknowledge the contributions of Black, Asian and Minority Ethnic individuals and organisations who worked tirelessly to collect and collate the contributions from the wider community, bringing us new voices to help inform our work. Finally, we are in debt to all those who gifted their time to participate in the various vision-setting events and evidence gathering phases of this work. We saw the emotional burden of racism and discrimination that many carry, and we recognise the difficulties in opening up about some of the traumatic experiences individuals have experienced. It is our fervent belief that the success of this Plan will be such that individuals will no longer be asked to recount such distressing experiences in the future.

We are grateful to the Welsh Government Policy Leads and their colleagues, who have worked tirelessly to keep up with the tight schedules. We wish also to thank Trade Unions and the Wales TUC for working with us in social partnership, adhering to the important principles of co-operation, respect and trust. We would also like to thank the team of officials who have been exceptional in managing the entire process leading to the development of the Plan.

Mark Drakeford MS, First Minister of Wales

Jane Hutt MS, Deputy Minister and Chief Whip

Professor Emmanuel Ogbonna, Cardiff University

Dame Shan Morgan, Permanent Secretary, Welsh Government

# 4. Racism: quotes from partners

"Racism contradicts itself, racism is illogical, racism is a farce to deny people of human rights and as such deny their right to live their lives with dignity, denied being afforded the same privileges as everyone else, denied a way to make a living and denied the basic pleasure of waking up to a new day with hope".

Cindy Ikie, Black Lives Matter Wales. 2020

"For 30 years I faced discrimination and racism because I wore my Hijab; I have been called names, which I do not want to repeat, I have been told to go back to my own country. I have been spoken to as if I don't understand English and as a second-class citizen....
(eventually) I decided to remove my Hijab as I feared for my daughter and grandchildren that when I go out with them that they would also be abused, or worse attacked..."

"Sometimes a car will pass you, they call out 'terrorist' or 'go back home' and all that stuff. So you get used to it. For the rest of your life, you are living here, you get used to get racism and then you think it's normal, you know".

Diverse Cymru

"The police... are too quick to judge and they single us (Gypsies and Travellers) out, unless they personally know us. I honestly do not have respect for the police because of the way I have been treated in the past".

TGP Cymru

"An ambulance won't come on the site unless they have the police with them. They won't come down here at all. You call an ambulance, it takes 2 or 3 hours until the police are here. There has never been a problem that way – there is no need".

#### Romani Cultural & Arts Company

"It's been going on for 10 years. The man downstairs is so abusive and aggressive. The police know about him...I have reported it so many times and nothing gets done – so then I stopped reporting the incidents and then I was told I don't report enough....(his) kitchen is next to the entrance to our building; he shouts 'You black bastard, you black \*\*\*t'. My husband has even caught it on camera. The man was arrested but he was back in the building in two hours. I'm left feeling so vulnerable having to go past this man's front door".

BAME Women (MELA, WCF, Hayaat WT, Henna Foundation)

"I moved to Wales from England, to study medicine...as I've moved around different parts of Wales during placements I've found that there are places where I am very unwelcome. It might be micro-aggressions, like being stared at or questioned about my hijab, but it can also be very serious, having insults thrown at me or being asked by a patient for a white doctor... it's made me think again about how open and fair Wales really is".

Islam UK Centre & Muslim Council of Wales

"Recent online racial hatred has been dreadful. I hope that as a community we can reach a place where it is totally unacceptable to post racial comments. We need everyone in the community to listen, to understand, and to speak out. It is only by education the community that we can achieve this".

#### Neath Port Talbot surveys

"Race and sex discrimination occurs on a regular basis, but this is carried out in a subtle way so (as) not to be detected overtly. So many tricks are used to do this..."

Hindu Cultural Association (Wales)

# 5. Background

#### Over the last five years, the Welsh Government has faced the significant challenges of austerity, Brexit, the climate emergency and the Coronavirus pandemic.

In 2020, work started on a new action plan for race equality, called for by grassroots organisations represented on the Wales Race Forum and others who support us in this work. But in March 2020, the work was derailed by the COVID-19 pandemic. Then, in May 2020, the killing of George Floyd sent shock waves through the global community. In different ways, both of these events have shone a light on the systemic and institutional racism faced by Black, Asian and Minority Ethnic communities (herewith called ethnic minority people / groups), both in Wales and elsewhere.

#### The differential impact of COVID-19

Over the past year, a plethora of reports, inquires and research, statistical data and documented experiences of individuals and communities, have all been making clear the disproportionate impact of the current pandemic on people from ethnic minority communities. The Socio-economic subgroup's report in particular<sup>1</sup>, highlighted these impacts and is significant precursor to many of the actions in the plan.

This is underscored by social and structural differences, which lead not just to health disparities, but to other inequalities also. The Welsh Government Chief Medical Officer's recent report<sup>2</sup> summarises these key health and wellbeing challenges for ethnic minority groups. This is not just about the pandemic but about fundamental disparities in our society.

The Runnymede Trust gives testament to such disparities, stating that "racial inequalities persist in almost every arena of British society, from birth to death" 3. The impact of COVID-19 continues, for as this consultation is being written we are still in lockdown although restrictions are being cautiously eased. The First Minister has stressed that when Wales does move into the recovery phase we need to recover well, but also to recover more fairly.

#### George Floyd / 'Black Lives Matter'

This evidence has supported the growing calls for action, but the killing of George Floyd, the black lives lost in Wales, miscarriages of justice and the work of rights-based organisations in Wales, have also increased the calls for change. Cindy Ikie, National Campaign Manager for Black Lives Matter Wales has articulated this powerfully:

"We were sold a lie, long ago, that there is justification for the ill treatment of a people because of their pigmentation of skin. We have been operating in a system that encourages us to hoard opportunities and resources, and to maintain the deficit of these things for Black people, so that those who are not Black can live their lives more freely, and at the expense of others. We live in a global society that has dirtied its hands in this heinous practice but was rudely awakened to the truth of its ugliness. Forced to gaze now at its reflection – and find that it is not the fairest of them all. A global society that continually ignored the labour pains and cries of Black people until one Black man, by the name of George Floyd, in the middle of a global pandemic, had the knee of a white man, bear the fullness of that white man's weight, pressed down upon his neck, crushing down on the uppermost parts of his spinal cord".

<sup>1</sup> www.gov.wales/sites/default/files/publications/2020-06/first-ministers-bame-COVID-19-advisory-group-report-of-the-socioeconomic-subgroup.pdf

 $<sup>2\ \</sup> www.gov.wales/chief-medical-officer-waless-special-edition-annual-report-2019-2020-protecting-our-health$ 

 $<sup>3 \</sup>quad Runnymede\ perspective\ (2020);\ https://www.runnymedetrust.org/uploads/publications/pdfs/ImmigrationAndTheLotteryOfBelongingFINALJuly2020.pdf$ 

Cindy's words signal the distrust felt by ethnic minority people, a lack of trust that public services and authorities will proactively enforce their rights; rights that may be enshrined in legislation, but have "limited or no impact on our lives" as one partner organisation suggested. Yet for ethnic minority groups, these rights have long-since been earned, by participating in the economy, in the health and other 'front line' services, and by risking their own and their families' lives, both historically and today.

#### Are organisations responding?

The on-line discussions we have undertaken since the summer of 2020 have left us in no doubt that many groups feel that many public, private and third sector organisations have not met their obligations to dismantle systemic and institutional racism. Conversely some services have risen to the challenge, by asking what they can do and responding to the call for action. The recent work by the National Library for Wales / Llyfrgell Genedlaethol Cymru and the Welsh Government to decolonise the Library's cultural assets and working practices is one example.

Government response: in summer 2020, Jane Hutt MS, The Deputy Minister responsible for Equalities, asked officials to develop an "ambitious and radical" Race Equality Action Plan (the Plan). She invited Professor Emmanuel Ogbonna from Cardiff University to co-chair a Race Equality Action Plan Steering group (Steering Group), with Dame Shan Morgan, the Permanent Secretary, Welsh Government. Membership and terms of reference were agreed, as in Appendix 1.

This draft Plan has been co-created with many community, public, private and third sector partners, and is now being issued for consultation. We aim to launch and publish the final version in September 2021.



Wales is not an equal country, and the experiences of the many communities within it are very different. Black, Asian and Minority Ethnic people face discrimination and racism.

#### A plan for anti-racism (not a strategy)

In the Steering group and outside, there was a strong feeling that Black, Asian, and Minority Ethnic groups did not want "yet another strategy!", but wanted to see meaningful delivery of existing promises and plans and prioritising of anti-racist action. This was based on an acknowledgement that previous approaches, of equal opportunities, or diversity and inclusion, or a multi-cultural or even a race equality perspective, did not tackle systemic and institutional racism.

The Macpherson Report (1999) defined Institutional racism as: "The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture, or ethnic origin". The report argued that institutional racism "...can be seen or detected in processes, attitudes and behaviours that amount to discrimination through prejudice, ignorance, thoughtlessness, and racist stereotyping which disadvantage minority ethnic people."

This view of institutional racism was advanced by many of the individuals and groups that participated in the various stakeholder groups that fed into the Plan. For example, in one of the Vision-setting events, partners talked of anti-racism as the key approach and part of the desired vision. They described it in their own words, as highlighted in the Vision-setting pages (22 to 25).

Professor Ogbonna, the Co-chair of the Race Equality Action Plan Steering group, reiterated in many events he led that anti-racism is about institutions and individuals consciously raising their awareness of how negative stereotypes of ethnic minority groups, historically embedded to justify colonialism and slavery, still persist. These stereotypes are inevitably deficit-based and see minority groups as 'less than' and as 'others'. These stereotypes can become ingrained in societal and organisational cultures in ways that become taken-for-granted, and guide behaviours in everyday life.

Anti-racism is usually structured around conscious efforts and deliberate actions to provide equitable opportunities for all people, on an individual, organisational and systemic level. It requires individuals to scrutinise the stereotypes they and others hold, and to understand how their actions may impact on people of different races and ethnicities. Anti-racism at organisational and institutional levels requires a careful audit of policies, practices, functions and processes to uncover whether and how practices and behaviours which may seemingly appear benign may inadvertently discriminate against ethnic minority groups.

Privilege (or "white privilege") is when the majority of decision makers who are white do not take into account the automatic privileges – of position, resources, influence, authority and historical beliefs – on superiority and inferiority in decision-making, and the ways in which these can disadvantage Black, Asian and Minority Ethnic people. We acknowledge that the narrative around white privilege can be complex for Gypsies, and Travellers and some Roma people. However, it should be acknowledged that they too are ethnic minorities who, in the Macpherson definition, experience institutional discrimination because of their culture and ethnic origin.

Members of the Steering Group and the stakeholders who participated in the development of the Plan discussed the ways in which the Plan may alienate some members of the dominant community who may argue that very real problems faced by other people, for example white people from lower socio-economic groups, are not addressed by the plan. We recognise that many people face challenges and disadvantages and that COVID-19 is making this worse. There is a separate area of work, including the enactment of the socio-economic duty, being undertaken to address these issues.

It is important, though, that we challenge this divisive analysis, and do not see a competition between the desirability of support for white people who are disadvantaged and the promotion of fair and equitable policies for Black, Asian and Minority Ethnic communities. Both are necessary and both can, and should, be achieved.

There is a strong case for action on race and we have set out some key evidence of disparity in experiences and outcomes that demonstrate this in Section 2. Any progress on race discrimination is likely to result in fairer treatment for **all** disadvantaged groups by making systems fairer and more transparent and services more responsive and person-focused.

In short, the Welsh Government wants to make Wales a more equitable, anti-racist country.

### 7. Where we are now

Following a series of workshops, round table discussions, and in-depth examinations of specific policy areas over the last six months we are now consulting on this draft Plan. It includes high level goals, actions and outcomes for thirteen policy themes and cross-cutting issues. These sit under our vision for an anti-racist Wales. Our key purpose is to make meaningful changes to the lives of Black, Asian and Minority Ethnic people in Wales. We have also developed key values and what 'good' may look like by 2030, if we succeed. These are all for you to consider. In addition, pages 29 to 30 on Governance outline a proposed approach for holding us, and public services more broadly, to account as we implement the Action Plan.



The draft Plan reflects the output of our co-construction work so far and is not yet a finished product. The consultation process will further develop and strengthen what we are proposing and enable us to discuss how we can implement it most effectively. We recognise there are parts of the Plan we would like to develop further, for example there are opportunities to make stronger links between different themes. There is also work to do to fully addresses intersectionality and ensure the Plan properly responds to the needs of Black, Asian and Minority Ethnic women and disabled people. The conversations we have and feedback we receive through the consultation will help us address these areas.

During this 12-week period we will be seeking views from all communities, organisations, research experts, Wales TUC, trade unions and our public, private and third sector partners to further refine and develop this work. We will seek approval and ownership of the final Plan from the new Welsh Government, to be formed after the forthcoming elections for the Senedd. We will aim to publish the finalised plan in September 2021.



To help develop this Action Plan, people representing organisations, academia and others with knowledge of race and racism, were brought together to form a steering group. (See Appendix 1 for details).

In the Steering group, there was a strong feeling that ethnic minority groups needed not "another strategy" but more actual delivery, including delivery of pre-existing plans and promises. Members also felt that the whole approach needed to be actively anti-racist. The previous emphases on 'equal opportunities', on 'diversity and inclusion', on 'taking a multi-cultural approach', or even 'race equality', were not felt to have succeeded in tackling systemic and institutional racism. This sentiment was also echoed by people outside the Steering Group.

There was also concern that the Welsh Government did not have all the necessary systems and levels in place to incentivise action, or to apply appropriate sanctions where progress was not being made, either by itself or by organisations that it funded. One member of the Steering Group said that "without sanctions, there is no accountability".

Concern was also raised that current organisations meant to ensure accountability – such as audit and regulatory bodies, inspectorates and ombudsmen – do not have a strong enough experience or understanding about how racism works, and what they need to do about it in their work.

Some partners also felt that many public bodies were not even "minimally complaint with the Equality Act 2010"; they felt the lack of compliance with the public sector equality duty included not publishing such information as their Equalities (Action) Plans and/or data on under-representation, and a failure to use the tools of positive action. They felt that too little information, such as ethnicity data on the workforce or on service users, was made available to the public so that it could be scrutinised, and the organisations held accountable.

The Equality and Human Rights Commission (EHRC) and others asked that there be consideration of whether additional legislation is needed in order to ensure change. The EHRC made a number of specific recommendations in its briefing to us.

Discussions also demonstrated that many were not aware of the levers for change that Government could use, or the strengths and limitations of those mechanisms.

More broadly, while acknowledging the importance of intersectionality there were concerns that generic Diversity and Inclusion Plans and Strategies tended to result in a lack of focus on race issues; a more specific focus was necessary, given the experience of discrimination and the disparity in outcomes shown in the evidence.

Experience also told us that policy officials, who have competing priorities, may not prioritise the implementation of well intended actions, nor lived experiences of discrimination felt by the people they are shaping policy for. As a result, what should be well planned policy approaches, designed to identify the impact of a policy on specific groups – for example 'Impact assessments' – often become tick box exercises, instead of rich discussions with service users which would make the policy or service better designed, and more impactful.

In drafting this Plan we acknowledge that ethnic minority women often have multiple roles (mothers, partners, carers etc.) and high levels of interactions with service providers in health, education and many other areas, either for themselves or on behalf of their children and families. They often experience multiple discrimination not only on the basis of race and gender but socio-economic, disability, mental health and other discriminations.

In many of the "deep dives" and round tables sessions and via community led reports, we heard how it is this specific intersectionality where ethnic minority women's voices and needs go unmet though policies and processes. This often results in ethnic minority women "falling through the gap" and their significant contributions to society being unrecognised and insufficiently valued.

In delivering tangible and meaningful changes to improve the lives of ethnic minority women, we therefore will develop policy to ensure a more positive response to delivering better outcomes for them.

There are important links with other work we are undertaking, and opportunities to progress our anti-racist agenda through these initiatives. For example, at present, the Welsh Government is also consulting on the introduction of a 'Social Partnership and Public Procurement Bill', which consists of the following:

Part 1: Social Partnership – this would introduce a 'Social Partnership Duty' on all public bodies to set wellbeing objectives, and to consult their recognised trade unions when setting them, and when taking strategic decisions to deliver them.

Part 2: Fair Work – this would place a 'Fair Work Duty' on the Welsh Government to set fair work objectives, and to take action to achieve them, in consultation with the Social Partnership Council (see below).

Part 3: Procurement – this would place a 'Socially Responsible Procurement Duty' on specific public bodies. These bodies would have to set socially responsible procurement goals for well-being and fair work. They would then set objectives to maximise the opportunities to meet these goals via procurement spend. They would also have to publish annual procurement strategies, and a contracts register.

Part 4: The Social Partnership Council – this would place a duty on Ministers to establish a tripartite Social Partnership Council, of 27 members, taken equally from government, trade union and employer representatives. This would provide information and advice to Ministers about the duties. This would not be set out in law; it is expected that the SPC would make voluntary agreements, such as strategies, principles or quidance.

Creating an anti-racist Wales in the workplace would be a key outcome in a social partnership agreement, and would impact on the availability of Fair work for Black, Asian and Minority Ethnic workers, to access secure work, with the ability to progress in a healthy, inclusive environment in which they are collectively heard and represented, where there is fair reward and where rights are respected.

# 9. Key steps in the development of this Action Plan

#### Context for the Action Plan

#### (a) Grassroots organisations and individuals

In undertaking this work we would like to acknowledge the significant work already undertaken and the rich insights and evidence provided by Wales Race Forum members, other race and community organisations, the Wales TUC and trade unions and many others. These include the manifestos, events and forums delivered by race related organisations and individuals who have kept the challenges of racism highlighted in a continuous and systemic way.

#### (b) COVID-19 Group Health Advisory Group

In March 2020, in response to the alarmingly disproportionate impact of COVID-19 on ethnic minority groups, the First Minister acted quickly to set up a Black, Asian and Minority Ethnic COVID -19 Health Advisory Group. This group has been led by Judge Ray Singh. Its two sub-groups the Socio-economic Subgroup, and the Risk Assessment Sub-group, had a membership of medical experts, academics and community activists and policy officials. Both acted rapidly to produce a series of recommendations<sup>4</sup> and a highly commended Risk Assessment Toolkit<sup>5</sup>. The sub-groups were led by Professor Emmanuel Ogbonna and Professor Keshav Singhal respectively.

The Welsh Government has responded to the Socio-economic Subgroup's extensive recommendations<sup>6</sup> and has actively promoted the Workplace Risk Assessment Tool, both to health professionals and other wider workforces. This has been a success in Wales but has also been adopted across the UK.

Recommendations from all these reports are incorporated into this Plan.

#### (c) Cynefin and Monuments Advisory groups

The killing of George Floyd and the growth of the Black Lives Matter movement awakened many people to some of the undeniable disparities in life chances facing Black, Asian and Minority Ethnic groups. For the Welsh Government, these events created an increased urgency to act. In response to these events, and debate about how our new curriculum can reflect the diverse experiences and contributions of Black, Asian and Minority Ethnic peoples in Wales, two more Groups were established to advise on how to these issues should be responded to.

The Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group, chaired by Professor Charlotte Williams OBE, has published the first of its two reports<sup>7</sup>. This highlights the need for more high-quality learning resources, involving more positive representations, and detailing the contributions, of Black, Asian, and Minority Ethnic groups in schools in Wales. The Welsh Government has accepted the findings in their entirety.

<sup>4</sup> www.gov.wales/sites/default/files/publications/2020-06/first-ministers-bame-COVID-19-advisory-group-report-of-the-socioeconomic-subgroup.pdf

<sup>5</sup> www.gov.wales/COVID-19-workforce-risk-assessment-tool

<sup>6</sup> www.gov.wales/COVID-19-bame-socio-economic-subgroup-report-welsh

<sup>7</sup> www.gov.wales/black-asian-and-minority-ethnic-communities-contributions-and-cynefin-new-curriculum-working-group

The Slave Trade and the British Empire: an audit of commemoration in Wales Task and Finish Group, led by Gaynor Legall, has produced its first report identifying all monuments, street and building names in Wales associated with the slave trade and the British Empire. It also touches on the historical contributions to Welsh life made by people of Black heritage<sup>8</sup>.

#### Developing the Race Equality Action Plan

We knew that by doing what we always do in simply developing a new plan or a strategy would produce what we always produce, namely a document that was not 'owned' by the key audiences. We wanted to do something different and more ambitious.

A further impetus came from securing the buy-in of senior civil servants (led by the Permanent Secretary) and community mentors, and from engagement undertaken by ethnic minority groups in their communities. We are very grateful for the work undertaken by our community mentors and community groups in helping shape the draft Plan and for the engagement of Steering Group members on the detail of specific themes in addition to providing overall direction and comment.

### The Steering Group built on the good work of the above groups

Officials also worked with EYST to engage stakeholders to identify what we would see, feel and do differently by 2030 if we were successful, to identify the vision, purpose and values we want to work to, and to identify high level Goals and actions for thirteen separate policy areas. More details about these work streams are set out below.

#### (a) Intersectionality

Intersectionality describes our overlapping identities and the ways in which they connect to systems and structures of oppression and privilege. Intersectionality provides an analytical framework, which considers the cumulative effect of multiple identities. It helps us to understand how people with different identities may experience services such as health and social care, education and employment differently.

We have addressed some of these issues in our evidence gathering, and in developing the goals and actions, but recognise that as we delve deeper into the action plans, we will need to identify more actions. We hope to develop this aspect of the work through the conversation we have as part of the consultation.

#### (b) Vision-setting events

In order to identify what 'success' would look like to ethnic minority groups if we were successful in delivering this work, and what the vision and purpose (of our call for action) was we worked with EYST and on our own to hold several community events. Please see page 25 for more details.

#### (c) Rapid evidence reviews

The Welsh Government commissioned the Wales Centre for Public Policy (WCPP) to undertake a rapid review, to examine the plethora of past reports, inquiries, research, community gathered insights and good practice, and to focus on policy areas which are devolved. They identified the following themes, and provided reports for each:

- Housing and accommodation
- Jobs and income (later referred to as Income and Employability)
- Health (physical and mental) and social care
- Education, including higher education
- · Crime and Justice
- Leadership and Representation.

We used these reports to develop clear high-level actions and Goals. Due to their key role in people's lives, we later added:

- Culture, arts, sports and heritage
- Local Government
- Welsh Language
- Environment (albeit in a limited way for now)
- Social Partnership and Fair Work and Entrepreneurship as part of Income and Employability.

The individual reports from WCPP, and its summary report, can be found here<sup>9</sup>.

In addition to the policy themes, we identified some key **cross-cutting issues**. These relate to:

- Data how it is collected, used and stored, and how to build trust in it.
- How we engage and how we fund communities.
- Policy and programme design and how we assess impact, and how we might use these insights to develop more effective policy responses.
- Services for individuals experiencing racism.
- Role of informal volunteering.

See beside this for how the Vision-setting and the Goals fit together.

#### Vision: "A Wales that is Anti-racist by 2030."

**Purpose:** "To make meaningful and measurable changes to the lives of Black, Asian and Minority Ethnic people by tackling racism."

**Values:** "Open and Transparent, Rights based, and Lived experiences as core to all policy making"

#### Goals – Policy Areas:

Leadership and Representation	Housing and accommodation	Income and Employability (I&E)	Social partnership and Fair Work (I&E)	1 1	
Health	Social Care	Education, including higher education	Crime and Justice	Culture, Heritage and Sport	
Local Government	Welsh Language	Environment			
Cross cutting Goals:					
Data	Engaging and funding communities	Impact assessment for better policy design	Services for individuals experiencing racism.	Role of informal volunteering	

<sup>9</sup> www.wcpp.org.uk/publication/improving-race-equality-in-wales/

#### (d) Language of 'BAME'

The terminology used to describe a very diverse group of people that often share very little in common other than the discrimination they encounter is often a contentious issue. There were several debates on the terminology that should be used in this Action Plan. There was little agreement on what the most appropriate terminology should be.

The term 'Gypsies, Roma and Travellers' is used to refer to a diverse range of ethnic, linguistic and cultural groups and includes cultural groups such as New Travellers, Bargees, Liveaboard Boaters and Show People who are not ethnic minorities. These cultural minorities experience discrimination that may have similar form and motivation as the racism experienced by ethnic minority Gypsies or Travellers or Roma. However, during the deep dive meetings we heard compelling testimony that for the ethnic minorities here, the impact on identity is different. This Plan does not use the acronym 'GRT' and seeks to be clear that actions relate to specific ethnic minority groups, each with their own distinct identities and challenges.

However, there was agreement that 'BAME' as an acronym should not be used. The Welsh Government has recently decided to discontinue the use of 'BAME' but to retain the use of 'Black, Asian and Minority Ethnic' in full in all its communications, and when shortened it is to be 'ethnic minority groups' (or communities or individuals).

In the absence of agreement, the Steering Group decided to adopt the same approach. It was also agreed that where necessary, this can be shortened to 'ethnic minority'.

#### (d) Lived experiences – Community mentors

We experimented with a model of appointing, for small fees, seventeen "community mentors" who brought their individual, and their communities', lived experiences to the attention of a specific lead official in different policy areas. There were also three community mentors who offered support and advice to all policy officials – on children and families work, on community work with Gypsies and Travellers, and on work with young people.

The mentors will continue to work with the Welsh Government as we refine the Plan following the consultation. The early indications are that this model has had a positive impact on policy makers and our proposals and has been valuable for mentors. We will continue to seek feedback as we go and will learn from this approach in a more structured way and look to see how we might further develop this model.

### (f) Lived experience: Community-led dialogue and consultation with 'little heard' voices

Twenty-five Community Engagement grants were awarded to community groups and forums across Wales to fund engagement that centred ethnic minority voices, including that of women, young people, Welsh speakers and many others, in the development of the Action Plan. We are very grateful that each group worked within the very tight timelines set for engaging and reporting, and produced powerful insights and recommendations that have informed this Plan. Key themes from their reports are contained in the Section 3 on 'What does the evidence tell us'.

A full list of organisations we funded is at Appendix 3. It includes many who previously may not have been given a voice directly in the development of a Government policy such as this. An analysis of the community engagement reports was commissioned and informs this Plan.

#### (g) Training and development sessions

In order to get some common, shared understanding of institutional racism and why we are taking an anti-racist approach to this work, the Permanent Secretary commissioned three sessions of training – one for the ethnic minority members of the Steering group, one for the policy leads and others in the Steering group, led by Lord Simon Woolley, and one for the whole Welsh Government senior civil service, at which Professor Ogbonna presented.

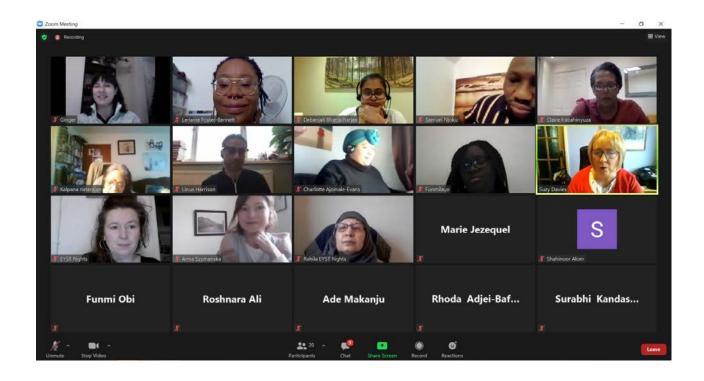
### (h) Policy themed 'deep dives' and 'round table events'

We brought together all the different partners working on the evidence base, on community-led dialogues, steering group members, Wales TUC, Trade Unions, experts in the field, and lead policy officials for each policy area for 'deep dive' sessions to share the different types of evidence and inform the development of the plan.

Subsequent refinement of the goals and actions were enabled at 'round table events'. Convening them enabled those who had participated in the 'deep dives', and new participants including the community mentors, to see how the evidence they had shared had informed the emerging goals and actions. The discussion which took place in the sessions then helped policy leads identify where they needed to develop their proposals further and, in some cases, add new themes or make quite radical change.

All the sessions were undertaken online which enabled wider participation. Typically, each session involved between 35 and 50 people.

In all, we delivered nineteen 2.5 to 3 hour sessions.



# 10. Key considerations in developing the Goals

### We have responded to the key challenges by co-creating a different type of Plan.

The need to produce this work in a short time was challenging, nonetheless we have developed goals and actions for all key policy areas. It has been discussed in Cabinet, and the Deputy Minister and Chief Whip, Jane Hutt MS, has also held meetings with individual Cabinet Ministers to secure ownership.

We have developed an Action Plan with clear actions, and not a strategy. This is in response to the concerns raised and outlined earlier. In 'the case for change' we agreed some key principles for policy officials developing the goals and outcomes.

#### These include:

- Focus on anti-racist actions, not multiculturalism or other approaches;
- Incorporate actions from the exiting recommendations by groups set up by the First Minister in response to COVID-19 and BLM;
- Focus on the areas highlighted through the deep dives and roundtables, the lived experience reports and inputs and the WCPP reports;
- Develop goals not only for the workforce but also for service delivery;
- Consider where there is scope to strengthen the work of current audit, inspection, regulatory bodies, and roles of ombudsmen, in responding to racism;
- Highlight and renew key commitments in existing plans that would make a significant difference to the lives of ethnic minority people;
- Seek ways in which compliance by Welsh Government and the bodies it funds can be made more obvious e.g. by publishing of data, collecting more granular data, etc;
- Identify and use other levers of change e.g. increasing representation, convening groups, funding directly or via third parties, legislation etc.;
- Consider intersectionality and especially the needs of ethnic minority women and children
- Identify key outcomes that can be achieved to 18 months in the first instance;
- Ensure that wherever possible, work can be undertaken through Social Partnership, to encourage a more robust and effective decision-making process in public bodies, and to ensure the creation of an anti-racist culture is central to this work.

The high-level Goals and actions in the following pages outline the work developed for each theme.

Finally, we are open to considering strengthening the legislative powers available or finding ways to make more effective use of the ones we have so that we can achieve better outcomes. The socio-economic duty, which is to commence in March 2021 will also act as a vehicle for change, as will compliance with the current legislation already in place. We are also restarting our review of the Public Sector Equality Duty which was paused in 2020 due to the pandemic.

The inclusion of such measures and the establishment of the independent body, whose terms of reference are under discussion, will make this Action Plan different from previous Race Equality plans; these might well have had similar ambitions, but often struggled to retain traction in the face of multiple competing objectives. See the Governance section for further information.

#### What next for us while we are consulting?

While this consultation is in progress, we will be continuing to develop some key parts of the Action Plan with the Steering Group and with Welsh Government officials, and we welcome feedback and perspectives on these issues. We will focus on the following areas:

Supporting policy officials to develop more specific, measurable, achievable, reliable and time-bound Goals and actions.

Discussing with colleagues how the nature of data collection, retention, use and trust in it can be resolved across all of the policy areas we have outlined.

Developing some baseline information, data etc. to measure change in the actions for the Goals;

Identifying issues for intersectionality across Policy themes and how that can be demonstrated more and actions to achieve gaps;

Identifying key levers for change across the policy areas, to ensure a strategic perspective of what needs to change (in addition to individual actions);

Evaluating and identifying how we develop the model of 'community mentors', so that it becomes sustainable.

All this work will feed into the final document that will have your feedback in it, and which will be ready to publish in September 2021.

#### Our ask of you:

We ask that you give us clear feedback on the Plan as drafted, especially on whether we have the balance right, and if there are any key omissions.



### Section 2

#### Background

In order to co-construct the long-term Vision, the Purpose, the Values and the envisaged future to 2030 of the Race Equality Plan, five stakeholder events were convened.

Three events with stakeholders from across Wales were convened by EYST. One was a mixed group – Black, Asian and Minority Ethnic people and others, one involved young Black, minority ethnic young people (also from across Wales) and one was with elders (mixed community). Additionally, two events, one with ethnic minority staff from the Welsh Government and one with Gypsy, Roma and Traveller organisations representing them were convened by the Welsh Government. In all, we engaged more than 180 people across the five events.

Participants were given a short presentation on the background to the work of the Race Equality Action Plan. They were guided by the metaphor and imagery of a voyage which leads to a long-term vision of what Wales may look like in 2030, and of what we need to put in place to make a difference. Those participating were asked "How will we walk the talk", and what values we need while we make the journey towards an anti-racist Wales. Participants were also asked about the call for action – the purpose of this work.

Finally, participants were asked to imagine what Wales would look, feel and be like, if the Race Equality Action Plan were to be successful.

'Anti-racist' is a term that was regularly used by participants. In order to honour this term we need to explain it, and use some quotes in parenthesis where participants have used those words.

We believe that "anti-racism" is about consciously surfacing and actively tackling systemic and institutional racism. *Anti-racism* appears to be a preferred term to *race equality*, as it signals conscious awareness and a positive readdressing of institutional racism by leaders at all levels; it signals "a word with force and intention behind it" which "calls out institutional racism". It acknowledges that unconscious biases exist. It "speaks truth to power".

We believe that white privilege will be laid bare and also the misuse of this privilege in "making us feel inferior" will be highlighted, in order to eliminate institutional racism. It is hoped that white people will "engage in challenging (their white privilege) and enriching themselves (by being curious about cultures and traditions different to their own)" so "we are at ease with each other". We will have talked "about the elephant in the room", "about white superiority and entitlement to set the rules". We "want to embrace and be comfortable about what unites us, rather than what divides us".

#### Vision

#### A Wales which is anti-racist



Amongst the main themes that emerged, anti-racism was key, and so central to this work. Other themes included the notions of equity, social justice and celebrating diversity in all its forms.

Contributors

felt that they wanted to see a Wales where there is a "shared understanding, and agreed actions" for tackling systemic and institutional racism, i.e. the ways in which racism is and historically has been embedded in the working of organisations they encounter. The goal should be to "create equitable outcomes", which "celebrate differences and similarities among minority ethnic communities" where we are "united not divided by our differences".

We want to work "together, as white and ethnic minority people, to jointly make a different and better Wales".

#### **Purpose**

To make a meaningful change to the lives of Black, Asian and Minority Ethnic communities by tackling racism.



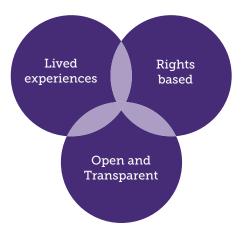
The purpose of this work was thought to be to create "urgency and culture change that make public services publicly accountable" and "delivers on promised, actions" to reduce inequalities in various areas of our duties and powers.

It was suggested that the Welsh Government and public services needed to "have difficult conversations without fear of retribution" so that we can achieve "the change we want to see". People felt that we will only do this by tackling systemic and institutional racism, by "speaking truth to power" and creating a "new legacy for anti-racism that includes equitable outcomes for our communities".

Additionally, there was a strong hope that we could create a "new legacy of public services that include leaders from the Black, Asian and Minority Ethnic communities who have been recognised for their potential, talent and unique contribution".

#### **Values**

In the values below "We" refers to the participants and Welsh Government together



Lived experiences
We believe that our lived experiences should
be "included" at the heart of all decision making in
Wales. We have a right to be "heard and to sit at the
top table" and hear decisions you make about us.

We believe that our "challenges from all the different groups, should be heard as helping you to do your jobs better", and "our history and oppression more acknowledged" while respecting "the emotional toll of sharing".

Rights based
We believe that we are asking "only for our rights, as opposed to favours" in all you do. It is the responsibility of those in power to "serve justice", "enforce" and hold "to account" those responsible for services and decision making.

**We believe** that by 2030 we should all be seen as "Welsh", with "the problem of racism, which leaves trauma that "affects mental health for years no longer upon on our shoulders".

Open and transparent We believe that "we can walk the talk of equality". There should be no "in groups" and no "out groups", but instead a Wales where people are valued for their unique talents and lived experiences which, while different, are of equal worth.

We believe that "living in a place where you can be free to have challenging discussions and not fear repercussions of exclusion because of institutional racism, will emancipate us".

#### Envisaged Future by 2030

When we asked participants what our achievements should be by 2030, if we work together to address racism for the good of all citizens, there seemed to be different responses depending on the groups; therefore the statements have been split up.

#### By 2030 the Welsh Government will have:

- Made "no more promises but have delivered, delivered, delivered!"
- Treated people differently by respecting their difference – not as a "monolith BAME community"
- Heard and acted on the voices of Gypsy, Roma and Traveller communities.
- Ensured that "acts of micro-aggression are a thing of the past".
- Held more difficult conversations and "not feared being called a racist", "have stopped being reluctant to challenge, address and ask questions".
- Held themselves and those they fund "publicly accountable for promised actions not yet delivered."
- Ensured that all senior leaders have the right skills and understanding to introduce and support anti-racist work, including asking for compliance to non-discriminatory behaviours.
- Ensured white leaders are confident about why we need Black and Minority Ethnic talent and are not resentful of it.
- Seen that they do not need targets because good recruitment and a recruitment 'pipeline' will have resulted in a balanced and representative workforce.
- Used the lived experiences of different groups to engage, involve and co-create different and creative solutions to old problems.
- Recognised that Black, Asian and Minority Ethnic people are not responsible for, and should not carry, the emotional burden of racism.
- Used the levers they have, for example positive action, to their full.
- Recognised and addressed intersectionality.

- Removed barriers such as payments, time to attend meetings and others to enable full participation.
- Complied with, and enforced others' compliance with the Equality Act 2010.
- Complaints or grievances are heard, the victim is not made to feel like the perpetrator, and there are stricter consequences for those who have transgressed.
- Ensured that ethnic minority people are digitally included.

### By 2030 Public services and the third sector will have:

- Provided demonstrable leadership at all levels to meet their existing commitments to challenge systemic and institutional racism.
- Self-motivated to comply with Equality Act (2010) and Well-being of Future Generations (Wales) Act 2015.
- Changed the experience of education, job seeking and career progression for ethnic minority people, to bridge the "attainment gap" in education and the "reward gap" in employment.
- Provided equitable, culturally appropriate services, recognising intersectionality and differences among groups.
- Provided a safe and nurturing workplace for ethnic minority people to thrive and flourish.
- Implemented the policies they agreed to deliver.
- Collected the right data, established baselines from which to measure progress and used evidence to identify where action is needed.
- Recognised the differential impact of racism in different locations in Wales.

# By 2030 young, Black, Asian and Minority Ethnic people will see that together we will have:

- security that hate crime in the media, including social media, will no longer occur
- seen the first Black, Asian and Minority Ethnic First Minister in place
- not be seen as the "tokens", or "good on equalities only", but welcomed and valued for our talent
- seen White society and leaders make the necessary changes, without "putting it on our shoulders"
- a culture where we "call people out on racism" when we see it, and "are brave" and "have difficult conversations"
- "visible and positive paths" to career progression
- seen people educated at every level, on all aspects of all our history, so that we all know what is 'banter', and what is unacceptable language
- seen changes in people's attitudes and actions towards each other, physical action and friendship groups and more integration and less segregation
- seen teachers and headteachers take our complaints of racism/hate crime seriously, by doing something about it and not blaming us for it
- tackled institutional racism in pop culture and sport
- seen that the media can "no longer shoehorn us into a box... as entertainers and slaves"
- ensured that mixed heritage children and their parents don't have to choose the "white" identity to hide behind because of racism
- seen that the stigma of disability in ethnic minority communities will have diminished
- set up an anonymous website where young people and elders can share their experiences of racism in a safe way.

### By 2030 Black, Asian and Minority Ethnic people and others will have:

- "relinquished the emotional labour of supporting racist behaviours and institutional racism"
- exercised power to be represented in a way that is recognised and is formalised
- seen asylum seekers acquire proper rights, including the right to work
- had "courageous conversations about white racism and internalised racism"
- recognised and ensured that all of our different lived experiences (protected groups, religions, languages, ethnicities etc.) "are heard and advocated for"
- worked "collaboratively" and "without competing"; we will "speak with one voice"
- more "White Welsh" (noting that some white people are ethnic minority people but in parenthesis here as it was a term used by participants) people getting to know people who are "other"
- "lost the anxiety of waking up to racism as a fact for myself and my children", and of "carrying the emotional toil that triggers us daily"
- "not have to march to get our rights and for our people to be treated as equals not as inferiors".
- seen "Change taking place" more actions than promises, through visible leadership
- seen Welsh Government and others "avert a backlash from Brexit onto our communities".
- a "right to ask for" and "receive a culturally appropriate service – with no need to fight for it" – we "truly trust" the services we need. We will not feel gratitude for minimal services but expect and receive quality services

- safety when cared for in private care because "local authorities put standards before profit"
- "safety at my workplace" because people I work with "do what they morally should, not what they like"
- a situation where people no longer get asked;
   "where do you come from" but are "accepted for their commitment to Wales and so seen as Welsh"
- "stimulated conversations that white people needed to have", to come to terms with white privilege and white fragility
- known that policies are based on assumptions or conversations leaders have had, not with a few conversations but in the richness of all our different lived experiences
- no need to fight each other for resources as we "believe that there are fair and open processes which we have co-created"
- confidence that we are being recruited on merit, through processes that are transparent and open, and no need to keep proving ourselves or to be appointed as "a Black token" to window-dress the service.

# 12. Governance for implementation

When embarking on the work to develop this plan there was a very clear message that the focus should be on meaningful action and delivery. It is therefore vital that the governance arrangements enable this to happen and the ambitions of the plan to be achieved.

We have also been told that sometimes our governance arrangements can feel exclusive rather than inclusive and that they can create an imbalance of power, especially to those groups who feel excluded.

The governance framework therefore needs a robust level of authority and power to ensure delivery of the actions stated in the Race Equality Action Plan, both creating an enabling environment and compelling people to action.

We plan to change the Steering Group, which has overseen the development of the plan, into an Accountability Group. The overarching purpose of this Group will be to hold the Welsh Government, public services and others to account on their commitments and actions in relation to race equality/anti-racism as outlined in the Plan. The Group will assess the extent to which progress is being made towards the vision. The Group will advise on any areas which they think need to be explored based on new challenges and successes as they emerge. We propose the remit of the Group will include:

- Assessing, challenging and reporting on progress in achieving the vision by implementing the goals and actions in the Plan, ensuring progress is making a material difference to the lived experience of Black, Asian and Minority Ethnic people in Wales;
- Overseeing delivery of wider work including commitments made in response to the Socio-economic report, the Risk Assessment Toolkit Subgroup etc
- Identifying and making recommendations on emerging themes and new actions to make progress towards the vision and champion good practice;
- Requesting reviews, and information, including hard and soft data, if concerned about patterns of racism;
- Making recommendations for strengthening any Government levers it deems necessary to progress anti-racism;
- Publishing public statements of progress.

One of the strong messages which has emerged during the development of the Plan is that governance arrangements which oversee implementation should compel people to action. It is proposed that the work of the Group is supported by an agreed set of measures of progress, which are underpinned by specific levers and tools which will be used to drive change and focus attention and resources. Further work will be undertaken to determine what the measures of progress should be and the tools and levers that will drive change in relation to them. There are examples in the Action Plan already, for example around leadership, representation and workforce experience, but we will draw this together into a single accountability framework. It will help us both drive and assess progress.

One of the strengths of the development of this Plan has been the combination of data and research alongside people's lived experiences. Lived experience has been given prominence during the delivery of the Plan. Hearing testimonies has been powerful, and these voices will be equally as important as data collected when delivery and progress against the Plan is considered. We want to ensure that our understanding of how well we are implementing the plan is informed by people's voices. We will be exploring the best way that we can do this, learning from the experience of developing the plan.

In addition, we are scoping out the remit of a Race Disparity Unit and an Equality Data and Evidence Unit. This work is currently underway and will conclude by the end of April so we can present options to the incoming government. It is currently envisaged that the Race Disparity Unit will play a key role by providing data and analysis which can demonstrate the impact of the Plan and where further action is required. It is expected the Race Disparity Unit will also be able to provide analysis on any new challenges and emerging trends which could impact upon the achievement of the vision and goals. The Race Disparity Unit could also play a role of sharing good practice across public services and beyond.

We intend to transition from the current arrangements to the new arrangements later in the year as this plan is finalised.



# 13. Policy Goals, actions, timelines and, outcomes

- a. Leadership and representation.
- b. Local Government.
- c. Health.
- d. Social care.
- e. Education.

- f. Income and employment.
- g. Social partnership and Fair Work (part of Income and Employment).
- h. Entrepreneurship (part of Income and Employment)
- i. Housing and accommodation

- j. Culture, Art, Heritage and Sports
- k. Hateful attitudes, Crime and Justice
- l. Welsh Language.
- m. Environment.
- n. Cross-cutting Goals and actions

# Leadership and Representation

"If you want community members to come and be part of the organisation, the organisation needs to be an organisation that people want to be part of ..."

#### Community activist

The importance of leadership and representation in tackling racism is a recurring theme in the reporting of lived experiences of Black, Asian and Minority Ethnic (herewith referred to as ethnic minority). Research on what makes for success in delivering better outcomes for ethnic minority people consistently points to the need for:

- senior leadership to be actively anti-racist, fully involved in tackling racism and leading from the front; and
- proper representation of all communities in public, private and third sector organisations at all levels, including in decision making. By reflecting Wales in running Wales, we will make better decisions. And we need all the talent from across our communities at every level of our organisations to become more effective.

We, as the Welsh Government, have listened and understand that these things are not currently in place. We wish to take positive action now and, as the Equality Act 2010 requires, ensure that race equality is at the heart of all we do. This will deliver benefits for ethnic minority people but also for all people in Wales.

As a Government, we will become an exemplar for a workplace that reflects our ethnic minority population and ensure fair and open recruitment to our decision making bodies. We will review and improve our recruitment and selection processes, ensure good induction, effective ongoing support and development and progression opportunities. It is imperative that steps are taken so that those who are recruited are supported, included and retained and that we tackle the particular problem of under-representation of ethnic minority women in leadership roles in Wales.

We will address what public sector bodies in Wales as employers will do to make our workplaces safe and inclusive, which enable ethnic minority people to enter, be supported and developed and so thrive and flourish. We will review our approach and policies for the workforce from the point of interest – when people become aware of the possibility of working in an organisation – to the point of exit.

We understand that recruiting more Black Asian and ethnic minority staff is not enough in itself – we need to create an environment in which they are able to flourish and not have to carry the burden to be anti-racist on their shoulders alone. We need all staff to understand what an anti-racist organisation looks like and how it works at its best. We will therefore work with ethnic minority people to help understand what anti-racism means, why it is important and how we all need to behave in ways that are anti-racist.

We recognise the responsibilities of the public sector not only as an employer but also as policymakers, funders of public services and third sector bodies, and significant procurers of goods and services from the private sector. We have heard powerful testimonies from many ethnic minority people that their lived experience of public services is disempowering and diminishing of their self-esteem, skills and talents. We intend to put in place mechanisms that ensure we undertake impact assessments for all our policies that are effective and contribute to better services for these communities. We will also use our spending power to drive improvements in leadership and representation in the organisations we fund and buy from.

Key to improving outcomes is to continue to listen to the lived experiences and diversity of thought in Wales and focus on the evidence, including about the differential experiences of ethnic minority women, building on work like the Running Against the Wind report<sup>10</sup>, produced jointly by the Minority Ethnic Staff Network and Women Together Network in the Welsh Government which analysed staff experiences of race, gender and intersectionality in the context of the Black Lives Matter movement. We will establish a baseline understanding of the lived experiences of ethnic minority staff in the public sector and the views of managers in managing and developing ethnic minority colleagues, as well as transparent and consistent data. We, and others will then be able to measure success against it.

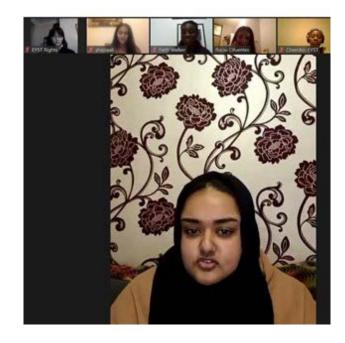
We will annually publish data on the number of complaints by and grievances against ethnic minority people, with the outcomes and consequences also reported publicly. We will co-construct and initially deliver it with health boards and local authorities before rolling out to all public bodies funded by the Welsh Government in future years.

We will take steps to make senior leaders in the public sector more personally accountable for improving representation and making public bodies anti-racist with clear performance expectations and appropriate incentives and sanctions. As part of this, we will implement the Diversity and Inclusion Strategy for Public Boards (2020) and require each CEO, Chair and Board member to have performance indicators which properly reflect the importance of improving race equality outcomes.

We recognise that leadership extends well beyond senior leaders in public bodies and it is vital to ensure we recognise, value and cultivate the essential contribution made by community leaders. Supporting community leaders and sustaining their capability and capacity not only helps enable them to provide an effective voice for their communities but also helps achieve better outcomes for ethnic minority people, and in turn also supports the work of public services. We will enable and put in place co-designed learning and development provision, and other support for community leaders and link this to the growth of a pipeline for both public appointments and for employment in the public services. We recognise that for many their contributions are made in their own time and often at a financial cost. We will seek to remunerate their efforts where possible and appropriate.

The Welsh Government has a long standing commitment to promoting and supporting diversity in democracy across Wales. Our democracy should be representative of the communities it serves as this is essential to both engendering public trust and robust decision making. A democracy which is comprised of a diverse membership and fully engaged with the diversity of its communities is a stronger democracy and will make decisions which better reflect the full range of needs of its communities. Our key commitments to strengthen representation and participation in our democracy are set out in the Local Government section of this plan but we will also look to begin conversations at the national level.

We will work with Unions and others to ensure we comply with our [future statutory] social partnership and fair work duties.



Goal	Actions	When	Outcome
1. The public sector workforce in Wales is at least properly represents the population it serves.	Meet with all public body leads to agree the data needed, how it will be collected, and barriers to collection and agree one system for publishing it.  Meet with analytical experts from the Welsh Government to ensure approach is consistent with data collection and analysis across public services.  Take proposed methodology, timescale and where it will be published to the REAP Accountability Group to agree before rolling out.	Short term	All public bodies in Wales will have complied with duties under the Equality Act 2010 to publish accurate and timely diversity data.
	Communicate timelines and location for publications to public services in good time for them to act.	Medium term	All public bodies will have published data on the ethnicity pay gap.
	Convene meeting with key heads/ CEOs to ensure they understand positive action, what challenges they think they face in recruiting more Black Asian and ethnic minority staff, particularly ethnic minority women to leadership roles, and jointly agree if one single target is needed for all public bodies or as identified by each public body.  Communicate agreement of targets to public services to commence positive action. These targets will be expressed in the form of 'by 202x y% of the people we recruit will be ethnic minority, with an appropriate gender balance.	Medium term	All public sector bodies in Wales which did not have representative workforces will have set targets for more diverse recruitment.

Goal	Actions	When	Outcome
	<ul> <li>Welsh Government to put in place a 'diversity in recruitment' team to:</li> <li>Undertake targeted outreach.</li> <li>Produce guidance for line managers, heads of profession and HR Business Partners.</li> <li>Monitor all recruitment opportunities to ensure that they are offered, advertised and promoted fairly and consistently, across protected characteristics and part time workers.</li> <li>Changes will be made to recruitment practices which will include:</li> <li>The commissioning of a one-off external audit, of all WG policies and processes; from Interest to Exit for recruitment, selection, progression, exit and related polices and of lived experience of ethnic minority staff and a sample of managers.</li> <li>Welsh Government will review, in partnership with people with lived experience, our learning and development offering for Equality, Diversity and Inclusion (including anti-racism) and procure specific high quality learning and development opportunities to upskill and empower under-represented groups.</li> <li>Welsh Government will offer a package of learning and development to incoming Ministers in the new Cabinet which will include anti-racism.</li> <li>The Welsh Government will explore what standards will be adopted to have diverse panels, including independent panel member recruitment for Senior Civil Servant appointments, and in particular ethnic minority representation on interview panels.</li> </ul>	Short term Medium term	The changes that have been put in place will improve outcomes for ethnic minority people, and there will be established procedures in place to ensure that recruitment practices have the trust of those wanting to work in Welsh Government and continue to be anti-racist.

Goal	Actions	When	Outcome
	We will enlist staff to be role models and advocates from across the organisation who exemplify inclusive leadership and flexible working, by sharing their stories and experiences.	Short term	Stories of successful inclusive leadership will have inspired others.
	<ul> <li>We will establish a proactive publishing approach for diversity data for recruitment to:</li> <li>Monitor progress against our new flow targets.</li> <li>Monitor the diversity of applicants to recruitment programmes and individual job adverts in order to measure progress against our targets.</li> <li>Monitor where job applicants heard about or saw the vacancy.</li> </ul>	Short term	Targets for recruitment and diversity data and for recruitment will be published for all to see and inform next steps for improvement.
	We will develop a placements and pathways plan which will include targeted schemes to enable ethnic minority people as under-represented groups to undertake work experience and help us develop a pipeline of future employees.	Short term	Placement and pathways plan in place has encouraged applications and successful recruitment of ethnic minorities.
	The Welsh Government to co-design a programme of activities with ethnic minority staff so that it can identify and cultivate talent, and accelerate progression, particularly ethnic minority women who are exceptionally under-represented in leadership roles. This will include:  • How it will actively identify more ethnic minority talent and role models;  • Identifying and resourcing specific development programmes for, co-designed with, ethnic minority people;  • Implementing a programme for mentoring, coaching, sponsorship;  • Establishing procedures which will enable the monitoring of the openness and fairness of progression opportunities.		<ul> <li>Welsh Gov has in place a proposal and started to implement an approach that</li> <li>Identifies more actively of Black Asian and Ethnic Minority talent and role models;</li> <li>Specific development programmes for, co-designed with, ethnic minority people;</li> <li>Programme of work for Mentoring, coaching, sponsorship;</li> <li>Has progression which is open and fair</li> <li>Ethnic minority staff at least as likely to be promoted as white, pathways for progression clearly defined, accessible, etc e.g. promotion Gateways.</li> </ul>

Goal	Actions	When	Outcome
2. Senior leadership is representative and inclusive, as are all Boards of public bodies	All leaders of public bodies are held personally accountable for delivering a representative workforce and inclusive and psychologically safe workplaces, with appropriate incentives to ensure that they take action.	Medium term	All leaders of public bodies own personal accountability for delivering a representative workforce and inclusive and psychologically safe workplaces.
	<ul> <li>Implement the 2020 Diversity and Inclusion Strategy for Public Appointments, including:</li> <li>Chairs of all regulated bodies to ensure every Board member (including themselves) has a diversity and inclusion objective, to include anti-racism as part of their performance management system. Boards to have a discussion about diversity and inclusion objectives and Chairs' objectives to be discussed by relevant stakeholder groups and agreed by Ministers.</li> </ul>	Short term	All senior leaders in public services will have performance indicators that reflect an aspect of anti-racism and will have been supported (training and development and other ways) to deliver on this.
	<ul> <li>These will be reported to the Accountability Group annually by Public Appointments Team.</li> <li>CEOs of all public bodies to identify one inclusion and diversity objective, with a focus on anti-racism.</li> <li>Health officials to develop an associate board programme in consultation with Public Appointment Team where people from ethnic minority communities are invited to join a health board for a 6-month period. Programme to be used as a pilot and evaluated by Health officials and presented to the Governance body for REAP for scrutiny and to strengthen before rolling out to boards of other public bodies.</li> <li>Public Appointment Unit to consider if this approach is to include all protected groups and if yes what changes may be needed for different protected groups.</li> </ul>		An associate Board members pilot for Health Boards developed and delivered lessons learnt for widening it.  Chairs, members of recruiting Panels and board members will have had training in anti-racism.

Goal	Actions	When	Outcome
	A suite of training to be procured in relation to the Diversity and Inclusion Strategy to include anti-racism training for Chairs, for Panel members recruiting for appointments, and for boards of public bodies in Wales.		
	All regulated public bodies will be asked to have an equality, diversity and inclusion champion on their Boards – list to be collated by Public Appointments Team (PAT) and regular meeting convened to support them.	Short term	All public bodies will have a Board-level equality, diversity and inclusion champion.  PAT will have convene support meeting for all champions.
	The Welsh Government will pilot a shadow Board with membership from under-represented groups with the intention of learning lessons on how to improve the diversity of our decision-making fora.	Short term	Shadow Board approach will have offered learning, which will have been acted upon to improve the diversity of decision making fora.
3. People in public bodies in Wales are anti-racist, with zero tolerance of any form of discrimination or inequality (in the workplace, in the provision of services, etc) and provide a safe and inclusive environment for ethnic minority people.	Review and refresh the Public Services Leadership Behaviours Framework with key ethnic minority academics and Steering Group members and any other ethnic minority people who can offer insights to it.  Academi Wales to submit proposed changes to REAP Accountability Group before publishing and sending to all public leaders in Wales.	Short term	There is a common Wales-wide understanding of of what the standards are in Wales for anti-racist leadership behaviour in public service.
	Lower risk from speaking up, voicing concerns and making mistakes at work, including by implementing more effective complaints systems relating to racism, supporting complainants and regularly publishing data on complaints.	Medium term	Ethnic minority staff are empowered to speak up and assured that their voices are heard and their opinions visible and communicated.
	Empower ethnic minority staff to raise concerns and share experience and ideas, including by sponsoring and supporting staff networks.	Short term	

Goal	Actions	When	Outcome
	Tackle micro-aggressions, encourage allyship and bystander intervention, with mandatory, ongoing team-based learning and development provision for all middle managers and those they manage to develop knowledge, skills and behaviours for working in an anti-racist way.	Medium term	Welsh Government understand their biases and acknowledge that institutional racism exists and how it manifests. They take individual responsibility to address racism through the development of their own skills and knowledge.
	Regular audit by external, independent experts to assess lived experience of Black Asian and ethnic minority staff and service users, including the differential experience of ethnic minority women, to be published with action plan to respond to recommendations.	Short term	People who don't work in the Welsh public sector understand what it is like, that it is anti-racist, and are encouraged to become part of it.
	We will hold events to identify the lived experiences of ethnic minority people in the Welsh Government and ethnic minority communities in our stakeholder groups to identify the change we need to take to become an anti-racist organisation, promoting a strong culture of challenge on anti-racism so that colleagues at all levels of the organisation feel supported to 'call it out'.	Short term	A culture shift to anti-racism showed that racism is called out when it is seen.
	We will review, in partnership with people with lived experience, our learning and development offering for Equality, Diversity and Inclusion (including Coaching and Mentoring) and procure specific high quality learning and development opportunities to upskill and empower ethnic minority staff.	Short term	A co-designed offering of learning and development for ethnic minority staff will be in place and high level of satisfaction with it expressed.
	We will equip our staff with the skills they need to become anti-racist leaders and team members, understand micro behaviours and what unacceptable behaviour looks like.	Short term	Staff will have had access to good anti-racism training and understood what micro aggression looks like.
	We will equip the Senior Civil Service with the skills and confidence to champion Anti-racist Leadership and enable them to role model behaviours that support anti-racism in both their leadership and policy/ operational delivery.	Short term	Senior Civil Service will feel equipped to understand institutional racism, incorporate it into their strategic equality (with focus on anti-racism) objective and how to dismantle it and so acted as role models.

Goal	Actions	When	Outcome
	We will launch a new round of the Reverse Mentoring programme for Senior Civil Service staff.	Short term	Enabled Senior Civil Service members to have an increased understanding of the barriers that ethnic minority groups face. Also explored other more informal ways of sharing lived experience.
4. Public bodies use their spending power	Ensure grant and procurement processes are anti-racist.	Long term	Anti-racism is always a key criteria/
to improve leadership and representation across the public, private	Use conditions of grants and public procurement to incentivise other organisations to improve leadership and representation and anti-racism more generally.	Long term	consideration for the Welsh public sector when choosing who to give money to or whose services to buy.
and third sectors.	We will develop our ethnicity pay gap calculation while we await guidance from the UK Government on the ethnicity pay gap. We will use this data internally in 2021-22 with a commitment to publishing an ethnicity pay gap in 2022-23.		Ethnicity pay gap data will be published for internal use by 2022.  Commitment to publish ethnicity data realised in 2023.
5. Ethnic minority community leadership in Wales is supported by enabling the development of Black, Asian and Minority Ethnic community leaders in Wales, with the intention of creating a wider offer for community leaders from ethnic minority groups.	Enhance learning and development provision for community leaders, including by making available existing provision for ethnic minority staff within organisations also available to community leaders.	Medium term	Provision for learning and development made for community leaders from ethnic minority groups.
	Co-create bespoke opportunities including mentoring, coaching, community mentorship, reverse mentoring for community leaders with public service leaders, providing mutual benefit for them and for public services.	Short term	Co-created a suit of bespoke learning and development offerings.
	Join up work to support community leadership with development of the pipeline for public appointments and entry to the public service workforce for ethnic minority people, with particular focus on ethnic minority women who are exceptionally under-represented in leadership roles.	Medium term	Joined up Welsh Government support for community leaders from ethnic minority groups to enter the public services workforce.
	Expand the availability of opportunities for community leaders to be involved in policy development and decision making (including making public appointments), with remuneration where possible and appropriate.	Short term	A significant number of opportunities identified for community leaders from ethnic minority groups to be involved in decision making and remunerated as appropriate.

# Local Government

#### Introduction

Local government in Wales consists of our 22 county and county borough councils, town and community councils, the four national parks, three fire and rescue services and our newly established corporate joint committees.

All of these organisations are democratically led by elected councillors, deliver essential public services and have an ethical and governance framework in common. Between them they are also major public service employers. There are around 1250 principal councillors, over 8000 town and community councillors and over 98,000 local government employees.

Local government provides essential public services and its role as a service provider is considered elsewhere in this plan. However, local government is more than a service provider, it plays a community leadership role and is the heart of Welsh democracy shaping places and communities and providing local vision and ambition. For example, during the COVID-19 pandemic it has shown its strengths in supporting local communities. It is vital therefore that local government is fully representative of the diversity in our communities and is committed to being anti-racist, and that this is clearly demonstrated through the operation of its democratic processes and in its role as a major employer.

The Welsh Government has a long standing commitment to promoting and supporting diversity in local democracy across Wales. This is a commitment fully shared by the Welsh Local Government Association (WLGA) which has recently made a clear commitment and outlined an action plan to promote Diversity in Democracy ahead of the 2022 local elections.

As part of the Race Equality Action Plan we will work with the WLGA and other partners to strengthen and deepen our commitment to supporting and enabling people from all backgrounds to stand for local elected office. Black, Asian and Minority Ethnic people, in particular women are under-represented in local government and this must be addressed. Our local democracy should be representative of the communities it serves as this is essential to both engendering public trust and robust decision making. A local democracy which is comprised of a diverse membership and fully engaged with the diversity of its communities is a stronger democracy and will make decisions which better reflect the full range of needs of its communities. It is essential to demonstrating progress towards the goals in the Well-being of Future Generations Act.

To ensure that our local democracy is inclusive of everyone who has a stake in the local community, we have recently extended the franchise for local government elections to lower the voting age to 16 and include anyone from any country who lives in the local area. In implementing

this change we are working with a wide range of people and groups developing information for first time voters, including for schools and colleges which is available on our Hwb website. This information is aimed at explaining and promoting participation in our elected bodies, not just through voting but by getting involved in other ways such as starting petitions, initiating debates and getting involved in community groups. We will include as part of this work a focus on black, ethnic minority people and young people which will also look at how this work becomes part of the development of our new curriculum. This will be essential to ensure we have informed young people who feel equipped to be active citizens in our democracy and who understand the real value community participation can make to the services they rely upon. In this way some of them may choose to stand for election, put themselves forward for a public appointment or see working in the public service as a career path.

Moving forward we want to create an environment where everyone wants and feels able to participate in democracy including by exercising their right to vote. This means exploring why people who are already enfranchised do not vote. In taking this forward we will consider how accessible the process of participating in elections is for Black, Asian and Minority Ethnic people, for example, what voter information and support should be available.

The flip side of encouraging and supporting people to participate in democracy is ensuring that democracy is open, transparent, listening, engaging and acts on that involvement and engagement. We are implementing new measures to support local government to engage with communities and promote public involvement. These include statutory participation strategies aimed at opening up new ways for people to become involved with democracy, on-line petition schemes and new approaches to involving people in the scrutiny of local democracy so they can be actively involved in holding elected representatives to account through the whole of their term of office. We will seek the views and involvement of Black, Asian and Minority Ethnic people of all gender and ages in this work to ensure that as councils implement these new requirements they are recognising the needs and the benefits of diverse involvement from the community.

We are also implementing a new performance and governance framework for county and county borough councils. This framework requires councils to keep their performance under review and consider the views of citizens, communities as service users as part of this process. We will ensure that councils seek the views of Black, Asian and Minority Ethnic people as part of this process. Councils will be required to publish their self and panel assessments and respond publically to recommendations.

We also have a long commitment to promoting ethical behaviour amongst our local elected representatives. The current ethical framework has been in place for several years, we have recently passed legislation to strengthen it by requiring political group leaders to promote high standards of behaviour amongst their members and requiring Standards Committees to make an annual report, including recommendations on how local processes can be improved. So now is the time to review the whole of the arrangements we have in place and ensure they promote anti-racist behaviour. Any changes recommended by the review will be implemented prior to the local government elections in May 2022. All elected councillors will be required to commit to a refreshed code of conduct when they take their oaths of office. The review will also consider whether the existing sanctions for inappropriate behaviour are sufficient, whether there should be more training and whether councils deal with complaints in an appropriate and sensitive way when they are made.

Local government is an essential part of the Welsh public sector and we expect local government to set itself high standards in all areas, including taking a stance as an anti-racist employer. We expect this to include looking at best practice across the Welsh public sector and the standards that other bodies are adhering to whether these are legislative requirements or not. Our expectation is that local government should be an exemplar and take collective action to achieve this.

In addition, each local government body is a sovereign body in its own right and in terms of their role as an employer it is for each body to ensure an anti-racist culture exists within the organisation and that this underpins its recruitment policies, complaints policies, terms and conditions and so on. To support this, we will work with the Welsh Local Government Association, local authorities, professional bodies and One Voice Wales to embed an anti-racist approach in all human resource practices across local government and to expand the level of data about the numbers of black. Asian. minority people employed by the sector and each grade and the pay gap. We will also work with professional networks and Academi Wales to develop existing graduate recruitment schemes and mentoring schemes to support Black, Asian and Minority Ethnic people to move into senior leadership positions in local government.

## Goals for local government

- 1. The framework of local government legislation and guidance will drive local democracy to become fully representative of the population it serves.
- 2. The framework will also enable people from all communities to feel comfortable engaging with local democracy, support them to become involved and have trust that their views will be considered and taken into account.
- 3. Local government is an exemplar employer, all employment and human resources policies are anti-racist to create a safe and inclusive environment for Black, Asian and Minority Ethnic people.

### **Actions**

1. The framework of local government legislation and guidance will drive local democracy to become fully representative of the population it serves.

Action	By when
We will review and make changes to the Ethical Framework which sets out the behaviours expected from councillors by May 2022 so that new and returning councillors will be required to sign up to being anti-racist when they take up their office.	May 2022
Working with the WLGA and local authorities we will consider what induction, training and support is required for councillors to understand their responsibilities around equalities and comply with the Code of Conduct. This will include working with experts and groups representing Black, Asian and Minority Ethnic people to advise on core content for training and support materials.	May 2022
We will ensure that political group leaders understand their role in demonstrating and promoting anti-racist behaviour when exercising their duty and to ensure high standards of behaviour amongst their political group.	May 2022
We will ensure that Standards Committees' Annual Reports highlight racist behaviour and make recommendations to address it amongst elected members in the councils they are responsible for.	May 2022
Working with WLGA and local authorities, we will review local processes for dealing with complaints about elected representatives from members of the public to ensure they are fully considered and the public have confidence their concerns will be given the weight they are due. We will also consider the support and advice available to councillors where a complaint has been made against them.	May 2022

Action	By when
We will review the Access to Elected Office Fund to explore whether it can and should be extended to people from a wider range of under-represented groups.	July 2021
We will explore the options in relation to quotas for under-represented groups for local government elections.	September 2021
To promote a safe and welcoming environment, we will remove requirements for the publication of candidates and elected members home addresses and also review electoral offences related to the abuse of candidates and their support staff.	May 2022
We will work with the Independent Remuneration Panel to promote the need for all councillors to have access to the support and tools they need to undertake their roles, including IT equipment and supporting the costs of care.	May 2022
We will work with political parties, the WLGA and principal councils to ensure there is good information and support available for prospective candidates in local government elections.	January 2022
There are further actions in our Diversity in Democracy Action Plan. gov.wales/written-statement-phase-two-diversity-democracy-programme-action-plan	Various

2. The framework will also enable people from all communities to feel comfortable engaging with local democracy, support them to become involved and have trust that their views will be considered and taken into account.

Action	By when
Ensure the development of new guidance for local democracy – "The Democracy Handbook" - which will include how people engage with and become involved with local democracy, and scrutiny and the operation of democratic processes has anti -racism at its core.	May 2022
We will consult with Black, Asian and Minority Ethnic people of all ages and gender to identify any barriers to participating in the electoral process, for example voter information, and with democracy more widely. We will use the outcomes of these consultations to co-produce any legislation or guidance needed to remove the barriers.	May 2022

Action	By when
We will work with Black, Asian and Minority Ethnic people to ensure our education and awareness raising resources for young people reflect their needs.	May 2022
We will ensure county and county borough councils consider the views and needs of Black, Asian and Minority Ethnic people in the new performance and governance framework.	May 2022

3. Local government is an exemplar employer, all employment and human resources policies are anti-racist to create a safe and inclusive environment for Black, Asian and Minority Ethnic people.

Action	By When
We will review and make amendments to the workforce data which local government is required to publish in its pay policy statements to ensure it reinforces duties in the Equalities Act 2010 to publish accurate and timely diversity data and to achieve timely and complete compliance with other statutory requirements. We will work with local government to ensure this data is used to inform policies and performance frameworks for improvement which will be subject to both internal and external scrutiny.	May 2022
We will work with the WLGA, local authorities, professional bodies and One Voice Wales to support local government to review its recruitment, human resources and internal complaints processes including coaching and employee support schemes to ensure hey are anti-racist and that good practice examples such as staff support groups are promoted.	May 2022
We will work with the WLGA, One Voice Wales, Academi Wales and local government professional bodies to ensure all graduate recruitment and mentoring schemes are strengthened, promoted and accessible to Black, Asian and Minority Ethnic people.	May 2022

# Health Services and Health Outcomes

As detailed under Leadership and Representation in this Plan, research on what makes for success in delivering better outcomes for Black, Asian and Minority Ethnic people (here after referred to as ethnic minority) consistently points to the need for senior leadership to be actively anti-racist, fully involved in tackling racism and leading from the front. The NHS in Wales is both a substantial public sector employer and a key provider of essential services, and there should be no barriers in accessing and engaging with available services. Our vision for a 'whole system approach to health and social care' is focused on health and wellbeing, and on preventing illness. This is set out in A Healthier Wales: our Plan for Health and Social Care. For the sake of this Plan we have separated Health and Social Care, but signpost you to the Social Care and Leadership and Representation Goals and Actions, recognising the necessary and intended overlap.

We want to ensure progress is made at pace, and have identified five enabling goals for NHS Wales, under the themes of: Leadership and accountability; Workforce; Data and intelligence; Access to health services; and Tackling health inequalities.

Leadership in our NHS must set the right anti-racist culture that demonstrates zero tolerance for racist behaviour and discrimination, ensuring there is no bias in employment policies including appointment, promotion, grievance, capability and disciplinary procedures, to promote inclusive, psychologically and physically safe workplaces. The role of senior leaders in the NHS is to be educated on this issue, to be fully involved in tackling racism, leading from the front.

The delivery of high-quality health and social care to the population of Wales is dependent on our workforce. There are policies in place in the NHS in Wales to support individuals to raise concerns in the workplace and to address issues. However, we have heard from many ethnic minority people that their lived experience is disempowering and diminishing of their self-esteem, skills and talents. This suggests that policies are either not fit for purpose, or are not implemented appropriately, and individuals may not feel confident to use the policies for fear of negative consequences. This is unacceptable. We intend to use the mechanisms available to us

to close the loop, to understand when policies are ineffective and take the right actions. We will work with ethnic minority people in the workforce, community groups, and social partners to support our NHS workforce to understand and deliver the cultural awareness and competence, understanding what it is to be anti-racist, in order to improve health choices and health outcomes.

Data collection and intelligence is an important foundation in tackling differential experience and there is still work we have to do, and must do, to improve the data we hold. We will work in social partnership including trade unions and professional bodies to ensure that staff feel safe to provide ethnicity data and confident that data will be used for their benefit, not their detriment. We also know that data on ethnicity isn't generally well captured in health systems and improvements to data collection are essential to understand and reduce racial and ethnic inequalities experienced by service users. We will explore monitoring arrangements to ensure data is used to understand and develop policies which support equitable access to health and social care services.

There remains variation in how individuals access and engage with the available health services, leading to differences in health outcomes. We know there has been a greater amount of disease and death in certain groups of the population in Wales due to COVID-19. Some of these differences are avoidable and unjust. We must sharpen the focus on reducing health inequities. We recognise there is much to be done to improve how public health messaging is developed and how we engage with ethnic minority communities who are not accessing care for both immediate emergencies and for preventative health messaging. We know there are significant specific challenges for women from ethnic minority backgrounds and measurable adverse differences in health outcomes, for example in maternity services. Ensuring services are delivered in an accessible, culturally sensitive way for all women is a priority for us and we will use the consultation period to further define the actions and outcomes. We will learn from our experiences during the COVID pandemic to explore how community connectors can support a greater understanding and dialogue which promotes health behaviours and supports appropriate access to services across primary, community and secondary health care.

As we continue to respond to the very real threat posed by COVID-19, it is understandable that our Public Health partners including Public Health Wales and NHS Wales Informatics Service (NWIS) have been necessarily focussed and continue to prioritise our response to COVID-19. The pace of developing this Plan has limited the input of delivery partners to our actions for Health and Health Outcomes at this time. We will work with our delivery partners, Champions, community mentors and others as needed during the consultation of this Plan to ensure our actions focus on realising change.



Goal	Actions	When	Outcome
1. Leadership & Accountabi	lity		
To ensure that NHS Wales is anti-racist, with zero tolerance of any form of discrimination or inequality for employees or service users.	Welsh Government will review accountability frameworks for the NHS to make clear the requirements to address racism in all its forms. This will be embedded into NHS systems including reporting within Integrated Medium Term Plans (IMTP) and Annual Plans, which will be monitored through the Joint Executive Team process.	Short term – within 12 months	Welsh Government will have used many more levers to embed leadership responsibility for anti-racism and for supporting ethnic minority staff and meeting the Public Sector Equality Duty in its fullest.
	All NHS Executive Directors, Chairs of NHS Health Boards, Trusts and Special Health Authorities in Wales will be required to demonstrate their personal contribution to meeting the Public Sector Equality Duty as part of their objectives. And ensure every Board member (including themselves) has diversity and inclusion objectives, to include anti-racism, as part of their annual appraisal.	Short term – within 12 months	
	Welsh Government will introduce a role description for 'Board Executive Equality Champion' roles to provide greater clarity regarding the expectations of the role and make clear the requirements to address racism (and other oppressions) in all its forms, and for evaluating effectiveness.	Short term – within 12 months	Every NHS Wales organisation has appointed an existing board member to fulfil the role of 'Board Executive Equality Champion', as set out in guidance issued by Welsh Government.
	NHS Wales organisations will be required to implement Reflecting Wales in Running Wales; the diversity and inclusion strategy for public appointments in collaboration with Public Bodies Unit specifically in relation to the following goals:  Goal 3 – to secure open and transparent	Short term – within 18 months and ongoing	Leaders in NHS organisations will have taken responsibility for implementing the Diversity & Inclusion Strategy and action plan for Public Appointments.
	recruitment practices		
	Goal 4 – to get 'Boards on board'  Goal 5 – to strengthen leadership		

Goal	Actions	When	Outcome
	Welsh Government will revise directions for all NHS Health Boards and officers of the Board, to establish (where they are not already in place) Black, Asian and Minority Ethnic Networks and ensure they have appropriate levels of resource and access to the Board to inform and progress improvements.	Short term – within 18 months	Welsh Government will have used many more levers to embed leadership responsibility for anti-racism and for supporting ethnic minority staff and meeting the Public Sector Equality Duty in its fullest.
	Welsh Government will work with partners including Academi Wales, to take forward Goal 2 "To build a robust pipeline" of Reflecting Wales in Running Wales; the diversity and inclusion strategy for public appointments, to establish a quality assured training and development offer for public appointments to NHS Wales.  This will consider the Pilot Aspiring Board Member programme in consultation with Public Bodies Unit and people from ethnic minority communities including ethnic minority women.	Short term – within 18 months	Pilot and programmes will be evaluated for scrutiny by the Governance body for REAP for rolling out to boards of other public bodies.
	Health Education and Improvement Wales (HEIW) will ensure that its compassionate and collective leadership development programme, being developed under the 10-year workforce strategy Theme 6, Leadership and Succession, has anti-racism as a core part of its value and understanding.	Short term – within 12 months	Leadership and Succession programme has and will have demonstrated anti-racism as a core value.

Goal	Actions	When	Outcome
2. Workforce			
To ensure that the NHS Wales workforce reflects the population it serves; and staff work in safe, inclusive environments (recognising specific challenges for women in the workplace) that enables them to reach their full potential recognising the intersectional factors causing cumulative disadvantage in an individual.	Welsh Government will support Health Education and Improvement Wales to work with Higher Education Institutions and NHS Organisations in delivering anti-racist health education and training for all staff and students, to tackle and root out racism in all its forms.	Ongoing Collaboration	Actions supported the need for all staff to better understand anti-racism and how it promotes inclusive, psychologically and physically safe workplaces and culturally sensitive and appropriate services.
	Health Education and Improvement Wales will ensure that the NHS Wales mandatory training "Treat me Fairly" is redesigned with ethnic minority partners, to include lived experiences as well as a focus on cultural competence, and relaunched.  Welsh Government will set a requirement for all NHS staff to undertake the new training within a fixed timescale once the new package is available.	Short term – within 18 months	Mandatory training programme includes actions to support anti-racist ambitions
	Health Education and Improvement Wales will work with partners including NHS employers and trade unions to ensure that tools and resources are available to support NHS employers in capturing the experiences and outcomes of ethnic minority staff in the NHS and driving improvement in those areas in line with the seven themes of the 10 year workforce strategy.	Medium term – within 3 years	Better leadership and stakeholder understanding of the experience and outcomes of ethnic minority staff are secured and responded to.
	Health Education and Improvement Wales will work with partners to ensure that the Widening Access actions of the 10-year workforce strategy will identify plans and targets to increase reach and recruitment from ethnic minority backgrounds who are currently under-represented in the NHS in Wales.	Short term – within 18 months	Actions have been taken to target and support racial and ethnic diversity among the health and social care workforce.

Goal	Actions	When	Outcome
	Welsh Government will support the work in Health Education and Improvement Wales to address issues of differential attainment identified by the General Medical Council.	Ongoing	Actions have been taken to support racial and ethnic diversity among the health workforce, which promote inclusive, psychologically and physically safe workplaces and culturally sensitive and appropriate services.
	Welsh Government will establish, by co-designing with ethnic minority stakeholders and social partners an independent review of processes for complaints from staff to ensure transparency and restorative approaches are embedded.	Short term – within 18 months	Ethnic minority staff feel safe and confident to report concerns and confident that they will be dealt with fairly.  Demonstrable benefits for other protected groups are achieved.
3. Data and Intelligence			
	Workforce Data & Intelligence		
To ensure that health data in relation to race, ethnicity and intersectional disadvantage is actively collected, understood and used to drive and inform continued improvements in services.	The NHS in Wales will use workforce data and intelligence, including from Health Education and Improvement Wales' centre of excellence, to address concerns of discrimination and bullying raised by staff, including information such as staff survey results, lived experience and commissioned, independent interviews on the lived experiences of ethnic minority staff. This will be monitored jointly through the Joint Executive Team process.	Short term – within 18 months and ongoing	Staff start to feel safe and confident to provide ethnicity data and confident that data will be used for their benefit.  All NHS Wales bodies will have complied with duties under the Equality Act 2010 to publish accurate and timely diversity data.  Those that are asked to provide information about their ethnicity will have a greater understanding of why that information
	Welsh Government will introduce a Workforce Race Equality Standard (WRES) ensuring appropriate mechanisms of governance and accountability to monitor progress and act on concerns raised.	Short term – within 18 months and ongoing	is needed, leading to greater trust.

Goal	Actions	When	Outcome
	Welsh Government will work in social partnership with NHS Employers, Trade Unions and professional bodies to jointly develop targeted interventions to improve workforce data quality and capture; and ensure staff feel safe and confident to provide ethnicity data, and speak up against racist discrimination and practices.	Short term – within 18 months And to be built upon	
	Population Health Data & Intelligence		
	We will explore changes to population health data collection, monitoring and reporting to ensure arrangements are in place to regularly collect and report data to support understanding and development of policies to provide equitable health and social care services.	Short term – within 18 months And to be built upon	
4. Access to Health Services	S		
To ensure public health messages to improve uptake and access to health services are developed through dialogue and in partnership; individuals are supported where necessary in order to access health care.	Senior Directors in Welsh Government Health and Social Services Group will establish an internal Challenge Board to include external challenge to monitor progress against actions to improve access to services for ethnic minority people.	Short term – within 18 months	Progress against actions will be scrutinised to deliver equitable access to health services and improved outcomes for people from ethnic minority backgrounds.
	Maternity Services in Wales: officials will work with the Royal College of Midwives as part of their Race Matters campaign and key stakeholders, to scope the actions needed to improve the access and experience of care for women throughout their maternal journey.	Short term – within 18 months	To demonstrate an equitable access to maternity services and improved experience and clinical outcomes.

Goal	Actions	When	Outcome		
5. Tackling Health Inequali	5. Tackling Health Inequalities				
To ensure disease and condition specific delivery plans and strategies include actions to address the evident health inequalities experienced by some Black, Asian and Minority Ethnic people.	Welsh Government will consider what more needs to be done to promote better uptake or outcome of care when developing successor arrangements to current delivery plans and in future strategies and frameworks.  This will consider the picture in the round, linking in with NHS Health Boards, Trusts and Special Health Authorities annual plans and integrated medium term plans.	Short term – within 18 months	That we can demonstrate there is more equitable access to health services and improved outcomes for people from ethnic minority backgrounds.		
	To convene a joint Task and Finish group with the Wales Alliance for Mental Health.	Short term – within 18 months	Improvements in access to and the quality of support and services to ethnic minority communities.		
	Welsh Government will establish a new workstream within Time to Change Wales (TtCW) to focus on issues facing Black, Asian and Minority Ethnic communities.	Short term – within 12 months	Better and more nuanced understanding of the needs of different ethnic minority communities in relation to mental health stigma.		
	Welsh Government will explore ways to improve early access to mental health and Dementia services for ethnic minority populations.	Medium term – within 3 years	Reduction in variation of proportion of ethnic minority populations' access to diagnostics and treatment.		
	Welsh Government will explore ways to improve end of life care (EOLC) and access to hospice and palliative care services for ethnic minority populations.	Short term – within 18 months	Increased awareness of and take up of the palliative and end of life care needs of ethnic minority populations.  Improved experiences for ethnic minority populations at the end of their lives as reported by lived experience reports.		
	We will work with partners and representatives of ethnic minority communities to promote awareness of Putting Things Right concerns and complaint procedures available to all recipients of NHS care.	Short term – within 18 months	Increased awareness, satisfaction and use of Putting Things Right process amongst ethnic minority communities.		

Goal	Actions	When	Outcome
	The Putting Things Right Guidance (for the Welsh NHS complaints procedure) will be revised by Welsh Government when the duty of candour is brought into force. Consideration will be given to how the guidance can be improved and tightened to address matters that relate to complaints about racism in the provision of services in a way that also takes account of the Equality Act 2010.	Medium term – within 3 years	Increased awareness, satisfaction and use of Putting Things Right process amongst ethnic minority communities.
	The overarching function of the Citizen Voice Body (CVB) is to seek the views of the public about matters relating to health and social services in Wales. The CVB will be issued with a remit letter from Welsh Government when it is established. In terms of remit, the CVB will be asked to develop actions to ensure it can seek and obtain the views of all people in Wales which will include those from ethnic minority backgrounds and ensure diversity in their workforce and in their decision making structures.	Medium term	Ethnic minority people feel that their voices and needs are heard and acted upon and they are represented in the decision making structures by the Citizen Voice Body.
	Welsh Government will develop strategies to determine whether the short term and medium term actions have led to improvements in issues such as diversity of the volunteer base for the CVB, and the number of people who feel supported if they consider that they have a race related complaint which they wish to make to the NHS or a Local Authority.	Long term	Data on the number of Putting Things Right complaints and reports of lived experiences made by people from ethnic minority backgrounds demonstrate both a will to complain but also positive responses to their complaints.
	Welsh Government will develop sustainable mechanisms to engage with young people from Black, Asian and Minority Ethnic communities to understand issues of access to health services.	Short term	Increased understanding of the lived experiences and positive responses of young people in ethnic minority communities when accessing healthcare, which can then be addressed.

#### Notes:

HSS is the Health and Social Services group of Welsh Government, made up of the health and social care policy and planning leads and professionals.

Health Education and Improvement Wales (HEIW) sit alongside health boards and trusts as part of NHS Wales and have a leading role in the education, training, development and shaping of the healthcare workforce in Wales; ensuring we have the right staff, with the right skills.

Wales' 10-year workforce strategy, 'A Healthier Wales: Our Workforce Strategy for Health and Social Care' was jointly developed and launched by Health Education and Improvement Wales (HEIW) and Social Care Wales (SCW) on 22 October 2020. This 10-year workforce strategy makes clear the strategic intent around equality and equity, setting out both the vision and ambition as well as approaches required to deliver an inclusive, engaged and sustainable, workforce in health and social care.

NHS Employers Wales were established in February 2009 to support the strategic agenda of the NHS in Wales from an NHS employers' perspective, recognising the central role of the workforce in facilitating service change and consequently ensuring that the NHS is a place where people want to work and an employer of choice.

NHS Wales Informatics Service (NWIS) is the national organisation delivering technology and digital health systems and services working in partnership with all NHS Wales organisations to modernise, enhance and provide the best technology for our healthcare. NWIS will transition from its current non-statutory status, to the new Digital Health and Care Wales (DHCW) from April 2021, reflects the importance of digital technology as a key enabler of change.

NHS Wales Shared Services Partnership (NWSSP) provides a range of customer-focused professional, technical and administrative services on behalf of all Health Boards and Trusts in NHS Wales.

Time to Change Wales (TtCW) is a national campaign to end the stigma faced by people with mental health problems.

# Social Care

Social care services are key public services through which anti-racist, intersectional and dignified practice can be delivered. Our guiding legislation, the Social Services and Well-being (Wales) Act 2014 (the Act) contains important provisions which set the framework for our person-centred approach. There are duties on those performing social services functions to ensure that the rights, views, wishes and feelings of those receiving services are taken in to account and acted on. There are also duties to ensure that people's characteristics, culture and beliefs (including, for example, language) are taken in to account and acted on. These duties are critical to ensure that all partners who are working in the social care sector are striving to achieve the same goals and are providing the very best service to all people who need care and support and all unpaid carers who need support.

It is important that we acknowledge that there are gaps in what we do know and what we should know. As a direct result of this, a major feature of our work in delivering the actions set out in this plan is to significantly increase the range and the quality of the data, research and evidence that is available about people who use social care services and the social care workforce. This information will help us and our partners design future, more targeted activity that benefits the Black, Asian and Minority Ethnic people that use services and their families, builds the cultural competence and assets based practice of the wider workforce and protects and develops our Black, Asian and Minority Ethnic workforce. Much of what we know is told to us and our stakeholders. This lived experience is strong evidence in its own right and it will benefit from being supplemented by a far wider range of high quality data and research evidence.

Our evidence from the evaluation of the Act<sup>11</sup> also demonstrates that there are many implementation gaps between what we say in our legislation, policy and guidance and what happens in practice. How we translate the data, research and evidence we will gather in to actions that improve the experience of the workforce, service users and their families, is one part of a larger piece of work. The main part is to bridge the operational gap between what the legislation and policy tells leaders and practitioners to do and how leaders lead it and practitioners do it. There are many complex and systemic factors that contribute to these implementation gaps and the social care sector and specifically social care leaders, must resolve this and urgently guide behaviour change.

In relation to the workforce, Wales' 10-year workforce strategy, 'A Healthier Wales: Our Workforce Strategy for Health and Social Care' was launched by Social Care Wales (SCW) and Health Education and Improvement Wales (HEIW) on 22 October 2020. This makes clear the strategic intent around equality and equity, setting out both the vision and ambition as well as approaches required to deliver an inclusive, engaged, sustainable, flexible and responsive workforce in health and social care which will 'address a number of long standing challenges as well as preparing our workforce for future challenges.'

When we talk about our workforce we mean students; direct care staff and managers, including staff working in domiciliary care, supported living and care homes for adults and children; social workers and managers; local authority heads of services; and directors of social services. We mean everyone working in the statutory social services and those providing independent and voluntary social care provision.

It is important to note here that we know our social workforce is significantly represented by women, particularly in front line roles. The specific circumstances of the Black, Asian and Minority Ethnic female workforce, will therefore need to be given particular consideration. In addition, a significant proportion of our unpaid carers are women and women overall, take the lead role in caring for families and in our communities. Our approach, therefore, will ensure that the important contributions of Black, Asian and Minority Ethnic women at work and in communities, are properly considered and addressed.

We have also heard clear messages about trust in the system and the role of social care and CAFCASS Cymru. We will be using the consultation period to work with communities, service providers and CAFCASS Cymru to identify how we can address this.

### So, our work falls in to two parts:

What Welsh Government and our statutory, Independent and Third Sector partners can do for the individuals (adults and children) who use social care services and their families. This is about improving access to and experience of social care services, through an anti-racist lens.

What Welsh Government can do for and what our expectations are of the social care workforce at all levels. This is about improving the practice and experience of the social care workforce, again through an anti-racist lens.

Our goals have been developed under five themes: access to and provision of social care services; workforce; leadership; accountability; and data and analysis. In some areas of the plan there is a significant cross over between the goals and actions for health and social care, especially in cases where the goals and actions have been derived from A Healthier Wales<sup>12</sup> and Our Workforce Strategy for Health and Social Care. So that our stakeholders can track our progress, the milestones for all of the actions will be developed through the consultation phase.



Goal	Actions	When	Outcome
Goal 2			
To ensure that all Black, Asian and Minority Ethnic people who access social care services are provided with the highest quality support that is accessible, dignified and culturally appropriate.	We will develop, share and embed learning from a new repository of evidence of positive practice with Black, Asian and Minority Ethnic unpaid carers (as set out in the National Plan for Carers).  We will collect, review and share evidence of service provision in Wales that successfully reaches and meets the needs of Black, Asian and Minority Ethnic people.	Short to medium term	Unpaid carers from Black, Asian and Minority Ethnic backgrounds feel better supported by the statutory, independent, private and Third sectors.  Black Asian and Minority Ethnic Service users and their families feel that services are accessible, dignified, and tailored to their needs.
Goal 3A – Workforce			
To ensure that all members of the social care workforce have the cultural competence to work effectively with people from diverse racial, ethnic and cultural backgrounds	We will work with partners to ensure that all training for social care practitioners, including all initial, pre-entry training, is reviewed in respect of race and ethnicity. This will include the lived experiences of Black, Asian and Minority Ethnic people, a renewed focus on cultural competence and reflective practice and include the intersectionality of race and ethnicity with the other protected characteristics.	Medium to long term	All Black, Asian and Minority Ethnic people receiving care and support experience a service that fully meet their needs, is culturally appropriate and enables them to achieve the outcomes that matter most to them.
and ensure that this support is delivered with zero tolerance of racism and any other form of discrimination or inequality.	We will work with partners to develop ways to maintain continuous awareness of race and ethnicity with social care practitioners. This will include tools and resources to promote anti-racist and reflective practice such as a Cultural Competency Toolkit.		All social care practitioners are appropriately trained and qualified and are able to deliver the most effective and culturally appropriate support to all Black, Asian and Minority Ethnic people who are receiving care and support.

Goal	Actions	When	Outcome
Goal 4 – Leadership			
To ensure that leaders at all levels in social care model and champion anti-racism, diversity and inclusion and deliver an anti-racist social care sector for both people who are receiving care and support and for the social care workforce.	We will use the actions that are set out in the Workforce Strategy for Health and Social Care to drive consistent, high level and anti-racist leadership.  We will proactively market fulfilling leadership careers in social care for people from Black, Asian and Minority Ethnic backgrounds.  We will proactively design leadership development support and opportunities to encourage the Black, Asian and Minority Ethnic social care workforce into middle management and senior positions e.g. shadowing, secondment opportunities, coaching, mentoring (including reverse mentoring), development programmes, sponsorship and bespoke training.  We will proactively develop a Workforce Race Equality Standard as part of the Social Care Staff Governance Framework setting out a series of actions for employers to achieve together with mechanisms for governance and accountability to monitor progress and act on issues raised. This will link to	Short to long term	Leadership at all levels of social care are clear on the role they play, actions they can take, and the education that will support them to deliver an anti-racist social care sector in Wales.  That anti-racist thinking and practice becomes the norm in all activity related to the workforce and that anti-racist practice features as an inspection measure in all Care Inspectorate Wales inspections.

Goal	Actions	When	Outcome
Goal 5 – Accountability			
To embed accountability actions and behaviours across the social care sector, including robust governance structures and clear, measurable metrics, in order to determine the impact and effectiveness of the social care sector in delivering the actions set out in this plan.	We will review and, where necessary, address the membership of Welsh Government SSID-sponsored Boards / public appointments and Stakeholder Groups to assess current membership in respect of people from Black, Asian and Minority Ethnic backgrounds.  We will gather information from across social services and social care services regarding the use of reporting mechanisms such as concerns, complaints, grievance, fitness to practice referrals, safeguarding referrals, trade union intervention, staff surveys, annual reviews/appraisals; exit interviews and whistleblowing. All information will be analysed in the context of confidence to report racist behaviour, that reporting will be taken seriously and proactively acted on. Currently, much of this data is not available or is inconsistent and this will be addressed by Goal 6 – Data and Analysis.  We will use the Social Care Staff Governance Framework to develop an understanding of workforce attitudes towards colleagues and service users from Black, Asian and Minority Ethnic backgrounds. Together with the EHRC report, use this to determine what actions need to be taken to create an anti-racist culture. These will include:  We will address any unfair or illegal discrimination at work through renewed attention to anti-racist practices and a review and refresh of equality and diversity competences.  We will document and share safely, the lived experiences of Black, Asian and Minority Ethnic	Short to medium term	That Black, Asian and Minority Ethnic staff, service users and their families feel as if they, as people and their concerns, views, wishes and feelings are heard and respectfully acted on and evidenced.
	to report racist behaviour, that reporting will be taken seriously and proactively acted on. Currently, much of this data is not available or is inconsistent and this will be addressed by Goal 6 – Data and Analysis.  We will use the Social Care Staff Governance Framework to develop an understanding of workforce attitudes towards colleagues and service users from Black, Asian and Minority Ethnic backgrounds. Together with the EHRC report, use this to determine what actions need to be taken to create an anti-racist culture. These will include:  We will address any unfair or illegal discrimination at work through renewed attention to anti-racist practices and a review and refresh of equality and diversity competences.		

Goal	Actions	When	Outcome
	We will review the present approach to Equality Impact Assessments specific to race and ethnicity and co-produce a new approach with lived experience, intersectionality, transparency and openness at the centre of the process. This is with a view to improved service design and delivery so that people from Black, Asian and Minority Ethnic backgrounds have greater confidence in the process and outcomes.		
Goal 6 – Data and Analysis			
To improve qualitative and quantitative data, research, evidence, analysis, intelligence and understanding to support and drive continued progress, including a significant increase in the lived experience data gathered from Black, Asian and Minority Ethnic people.	<ul> <li>We will use the Social Care Data Strategy to consider how improve data collection and reporting as set out below:</li> <li>We will identify data requirements and what action can be taken to improve self-reporting of race and ethnicity (alongside other protected characteristics).</li> </ul>	Short to long term	Welsh Government and partners are better informed about the racial and ethnic characteristics of the workforce where disclosed to enable targeted, remedying actions to be taken.
	- We will use workforce data to monitor the diversity of the workforce and take action to increase the number of Black, Asian and Minority Ethnic staff (as set out in the Social Care Wales We Care Wales Campaign).		The workforce feels confident to disclose their race and ethnicity and that this information will be used for their benefit.  Better evidenced Population Needs
	<ul> <li>We will produce an annual statistical statement for the social care workforce in Wales, on race and ethnicity and the other protected characteristics as provided for in the Equality Act 2010.</li> </ul>		Assessments that more accurately reflect the populations assessed and their needs.
	- We will use data and intelligence (qualitative and quantitative) to tackle and address incidences of racism and bullying raised by staff, using information from a variety of sources including staff survey results.		

Goal	Actions	When	Outcome
	<ul> <li>Service user data</li> <li>We will commission an analysis and report of all Welsh Government social services published statistics that contain an ethnicity measure and to do so against national and local population data and the intersection with other protected characteristics.</li> <li>We will ensure the development of the Adults Receiving Care and Support Census includes datapoints on ethnicity so that we have better intelligence on Black, Asian and Minority Ethnic people who receive a social service and the types of services they receive.</li> <li>We will collate robust data on Black, Asian and Minority Ethnic service users' experience of social services and social care.</li> </ul>		
	<ul> <li>We will consider and proactively develop a system for mapping race and ethnicity against use of services to identify gaps and take remedial action where necessary.</li> <li>Research</li> <li>We will collate the existing research evidence relating to the use of and experience of social services in Wales by Black, Asian and Minority Ethnic people; and collate the existing research evidence relating to the experiences of Black, Asian and Minority Ethnic social care workers across Wales.</li> <li>We will use research and evidence to explore issues faced by Black, Asian and Minority Ethnic people within social care, both as service users and as social care workers, and use this evidence to guide systemic change within the sector.</li> <li>We will use the Social Care Research and Development Strategy to improve the development, collation and use of evidence in Wales and link to any gaps in research identified via the work undertaken above.</li> </ul>		

#### Notes:

Social Care Wales will have a key leadership role in the delivery of the goals and actions that are set out in this plan through their responsibilities for the regulation and development of the social care workforce, the improvement of care and support across Wales and for increasing public confidence in social care.

Wales' 10-year workforce strategy, 'A Healthier Wales: Our Workforce Strategy for Health and Social Care' was jointly developed and launched by Health Education and Improvement Wales (HEIW) and Social Care Wales (SCW) on 22 October 2020. This 10-year workforce strategy makes clear the strategic intent around equality and equity, setting out both the vision and ambition as well as approaches required to deliver an inclusive, engaged and sustainable, workforce in health and social care.

# Education

### Schools, Further Education and Higher Education

#### Schools

The experience of racism and race inequality, as well as a range of other inequalities, is well-recognised and the recent WCPP report documents some of these issues. The Welsh Government education transformation plan 'Our National Mission' has as one of its key objectives the closure of the attainment gap as well as achieving excellence in education: the third enabling objective seeks to promote equity The centrepiece of delivery of this is the new Curriculum for Wales, which looks beyond what is taught to focus on the development of capable, healthy, informed and enterprising individuals, to enable them to progress through their lives with confidence, knowledge and skills. An understanding of diversity and the need to challenge racist behaviours, is a core part of the Curriculum for Wales. We recognise the evidence and experience of racist bullying and harassment in the school environment, for both learners and teachers. This plan prioritises how we will support schools to address these behaviours in a visible and tangible way.

The WCPP report on the diversity of the education workforce in Wales cites the Education Workforce Council finding that the proportion of teachers who are black has remained at 0.2% since 2016, during which time the proportion of white teachers has increased from 88 to 91% (Education Workforce Council, 2020). We see the workforce issues in two dimensions: the need for specific programmes to promote diverse representation in the workforce in all areas of Wales, and the professional learning support required to enable all practitioners to understand and teach minority ethnic stories anti-racism and inclusiveness confidently right through education, including non-statutory educational provision from the age of 3.

It is also important to address how learners in Wales engage with different historical, racial, cultural and ethnic experiences. The Humanities Area of Learning and Experience specifically refers to the need to 'The Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group', chaired by Professor Charlotte Williams OBE, has published the first of its two reports, highlighting the need for more high quality learning resources, involving more positive representations, of Black, Asian, and Minority Ethnic groups across all teaching. The Welsh Government has accepted the findings in their entirety.

The experience of COVID 19 in schools has disproportionately impacted vulnerable and disadvantaged learners: including those learners who are digitally excluded, as well as those who may be culturally and socially excluded, or excluded by confidence in the language of teaching. All of our thinking and actions below must and will consider specific experiences and issues for ethnic minority learners in learning recovery over the coming period alongside ongoing experiences of racism.



Goal	Actions	When	Outcome
To improve the experiences of Black, Asian and Minority Ethnic leaners and teachers in schools by taking an inclusive and anti-racist approach to teaching and school experience.	By July 2022 we will strengthen Rights, respect, equality anti-bullying guidance, with a particular focus on the disciplinary procedures in schools for handling incidence of identity-based bullying. This will support schools to develop anti-bullying strategies, which have effective mechanisms to support the elimination of discrimination, harassment and victimisation in schools, including tackling racist behaviour. The update will include advice on how to engage effectively with parents and carers around this agenda. [as recommended in the Show Racism the Red Card].	Short term	Reduction in identity based bullying.  Improved disciplinary procedures in schools.
	To support the Rights, respect, equality anti-bullying guidance, we will strengthen data collection and reporting of racist incidents and harassment in schools in Wales. We will, where possible, disaggregate this by ethnic subgroup, as recommended by the WCPP report.	Medium term	Policy makers education sector, and partners will have more granular knowledge of the numbers of racists incidence, and can use this to measure success of policies.
	By July 2022, we will publish statutory Gypsies, Roma and Travellers' guidance to support educational outcomes, ensuring that championing anti-racist practice is at the centre.	Short term	Improved educational outcomes for Gypsies, Roma and Travellers learners.  Reduction in rates of racial incidences experienced by Gypsy, Roma and Traveller learners.
	We will convene a working group to help us strengthen our guidance on Exclusion from Schools and Pupil Referral Units in relation to learners who we are aware can be disproportionately subject to permanent or temporary exclusions, this will include Black, Asian and Minority Ethnic learners and learners with special educational needs (SEN). We anticipate this will work will take about two years to complete. We will use information from the Official Statistics published by the Welsh Government on permanent and fixed-term exclusions from schools (www.gov.wales/permanent-and-fixed-term-exclusionsschools), which includes data on exclusions by ethnic background. This data will continue to be published.	Medium term	A reduction in the disproportionate number of exclusions of ethnic minority and SEN learners.

Goal	Actions	When	Outcome
	We will work with our sector partners to acknowledge and promote the valuable reach of youth work. Through the board's final report recommendations in summer 2021, we will encourage anti-racist practice and identification of the specific needs of Black Asian and Minority Ethnic children and young people both across the workforce and in ensuring all young people are encouraged to access services which are relevant to them. A young person's committee will be working with the board throughout, representing the views of Wales' diverse young people.	Short term	Increased awareness, reduced racism and increased accessibility for Black, Asian and Minority Ethnic children and young people.
	As recommended by the First Minister's Black, Asian and minority ethnic COVID-19 Advisory Group – Report of the Socioeconomic Subgroup, chaired by Professor Ogbonna, we will make learning about Black, Asian and Minority Ethnic stories mandatory within the Curriculum for Wales. Understanding of anti-racism, and the confidence and ability to challenge harmful norms will be mandatory learning across the curriculum. This will be confirmed as statutory by end 2021 (after the passage of the Bill).	Short term	Within the mandatory 'What Matters Statements', pupils in Wales will learn about Black, Asian and Minority Ethnic stories in Wales.
	We will take forward the recommendations (see Annex A) set out in the interim report submitted by the Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group, chaired by Professor Charlotte Williams OBE, in November 2020, which focused on learning resources: https://gov.wales/sites/default/files/publications/2020-11/black-asian-minority-ethnic-communities-contributions-cynefin-new-curriculum-working-group-interim-report_2. pdf. Through this we will maintain the focus on embedding anti-racism organically through classroom resources, the use of role models and offering exposure to a diverse range of stories and examples, as recommended in the Show Racism the Red Card report. Each school's new curriculum will be discussed with parents and local communities and reflect their priorities, as recommended in the WCPP report.	Medium term	Improved diversity – ethnic minorities, in the teaching workforce, resources for teachers on anti-racism, diversity and Black history.

Goal	Actions	When	Outcome
	We will raise awareness and encourage increased take-up of Welsh medium education by Black, Asian and Minority Ethnic children to ensure equality of access for all to Welsh medium education and services in line with our Cymraeg 2050 ambitions. This includes from the early years, statutory education period, post 16 and further education as well as Welsh for adults. ( see Goal on Welsh language)	Medium term	More Black, Asian and Minority Ethnic learners given the opportunity of a Welsh-medium education
	This will be done by incorporating into formal Welsh in Education Strategic Plans (WESP) monitoring, discussions around how local authorities engage with the Black, Asian and Minority Ethnic community as part of their strategy to increase provision and take-up of Welsh-medium education, dispelling assumptions that Welsh-medium education isn't an option for children from Black, Asian and Minority Ethnic homes where English may not be spoken.		
	We will also challenge our grant partners (eg the Urdd, Mentrau Iaith, Mudiad meithrin, RhAG) that support local authority WESP activity through their Welsh in Education Planning Forums to consider their role in articulating positive attitudes around race, ethnicity, equality in addition to Welsh language and cultural heritage.		
To improve the diversity of the teaching workforce and embed anti-racist professional learning	We will strengthen and enhance training for all teachers in Wales on race equality and anti-racism, building on the existing inclusivity and equality Accreditation Criteria. The details of this will be informed by Professor Charlotte Williams' Working Group recommendations focused on teacher training and professional development, as well as their final report, due to be submitted in February 2021. This specifically considers how all teachers can build confidence and effectiveness in teaching Black, Asian and Minority Ethnic stories. These will form the basis of a new action for professional learning, as recommended by the WCPP.	Short term	Understand levels of anti-racism training across partnerships to enable enhancement and consistency.

Goal	Actions	When	Outcome
	We will strengthen the values and dispositions in the Professional Standards for Teaching and Leadership that drive all teachers to be the best they can be, to better reflect teachers' and leaders' role in promoting race equality and being anti-racist. We will also work with regions to deliver professional learning that will enable all teachers and leaders to demonstrate that they are positively promoting these values. This will include awareness and reflection on race-based prejudices and stereotypes, and supporting teachers in communicating positive and high expectations for Black and mixed ethnicity pupils in the classroom, and in undertaking pastoral and disciplinary actions.	Medium	Practitioners positively promoting race equality and being anti-racist.
	We will develop a strategy and action plan by September 2021 to increase the numbers in the teaching workforce from Black, Asian and Minority Ethnic groups and including other under-represented groups. This will consider the recommendations in the leadership and representation section of this Action plan to ensure that recruitment and selection approaches reflect best practice to attract Black, Asian and Minority Ethnic teachers (including the WCPP recommendations). We will also make increased use of digital means to increase the number of learners who are taught by Black, Asian and Minority Ethnic teachers.	Short / Medium / Long term	The strategy will infirm an action plan that will set out specific actions that we will take to address:  1. Under-representation in the workforce.  2. Wider diversity of the workforce in all areas including those that do not have a high proportion of ethnic minority pupil population.  3. Increase the number of Black, Asian and Minority ethnic communities entering the workforce and enhancing their career progression.  4. Action plans from ITE Partnerships to increase applications to courses from ethnic minority communities.
	We will ensure the E-sgol programme actively seeks out Welsh-speaking Black, Asian and Ethnic M-inority teachers to teach subjects, revision or awareness sessions online in schools across Wales, focusing specifically on rural areas with a less diverse teaching workforce.	Medium term	Increased numbers of Welsh speaking ethnic minority teachers teaching subjects.

Goal	Actions	When	Outcome
	We will ensure school practitioners and school support groups are confident in leading positive discussions around anti-racism, cultural diversity, by working collaboratively with Bangor University and Black, Asian and ethnic minority advisory groups to revise and introduce new standardised terminology in Welsh that best reflects Wales's cultural and racial and ethnic communities, and include in Y Termiadur Addysg.	Medium term	Greater confidence in understanding and promoting anti-racism.
To improve understanding of diversity and racism in the wider education sector	We will work with Estyn to determine how a refreshed inspection framework can be strengthened for anti-racism and so for Black, Asian and Minority Ethnic learners and teachers, and recognise, understand and support them. We will look for this to include how schools create a sense of belonging and safety for both learners and practitioners, building on the recommendations of the WCPP report and the Show Racism the Red Card recommendations. By October 2021.	Short term	Through inspection we will have better accountability for anti-racism and a better understanding of how the education sector supports Black, Asian and Minority Ethnic learners and creates a sense of belonging and safety.
	We will make revisions to the school governors' guide to the law to further highlight the importance of the Public Sector Equality Duty and Strategic Equality Plans by November 2021. We will provide training to all Governors on the Public Sector Equality Duty, and in anti-racism, particularly in preparation for the delivery of the new curriculum. Regional consortia are ready to develop and deliver this, in line with the recommendations of the WCPP report.	Short term	Governors will gain an enhanced understanding of the importance of the Public Sector quality Duty and Strategic Equality Plans and anti-racism.

Goal	Actions	When	Outcome
	We will provide information and advice to local authority governor support services on the importance of anti-racism training and the vital role that school leadership teams have to play in implementing effective anti-racism policies. Additionally, we will explore how Hwb playlists or other online training materials on anti-racism and wider equality can be made available to governors. We will also seek feedback on the feasibility of introducing an Anti-Racism Champion role to school governing bodies, by the end of October 2021.	Short term	Governors will develop a deeper understanding and a sense of ownership of race equality and anti-racism policies.
	As part of our Whole School Approach to Wellbeing we have provided funding in the current year of £600,000 to local authorities to embed universal and targeted interventions in schools. It is a matter for local authorities to decide, in discussion with schools, which interventions are most appropriate in their areas, though interventions can include building resilience among learners and addressing stigma and discrimination. We know that some groups of learners are more affected by emotional and mental health problems and may experience difficulties or be uncomfortable discussing emotional difficulties due to stigma. These learners include those who are part of one or more vulnerable or historically marginalised groups, including those with protected characteristics such as LGBT+ children and young people; refugee and asylum seeker children and young people; Gypsy and Traveller children and young people; and children from Black, Asian and Minority Ethnic backgrounds.	Medium term	Learners are supported in an appropriate and timely fashion through the trauma of racism and other discriminations and so enabling them to maintain their education and reach their potential.
	As we embed our whole school approach we will consider the lessons from implementation and the need to provide more specific and tailored guidance for ethnic and other minority groups to ensure equitable and anti-racist provision as appropriate.		

Goal	Actions	When	Outcome
	We have also invested an additional £1.252m in improving and extending school counselling support in 2020-21. The Service sees around 11,500 children and young people each year, with data showing that around 4.5% of those seen are from a Black, Asian and Minority Ethnic background. We have commissioned Cardiff University to evaluate the service and will consider the recommendations, including any related to accessibility of the service and the need to provide more specific and tailored guidance for ethnic and other minority groups to ensure equitable provision when the findings are reported later in 2021.	Medium term	Counselling provision is available to ethnic minority students which meets their wellbeing needs.
	In February/March 2021 we will publish our Whole School Approach to Emotional and Mental wellbeing Framework which will be statutory guidance for all maintained schools and local authorities. The guidance will support schools in meeting the wellbeing needs of all their learners and staff by reviewing their wellbeing needs, putting in place strategies to build on their strengths and addresses weaknesses and review and evaluate progress as part of continuous improvement. The Framework highlights that some learners are at higher risk of facing poor well-being and experiencing adverse outcomes. School senior leadership teams should be taking an inclusive, anti-racist and non-stigmatising approach to ensuring good well-being for all of their learners, regardless of circumstance. However, it is important to acknowledge that some learners may need additional support at different times and more targeted early intervention to prevent negative experiences. School senior leadership teams should consider their learner and parent/carer population when developing their well-being plan.	Long term	Services which are better able to respond to the needs of ethnic minority learners.

#### **Further Education**

Further education (FE) institutions play a vital role in their communities, offering a wide range of education and training provision for all ages and at all levels. They are often the "second chance" solution for those who have not thrived in the school system, as well as adults seeking to retrain and to develop basic skills.

A high proportion of FE learners come from disadvantaged backgrounds and protected groups. Around seven per cent of learners in FE colleges are from Black, Asian and Minority Ethnic groups; and the proportion of FE teachers from those groups, at around four per cent, is much higher than the equivalent percentage in the schools sector. Nonetheless, the whole area of race equality in the FE sector is under-researched. We do not know enough about participation and outcomes for learners from different ethnic backgrounds, nor the underlying reasons for any issues or gaps. We also do not have a systemic overview of how colleges are working to ensure that harassment and discrimination of protected groups are not tolerated.

The actions set out below aim to address this, by focusing primarily on improving our evidence base and our understanding of data on FE staff and learners. We also need to understand more about the experiences of Black, Asian and Minority Ethnic learners and staff in colleges, and the approaches colleges are taking to address risks of discrimination. We need to do this before articulating detailed actions, so that we understand what and where the problems are first. It is important that, as part of our wider COVID recovery planning, we ensure we understand how COVID-19 may have disproportionately impacted on ethnic minority learners, and that we support the sector to respond effectively.

The Welsh Government's Adult Learning Policy (2017) plays an important part in supporting employability, well-being, bilingualism, families. integration, and helping people of all ages to live more independent, fulfilling lives. It provides support for all adults to improve their Essential Skills so that they are best placed to access work opportunities or progress while in employment. Essential Communication Skills - including English for Speakers of Other Languages (ESOL) is a funded priority area directed to all providers of adult learning in the community in Wales through our ESOL Policy (2019). Welsh Government is committed to promoting integration, and to helping those who migrate to Wales to participate fully in the communities which become their homes. Being able to communicate with confidence is essential if they are to utilise the skillset which they bring with them. As part of our plan, we will review the effectiveness of the ESOL programme in meeting the needs of the communities it serves, and put in place an action plan to address the outcomes.

We are continuing to maintain the Credit and Qualifications Framework for Wales (CQFW) – an all-inclusive framework which allows for the recognition of qualifications across all sectors and levels of the education system, irrespective of where learning is undertaken and by whom. The CQFW maintains links with the qualification frameworks of the other UK administrations and is referenced to the European Qualifications Framework (EQF). This ensures that qualifications can be recognised and broadly compared, offering portability and transferability for learners and workers.

The 2019 Nation of Sanctuary Refugee and Asylum Seekers (RAS) Delivery Plan included an action "to assist the employability of refugees by ensuring the CQFW is promoted to RAS and service providers to assist with recognition of qualifications". To address this action a new guide was developed and issued to caseworkers providing advice and support to refugees in Wales on using the CQFW to understand and compare international qualifications. The content of the CQFW learner and employer guides were also duly updated to signpost to UK Naric, which can advise on the comparison of international qualifications.

CQFW Advisory Group Members whose role is to oversee the operation of the CQFW in the UK agreed that the development of a refugee/ asylum seeker case study would be helpful in due course, suitable material on which to develop a case study and a technical writer has yet to be identified. ColegauCymru, on behalf of the Welsh Government and the CQFW Advisory Group, has also been carrying out a scoping exercise to establish current recognition of prior learning (RPL) practice within the vocational education (VET) sector in Wales and a seminar taking place in February will focus specifically on the use of RPL with refugees and asylum seekers and inform the development of new quidance.

Goal	Actions	When	Outcome
To improve our evidence base and understanding of ethnicity profiles in the Further Education sector, and work to ensure that they are representative of the communities colleges serve.	Undertake focused analysis of data on learners who identify as Black, Asian and Minority Ethnic in order to ascertain where direct and effective improvements can be made.  Undertake focused analysis of learner outcomes and qualification levels by ethnicity (broken up by gender).  Ensure that analysis of ethnicity variables is routinely included in statistical reports including learner outcomes, staff and learner surveys.	Short term	Improved evidence base on ethnicity and recommendations to address identified gaps and issues.
	Work with representatives from Black, Asian and Minority Ethnic communities across the sector to develop tools and support systems in response to this analysis (2022-23).	Medium term	System-wide approach to ensuring that participation and outcomes for learners from different ethnic backgrounds are equitable and that underlying factors are understood and addressed.
To offer a safe, positive and inclusive environment for all staff and students, in Further Education	As part of the Post-16 Workforce Development project, consider the representation of tutors, assessors, leaders and support staff within the post-16 workforce who identify as Black, Asian and Minority Ethnic with a focus on recruitment and retention (2021-23).	Short term Medium term	Diversity of staff , in particular of ethnic minority staff, at all levels in the FE sector in Wales is increased.
where racial harassment and discrimination is addressed.	Work with Further Education, staff and student stakeholders to strengthen policies and procedures to tackle racial harassment and intimidation.	Short term	Robust whole-institution systems are in place at all Further Education Institutions to raise and tackle racist behaviour.  Further Education in Wales is diverse, in particular for ethnic minorities and inclusive spaces for staff and students are evident, as evidence by student and staff satisfaction surveys and lived experience feedback.

Goal	Actions	When	Outcome
To ensure English for Speakers of Other Languages (ESOL) provision fully supports the needs of Black, Asian and Minority Ethnic communities.	Conduct a review to consider the operational issues raised around adult community learning, particularly how ESOL training is aligned with vocational training.	Medium term	Increased opportunities for people from ethnic minority groups to progress to fair and rewarding employment.
To ensure that the Credit and Qualifications Framework for Wales (CQFW) continues to support the principles of anti-racism, recognition of prior learning and facilitates the understanding and comparison of international qualifications.	Maintain alignment between the CQFW and the other UK qualification frameworks and the European Qualifications Framework to support ongoing qualification comparability and learner mobility. Raise awareness and promote the CQFW as a vehicle to aid understanding and recognition of qualifications and refer queries from international learners relating to the equivalency and comparison of international qualifications.  We will collate information together with examples of the types of qualifications currently not being recognised or accepted by institutions or employers across Wales, to help our understanding of barriers to employment.	Short to medium term	Qualifications and learning are understood anti-racism and recognised, facilitating learner/citizen progression, transferability and mobility.  Increased consistency of approach with regards to assessing prior learning.

#### **Higher Education**

We recognise the value and benefits of anti-racism and diversity within higher education (HE) for both staff and students. While there are evident inequalities in the higher education (HE) sector, good practice is being developed in Welsh universities to increase this diversity and enhance the strengths that this brings. Universities in Wales and the Higher Education Funding Council for Wales (HEFCW) have responsibilities under the Equality Act (2010) and the Public Sector Equality Duty, as assessed by the Equality and Human Rights Commission (EHRC). Nonetheless, there is evidence of race-based inequalities amongst both staff and students in higher education. Evidence from Universities (UUK) and the EHRC indicates that the degree to which senior leaders across the UK take responsibility for tackling racial harassment varies between universities. Issues range from disparities in entry and progression rates to degree-awarding gaps to negative experiences, including harassment and bullying, whilst studying or working in the sector. 13 For example, the report Is Wales Fairer? 2018<sup>14</sup> highlighted that in 2015/16, White British students in Wales had an attainment lead of 8.5 percentage points over Black, Asian and Minority Ethnic (herewith ethnic minority) students. The Universities UK report, Tackling racism in higher education, notes that 24% of students from ethnic minority backgrounds had experienced racial harassment within British universities since starting their course, while more than 7 in 10 staff who had experienced

racial harassment reported micro-aggressive acts and demeaning behaviours. <sup>15</sup> These factual data was reflected vividly in the lived experiences of ethnic minority people attending the deep dive and roundtable events we held.

The EHRC's 2018 inquiry into racial harassment in higher education<sup>16</sup> found that racial harassment is a common experience in publicly funded universities in Britain, and is widespread, consisting of racial harassment, physical attacks, name calling and micro aggression. It drew attention to issues relating to a lack of understanding within the sector in relation to racial harassment, a lack of confidence amongst university staff in dealing with racial issues, and issues relating to under-reporting and recording. There is clearly a need to ensure that real cultural change is encouraged so as to ensure that racism in HE is addressed and that the HE experience is a positive one for both ethnic minority students and staff. This includes, but is not limited to, senior management buy-in, positive role models and having appropriate systems in place to address these issues, including procedures that encourage individuals to report incidents, whilst engendering confidence that these will be taken seriously and clear, appropriate actions taken.

We want to tackle racism at all levels of higher education in Wales, within institutions and across the sector. We will continue to work with HEFCW and its planned successor body, the Commission for Tertiary Education and Research, together with staff, students and institutions as a whole, to address anti-racist practice across the HE sector. We will expect HEFCW to continue to make clear, in its relations with the HE sector and Government expectations on this. That includes an expectation that universities will take a whole-institution, anti-racist approach to this issue, led and owned by senior managers, which is embedded in their governance systems, structures and policies.

We welcome the work that has been taking place across the HE sector in Wales to address racism and we recognise that HEFCW and HE institutions are taking action to address racism. However, more needs to be done. This action plan sets out the Welsh Government's expectations that HEFCW and HE institutions make rapid and sustained progress in tackling racism and improving the HE experience of staff and students in HE regardless of racial background. We expect zero tolerance of racism in the HE sector in Wales. In order to make this happen, we have set out goals and actions that build on and further develop work that is already underway with HEFCW and Welsh HE institutions to address racial inequality as it affects both staff and students. It will include proactively seeking opportunities to build on good practice in areas such as widening access, 17 working with schools and local community groups and developing links with employers.

 $<sup>13\</sup> www.nusconnect.org.uk/resources/race-for-equality-a-report-on-the-experiences-of-black-students-in-further-and-higher-education-2011$ 

<sup>14</sup> www.equalityhumanrights.com/sites/default/files/is-britain-fairer-2018-is-wales-fairer.pdf

<sup>15</sup> www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2020/tackling-racial-harassment-in-higher-education.pdf

 $<sup>16\</sup> www.equalityhumanrights.com/sites/default/files/tackling-racial-harassment-universities-challenged.pdf$ 

<sup>17</sup> https://www.uniswales.ac.uk/policy/widening-access/

Our approach draws on a variety of data, including student and staff numbers, reports from HEFCW and evidence from individuals as highlighted in reports such as Universities UK's Tackling racial harassment in higher education. 18 It relies on individuals and institutions alike taking responsibility for identifying and tackling racist attitude and behaviour and, where necessarily, driving real cultural change. That means a step change in behaviour across institutions. It also means ensuring strong reporting systems are in place, individuals feel that they are listened to and supported, and genuine solutions are created. It also means taking action to address issues such as admission, retention and progressions rates, degree-awarding gaps and inequalities in staff pay. This is not about meeting the minimum requirements set out in law. Increased racial diversity within institutions brings benefits to all who work and study in them, including an enrichment of the higher education experience and ensuring that positive role models are visible. There is more to be done working across agencies and Ministerial portfolios, to drive change in areas such as health and wellbeing, skills and businesses.

The actions set out here are for the Welsh Government, but we cannot drive this change on our own. We will look to the EHRC, as the regulator of equalities in Wales, including HEFCW and the HE sector, to monitor accountability and compliance with the legal requirements and to HEFCW to work with institutions in developing their approaches to tackle racism. We will also look to the individuals within those institutions, both students and staff at all levels, to play their part in creating lasting change.

Goal	Actions	When	Outcome
To ensure that higher education in Wales is a safe, positive and inclusive environment for all staff and students, where racial harassment and discrimination is promptly and effectively addressed.	<ul> <li>Review staff- and student-focused data – both statistics and lived experience data on racism in HE and work with individual and organisational stakeholders to develop appropriate, and effective anti-racist policy response.</li> <li>Work with HEFCW and staff and student stakeholders to strengthen policies and procedures in universities to tackle racial harassment and intimidation.</li> <li>Work with stakeholders to identify and respond to particular issues and experiences raised by Black, Asian and Minority Ethnic women as staff and students.</li> </ul>	Short term	Higher Education in Wales becomes a more anti-racist, positive and inclusive place for staff and students.
To ensure that anti-racist practice in all policies and procedures enables ethnic minority students can access, progress and succeed in higher education regardless of their racial background.	<ul> <li>Create strong pathways with stakeholders to support opportunities for ethnic minority students to access and succeed in higher education.</li> <li>Understand and address disparities in experiences of higher education and outcomes across different ethnic minority groups.</li> </ul>	Medium term	Students can expect their experience and outcomes in HE to be irrespective of their racial and ethnic background.
To ensure that ethnic minority staff are enabled and supported to access, succeed and progress in employment in higher education regardless of their racial background.	<ul> <li>Secure ethnicity pay gap information</li> <li>Work with HEFCW and HE institutions and staff representatives to monitor staff pay by ethnicity and develop appropriate response to address inequalities.</li> <li>Work with HEFCW, universities and staff representatives to address race-based inequalities relating to recruitment, retention and progression of staff.</li> <li>We will encourage universities to continue to develop programmes to support staff to develop and progress.</li> <li>Ethnic minority people are reflected on Boards and committees in HE institutions and in HEFCW.</li> </ul>	Medium term	Staff from ethnic minority groups are able to succeed and progress in HE on the basis of their personal achievements and qualities, regardless of their racial background.  Increase in ethnic minority representation on HE Boards and related bodies is reflecting the diversity of Wales.

## Employability and Skills

The Welsh Government Employability Plan sets out a number of key commitments to support those furthest from the labour market. This includes delivering an individualised approach to employability support, and promoting inclusivity, requiring organisations who deliver our programmes to demonstrate commitment to diversity, inclusivity and equality.

The Plan also acknowledges that some people, including people from Black, Asian and Minority Ethnic groups, women and disabled people, have poorer labour market outcomes.

The Welsh Government offers a number of employability programmes for unemployed people to enable them to gain skills and qualifications to support them enter or sustain employment, these include Employability Skills Programme, Jobs Growth Wales, ReAct, PaCE and Community Employability Programmes, as well as our Working Wales advice service.

The Wales Centre for Public Policy reports and the community grants report, as well as our own stakeholder engagement has indicated that our communications and messaging is not consistently reaching all communities across Wales, and particularly with ethnic minority communities. People are not aware of the support that is available, for both those seeking work or those who are in work and want to progress. We must continue to find effective and innovative ways of communicating our offer to different communities throughout Wales.

We will undertake an anti-racist review of our employability programmes to ensure that their operations are inclusive and not at risk of deepening any existing inequalities and disparities in supporting people into fair and rewarding work. We will examine the impact of our actions on people from ethnic minority groups, mindful that they are diverse and with different needs, and will include a focus on understanding the impact on women from ethnic minority groups. We will build on our existing engagement with stakeholders from ethnic minority communities to find out exactly how we should communicate our offers and increase awareness, and trust, in our post-16 learning and skills offers. And we will identify what barriers remain that prevent people from accessing and benefiting from employability and skills support, and remove them.

Ensuring equality of opportunity and broadening access are key priorities within our post-16 sector. But we recognise we need to take further action to tackle structural and systemic racism that prevents people from accessing the skills, training and employment prospects that exist in Wales. Within our Apprenticeships Policy, we are funding an Equality and Diversity Champion whose role is to provide an enhanced focus to drive apprenticeship providers' commitment to increase participation of the individuals from protected groups on apprenticeships programmes. The Champion has undertaken considerable engagement with many people with ethnic minority backgrounds both in her day to day work since she took up the role and specifically in recent months whilst developing a new five year Equality Strategy on behalf of the apprenticeship provider network. Providers expect to publish the Strategy in the coming months.

Goal	Actions	When	Outcome
To improve accessibility, relevance and performance data associated with programmes to deliver better outcomes for ethnic minority groups in relation to Welsh Government Skills Employability programmes.	We will review and evaluate the data we collect on learners from ethnic minority groups in Employability Programmes and continue to develop analysis of participation and outcomes for different groups of learners in our statistical reporting (disaggregated by differing ethnic minority groups where possible).  We will review and evaluate the data we collect on Employabilty Programmes. We will then undertake a review using anti-racism as a lens of our employability programmes – including Working Wales, ReAct, Traineeships, Jobs Growth Wales, Employability Skills Programme. We will review the impact of our support on women from Black, Asian and Minority Ethnic backgrounds in order to understand the issues they face and how we can support them through our programmes.  Careers Wales/Working Wales services will be asked to take forward developments that enable them to connect in a more effective and relevant way to ethnic minority groups. Using careers advice and guidance services to help individuals and make the right career choices. We will develop co-shaped proposals to raise career aspirations for young people from Black, Asian and Minority Ethnic backgrounds.	Short term By April 2023	% increase in ethnic minority groups participation in stated programmes and services linked to the demographics of the wider society.  Improved performance levels.  Improved customer satisfaction levels.  Improved awareness of Career choices.
Supporting people from Black, Asian and Minority Ethnic communities through Community Employability Programmes.	We will undertake a review using anti-racism as a lens of our Community Employability Programmes. Undertake analysis of the statistics of participants who identify as Black, Asian and Minority Ethnic in order to ascertain where direct and effective improvements in programme delivery can be made. Review delivery partner engagement and will include a specific focus on understanding the experiences of women from ethnic minority communities with ethnic minority community organisations to increase awareness of support available through Community Employability Programmes.  Review community delivery locations to increase accessibility of provision to individuals from ethnic minority communities.	Short term By April 2023	Equitable participant experience and opportunities to progress to employment.  Increased participation of individuals from Black, Asian and Minority Ethnic groups on Community Employability Programmes.

Goal	Actions	When	Outcome
Employability programmes in Wales will offer a safe, positive, and inclusive environment for all staff and students, where racial harassment and discrimination is addressed.	The review will include an assessment of anti-racism within the workforce of our providers of learning and delivery organisations for employability programmes and services.  We will introduce a programme of anti-racism training and anti-racism awareness sessions for all programme providers and learners and will raise awareness of the experiences of Black, Asian and Minority Ethnic groups, including the specific experience of Black, Asian and Minority Ethnic groups women.  We will ensure providers continue to monitor the increased risks of COVID-19 when considering the needs of learners and staff from within ethnic minority communities, and will complete risk assessments as required.	Short term By April 2023	Gained the trust of those providing the data.  Learners are not indirectly and inequitably affected by any reluctance to attend face to face provision as a result of the perceived higher risk to their health  Employability settings are diverse, inclusive spaces for staff and customers.  Whole systems approach to raise and tackle racist behaviour.
Test new employability approaches to anti-racism.	Through the Skills Gateway we will roll out awareness and training on anti-racist recruitment practices and anti-racism awareness to businesses.  Create a new equality challenge fund to support innovative pilot work linked to the engagement and support of ethnic minorities across Wales.  Utilise the Wales Union Learning Fund (WULF) Working with trade unions to develop the essential skills and employability of the workforce, with a particular emphasis on removing barriers for traditional non-learners.  We will also explore avenues for developing a co-created framework for family learning as a route into skills development and employment opportunities.	Medium term	Increased opportunities for people from ethnic minority groups to progress to fair and rewarding employment.

Goal	Actions	When	Outcome
Support ethnic minority people undertaking Apprenticeships.	We will continue to support the Apprenticeships provider network to secure greater interest and relevance of the apprenticeship programme.	Short to Medium term	Increase participation of individuals from Black, Asian and Minority Ethnic groups on apprenticeships programmes.
	The Apprenticeship Strategic Equality and Diversity Lead has undertaken considerable engagement with many people from Black, Asian and Minority Ethnic background and representative organisations whilst developing a new five year Equality Strategy on behalf of the apprenticeship provider network.		
	We will build on that existing engagement with stakeholders and communities to develop how we should communicate our offers and increase awareness.		
	Some measures that are proposed as part of that strategy:		
	- Targeted promotional material.		
	- Targeted events in communities.		
	<ul> <li>Recruiting and promoting Black, Asian and Minority Ethnic Apprenticeship Ambassadors.</li> </ul>		
	- Cultural awareness training for providers.		
	<ul> <li>Discussion forums with ethnic minority groups/learners.</li> </ul>		
	- Blind recruitments - names and addresses.		
	- Training around positive action.		
	We will consider the Equality Strategy being developed by apprenticeship providers in Wales that will set out how the network can create change in relation to equality matters including Race.		

# Social Partnership and Fair Work contribution to the Race Equality Action Plan

#### **Narrative**

The world of work has a vital role to play in our individual and societal well-being. Work is a social mechanism through which all our communities interact to provide the goods and services upon which our collective well-being depends. At an individual level, fair, safe and secure work empowers people to meet their needs, provides a sense of fulfilment and enables individuals to contribute, develop and grow. At a societal level, it promotes community cohesion, participation and social and economic development.

Evidence consistently demonstrates that individuals in decent work lead happier and healthier lives. However, we know that fair, safe and secure work is not universal or equally distributed. A recurring finding in WCPP and other reports shows how there are entrenched and persistent racial inequalities in employment and income. These include under-representation at more senior levels, lower rates of pay progression, and over-representation in lower paid and more precarious jobs.

In addition to what research reports tell us, we have heard directly from Black, Asian and Minority Ethnic people about their lived experiences and the unacceptable workplace barriers, behaviours and organisational cultures they have encountered and which stifle their capacity to progress. These inequalities are not acceptable and we are determined to use our powers and influence to change these outcomes for the better.

We are delivering our priorities and ambitions for a fair work nation – using every lever we have to help realise fair work outcomes and improve working lives. As part of that, we will double-down on our efforts to ensure that equality, diversity and inclusion pervades every aspect of our approach to fair work so that supporting anti-racism at work is at its core. To help ensure this happens, we will incorporate measures on Black, Asian and Minority Ethnic pay, employment and other data relevant to the world of work into our fair work outcome indicators. And we commit to doing so this year. We will use those measures to improve our understanding and evidence base around fair work issues in relation to race, and we will use them to inform our future policy development and interventions. We will of course also continue to listen to people's lived experiences, in recognition that data can reflect the general situation but not necessarily give us the weight of individual lived experience.

To help implement the actions in the Race Equality Action Plan, we will use the power and influence of our established social partnership approach, through which we work closely with employers and trade unions to develop collective solutions to shared challenges. Specifically, we will engage social partners to ensure that employers and trade unions act as champions for change – helping us to diffuse awareness and implement good practice in workplaces throughout Wales. In particular, we will use the Workforce Partnership Council (WPC) – which brings together employers and trade unions in the Welsh public sector – to consider and agree the further action devolved public services should take as employers. In particular, this will support the delivery of the 'Leadership and Representation' goals and actions in the REAP. The WPC will also play a critical role in ensuring that the voice of Black, Asian and Minority Ethnic workers inform and shape future actions and we will ensure that the new work programme that is developed this year will include diversity, inclusion and anti-racism.

We will take steps to improve workplace compliance with equality law, including through building more effective relationships with the Equality and Human Rights Commission (EHRC) and others. We will consider the development of more effective mechanisms for gathering and sharing intelligence from social partners and others to help detect, deter and remedy non-compliance.

Working with trade unions and employers we will challenge prejudice in the workplace and encourage zero tolerance to workplace discrimination, bullying and harassment from recruitment practices and right through the career ladder. This goes beyond simply fulfilling statutory equality obligations and we will work with our social partners to help employers to proactively recognise the advantages for all of a diverse workforce and working environments that support Black, Asian and Minority Ethnic workers to participate, progress and thrive.

Fulfilling these goals and actions requires a consistent and permanent effort together with honest reflection. Whilst we intend that delivery begins and accelerates through 2021, in many respects there is no end date where an action is delivered with no need for further activity, because there will always be room for further improvement and development.

In addition, given the pace of change in the world of work, we will also need to be attentive to new and emergent risks and opportunities and their disproportionate impact according to race. This underlines the value of framing these goals and actions in the wider context of social partnership and the dynamic relationship it provides to consider and shape our responses to these challenges and opportunities in real-time.

#### Goals

#### Goal 1

We will use our social partnership approach and structures to develop, agree and implement changes in organisational process, policies and procedures aimed at improving fair work outcomes for Black, Asian and Minority Ethnic workers.

#### Goal 2

We will improve workplace compliance with equality law and tackle workplace discrimination, bullying and harassment, from recruitment practices and right through the career ladder.

#### Goal 3

We will support equality, diversity and inclusion and promote anti-racist workplace practices through implementing the fair work agenda.

### Actions, Outcomes and Impact

Goal	Actions	Outcomes and Impact
We will use our social partnership approach and structures to develop, agree and implement changes in organisational process, policies and procedures that improve fair work outcomes for Black, Asian and Minority Ethnic workers.	<ul> <li>During 2021, we will build diversity, inclusion and anti-racism objective into the new work programme of the Workforce Partnership Council (WPC)<sup>19</sup> and better position the WPC to support the actions in the REAP, including developing guidance and best practice across the devolved public sector in support of the REAP.</li> <li>Engage social partners and others to agree mechanisms to identify, diffuse and implement best practice and support the communication of good examples by the end of 2021.</li> <li>Promote ongoing awareness, support and advocacy for the REAP across all levels of the social partnership system, up to and including the Social Partnership Council chaired by Welsh Ministers.</li> </ul>	Fully engaged employers and trade unions as partners in helping to deliver the REAP and in maximising its positive impact on workplaces.  The capturing of worker voice and experience on workplace practices.  Maximising the potential of devolved public services to act as exemplar employers, including improved Black, Asian and Minority Ethnic recruitment, representation and progression across the devolved public sector.
We will improve workplace compliance with equality law and tackle workplace discrimination, bullying and harassment from recruitment practices and right through the career ladder.	<ul> <li>Improve relationships and opportunities for collaboration with the Equality and Human Rights Commission (EHRC) and other relevant enforcement agencies, starting with more effective and meaningful engagement during 2021.</li> <li>Within the next 18 months, develop mechanisms for gathering and sharing intelligence from social partners and others to help detect, deter and remedy non-compliance.</li> <li>Use our levers to improve access to Trade Unions and the support they provide in tackling discrimination, bullying and harassment in workplaces. Engage the Social Partnership Council in overseeing this activity – starting during 2021.</li> </ul>	Fairer workplaces, fewer examples of non-compliant behaviour which is undetected, and individuals empowered to challenge unacceptable workplace behaviours.  More diverse, cohesive and productive workplaces. And a more effective voice and participation for Black, Asian and Minority Ethnic workers in challenging discrimination.

Goal	Actions	Outcomes and Impact
We will support equality, diversity and inclusion and promote anti-racist workplace practices through implementing the fair work agenda.	<ul> <li>In 2021, we will a) develop fair work outcome measures that include metrics on Black, Asian and Minority Ethnic pay, employment and other data (including on gender of ethnic minority people) relevant to the world of work; b) use those measures to inform and shape approaches to fair work over the medium and longer-term and c) continue to listen to peoples lived experiences.</li> <li>Improve the implementation, reach and impact of the Code of Practice on Ethical Employment in Supply Chains by the end of 2021.</li> <li>Ensure equality, diversity, inclusion and anti-racism is embedded in all our interventions to support, facilitate and encourage fairer, more secure and safer workplaces. Engage the Social Partnership Council in providing oversight – starting in 2021.</li> </ul>	An improved understanding and stronger evidence base around fair work issues in relation to race. A firmer grip on the scale of the issues will help to target and focus effective action.  Increased awareness and participation in the Code and fairer supply chains, with more organisations taking action to eliminate Illegal and unethical employment practices.

## Entrepreneurship

Entrepreneurship: Our work encompasses the promotion of entrepreneurship to young people, supporting new business starts and providing advice and support to established small and medium sized businesses. The service is delivered in a collaborative manner between the Welsh Government and contactors, who provide the specialist business advice. We recognise the need for all parts of the service to engage with and meet the needs of individuals from our Black, Asian and Minority Ethnic community.

The current service is designed to offer an inclusive service that recognises and aims to meet the needs and supports the aspirations of individuals that seek to start or grow their business, whether this is working on a self-employed basis, starting a high growth business or sustaining an existing business. There is also recognition and evidence that many individuals from underrepresented groups (in terms of business start-up) may require additional support to develop their business proposal. Where this is the case the service engages in outreach activities to work with individuals or groups within local communities.

As part of the service, advice and support is offered to businesses to review and adopt their employment policies and practices. We seek to influence their approach, encouraging the adoption of Fair Work practices and eliminating discrimination and bias in the recruitment and retention of staff

We recognise that in order to reach out and engage with individuals from the Black, Asian and Minority Ethnic community we need to further attune our communication with individuals and in using role models to ensure that Black, Asian and Minority Ethnic individuals are more aware of and have full confidence in using our services.

We recognise that we can advance the work we currently do and contribute further to realising the change sought in eliminating discrimination.

Our actions aim to build on our current approach of engaging with and supporting individuals wishing to start in business and established business owners from the Black, Asian and Minority Ethnic community.

Goal	Actions	When	Outcome
To ensure that contracted Business Wales services are reflective of the population of Wales.	New tenders to deliver Business Wales services will include a requirement that asks bidders how they aim to reflect the demography of the population they serve in their client base and staffing, in particular for public facing roles such as advisors and mentors.  Requirements built into next Invitation to Tender (ITT) for the delivery of Business Wales services from Autumn 2022.	Medium term	A Business Wales service that actively engages with and reflects the demography of Black, Asian and Minority Ethnic entrepreneurs.
To ensure that our services meet the needs of ethnic minority clients.	Work with representative bodies and individuals to develop good practice for the delivery of services to ensure that delivery is focussed on meeting the needs and supporting the aspirations of BAME clients.  Autumn 2021 – March 2022.	Medium term	A Business Wales service that is culturally confident, better understands intersectionality, and offers an Improved user experience and high satisfaction levels.
Improve engagement with ethnic minority community.	Review our marketing and engagement activities to extend our reach to Black, Asian and Minority Ethnic groups and individuals and that Black, Asian and Minority Ethnic entrepreneurs are well reflected in our publicity.  Review to commence by Summer 2021.	Medium term	Black, Asian and Minority Ethnic community more aware of and confident in Business Wales services.

## Housing

COVID-19 has shone a light both on the importance of a decent, appropriate and affordable home for everyone's mental and physical well-being and every aspect of their lives. The pandemic has also thrown into stark relief the deep inequalities that exist for some people in accessing such homes.

The COVID-19 Socio-economic sub-group looked specifically at housing and accommodation as part of its report in June 2020. The report highlights issues with overcrowding, which disproportionately affects some Black, Asian and Minority Ethnic (herewith ethnic minority) people. The report also points to inequalities faced disproportionately by ethnic minority people in relation to poor housing quality; poor air quality; affordability and a shortage of social housing at local level which meets the diversity of people's needs.

The Steering Group, community mentors and many ethnic minority people and organisations have provided both expertise and lived experience to inform the goals and actions. We have heard very clearly that anti-racism needs to underpin all the action we take; accountability and transparency have to be central to our approach; there needs to be much better engagement with ethnic minority people to inform better policy making and service provision; and there is strong link between poverty and socio-economic disadvantage and the inequality faced in housing and accommodation by ethnic minority people. It has also been emphasised that we need to take into account 'intersectionality', that is how different aspects of a person's identity combine to create different experiences and multiple barriers, including women, disabled people, young people, older people, LGBTQ+ people, religious and non-religious groups and those from lower socio-economic groups.

Central to achieving change is active anti-racism: seeking out and addressing where policies, procedures and delivery cause racial inequality, and proactively building in an anti-racist culture. This relies on cultural change and strong and focused leadership to make race equality a reality, as well as equality, human rights and inclusion more broadly. This must be underpinned by the accountability provided by equalities and human rights legislation and the Well-being of Future Generations Act.

We know that in housing and accommodation, as with all other areas in the Race Equality Action Plan, that there is a need for much better data and evidence, as well as meaningful engagement with the full diversity of ethnic minority people – these will be 'givens' that underpin our approach going forward.

We have heard very powerful evidence of the particular discrimination, racism and inequality that Gypsies and Travellers face, and this is reflected in the Socio-economic sub-group report; there is a specific goal to focus on this. The term 'housing' leads people to wittingly or unwittingly exclude consideration of the needs for significantly more and better quality Gypsy and Traveller sites and access to mobile homes, and it is important to talk not just about housing, but about accommodation and homes, including Gypsy and Traveller mobile homes and sites.

Asylum seekers, refugees and migrants face particular inequalities. Whilst Welsh Government is not responsible for providing housing for asylum seekers (this rests with the Home Office), we have a responsibility to support them from day one of their arrival in Wales. For those who are granted refugee status, we know that discrimination, racism, inequality and systemic factors can pose barriers to accessing suitable housing and the actions in this plan and the Nation of Sanctuary plan seek to address this.

#### Overall Aim

Secure homes, whether bricks and mortar housing, Gypsy and Traveller trailers/mobile homes and sites, or other homes, are fundamental to people's well-being and to every aspect of their lives – including mental and physical health and well-being; educational achievement and opportunity; employment outcomes; and social and cultural well-being. Our overall aim is that ethnic minority people are able to live in decent and affordable homes which meet the diversity of people's needs. To achieve this requires:

- Representation of ethnic minority people within organisations at senior and all levels, reflecting the diversity within the communities those organisations work within;
- Building race equality and anti-racism, including zero tolerance of racism and harassment, into housing sector leadership, employment, policy and service provision;
- Engagement with the diversity of ethnic minority people (especially ethnic minority women) with which organisations work, informing planning and delivery with lived experience;
- A strong emphasis on tackling poverty, which disproportionately impacts on some ethnic minority people and communities.



Goal	Actions	When	Outcome
Representation			
To significantly increase representation of ethnic minority people in senior leadership and at all levels of the workforce within the Housing sector so that they reflect the diversity of the population in which they operate.	Ensure organisations' boards, advisory groups, senior leadership and workforce reflect the diversity of ethnic minority people by:  • working with Black and minority ethnic-led organisations, and partners such as Tai Pawb, Chartered Institute of Housing (CIH), Community Housing Cymru (CHC), WLGA and Cymorth to:  • implement Reflecting Wales in Running Wales; the diversity and inclusion strategy for public appointments in collaboration with Public Bodies Unit specifically in relation to the following goals:  - secure open and transparent recruitment practices.  - get 'Boards on board'.  - strengthen leadership.  - build a community of individuals (in particular ethnic minority women) who are interested, aware and nearly ready for Board membership (i.e. to build a robust pipeline).  • Ensure RSLs, local authorities and third sector support organisations demonstrate how they will ensure anti-racism and race equality are to be embedded within their organisations both as employers and service providers, including initiatives such as the Tai Pawb's Deeds not Words pledge.	Short, medium and long term	Boards and workforces which reflect the diversity of the population.  Workforces reflect the diversity of the population in which they operate.  Anti-racist culture within the Housing sector where it is safe to challenge racism and where support is provided to those who experience racism.  Development path for ethnic minority staff at all levels and Board members.
	Provide anti-racism and zero tolerance training for Boards and staff groups on understanding and challenging racism.	Short, medium and long term	Boards and staff in housing sector equipped to challenge racism and provide support for those that do.
	Ensure the expectations of Registered Social Landlords with regards to representation on Equality, Diversity and Inclusion, which includes anti-racism, are clear in the revised regulatory standards currently being developed.	Short term and ongoing	RSLs reflect the diversity of the communities in which they work in all areas of the business, including recruitment of Board and staff and in the design and delivery of services.

Goal	Actions	When	Outcome
	Ensure Welsh Government housing boards and advisory groups, including the National Housing Support Advisory Group reflects ethnic minority people's voice and representation in the transformation of homelessness services.	Short, medium and long term	National Housing Support Advisory Group will reflect ethnic minority voice and representation as will other Housing boards and advisory groups.
Standards, provision and s	ervices		
To ensure that housing and accommodation standards, provision and services advance race equality, embed anti-racism, equality and human rights, and meets the needs of different and diverse ethnic minority people.	<ul> <li>Work with ethnic minority-led organisations, Tai Pawb, Chartered Institute of Housing (CIH), TPAS Cymru, CHC, and Cymorth and WLGA to:</li> <li>Provide anti-racism and cultural competence training for leaders and staff in relation to service provision for tenants and customers.</li> <li>Provide guidance for organisations to support staff and tenants to understand how to report racism and hate crime and provide support to those reporting (actively involving ethnic minority tenants in its design).</li> <li>Ensure landlords respond quickly to complaints of racism, harassment and hate crime and offer appropriate support.</li> </ul>	Short, medium and long term	Appropriate and immediate response to and support for those experiencing racism and/ or hate crime from the Housing sector.  Culturally competent Housing sector with anti-racism at its core.  Housing and accommodation policy that reflects the needs of the diversity of ethnic minority people.
	Building on literature review undertaken on overcrowding amongst ethnic minority people and communities, scope potential research and/ or analysis to better understand the link between overcrowding in housing and the greater risk from COVID-19 amongst ethnic minority people.	Short and medium term	A greater understanding of overcrowding amongst ethnic minority people in order to seek options to address overcrowding.
	Work with ethnic minority-led organisations, local authorities, RSLs, Shelter Cymru and Citizens Advice Cymru to ensure the information, advice and advocacy needs of ethnic minority people are met in relation to housing and accommodation, including Gypsies and Travellers, ethnic minority women and asylum seekers and refugees.	Short, medium and long term	Better access to information, advice and advocacy for ethnic minority people.

Goal	Actions	When	Outcome
	Ensure the expectations of Registered Social Landlords (RSLs) with regards to standards, provision and services on equality, diversity and inclusion, which includes anti-racism, are clear in the revised regulatory standards currently being developed.	Short term	Registered Social Landlords understand what is expected of them in terms of anti-racism and demonstrate that they are achieving this.
	Work with local authorities (LAs) to develop new guidance for Local Housing Market Assessments (LHMAs). To include:  • enabling analysis of the housing needs of key groups (Black, Asian and minority ethnic people, disabled people, homeless people, older people, those with mental health conditions, ethnic minority women, etc.) within the LA to understand the availability of appropriate housing and the estimated future need and therefore what is the shortfall, if any, for each key group.  • Welsh Government to give all LAs training and ongoing support.	Short, medium and long term	Local Housing Market Assessments which capture the needs of local communities including the diversity of ethnic minority people.
	Ensure that the LHMAs, and their assessment of needs for ethnic minority people and other groups inform the prospectus as part of the Social Housing Grant programme monitoring.		

Goal	Actions	When	Outcome
	Ensure equality for ethnic minority people, specifically addressing any barriers particular ethnic minority people/groups/women face to ensure equality of access, provision and outcome in provision of homelessness services and homes. This will include:  • making race equality an integral and focused	Part of 3-5 year transformation	Housing and homelessness services that meet the needs of ethnic minority people.
	aspect of the transformation of homelessness services (including future consideration of priority need and allocations) and ensuring success in addressing the needs of ethnic minority people is built into the evaluation of the transformation.		
	Ensure the policy and legislative framework supports the commissioning of culturally sensitive housing and accommodation-related support services to meet the needs of diverse ethnic minority people.		
	Ensure that all guidance to Local Authorities, such as the Rapid Rehousing guidance or Code of Guidance on allocations, includes consideration of the full diversity of ethnic minority people.		

Goal	Actions	When	Outcome
	Continue our implementation of our work to support those with No Recourse to Public Funds and EU Citizens who have not yet applied for EU Settled Status to access shelter and the services which they are entitled to receive. To include:  - Training delivered to 400 local authority housing and social services officers to ensure they understand rights of migrants, including those with No Recourse to Public Funds.  - Guidance published for local authorities to ensure they understand legal routes to support for those with No Recourse to Public Funds.  - Funding provided to the Third Sector to help expand and professionalise 'hosting' arrangements for those with a realistic prospect of achieving leave to remain.  - Shared housing schemes explored with housing providers and the Third Sector to find innovative ways to support homeless migrants.	Short and medium term	Fewer migrants will be homeless in Wales and vulnerable to exploitation.  Refused asylum seekers will be able to access legal advice to understand their prospects for achieving refugee status.  Local authorities will better understand their obligations and opportunities to support migrants in Wales.
	Over next 5 years  Ensure that the reviews of housing and related legislation and policy in the next Senedd term, including on homelessness and allocations, fully consider and embed the needs of the wide diversity of ethnic minority people.	5 years	The policy and statutory framework for homelessness meets the need of diverse ethnic minority people.

Goal	Actions	When	Outcome
Private rented sector			
To ensure that private rented sector (PRS) housing and accommodation and service provision advances equality, embeds anti-racism and meets the needs of different and diverse ethnic minority people.	Develop a Private Rented Sector Action Plan improving the quality of the sector, which has anti-racism at its core. To include:  • Further research into the prevalence of racism and discrimination in the PRS and determine options to address this (including potential legislation, policy and delivery).  • Review of the support provided to tenants to access and sustain tenancies in the PRS, including whether it is meeting the needs of ethnic minority people.	18 months	Better understanding of the scale of the issues and barriers within the private rented sector in order to prioritise actions to address.  Understanding of the standard of PRS stock, and options to take forward to address.
	<ul> <li>Determine options for improving property standards (including the scale of overcrowding) in the PRS, and the role and ability of local authorities to enforce standards in the PRS.</li> <li>Consider options and levers for ensuring the affordability of accessing and sustaining tenancies in the PRS for those on lower incomes.</li> <li>Work with stakeholders to strengthen anti-racism information, advice and training to landlords, agents and tenants in the PRS.</li> </ul>		Greater understanding and confidence for landlords and agents to tackle racism.  Support in place for tenants experiencing harassment, racism and hate crime.

Goal	Actions	When	Outcome
Engagement and Commur	nication		
To ensure accessible engagement with ethnic minority people across Wales to ensure that Welsh Government policies reflect the diversity of ethnic minority people's needs and priorities and that ethnic minority people have voice and influence in relation to housing and accommodation.	Ensure Housing and Regeneration Directorate communications and communications campaigns engage ethnic minority people in their design and roll out, and ensure ethnic minority-led organisations and ethnic minority people are involved in monitoring and evaluation.	Short, medium and long term	Housing and Regeneration communications reflect the diversity of ethnic minority people in Wales and tackle racism and harassment.  Ethnic minority people, regardless of experience or language or gender understand their housing options, systems, rights and expectations.
	<ul> <li>Ensure ethnic minority tenants have channels to voice concerns, challenge and influence by:</li> <li>Working with ethnic minority-led organisations and partners including Tai Pawb, Cymorth, CIH, CHC, and TPAS Cymru.</li> <li>Ensuring the expectations of Registered Social Landlords in terms of engagement and communication on Equality, Diversity and Inclusion, which includes anti-racism, are clear in the revised regulatory standards currently being developed.</li> </ul>	Short, medium and long term	Ethnic minority tenants are listened to and have influence over services.
	Supporting our approach to closer alignment of accountability for tenant services in both local authorities and RSLs (Domain regulation), to work with ethnic minority-led organisations, WLGA, CHC, and TPAS to ensure the collection and publication of ethnic minority tenant involvement data to help understand and remove barriers to tenant involvement.	18 months	Better involvement and influence of ethnic minority tenants over services.

Goal	Actions	When	Outcome
	Work with ethnic minority-led organisations, Tai Pawb, CIH, CHC, WLGA and ethnic minority people to understand how further steps towards Domain regulation (i.e. regulation of local authorities as well as RSLs) can further benefit ethnic minority people and communities, and act on this.	3-5 years	Domain regulation will incorporate anti-racism.
To recognise that safe, culturally appropriate accommodation is necessary in order for individuals to flourish in other parts of their lives and to address the lack of site provision and poor quality of Gypsy and Traveller accommodation in Wales.	Review the current funding policy for Gypsy and Traveller sites and assess its effectiveness, with a view to piloting additional or new ways of funding site provision, including support for private sites.	18 months	More accessible and flexible ways of accessing culturally appropriate site provision.
	Re-draft the Sites Guidance to ensure that the design and location needs of communities are better reflected in this document.	18 months	Local authority owned sites that are tailored to the needs of the communities.  The location and quality of both permanent and temporary sites is in parity with other forms of social housing.
	Support local authorities, both individually and on a regional basis to ensure that they provide transit sites in North and South Wales by April 2023.	18 months	Transit sites in North and South Wales.
	Commission a national training scheme for Welsh local authority housing options teams, and other relevant professionals, to improve the approach taken and support offered to community members seeking help for homelessness and accommodation issues by creating Gypsy and Traveller "champions" or "leads" in each authority.	18 months`	Local authority staff who are informed and culturally sensitive to the accommodation needs of Gypsies and Travellers.

Goal	Actions	When	Outcome
	Ensure existing legal mechanisms are fully utilised to ensure compliance with existing legislation.	18 months	
	<b>3 years</b> Pilot additional or new ways of funding permanent site provision.	3 years	
	Explore the potential for a mobile home rental scheme run through social housing in order to improve quality and cost of rental provision in Wales.	3 years	Improved and increased accommodation provision that is accessible, affordable and tailored to the needs of Gypsies and Travellers.
	Continue to run a regular stakeholder meeting to inform Welsh Government actions and policy making.	3 years	Frequent and ongoing engagement between Welsh Government and stakeholders, resulting in strong, honest and open relationships.
	5 years  Create a national network of transit provision to facilitate travelling life, with consideration for negotiated stopping, as appropriate.	5 years	A national network of transit provision in Wales.
	Provide learning and development support to Local Authority Elected Members on Gypsy and Traveller communities' culture, needs and strengths.	5 years	Elected members are informed and sensitive to the needs of Gypsies and Travellers.  Racist language, sentiment and actions towards the Gypsy Traveller communities are not tolerated and widely condemned.

## Culture, Heritage and Sport

#### **Narrative**

Culture, heritage and sport are fundamental to people's identities. They reflect the values, beliefs and attitudes that define us as people and inform how we relate to each other. They positively express both our origins and who we are today; but sadly misconceptions or ignorance of the rich diversity of our culture and society also inform perceptions which drive inequality and can also impact on our health and well-being, as people and as a nation. The Welsh Government works with a number of culture, heritage and sports bodies to deliver policies and services for the people of Wales. These include a number of sponsored bodies (the Arts Council of Wales, Sport Wales, Amgueddfa Cymru - National Museum Wales, the National Library of Wales and the Royal Commission on the Ancient and Historic Monuments of Wales) and several Welsh Government Divisions, who are either responsible for the direct delivery of services (such as Cadw), or for supporting the wider sector (Culture and Sport Division and Creative Wales). Together, all of these bodies work to promote and encourage active participation in the rich and diverse cultural, heritage and sporting life of our country.

Culture, heritage and sport can be powerful vehicles for expressing our unity and cohesion, celebrating our shared inheritance and even our achievements and successes. For example, in elite sport, Wales is frequently a high achiever on the global stage – but as we collectively share in the success of our rugby, football or athletics teams, their diverse racial and ethnic foundations are frequently overshadowed by the spectre of racism, both in person or through social media. Differences in our culture and heritage can often be used to define those who are considered to be 'insiders' and 'outsiders'. An attitude can form that only those with a so called 'indigenous' ancestral heritage, can truly aspire to a Welsh or British identity. Anyone else can be excluded from the privilege of 'belonging' and from the benefits of 'insider' status

Yet the make-up of Welsh society is far more complex than these simple stereotypes might imply. In reality, we benefit from a rich cultural mix; people from many different cultural backgrounds have lived alongside each other for generations. However, a negative perception can still prevail, often unconsciously, that if you are not white, or do not conform to certain cultural 'norms', then you are not part of 'us'. If such attitudes are not challenged, they can sit at the very heart of personal and institutional racism.

A celebration of our diverse and shared culture and heritage, valuing the global influences and perspectives that have helped shape our society, and encouraging active and equal access to participation in all forms of culture, heritage and sport, can be a powerful challenge to this narrative. In fact this is not just desirable, it is set out in legal obligations. International law and laws specific to Wales place binding obligations on public bodies and authorities to protect and promote equality and diversity and to ensure that these rights can be enjoyed freely and equally by all members of society.

Article 22 of the Universal Declaration of Human Rights states, 'Everyone [...] has the right to [...] social and cultural rights indispensable for his dignity and the free development of his personality'. Article 27 states that, 'Everyone has the right freely to participate in the cultural life of the community'. The International Covenant on Civil and Political Rights develops these ideas. For example, Article 27 states that, 'Minorities have the right to enjoy their own culture, to profess and practise their own religion, and to use their own language'. Closer to home is the Well-being of Future Generations (Wales) Act 2015. The Act places an obligation on named public bodies to work to achieve the seven goals that are set out including: A Wales of Vibrant Culture & Thriving Welsh Language – A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation. The Welsh Government has also adopted the UN convention on the rights of the child, which defines several directly relevant rights, including those relating to non-discrimination, freedom of thought, conscience and religion, minority and indigenous groups, and play and cultural and artistic activities.

The goals and actions in this plan are intended to acknowledge and combat past and present disadvantages experienced by Black, Asian and Minority Ethnic groups (henceforth referred to as ethnic minority groups); to eliminate discrimination and barriers to the full enjoyment of rights in all aspects of culture, heritage and sport; and to recognise and celebrate past and present racial and ethnic diversity in Wales.

In the deep dive policy session, evidence of lived experiences was shared, and a belief was expressed that public bodies have been cautious, and sometimes resistant to supporting and representing diverse ethnic minority groups, due to actual or perceived restrictions on use of public funds for 'political' or religious programmes. It was suggested that this may have inhibited freedom of expression and consequently may even have caused their failure to meet legal commitments.

Ethnic minority groups, (especially ethnic minority women) often feel that, to a disproportionately large extent, they have been left to fend for themselves and have had little choice but to develop cultural and sporting activities in isolation, unfunded and unsupported. While enabling a degree of freedom and autonomy, the barriers faced in accessing funding and facilities inhibited continuity, expansion and improvement. To counter this, financial support and designated resources from the public sector and public funded bodies, to support the development of ethnic minority initiatives, are vital to encourage and engage creativity and talent.

In the subsequent round-table session, there were discussions about the challenges faced in relation to the freedom to express identity through language, and the right of successive generations to have opportunities to learn about their unique and valued cultural inheritance, origins and ancestry. The importance of this theme to other aspects of the plan was emphasised, as contributing to a much wider sense of societal health and well-being. At this session, there was general support for the emerging goals and actions but several challenges were highlighted regarding their implementation. For example, it was stressed that ownership of the cultural narrative was critical. The concept of 'them' as beneficiaries and 'us' as benefactors, had to be challenged, keeping the principles of rights as paramount and avoiding the trap of telling ethnic minority people's cultural or heritage stories through the filter of a different 'lens' or perspective. Existing plans and policies (including race equality schemes and equality impact assessments, as well as the ongoing development of funding contracts linking an offer of Welsh Government support to commitments that deliver against the Future Generations well-being goals), offer a framework for culture, heritage and sport to play a unique role in bridging the divide between communities; building trust and developing a shared experience.

Our sponsored bodies have been actively involved in discussions to develop these goals and actions and are already taking steps to deliver anti-racist measures and promote race equality. To give just a few examples:

- The Arts Council of Wales is recruiting an Agent for Change to transform how it engages with and develops opportunities for people from ethnic minority backgrounds and deaf and disabled people, to enjoy, take part and work in the Arts.
- The National Library of Wales is running a project to decolonise cultural assets and working practices.
- Amgueddfa Cymru National Museum Wales issued a statement in response to the Black Lives Matter movement on its website, with a Task and Finish Group set up to review delivery on the commitments made in the statement.
- Sport Wales launched the #TellYourStory campaign, encouraging people from ethnic minority communities to share their knowledge and understanding of accessing, being involved in, or being excluded from sport, without criticism or prejudice. More information is available at https://www.storiesmatter.co.uk/

Several of our sponsored bodies are also members of the Wales Public Body Equality Partnership which will launch its shared strategic objectives in 2021.

To build on this, strengthening the commitment to anti-racism, to the rights outlined in the Vision setting for REAP and to the values of transparency and openness, and value of lived experience, there is a need to look at all policies and processes to consider how institutional racism is currently acting as a barrier to equal outcomes for ethnic minority communities.

The intention is that the goals and actions set out below are not simply transactional in their ambition but transformational and able to deliver demonstrable changes – practice leading to equal outcomes for ethnic minority people (including for ethnic minority women in particular) and equitable access to cultural, heritage and sporting activities will improve outcomes for all protected groups and so support best practice. Further discussions would be required, with the organisations mentioned below and with other stakeholders, to identify and agree specific roles. These will vary, on a case by case basis (e.g. they could involve discussions to inform the scope or development of work needed, or leading / participating in delivery activity, or in some cases taking responsibility for specific goals or actions).

Goal	Actions	When	Outcome
1. Accountability			
To hold public bodies we are responsible for accountable for the delivery of anti-racist measures and actions, as set out in this action plan.	Collectively establish clear leadership and performance indicators for anti-racism by governing bodies and nominated senior leaders, to which they are held accountable to as part of their performance reviews.  Establish working environments which are both highly inclusive and diverse.  Take action to increase ethnic diversity in the workforce at all levels, and specifically in leadership teams and on boards, as well as in paid and unpaid planning, design, curation and decision-making roles.  Identify what data is needed and agree across public bodies how they will be collected and trusted.  Publish what success will look like (for each relevant body), with clear intent and relevant metrics.	bodies are held to account.  A quantifiably more diverse board, senior management and workforce.  Long term  Diverse and inclusive working env.  Identified data (hard and lived expecollected and used intelligently.  Quantifiably improved user satisfact processes for dealing with discrimic coupled with a significant reduction in complaints of racist practice.	bodies are held to account.  A quantifiably more diverse board, senior management and workforce.  Diverse and inclusive working environments.  Identified data (hard and lived experience) collected and used intelligently.  Quantifiably improved user satisfaction with processes for dealing with discrimination, coupled with a significant reduction
	Review existing systems for reporting, escalating, investigating and dealing with complaints of discrimination; updating or amending them as needed to ensure they are fit for purpose, trusted, transparent and fully effective – including in the identification and elimination of all forms of racial discrimination. These systems should protect our workforce, service users and members of the public and cover employment, contracted arrangements or contact with any aspect of our functions or policies.  Encourage whistleblowing and implement effective mechanisms for communicating the above measures to all relevant parties.  Promote anti-racist practice and principles within our organisations – for example as a core component of professional learning and development, raising awareness of issues such as racial discrimination, assumed privilege and unconscious bias, and of the effects of structural racism in the workplace and in service delivery.	Short term	All employees understand what anti-racism is and take responsibility for their privilege and unconscious bias.

Goal	Actions	When	Outcome
2. Funding			
To work with the public bodies we fund to use their spending powers to embed anti-racist practice, facilitate equality of access and outcomes, and maximise	Undertake detailed financial assessments (including of workforce expenditure) and report on how funding resources are currently being used to eliminate racial discrimination, address historical disadvantage and provide support for ethnic minority people in cultural and sporting activities at local, regional and national level.  Use all the levers available to embed anti-racist	Short term Medium term	Report on these assessments within 12 months, including recommendations for concrete, quantifiable action.  Quantifiably improved ethnic minority people's access to / applications to / use of funding schemes / services offered.
participation for ethnic minority people.	practice, facilitate equitable access and equal outcomes, and maximise participation of previously underrepresented groups.	Short term Medium term	Quantifiably improved access to services by ethnic minority women and girls.
	Identify a specific ring-fenced resource to support grassroots cultural, creative and sporting activities among ethnic minority groups, taking account of intersectional disadvantages, specific issues relating to community languages and the most disadvantaged groups (e.g. Asylum seekers and Gypsy, Roma and Travellers).	Short term	
	Identify a specific programme of support for the participation in active lifestyles of women and girls from Black, Asian and Minority Ethnic groups, again taking account of intersectional disadvantages, languages and the most disadvantaged groups.	Short term Medium term	Standards published within 12-24 months.
	Work with funding bodies to develop co-designed standards for collaborative invitations for bids from small organisations across Wales, ensuring they facilitate equitable access and generate a genuine improvement in outcomes for ethnic minority groups.	Medium term	
	Where funding schemes aimed at small organisations already exist, to review the processes (including the way in which applicants are supported in making applications) and standards in place and ensure they facilitate equitable access and outcomes for ethnic minority organisations.	Short term Long term	Existing schemes reviewed within 12 months and outcomes published, including recommendations for change.

Goal	Actions	When	Outcome
	Gather and use data (hard and lived experience) and insight to evidence the impact and learning from investments, to inform future action and to develop informative practice around what does and doesn't work.	Short term Medium term	
3. Celebrating Cultural Dive	ersity		
To support all parts of the society in Wales to embrace and celebrates its diverse cultural heritage while understanding, and recognising the right to, freedom of cultural expression	Collaborate with and support community-based organisations to provide opportunities for ethnic minority individuals, women and groups to express their creativity, heritage, language, cultural identity and origins, encouraging and enabling community-led grassroots action.  Identify opportunities to pump-prime support for a cross-community programme of small-scale activities that allow people to come together to celebrate our diverse but shared cultural heritage.	Short term Medium term  Short term Medium term	Individual and across cultural activities are enabled and realised, locally and across Wales. Tourism for Wales reflects a positive image and an anti-racist image of the diverse groups and communities that are Wales. Creatives (and especially women) from the ethnic minority groups are supported and thriving, adding to the rich tapestry of the arts in Wales.
	Work with tourism partners to ensure that actions and marketing are anti-racist and truly reflect the true depth of our diverse cultural heritage, while avoiding stereotyping and cultural appropriation.  Work with all appropriate partners, including the creative industries and arts bodies, to support, promote and cultivate the visual and performing arts of ethnic minority groups, including both traditional forms and the rich body of contemporary street art, fashion, poetry, dance and music.	Short term Short term Medium term	Connected with the global culture, heritage and sports communities in a way that is anti-racist and not extractive.
	Connect with culture, heritage and sport organisations internationally (specifically in the Global South) to encourage engagement with and appreciation of diverse histories, languages and cultures.	Medium term Long term	

Goal	Actions	When	Outcome			
4. The Historical Narrative	4. The Historical Narrative					
To work with public bodies to fully recognise their responsibility for setting the historic narrative, promoting and delivering a balanced, authentic and decolonised account of the past – one that recognises both historical injustices and the positive impact of ethnic minority communities.	Review and appropriately address the way in which people and events with known historical associations to slavery and colonialism are commemorated in our public spaces and collections, acknowledging the harm done by their actions and reframing the presentation of their legacy to fully recognise this.  Implement new ways of telling the stories through the lens of Black, Asian and Minority Ethnic people (including women) in our galleries, museums and collections, celebrating their contribution and recognising their presence in the history of Wales.	Short term Medium term  Short term Medium term	Events and known historical associations to slavery and colonialism are portrayed in an anti-racist way- one that recognises historical injustices.			
	Take action to lift the barriers to heritage and cultural collections across Wales, through delivering and promoting innovative and engaging experiences relevant and relatable to Black, Asian and Minority Ethnic communities.	Short term Medium term Long term				
	Require the relevant responsible bodies to report on how they will review and redesign the narrative in a way that is informed by the lived experiences of users from ethnic minority communities across Wales.	Short term Medium term				

Goal	Actions	When	Outcome
5. Education and Learning			
Identify and meet targets for Welsh Government and sponsored bodies to deliver learning, educational, interpretation and marketing materials that recognise and celebrate the rich and diverse cultural mix of our society, encourage widespread physical and intellectual engagement and promote anti-racist practice and principles	Review web and social media content to improve visibility and encourage accessibility – seeking out and working with Black, Asian and ethnic minority groups and individuals, to uncover untold stories and celebrate success.  Improve dissemination through a wider range of networks and channels, using a wider range of materials and methods to delivery and support engagement.  Support programmes that facilitate new ways to engage, that enrich and support experiential learning and enable Black, Asian and Minority Ethnic people to engage in cultural and sporting activities – e.g. through appropriately funded and structured volunteering programmes.	Short term Short term Medium term Short term Medium term	Delivered learning, educational, interpretation and marketing materials that recognise and celebrated diversity and encouraged anti-racist physical and intellectual engagement.
throughout.	Build on and link the stories of Black, Asian and Minority Ethnic people within existing educational and cultural programmes, including the Curriculum for Wales, Hwb, and the People's Collection Wales.	Short term Medium term	

# Crime, justice, hateful attitudes and community cohesion

The criminal justice system is frequently identified as an area in which there has been "manifest and increasing racial injustice"<sup>20</sup>.

Whilst much of criminal justice policy is not devolved in Wales, the worrying statistics about over representation of Black Asian and Minority Ethnic individuals within the courts and prison system, under-representation of these communities within the judiciary and an alarming increase in recorded race-based hate crime<sup>21</sup>, demonstrate the need for the Welsh Government to use what power and influence it does have to affect much needed change.

Article 7 of the International Convention on the Elimination of All Forms of Racial Discrimination creates an obligation to adopt immediate and effective measures, particularly in the fields of teaching, education, culture and information, with a view to combating prejudices which lead to racial discrimination, as well as to propagating the purposes and principles of the Charter of the United Nations, the Universal Declaration of Human Rights, the United Nations Declaration on the Elimination of All Forms of Racial Discrimination, and the Convention. We are mindful of the role the Criminal Justice Systems plays in meeting this obligation, particularly in challenging racist attitudes and behaviours.

The Welsh Government is responsible for services which intersect with the causes and consequences of the perpetration and the experience of crime; these include mental health services, some policy funding, violence against women, domestic abuse and sexual violence, community cohesion and addressing hate crime. As the Wales Centre for Public Policy set out, we are also able to "encourage holistic and preventative approaches to tackling and reducing crime and promoting rehabilitation through [our] direct control over and funding of a range of services, including health, education, children's social care, housing and homelessness, and youth and community services".

The section below outlines key areas of work where the Welsh Government can lead or influence change. These high level goals and actions are supported by the cross cutting actions outlined earlier in the Plan. In his 2017 review, David Lammy recommended an 'explain or reform' principle be used to address racial disparity within the criminal justice system. He recommended that where "agencies cannot provide an evidence-based explanation for apparent disparities between ethnic groups then reforms should be introduced to address those disparities."

Whilst we do not have levers at our disposal to apply the principle across the Criminal Justice System, we are mindful of the WCPP recommendation that we apply this principle to devolved areas of competence. The introduction of a Race Disparity Unit may provide the evidence we need to put this principle into practice for Wales and it is clear from stakeholder feedback and evidence that strengthened data is key in identifying trends in potential racial disparity or disadvantage and taking effective action. Such an aim will form an important part of the scoping exercise for the unit.

An important element of this chapter is the experience of Black Asian and Minority Ethnic individuals as victims of crime; specifically race-based hate crime. Recorded racist incidents represent only a small percentage of the hate based instances, racially aggravated experiences and so-called micro-aggressions which are experienced by Black, Asian and Minority Ethnic communities in Wales.

Racism and associated hate actions, attitudes and behaviours create divisions and fuel conflict. Racist hate crime and behaviours damage people and damages the country that we live in. They prevent us from discovering, valuing and enjoying and celebrating difference in our society.

The Welsh Government sees community cohesion, hateful attitudes and hate crime as comprising a continuum. Stakeholder feedback is clear that recorded hate incidents should be seen as "the tip of the iceberg" and that such behaviour only occurs when supported by racist attitudes and values that are held, not only by an individual, but perceived across society. In order to effectively tackle hate crime we must also address hate based attitudes and values, the rise of populism and the apparent normalisation of overtly racist language. On this basis, this chapter contains actions that focus on campaigns and awareness raising around the impact of hate crime.

We are always striving for cohesive communities across Wales. Our vision is for a Wales where everyone is respected and valued and where we can enjoy and celebrate our differences, a country and society where everyone feels a sense of belonging and where racially motivated intolerance, hatred, divisive actions and behaviours have no place.

Community cohesion is the process that must happen to ensure different groups of people get on well together in the area. A cohesive community is an area where those from different backgrounds share positive relationships, feel safe in the neighbourhood and have a sense of mutual respect and shared values.

Where cohesion is not achieved, tensions and hateful attitudes can emerge. In extreme circumstances these attitudes breed hate crimes and even acts of terrorism. However, it is important not to focus only on these catalyst actions but also address the prevailing hateful attitudes which can be corrosive to relations between groups and individual well-being.

Hate crime and hateful attitudes cannot be tackled by a few people alone, it requires a collective approach. It requires people and organisations across the whole of Wales to recognise the damage done to victims of it and the need to address the actions and attitudes of perpetrators.

The Welsh Government calls on the people of Wales to stand together to call out and address racism, racist hate crime, hateful behaviours and attitudes. Reporting and tackling hate crime should not be left solely to the victims. We all share the society we live in, we therefore all have a responsibility to call out and eliminate hate crime and hateful attitudes. In equal measure we will seek to promote and celebrate diversity, educate and celebrate kindness and respect with the aim these positive behaviours will always win over hate and injustice.

We will ensure people who experience or witness hateful and racist abuse are aware of how to report it and have increased confidence in doing so. We will continue to work with communities and partners across Wales to make it easier for people to do this and also to ensure they get the support they need. We will do everything we can to enable to this and to ensure those who commit these crimes face justice.

Hate crime can dehumanise both victims and perpetrators. For perpetrators, whilst punitive measures can go some way to offering solutions, in the long term there must be opportunities for them to understand the impact of their action and interrogate their belief system. We work with perpetrators, in a similar way to the successful programmes in place for perpetrators of other forms of abuse such as accredited community based domestic abuse services

The Welsh Government has operated the Community Cohesion Programme since 2012 and the National Hate Crime Report and Support Centre since 2014. Over the years since, our programmes have grown in their impact and importance. Recorded hate crime in Wales has roughly doubled in the last 5 years and debate in the media and online seems increasingly polarised and aggressive. There is room for optimism too as more people than ever in Wales report belonging to their community and that people in their area treat each other with respect. Nevertheless, there is much more to be done to ensure Wales. is an anti-racist country. Race hate crimes comprise almost 70% of all hate crimes recorded in Wales and perhaps as many as half of all hate crimes go unreported for a variety of reasons.

The actions below will help us to redouble our efforts to address hateful attitudes before they lead to hate crime but also better support victims where crimes take place.

Goal	Actions	When	Outcome
For Wales to be an anti-racist country which feels a safe place to live by eliminating hateful attitudes and supporting victims of racially motivated hate crime.	Raise awareness of the impact of race hate crime through a series of communication campaigns. These campaigns will address perpetrators and bystanders. Campaigns will build awareness of what racist hate crime looks like, how to be anti-racist when incidents occur, and where to find support and advice. Campaigns will be developed with those who have been affected by racist hate crime. Our first campaign 'Hate Hurts Wales' is due to launch in March 2021. Campaigns will continue through the timeframe of the plan.	Short term Medium term	Bystanders will better understand hate crime and be motivated to act in an anti-racist way in support of victims.  Hateful attitudes will be seen as socially unacceptable.  Perpetrators will fear prosecution and understand the impact of their actions.
	Enhance our support and advocacy for those who have experienced racist hate crime through a refreshed Wales Hate Support Centre.	Short term	More victims will feel confident taking their abusers to court or finding an alternative suitable outcome.  Increased prosecutions will raise awareness of the problem and will inhibit potential perpetrators.
	Undertake direct work with hate crime perpetrators to better understand how to reduce racial abuse.	Medium term	We will better understand effective ways to convert potential and convicted perpetrators to anti-racist members of society.  Converted perpetrators will help us to convince others not to make the same mistakes that they did.
	Identify and propose improvements to hate crime law and processes through the Hate Crime Board Cymru.	Short tern	% of WHSC supported victims satisfied with the outcome of their hate crime case should improve over time.  Evidence-based advocacy supported by pilot projects should lead to better UK Government policy decisions.

Goal	Actions	When	Outcome
	Counter online racist hateful attitudes	Medium term	Participation in HateLab will better increase the visibility of racist attitudes online. It will enable us to test approaches to understand what works in disrupting spreading hateful content.
Tackle racism through building cohesive and integrated communities.	Enhance our support in building community cohesion through a review of successes and areas for improvement in our Community Cohesion Programme.	Short term Medium term	Our Community Cohesion Programme will be underpinned by a more consistent, evidence-based approach. This should increase the impact of the Programme. We would expect people to feel more belonging to their area and perceive better community cohesion.
	Community Cohesion Programme will focus on events and activities which foster good relations between groups through reducing segregation and increasing empathy and understanding.	Short term	% of people agreeing that they belong to their local area; % who agree that people from different backgrounds get on together; and % who agree that people in the area treat each other with respect should all increase.
	Ensure Cohesion teams act as conduits between communities and public bodies to promote participation in policy-making and equality of opportunity for ethnic minority communities.	Short term	Policy-making should be more inclusive of ethnic minority communities.  Ethnic minority communities should feel more engaged in policy-making processes.
	Undertake research to capture the views of the Welsh public in relation to community cohesion and hateful attitudes.	Short term Medium term	Research will increase our understanding of whether our actions are having the positive effect that we intend.  We expect to see measures of community cohesion to increase and confidence to report hate crime to increase.  We expect to identify better methods to mitigate hateful attitudes online and offline.

Goal	Actions	When	Outcome
We pledge to work together with devolved and non-devolved partners to address the over representation	Through Criminal Justice in Wales we will work to better understand and address race disproportionality and its causes across the criminal justice system, including the youth justice system in Wales.	Short term	Race Equality Delivery Group to confirm outcomes.
of Black, Asian and Minority Ethnic people in the criminal justice system, and the underrepresentation of Black, Asian and Minority Ethnic people working within it. Our collective aim is that everyone who comes into contact with the criminal justice system will receive equal treatment and equal outcomes, whatever their ethnicity'.	We will work with the Criminal Justice in Wales Delivery Group to develop a Race Equality Delivery Plan which will address the over-representation of Black, Asian and Minority Ethnic people in the criminal justice system, the under-representation of Black, Asian and Minority Ethnic people working within it, and strengthen relationships between the criminal justice system, including the police and CPS, and Black, Asian and Minority Ethnic communities in Wales.	Medium term	The Delivery Group will determine and articulate the outcomes.
	We will listen to the personal experiences of Black, Asian and Minority Ethnic people involved in the criminal justice system (including victims, witnesses, prisoners, defendants etc.) in order to better meet their needs through the Race Equality Delivery Plan.	Short term	Will lead to a more consistent and evidence based approach to the development of actions to address the issues.  Black, Asian and Minority Ethnic communities may feel more engaged in the criminal justice policy making process.  Improved relations between Black, Asian and Ethnic Minority communities and the criminal justice system.
	We will ensure all aspects of the Female Offending and Youth Justice Blueprints take account of racial inequalities within the criminal justice system and consider how disparity can be addressed through intervention and prevention strategies.	Short term	Develop an understanding of Black, Asian and ethnic minority women's lived experiences within the Criminal Justice System in order to inform and develop a programme of work.  Activities carried out under the Blueprints will consider racial inequality and utilise opportunities to address disparities.

Goal	Actions	When	Outcome
	We will encourage the Interim Youth Work Board to include anti-racist practice and identification of the specific needs of Black Asian and Minority Ethnic children and young people as they develop their final report (due in Summer 2021).		The report of the Interim Youth Work Board will have considered anti racist practice and the specific needs of Black Asian and Minority Ethnic children and young people.
	The Welsh Government will display support for Gypsy and Traveller communities by rejecting any anti Gypsy and Traveller policy that would criminalise or attempt to force more Gypsy and Traveller communities away from traditional ways of life.		We will aim first to dis-apply the proposed legislation for Wales.  If this is not possible we will consider how the impact of the legislation can be mitigated in Wales (relying heavily on proposed actions within the housing and accommodation chapter).
We will ensure specialist support for Black Asian and Minority Ethnic people affected by Violence Against Women, Domestic Abuse	Work with the Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) sector in Wales to develop a sustainable and long-term funding strategy for specialist support services (including ethnic minority women) in Wales, during, and beyond the Coronavirus pandemic.	Short term	Outcomes to be identified and included in new National Strategy.
and Sexual Violence is available across Wales.	Ensure that there is awareness and understanding of honour based abuse within practicing communities as well as in the wider community.		Outcomes to be identified and included in new National Strategy.
	Increase cultural and religious awareness of specific needs of different groups particularly ethnic minority women and girls within existing perpetrator programmes via practitioner training, to enable effective cross-cultural working and to ensure the experiences of women and girls are understood.		
	Welsh Government and Honour Based Abuse Leadership Group to work with Black, Asian and Minority Ethnic organisations to identify and address the ongoing needs of the communities in relation to honour based abuse, forced marriage and Female Genital Mutilation, which particularly affect women and girls.		Outcomes to be identified by Group.

Goal	Actions	When	Outcome
We will ensure members of the Black, Asian and Minority Ethnic communities access the advice they need to resolve social welfare problems.	Through the Single Advice Fund grant funding has been made available for the provision of information and advice services. The Single Advice Fund service delivery model includes Access Partners and Advice Partners. Access Partners are a wide range of 3rd sector organisations, including groups who support/represent the Black, Asian and Minority Ethnic communities, who are reaching out to their service users to ensure they understand how they can access the advice they need.		Black, Asian and Minority Ethnic communities access their social welfare rights.

### Welsh Language

Our vision for the Welsh language is expansionist and inclusive: Welsh is a language for all and a way of uniting people from different backgrounds. Learning new languages can make us as individuals more open to other cultures. We celebrate the linguistic diversity of Wales and that learning and using a second or third language can enrich people's lives.

As a nation we have begun a journey towards reaching 1 million Welsh speakers by 2050 and doubling the daily use of Welsh. At the last Census in 2011 around 10,000 of the 562,000 people who said they could speak Welsh were from ethnic minority communities. We want to see this number increasing, and we will work with our partners to promote access to Welsh-medium education and opportunities to use Welsh among ethnic minority communities. In doing so we will listen to, and learn from, the lived experiences of Welsh-speakers from ethnic minority communities.

As part of the expansion of Welsh medium education in line with the Cymraeg 2050 strategy, we want to raise awareness and encourage increased take-up of Welsh medium education by ethnic minority children whether the Welsh language is their first second third or other language. This is to ensure equality of access for all to Welsh medium education and services, and includes from the early years, statutory education period, post 16 and further education as well as Welsh for adults.

Goal	Actions	When	Outcome
To better understand the barriers and opportunities for ethnic minority people, and so remove barriers and increase access to the Welsh language by ethnic minority communities in the areas of education, language learning, the workplace and community activities for both children, young people and adults.	Commission research to understand the lived experience of the c.10,000 Welsh speakers from ethnic minority communities living in Wales to inform future actions to eliminate racism in Wales.	Short term	A better understanding of the current picture in terms of the barriers and opportunism in accessing Welsh language facilities in a number of areas.

Goal	Actions	When	Outcome
	A review to be undertaken by relevant education stakeholders in the first instance to gather detailed information on the current picture and the barriers to accessing Welsh medium education amongst the Black and Minority Ethnic community.	Short term Medium term	More children from Black and Minority Ethnic communities accessing Welsh medium education.
	Through the Welsh in Education Strategic Plan support programme, co-ordinate an online forum event for Local Authorities to share information and current good practice in terms of engagement, marketing strategies and reaching this community.		
	Include engagement and marketing Welsh medium education to increase take up within the Black and Minority Ethnic community within the annual monitoring process.		
	Incorporate marketing and engagement with Black and Ethnic minority community and support for external partners into WG Marketing and communication strategy for promoting Welsh medium education.		
	Internal review by the Centre into current take up of provision amongst Black Asian and Ethnic minority backgrounds, and current strategies in place to promote access.	Short term	More adults from ethnic minority communities across Wales accessing National Centre for Learning Welsh provision.
	Collect data on ethnicity.	Short term	
	Specific targets set as part of grant funding and an action plan to improve representation from Black, Asian and Minority Ethnic backgrounds.	Medium term	

Goal	Actions	When	Outcome
	Internal review by the grant recipients into current take up of provision amongst Black Asian and Ethnic minority backgrounds, and current strategies in place to promote access.  Learning event to share good practice around engagement, promoting access and take up. Set up a Community of Learning to ensure continuous discussion and developments.	Short term Medium term	More individuals from Black and Minority Ethnic communities across Wales enjoying activities and events through the medium of Welsh.
	Specific targets set as part of grant funding and an action plan to improve representation from Black, Asian and Minority Ethnic backgrounds.  Remit our grant-funded Welsh language partners to address barriers to accessing Welsh language activities or events, and to promote anti-racism within the context of their work.		
	Continue to participate in the work of a Welsh language terminology group established by Bangor University to ensure that the terminology used to discuss and debate issues surrounding anti-racism is current, appropriate and consistent and based upon input provided by Welsh speakers from ethnic minority communities.	Medium term	Standardised terminology that is easily understood by all developed to discuss issues in relation to anti-racism that reflects Wales's culturally ethnic community.
	Bangor University to continue to lead the Welsh language terminology group to revise and implement standardised terminology, and in doing so ensure engagement with representation of Welsh speakers from Black and Minority Ethnic communities.  Terminology group to discuss and develop effective methods of engagement to ensure understanding and use of the new terminology.  Include new terminology in Y Termiadur Addysg.		

### Environment

Globally and locally ethnic minority people are disproportionality effected by climate change and practises which are environmentally damaging. They may also have less access to green space. Their heritage, culture and religions however, offers them strong connection with, and respect for their environment. Historically we have not reached ethnic minority groups and other protected groups to support them to access nature, to benefit from the improvements to wellbeing that nature offers, or to take part in actions to restore and enhance nature.

The Local Places for Nature Programme (LPfN), intends to create 'nature on your doorstep'. The first year of the programme was 2020-21 and hundreds of projects are in train across communities in Wales, of very different types and scale. Three Scheme Managers are taking forward capital schemes to enable communities across Wales to get involved with restoring and enhancing nature "on your doorstep". The programme intends to focus on areas of deprivation, urban and peri urban areas and those communities with little access to nature.

All Local Places for Nature projects create natural capital assets and focus on at least one of the First Minister's 'modest measures that make an impact locally 'e.g. reducing pesticides, community

orchards, changing mowing practices, community growing, wildflower planting, public access to drinking water etc. All community projects involve volunteering. In 2021-22 the capital programme is continuing. This year we want to try to take action so that a more diverse range of communities could participate in LPfN in future. In 2021-22 we will focus on working with ethnic minority groups and people with disabilities. The first step is to engage with stakeholder groups to identify and co-create actions to lessen barriers to participation in the current programme. A long term objective is that in future years, ethnic minority, Gypsies, Roma and Travellers and disability groups may participate in projects to create 'places for nature' on their doorstep.

Goal	Actions	When	Outcome
To continue to create more local places for nature across Wales.  In particular, to support wider participation by those from protected groups; in particular those from the Black, Asian and Minority Ethnic groups and disabled people.	<ul> <li>Actions include:</li> <li>Work with representatives from the Race Forum, Disability Forum, Refugee Forum, Gypsy, Roma and Travellers Stakeholder group to consider the current LPfN programme and identify any barriers to participation.</li> <li>Work together to identify how those barriers to participation could be lessened.</li> <li>Co-shape any actions identified.</li> <li>Jointly agree a method for monitoring any outcomes that are proportionate and manageable.</li> </ul>	Short Term	A long term objective is that in future years, ethnic minority and disability groups may participate in LPFN projects to create 'places for nature' on their doorstep.  Ethnic minority and disability create places for nature and as a result reduce exclusion.

### Cross-cutting goals and actions

As we developed the Race Equality Action Plan (REAP) some common themes emerged. There appears to be a lack of structural approaches to a number of issues. Also, there is insufficient learning from the feedback provided by Black, Asian and Minority Ethnic communities, and by policy makers. Both issues need addressing.

#### Other themes that emerged include:

- 1. The need to look at different structural approaches to the way Welsh Government interacts and engages, and funds and monitors funding of ethnic minority communities;
- 2. How individuals' experience across different public services is felt to be disempowering, and that they are unable to access advocacy, support or help when facing racism;
- 3. The need for impact assessment processes to be more meaningful;
- 4. The need for more up to date data on lived experiences and data that is robust and 'granular';
- 5. The need to reflect the additional and often unrecognised efforts of volunteers from minority groups.

We have therefore included five cross-cutting Goals to respond to these concerns. We will work with stakeholders to co-shape these goals, and the subsequent actions. We will investigate what is needed, as opposed to having ready-made solutions. Some of this work will commence before the consultation is finished, to show our commitment to take immediate action.

Goal	Actions	When	Outcome
1a: To ensure that the way the Welsh Government communicates and engages is in keeping with lessons learnt, best practice, and as agreed through dialogue with Black Asian and Minority Ethnic peoples.	Welsh Government to establish and maintain, a single all Wales 'map' of Black Asian and Minority Ethnic groups of people. This will include faith, ethnic, and other intersectional groups representing people with multiple protected characteristics. This map can be used for different policy purposes so that all parts of Welsh Government have a single source they can use.	Short term	A single portal for better communication with Black, Asian and Minority Ethnic people across Wales.  More informed citizens.
	<ul> <li>This 'map' should:</li> <li>Include Immunisation work and associated mapping, a list of stakeholder groups and key organisations we consult with, and involve key activists willing to engage on different policy areas etc. This should be built on the Test Trace &amp; Protect and immunisation work done/commissioned.</li> <li>Identify groups and community activists interested in different policy- areas, and retain this on a database (under GDPR).</li> <li>Liaise regularly with community groups regularly to update and refresh.</li> <li>To further support this work, the Welsh Government should:</li> <li>Liaise with existing organisations with a remit to consult and give voice e.g. the different Commissioners' Offices, ethnic minority organisations.</li> </ul>		Better links with Black, Asian and Minority Ethnic people and their communities.  More trust in the Welsh Government.

Goal	Actions	When	Outcome
	<ul> <li>Work with the Third Sector Partnership Council, agree how it will ensure dialogue with ethnic minority groups, feed this into the Welsh Government, and report back to the groups that engaged with its processes.</li> <li>Establish single best practice paper for such items as translations, for when it is useful to use Welsh Government website and when not, guide for how to communicate that is customer centred and addresses their concerns, and how to use different methods e.g. outreach to reach different community groups.</li> <li>Learn from COVID outreach workers' work, and if possible, invest in further outreach (Overlap with Health Goal).</li> </ul>		
1b: To review and co-design better approaches to funding ethnic minority organisations.	<ul> <li>Action: Funding</li> <li>Build on what has already been expressed by communities to establish what has worked/ not worked in how the Welsh Government, and third parties who administer funds for it (e.g. WCVA), support ethnic minority communities.</li> <li>Link actions to the review of grants already commissioned by the First Minister.</li> <li>Capture good practice from elsewhere, and from within the Welsh Government, e.g. the Nature Fund.</li> <li>Co-shape and agree with the Accountability Group a Framework, outlining what is good collaborative work, support and proportionate monitoring, in the funding of ethnic minority communities. This should be suitable for use by all Welsh Government Departments and sponsored bodies, and by all who administer funds on its behalf.</li> <li>Monitor use of this Framework.</li> </ul>	Short term Medium Long	More consistent and sustainable funding streams that allow small and large ethnic minority organisations to plan their futures.  Removal of any institutional and systemic bias and racism built-into the funding system.

Goal	Actions	When	Outcome
2. To identify current and future services so that victims of racism have proper recourse to their complaints.	Convene a roundtable meeting of all those involved in taking complaints of hate/race crimes to explore gaps and synergies, and how existing practice can be strengthened.  - Enable training to help those involved in handling complaints* to recognise intersectional racism, in which ethnic minority people are targeted for multiple protected characteristics (Sex, Age, Disability, Sexual orientation, Religion, Transgender) (* to include: different commissioners offices, EHRC, Race relate organisations offering support, legal organisations supporting formal complaints, people with lived experience of trauma of trying to get a complaint heard, trade unions, judiciary, Crime & Justice Board members).  - identify what else is needed to 'bridge the gap' for individual complaint holders.  - scope the identified way to support need and agreed resources.  - communicate services available.	Short to medium term	Black, Asian and Minority Ethnic people, especially women and children have increased confidence in reporting hate crimes.  The route to achieving justice becomes smoother for Black, Asian and Minority Ethnic people.
3. To significantly improve the process for undertaking impact assessment, so that ethnic minority people and their communities are satisfied that the approach makes a real difference in identifying the impact of any policy on different groups.	Review current approach with stakeholders and policy officials; identify different approaches that could be tested to get better results.  Pilot equality mainstreaming as part of policy development.  Develop exemplar guidance and training and make this available in a variety of accessible formats.  Build-in a stronger remit for impact assessment within the public sector procurement and grant funding processes, to ensure that public funding delivers beneficial outcomes for Black, Asian and Minority Ethnic people.	Short term	Policies that are beneficial to ethnic minority peoples, which have their voices and lived experiences of all genders woven into policy design, rather than added after their inception.

Goal	Actions	When	Outcome
	Share best practice guide and monitor for impact.  Identify how the remit of the Race Disparity Unit supports action to ensure compatibility of access to data and work on impact assessment.		
<ul> <li>4. To secure meaningful, robust and useable data on ethnicity, so as to:</li> <li>build trust from those providing it;</li> <li>secure the level of data needed for decision making;</li> <li>value lived experiences as much as quantitative data and is not a continuous demand;</li> <li>ensure data is used appropriately to inform policy making, reviews and re-designs.</li> <li>Note: This Goal should be cross-referenced with Data goals in the respective policy areas (almost all) where particular needs and gaps were highlighted in the Wales Centre for Public Policy reports, 'deep dives', 'roundtables' and Steering group meetings.</li> </ul>	<ul> <li>Actions:</li> <li>Identify data gaps, understand why the gaps exist and how else they can be secured.</li> <li>Complete the scoping of the Race Disparity Unit and the Equalities Research and Data Unit to understand the role these two units may have in supporting greater data collections especially while the Census data will not be available for at least two more years.</li> </ul>	Short term Medium term	Data does not predate action, especially if lived experience tells otherwise. Hard data is followed up with lived experience if needed. Data on ethnicity includes separation by gender, disability and all other protected characteristics.  Data are readily available and used in all policy areas, to better reflect decision making for ethnic minority communities.

Goal	Actions	When	Outcome
5. The need to reflect the additional and often unrecognised efforts by volunteers from minority groups.	Explore the possibility of time credits as a mechanism for rewarding early work that is not payable/ rewarded financially as part of funding streams.  Co-create reward systems that praise, motivate and recognise unfundable, early work by ethnic minority communities, and takes into consideration intersectionality.	Short term Short term	To have work done by and with communities, that is currently unrecognised and unpaid for, recognised and rewarded.

### Section 3

### 14. What does the evidence tell us?

Those working with and for people who identify as Black, Asian and Minority Ethnic have undertaken a raft of research and evaluation across many decades to demonstrate the experiences of these communities and the inherent disadvantage caused by individual, structural and systemic racism. These reports have been used to develop this Plan and formed the basis of the evidence reviewed by the Wales Centre for Public Policy<sup>22</sup>. We provide a short summary of relevant evidence below using the themes of the Race Equality Action Plan.

We also received a briefing from the Equality and Human Rights Commission (EHRC) outlining its recommendations about the actions it thinks the Welsh Government should take in addressing racial inequality in the following areas of life Education, Employment, Participation, Housing, Health, and Access to Justice.

The following evidence, which includes quantitative data but also lived experience from the community led dialogues by 25 organisations, is not presented to confer a sense of inevitability or to undermine the significant achievements and strengths within ethnic minority communities in Wales. It is provided to illustrate the systemic disadvantage experienced by Black Asian and Minority Ethnic people in Wales and, in some cases in the broader UK context, linked to the priority themes of the Race Equality Action Plan.

According to pooled data covering the period 2017 to 2019<sup>23</sup>, 5.2% of the Welsh population describe themselves as Asian, Black, 'Mixed/Multiple ethnic group' or 'Other ethnic group'. Those describing their ethnic group as Asian are the second largest ethnic group in Wales (2.4% of the population).

Over the last six years, the proportion of the population describing themselves as Asian, Black, 'Mixed/Multiple ethnic group' or 'Other ethnic group' has steadily increased.

In addition to a national overview the proportion of the Welsh population that is Black, Asian and Minority Ethnic varies by sub-national area. For the year ending 30 September 2020, 19.1% of the population in Cardiff is Black, Asian and Minority Ethnic, compared to 1.4% in Powys.<sup>24</sup>

#### Education

Black, Asian and Minority Ethnic children are very unlikely to be taught by anyone who looks like them. The Education Workforce Council suggests that in 2020 just 1.3% of teachers in Wales are from a Black, Asian or Minority Ethnic background – roughly 469 out of 35,171 staff. 0.2% specifically identify as Black, African Caribbean or Black British, equating to around 64 teachers. In contrast, the latest school census<sup>25</sup> (as at January 2020) indicates that 8.6% of pupils aged five or over in Wales are Black, Asian and Minority Ethnic. According to evidence provided by EYST to the Children, Young People and Education Committee currently there are no ethnic minority head teachers in Wales<sup>26</sup>.

<sup>22</sup> www.wcpp.org.uk/publication/improving-race-equality-in-wales/

<sup>23</sup> Welsh Government (2020). Equality and diversity statistics: 2017 to 2019. www.gov.wales/equality-and-diversity-statistics-2017-2019 – accessed 24/02/2021

<sup>24</sup> Annual education workforce statistics for Wales. www.ewc.wales/site/index.php/en/statistics-and-research/education-workforce-statistics.html#school-teachers. Accessed 11/11/2020

<sup>25</sup> Welsh Government (2020). Schools' census results: as at January 2020. www.gov.wales/schools-census-results-january-2020

 $<sup>26\</sup> EYST\ (2018)\ www.seneddtest.assembly.wales/documents/s71276/TF\%2018\%20Ethnic\%20Minorities\%20Youth\%20Support\%20Team\%20Wales\%20EYST\%20Wales.pdf$ 

According to research undertaken by Show Racism the Red Card (SRtRC), a quarter of teacher/ teaching assistant respondents in Wales had observed, responded to or had a pupil report racial discrimination in the last year with 3 in 10 pupil participants admitting to being racist or using racist language towards another pupil<sup>27</sup>. In recent years, gaps within ethnic minority achievement have generally been closing. However, over the period 2017-19 in Wales, attainment figures for some Black and Mixed ethnicities are below the national average for key stages 2-4.

In 2019 a higher proportion of Black, Asian and Minority Ethnic adults in Wales have no qualifications (12 per cent, compared to 8 per cent for the White Group<sup>28</sup>.

The EHRC inquiry into racial harassment in higher education found that racial harassment is a common experience in publicly funded universities in Britain, and is widespread, consisting of racial harassment, physical attacks, name calling and micro aggression. It found that the higher education sector does not fully understand racial harassment and university staff lack confidence in dealing with racial issues. There were also issues relating to under-reporting and recording which restrict the universities' ability to take action<sup>29</sup>.

#### From community reports

Treatment by others, racist abuse, isolation: Respondents felt that it was common for young people from Black and Minority Ethnic backgrounds to be treated differently to others. For example, people often expressed their heritage through hair style, dress, and language – but the ways these expressions were perceived or treated by other pupils and staff were often disproportionate, insensitive, or even discriminatory. It has been widely reported that educational settings can be places in which people from minority backgrounds are subjected to racist abuse, and where practices such as by-standing and negative stereotyping can exacerbate its impact. Often, the effect on the victims is a profound feeling of isolation.

Role of teachers, lack of diversity in the profession, and teaching standards: teachers and institutions have a vital role in creating an inclusive environment for learners. However, some felt that staff did not always do this. A key factor was the lack of diversity within the teaching profession, including teachers and lecturers from Black and Minority Ethnic backgrounds. This made it harder to create a more inclusive environment. and to deliver a curriculum sensitive to different traditions. In terms of teaching standards, some expressed dissatisfaction with standards of English language teaching. This included adult classes for people looking to improve their English, to better integrate and help them find employment. However, some including many refugee communities, felt the quality of the help

they had received from schools and teachers had been very high. Taken as a whole however, respondents were concerned about experience of racism in the education system and about lower levels of educational attainment by some young people from Black and Minority Ethnic backgrounds. This was felt to undermine their life-chances, hinder a successful transition into adult life, and perpetuate inequalities.

"The participants reported that there are very few Black, Asian and Minority Ethnic teachers or head teachers in their schools. A proactive drive to recruit teachers from Black, Asian and Minority Ethnic communities encouraging paid training support for all subject matter teachers including the arts".

Race Council Cymru – West Wales

"The Welsh Government must work to raise educational attainment among those ethnic groups that are under-performing in order to support and increase successful transitions from education to employment".

Sub-Sahara Advisory Panel

#### Employment and income

People living in households in Wales where the head of the household is from an ethnic minority group are more likely to be in relative income poverty compared with those where the head of the household is from a white ethnic group. Over a third (34.9%) of people from a Black ethnic background live in the most deprived 10% of small areas and almost 11% of the people living in the most deprived 10% of small areas are from a Black, Asian and Minority Ethnic background. This is more than double the proportion of Black, Asian and Minority Ethnic people in the total population.<sup>30</sup>

For the year ending March 2020, employment rates among the working age (16-64) Welsh population were highest among individuals with a White ethnicity (74%) and lowest among individuals with an Other ethnicity (52%)<sup>31</sup>. The equivalent rates among individuals with a Black, Asian and Mixed ethnicity were 66%, 64% and 71% respectively<sup>32</sup>. In addition, the ethnicity pay gap in Wales in 2019 was 1.4%. This means employees from ethnic minority groups in Wales earned, on average, 1.4% per hour than White British employees.<sup>33</sup>

Evidence suggests Black, Asian and Minority Ethnic employees are more likely to work in certain occupations. Welsh Government analysis of the Annual Population Survey shows that in Wales 11.2% of healthcare workers and 7.2% (\*) of social care workers are Black, Asian and Minority Ethnic. In addition, Black, Asian and Minority Ethnic workers comprise 40.2% (\*\*) of taxi drivers and chauffeurs, 22.8% (\*\*) of chefs and 4.8% (\*\*) of bus, coach and goods vehicle drivers. For comparison, across all occupations 5.2% of workers are Black, Asian and Minority Ethnic (N.B. \* and \*\* are used to note that data items are based on small sample sizes (25-40 and 10-25 respectively) and should be treated with caution).<sup>34</sup>

According to research undertaken by the UCL Centre for Longitudinal Studies<sup>35</sup>, Carnegie UK Trust, and Operation Black Vote millennials from Black, Asian and Minority Ethnic backgrounds are 47% more likely to be on a zero-hours contract, compared to their White peers. Black, Asian and Minority Ethnic millennials also have 10% greater odds of working a second job, are a 5% more likely to be doing shift work, and are 4% less likely to have a permanent contract than White workers. The research draws on information from a nationally representative group of more than 7,700 people living in England who were born in 1989-90 and are being followed by a study called Next Steps. In

addition, the research found experiences in the job market varied for different ethnic groups. For instance, Pakistani millennials were more likely to be on a zero-hours contract or be working shifts, and less likely to have a permanent job than their White peers. However, Indian and Black Caribbean workers were no more likely than their White counterparts to be in these types of employment.

An analysis of the 2016-17 Trade Union Congress (TUC) Racism at work survey<sup>36</sup> found that over 70% of Asian and Black workers who responded, reported that they had experienced racial harassment in the workplace during the preceding 5 years. Around "60% of Black, Asian and Minority Ethnic workers and almost 40% of participants from Mixed heritage background reported that they had been subjected to unfair treatment by their employer because of their race".

 $<sup>30 \</sup> Welsh. Government (2020). \ Coronavirus (COVID-19) \ and \ the \ Black, Asian \ and \ Minority \ Ethnic (BAME) \ population in \ Wales. \ Government \ (COVID-19) \ and \ the \ Black, Asian \ and \ Minority \ Ethnic (BAME) \ population in \ Wales. \ Government \ Governmen$ 

www.gov.wales/sites/default/files/statistics-and-research/2020-06/coronavirus-COVID-19-and-the-black-asian-and-minority-ethnic-population-154.pdf – accessed 24/02/2021

<sup>31</sup> Welsh Government analysis of Annual Population Survey (APS) data. Undertaken September 2020

<sup>32</sup> Welsh Government analysis of Annual Population Survey (APS) data. Undertaken September 2020

<sup>33</sup> ONS (2020). Ethnicity pay gaps: 2019. www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/articles/ethnicitypaygapsingreatbritain/2019

<sup>34</sup> Welsh Government (2020). Coronavirus (COVID-19) and the Black, Asian and Minority Ethnic (BAME) population in Wales. www.qov.wales/sites/default/files/statistics-and-research/2020-06/coronavirus-COVID-19-and-the-black-asian-and-minority-ethnic-population-154.pdf – accessed 24/02/2021

<sup>35</sup> UCL Centre for Longitudinal Studies, Carnegie UK Trust, and Operation Black Vote (2020). BAME millennials at greater risk of being in unstable employment – www.ucl.ac.uk/news/2020/mar/bame-millennials-greater-risk-being-unstable-employment – accessed 29/01/2021

<sup>36</sup> Ashe SD, Borkowska M and Nazroo J (2019). Racism Ruins Lives: An analysis of the 2016-2017 Trade Union Congress Racism at Work Survey – www.hummedia.manchester.ac.uk/institutes/code/research/projects/racism-at-work/tuc-full-report.pdf – accessed 29/01/2021

#### From Community Reports

Lack of opportunities, difficulty in maintaining employment, and wage discrepancies: There were many reports of a lack of employment opportunities, particularly secure, better-paid jobs. In terms of maintaining employment, some reported being released, or not having their contracts renewed. There was a widespread perception that experience, and the qualifications held by people from Black, Asian and Minority Ethnic backgrounds were often not considered fairly during recruitment. Many individuals reported having to 'settle' for lower skilled or lower paid work than their experience and skills qualified them for or moving into self-employment to remove themselves from negative workplace cultures.

Another key theme was wage discrepancies. Many reported being paid unfairly in comparison to colleagues doing the same jobs. There were examples of people being passed-up for pay rises, and of being paid the same as less experienced colleagues. Overall, securing employment was seen as vital for meaningful participation in society, whereas failing to do so heightened social exclusion. This was particularly the case for groups excluded from the labour market, such as asylum seekers and refugees.

Lack of cultural awareness, bullying and racism, and lack of senior role models: Some participants described the impact of the lack of cultural awareness in their workplace; for example, unawareness of how passing comments could give offence, or obstacles to observing their religion, for example a lack of space to pray, or having to work on religious days or holidays. Bullying and racism were also significant issues, perhaps due to a lack of cultural awareness, and companies not previously having to accommodate the needs of people of different faiths and backgrounds. In some instances, there were barriers to reporting racist behaviour. There was fear that reports would be dismissed, or harm people's longer-term prospects. Many felt discouraged by the lack of Black, Asian and Minority Ethnic figures in senior roles. Some felt they just could not progress; others were more frustrated with the lack of ethnic minority people in positions of power to act as role models and provide support.

"Those Participants who did not report a hate incident or crime, told us the incidents happened at their workplace or in their neighbourhood they chose not to report as they were worried it would affect their employment or affect their home life."

Race Council Cymru – North Wales

"The participants were asked if they felt their ethnicity is represented at senior level in their place of work. The majority of participants said no however we were told this does not affect their place of work on a day-to-day basis. "No role models exist therefore we have to manage our aspirations and the level of understanding about different backgrounds at senior level is low". "All top management are white and have no lived experience of racism so cannot empathise and are often guilty of unconscious bias."

Race Council Cymru – West Wales

#### Leadership and representation

Research compiled by executive recruitment and diversity consultancy agency Green Park reveals that for the first time in the six years of analysis, there are no black Chairs, CEOs or CFOs, in the FTSE100. In addition, only ten of 297 (3.4%) leaders in the Top 3 roles have ethnic minority backgrounds, the same proportion as when Green Park began their FTSE analysis in 2014.37 We do not have equivalent data at an all Wales level, but there are clear indications that people from Black, Asian and Minority Ethnic backgrounds are underrepresented at a leadership level. For example, a large majority of candidates (98 per cent) in the 2017 Welsh local government elections reported they were from a 'White' ethnic group (Welsh/English/Scottish/ Northern Irish/British, Irish, Gypsy or Irish Traveller and any other White background). Candidates from other ethnic groups (including 'Mixed/ Multiple', 'Asian/Asian British', 'Black/African/ Caribbean/Black British' and 'Other ethnic groups') accounted for only 1.8 per cent of all candidates. Similarly, 1.8 per cent of county councillors and 1.2 per cent of community councillors stated that they were from non-white ethnic groups.

#### From community reports

More diverse leadership: strong and effective leadership was seen to be vital, if we are to properly reflect and represent Wales' intersectional diversity. Participants felt public bodies must do more to ensure that that all community voices are heard, and that actual decision-making involves meaningful participation by all groups in society. The clear view was that currently, leadership is not fully representative of the diversity of the Welsh population, both in the makeup of democratic legislatures, appointed and elected commissioners, special advisors, executives and institutions, and in terms of incorporating all views and perspectives in policy formation.

Knowledge of Welsh Government remit, all Black, Asian and Minority Ethnic shortlists, **improving participation**: the feedback indicated that a lack of knowledge of the Welsh Government's remit was a key barrier to people engaging in the public sphere. This was also true, more widely, about how political decisions are made, and how people and communities can engage in policy making. Another theme was the role of all Black, Asian and Minority Ethnic shortlists for certain leadership posts, including political appointments. Where this suggestion was raised, there was support for it as a way to ensure that leadership becomes more representative, and of generating more engagement and participation from ethnic minority communities across the country. The clear implication was that a lack of intersectional diversity is a real barrier to meaningful participation and engagement.

"There is hope that more diversity [in leadership] would help people to thrive, to achieve, for leaders to be relatable and accessible, to have greater opportunity to consult with leaders and fashion role models for future generations. There is a great sense that individuals would feel a lot more valued and be better able to contribute positively to Wales. Deeply, there is a sense that with better representation, stories will not be "forgotten or ignored".

Black Lives Matter Wales

"The survey then asked if there should be a cross-party agreement for an all BAME shortlist to ensure more diversity in political representation in Wales. The majority of participants said yes. "It would be wonderful to have all communities represented".

Race Council Cymru – North Wales

#### Health and Social Care

Particularly in older age brackets, Indian, Pakistani, Bangladeshi and Black Caribbean individuals are much more likely than White British people to report one or more of chest and breathing problems, heart, blood pressure or circulation problems, and diabetes.<sup>38</sup> Evidence suggests Black, Asian and Minority Ethnic groups face discrimination in relation to healthcare provision. For example, in 2017 the Traveller Movement produced a report exploring Gypsy, Roma, Traveller (GRT) people's experience of prejudice and discrimination. Based on an online survey of 214 community members from across the UK the Traveller Movement found 30% experienced discrimination in relation to accessing health care. 39 Similarly, one in five Black, Asian and Minority Ethnic LGBT people (19 per cent), including 24 per cent of Asian LGBT people, have experienced some form of unequal treatment from healthcare staff because they're LGBT.40 As the Black, Asian and Minority Ethnic COVID 19 Socio-economic subgroup report made clear, individuals from some ethnic minorities are also exposed to social and economic disadvantage which can result in a higher likelihood of poor health.<sup>41</sup>

The potential trauma, social and economic upheaval associated with experience of migration may also have a direct impact on health. Research has shown refugees and asylum seekers have high and persistent rates of PTSD and depression, highlighting the need for ongoing, long-term mental health care beyond the initial period of resettlement. 42

#### From Community reports

Health and care staff, quality of care, access and waiting times: many of the respondents cited a lack of cultural awareness by some health and social care staff, for example, people being offered treatments containing traces of alcohol or animal products. Several organisations reported clients having experienced animosity or racism; this ranged from a lack of respect, being looked at and treated differently, through to being ignored altogether due to their speech or appearance. Others reported being refused service due to a lack of a fixed address, not being believed or taken seriously, or having no recourse to public funds due to immigration status. For certain communities, language was the key barrier. This could have profound consequences, including the inability to describe symptoms, and confusion about how to take prescribed medication. There were also concerns around accessing primary health care, including GP appointments, and extended waiting times. Arising from this, there were calls for a shift in culture amongst

health and social care staff, so they could better understand the issues that people of different ethnicities may present with and engage them with cultural sensitivity and respect. There were calls for a more diverse workforce, to help improve experiences and outcomes for those accessing health and social care services.

#### Poor outcomes, and impact on mental health:

Some respondents stated that the additional constraints they faced in accessing services, and their negative experiences in receiving care and support, were having a negative impact on their health and wellbeing. There were also references to COVID-19 and how the pandemic has affected some communities acutely and disproportionately. Respondents also talked of the challenges of social isolation and loneliness. Again, there was reference to COVID-19 having exacerbated this, especially for older people. Overall, mental health was a key concern, especially as certain communities have specific needs, or were more likely to present with certain mental health issues. For example, refugees and asylum seekers may have experienced significant trauma. Alongside this, many positive experiences of people accessing health and social care were also reported, included on the high quality and conscientiousness of the care people had received.

<sup>38</sup> Platt L and Warwick R. (2020). COVID-19 and Ethnic Inequalities in England and Wales. FISCAL STUDIES, vol. 41, no. 2, pp. 259-289 - www.onlinelibrary.wiley.com/doi/10.1111/1475-5890.12228 - accessed 29/01/2021.

<sup>39</sup> The Traveller Movement (2017). The pervasive discrimination and prejudice experienced by Gypsy, Roma and Traveller communities. www.travellermovement.org.uk/phocadownload/userupload/reports/last-acceptable-form-of-racism-traveller-movement-report.pdf – accessed 05/02/2021

 $<sup>40</sup> Stonewall. (2018). LGBT in Britain: Health report-www.stonewall.org.uk/system/files/lgbt\_in\_britain\_health.pdf-accessed 29/01/2021 (2018). LGBT in Britain: Health report-www.stonewall.org.uk/system/files/lgbt\_in\_britain\_health.pdf-accessed 29/01/2021 (2018). LGBT in Britain: Health report-www.stonewall.org.uk/system/files/lgbt\_in\_britain\_health.pdf-accessed 29/01/2021 (2018). LGBT in Britain: Health report-www.stonewall.org.uk/system/files/lgbt_in_britain_health.pdf-accessed 29/01/2021 (2018). LGBT in Britain.pdf-accessed 20/01/2021 (2018). LGBT in Britain.pdf-accessed 20/01/2021 (2018). LGBT in Britain.pdf-accessed 2$ 

<sup>41</sup> Bécares L. Which ethnic groups have the poorest health? Ethnic health inequalities M 1991 to 2011. Centre on Dynamics of Ethnicity (CoDE) Briefing. Manchester: Manchester University, 2013

<sup>42</sup> Blackmore R, Boyle JA, Fazel M, Ranasinha S, Gray KM, Fitzgerald G, et al. (2020) The prevalence of mental illness in refugees and asylum seekers: A systematic review and meta-analysis. PLoS Med 17(9):e1003337. www.doi.org/10.1371/journal.pmed.1003337

"Language was the biggest barrier; participants whose first language was not English told us that not having interpreters at the first point of contact has led to misdiagnosis, or the patient not being able to understand the diagnosis and treatment".

Race Council Cymru – North Wales

"Research participants often raised the matter of their mental health and the significant impact racism has had on this. They have argued for improved mental health services in Wales and for increased numbers of counsellors from similar ethnic backgrounds".

Sub-Sahara Advisory Panel

#### The criminal justice system

In England and Wales over the period April 2018 to March 2019 Black, Asian and Minority Ethnic people had the highest stop and search rates in every police force area for which there was data. There were 4 stop and searches for every 1,000 White people, compared with 38 for every 1,000 Black people<sup>43</sup>.

In 2019 there were 91 Black people from Wales in prison for every 10,000 of the population, compared with 14 White, 28 Asian, and 41 Mixed, per 10,000 of the population<sup>44</sup>.

Of the 4,023 recorded hate crimes across the four Welsh Police Force Areas in 2019/20, 2,634 (65%) were race hate crimes<sup>45</sup>.

#### From community reports

#### Hate Crimes, and lack of support from authority:

Some respondents reported being victims of hate crimes. They highlighted the long-term impact that such crimes can have, including anxiety around the event itself, but also the experiences and investigations that followed. These crimes often go unpunished, due to a lack of reporting, or shortcomings in prosecution systems. Allied to this was a perceived lack of support from authority figures, for example from schools, businesses, and communities in the period following such incidents. Some felt this had created a narrative of the 'system' being broken'. This was leading to more and more victims not coming forward, as they distrusted those responsible for processing their complaints. This contrasted with the general view that most people felt safe amongst their own community.

#### Institutional racism – policing and immigration:

Some respondents cited their experiences, and practices such as racial profiling, as evidence of institutional racism within the Police. Some felt there was an indifference towards victims of crime, and perceived a reluctance by the Police to engage with and process race hate crimes. People said this had shaped their views on the criminal justice system. Alongside this, some also highlighted institutional racism within the immigration service, based on their own lived experience.

"Of the participants that had experienced a hate crime and reported it, only one participant said they were happy with the outcome. Those who did report a crime felt that the police either were not that interested or failed to follow up sufficiently. Some participants told us they felt police were not trained properly to understand the impact of hate crime, and had been biased".

National BAME Youth Forum Wales

"I think that the immigration system in UK is discriminatory it is very slow and difficult to find out what is happening. When you are seeking protection having to wait for four years or longer for some people to find out if you can stay is very stressful, and does not seem to be a fair or humanitarian system. The only experience I have had of the police is having my fingerprints taken".

TGP Cymru

<sup>43</sup> Ethnicity Facts and Figures (2020). Stop and search. UK Government. www.ethnicity-facts-figures.service.gov.uk/crime-justice-and-the-law/policing/stop-and-search/latest - accessed 09/02/2021

<sup>44</sup> Wales Governance Centre (2020). Prison, probation and sentencing in Wales: 2019 Factfile. Cardiff University. www.cardiff.ac.uk/\_data/assets/pdf\_file/0010/2446129/Prison, -Probation-and-Sentencing-in-Wales-2019-Factfile. Cardiff University.

<sup>45</sup> Home Office (2020). Hate crime, England and Wales, 2019 to 2020 - www.gov.uk/government/statistics/hate-crime-england-and-wales-2019-to-2020 - accessed 29/01/2021

#### Housing

Half of the Black, Asian and Minority Ethnic population in Wales live in rented properties, compared to just under a third of the white population. Black, Asian and Minority Ethnic people who rent are more likely to live in privately rented properties than socially rented properties. We know from the Welsh Housing Condition Survey (2017-18) that the private rented sector generally has the oldest housing stock and a higher proportion of poor quality housing (e.g. containing damp or other hazards).<sup>46</sup>

Of those households who applied to local authorities in 2018-19 for housing assistance because they were threatened with homelessness, 8 per cent were from a Black, Asian and Minority Ethnic background. However, 14 per cent of households who are assessed as unintentionally homeless and in priority need are from a Black, Asian and Minority Ethnic background and of these 83 per cent accepted an offer of settled suitable accommodation.<sup>47</sup>

According to the 2011 Census there were 1.1 million overcrowded households in England and Wales, with fewer bedrooms than the notional number recommended by the bedroom standard. Almost half (47.9%) of these households had a Household Reference Person (HRP) from an ethnic minority group (a group other than White British). Households with an HRP from a ethnic minority group represented 16.1% of all households but only 1 in 9 (11.1%) of the 16.1 million under-occupied households in England and Wales. Households with an HRP from the Bangladeshi ethnic group included a higher percentage (30.2%) of overcrowded households than those with an HRP of any other ethnic group. The five local authorities with the largest percentage of overcrowded households in 2011 all had at least 4 out of 5 of their overcrowded households with an HRP from a ethnic minority group<sup>48</sup>.

#### From community reports

Availability and affordability: there was a general view that shortages across all types of accommodation and tenure were the biggest barrier to securing good quality accommodation. This was very apparent, for example, amongst Gypsy and Traveller communities. There were also major concerns over affordability. Several respondents said that the low pay and under-employment prevalent within their communities compounded the difficulty of securing suitable rented accommodation, and also increased the risk of eviction. Another key concern

was the inability of many Black, Asian and Minority Ethnic people to participate in the housing market. Low pay and systemic discrimination meant that certain groups were less able to secure a mortgage and purchase their own homes.

Dealing with Landlords, overcrowding and **poor housing conditions:** Living in rented accommodation also presented many challenges, in both the private and social housing sectors. Many reported difficulties in getting repairs carried out, and many felt this problem had increased during the COVID-19 pandemic. Others reported experiencing racism and discrimination from landlords. Overcrowding was also key a problem. due to the small size of much of the affordable accommodation, coupled with potentially large numbers of people required to live in that space. Poor housing conditions, such as damp or general disrepair were also highlighted, as was a lack of furniture in both private rented and social housing accommodation. For those living in rented accommodation, shared spaces were said to pose particular challenges, including minority groups being targeted due to their race or background.

<sup>46</sup> Welsh Government (2020). Coronavirus (COVID-19) and the Black, Asian and Minority Ethnic (BAME) population in Wales. www.qo,2020b v.wales/sites/default/files/statistics-and-research/2020-06/coronavirus-COVID-19-and-the-black-asian-and-minority-ethnic-population-154.pdf

<sup>47</sup> Welsh Government (2019). Well-being of Wales: 2018-2019 - www.gov.wales/sites/default/files/statistics-and-research/2019-09/well-being-of-wales-2019-590.pdf - accessed 29/01/2021

<sup>48</sup> ONS (2011). Overcrowding and Under-Occupation by Ethnic Group, 2011 – www.webarchive.nationalarchives.gov.uk/20160105214050/http://www.ons.gov.uk/ons/rel/census/2011-census-analysis/overcrowding-and-under-occupation-by-ethnic-group--2011/rpt-overcrowding.html – accessed 29/01/2021

"There is not enough accommodation for all the Gypsy and Travellers in Wales; there are lots of Gypsies in Wales that now live in houses but wish they could live in a Trailer. There needs (to be) more sites built in the whole of Wales. I have been involved in the Gypsy and Traveller accommodation Needs Assessment and steering groups and unfortunately, we as a community are always the last to find out what is happening. The council need to talk to us more and get our opinions".

#### TGP Cymru

"The main issue reported, was the acknowledgment of multigenerational housing. When accessing social housing this was not taken into consideration, often leaving tenants in over-crowded houses that did not suit their needs".

Race Council Cymru – Newport

#### Arts, Culture and Heritage

#### From community reports

Cultural representation, acceptance and **engagement**: There was a strong feeling amongst many minority communities about their lack of representation in wider Welsh culture. This was linked with colonialism, and a systemic depiction of 'the other' regarding migrants and those of differing faiths, traditions, and histories. There was a sense that some minorities were not generally accepted by broader society, leading to discrimination and racism in their daily lives. However, some outlined very positive engagement by broader communities in engaging with people of different perspectives and identities. There were concerns that where there was a lack of engagement and acceptance, this led to a loss of cultural identity within those communities.

Legal and policy implications, and action needed: some reports suggested that a lack of cultural representation and awareness fed into legal and institutional responses. This served to formalise and perpetuate inequalities and racial discrimination across Welsh society. Better showcasing of the variety of cultures that now inhabit Wales was seen as crucial to overcoming this problem, and to ensuring that all cultures and backgrounds are accepted and understood. It was stressed that utilising the arts and performance to do this this must be done in a respectful and genuine way.

"We were told that some of the Black, Asian and Minority Ethnic people who participated in this survey felt detached from their own history and culture and do not live in an environment where they can re-connect. In rural settings there is more of a need to showcase local cultural diversity."

#### Race Council Cymru – West Wales

"Under no circumstances should a genuine approach to resolving this issue involve organisations or individuals that do not have a track record of uplifting these communities regularly. This work would need to be authentic and help build the economic strength of these communities that would be helping to create cohesive race relations in Wales. Furthermore, it will emphasise the importance of Black people telling Black stories, returning the power of the narrative to the rightful owners of the narrative."

**Black Lives Matter Wales** 

### 15. Impact Assessment of the Action Plan

An Integrated Impact Assessment template was completed alongside the development of the Race Equality Action Plan. It is a working document, which will be amended as the Plan is finalised and implemented. The purpose of the Integrated Impact Assessment is to set out Welsh Government's vision, purpose, values, goals and actions to address racial inequality in Wales, and to consider the possible negative and positive impact on different groups and policy areas.

Colleagues from across the Welsh Government and key external stakeholders have provided contributions to the Integrated Impact Assessment.

At present, the Plan's vision, purpose, values, goals and actions are likely to affect many people across Wales, particularly those from Black, Asian and Minority Ethnic communities, by directly tackling racism. Additionally, it is anticipated that the Plan will be owned and implemented across the Welsh Government and implemented proactively. Only by working collaboratively with key stakeholders, and centring the lived experiences and expertise of Black, Asian and Minority Ethnic communities, can we help ensure that the Plan has a sustained impact.

## Appendices

### Appendix 1: Steering Group Terms of Reference

#### Purpose

Our purpose in developing a new Race Equality Action Plan is to stimulate culture change in Welsh Government, in public services in Wales, in business and in Welsh society, to address structural and systemic racism. The Race Equality Action Plan will aim to transform the experiences and life chances of Black, Asian and Minority Ethnic people in Wales and ensure the contribution of Black, Asian and Minority Ethnic people is celebrated, reflected and afforded equal value to their White counterparts.

The role of the Steering Group is to support the development of the Action Plan, necessary culture change and practical action by providing insight, support and challenge to its development.

#### Make-up of the Steering Group

The Steering Group will bring together Black, Asian and Minority Ethnic people with lived experience with senior policy makers responsible for the policy themes identified as a priority by Black, Asian and Minority Ethnic people for inclusion in the Action Plan.

Relevant policy officials are expected to attend and be involved with the process until the Action Plan is published. External members are invited to maintain their involvement consistently.

The Steering Group will be co-chaired by Professor Emmanuel Ogbonna, Cardiff University and Shan Morgan, Permanent Secretary, Welsh Government.

It will form part of a co-construction approach which will be adopted to develop the Plan. The Wales Race Forum will provide strategic oversight.

#### Key tasks

- To champion, support and challenge the work of the Race Equality Action Plan as part of co-construction process
- To keep progress in developing the plan under review
- To bring wider perspectives to the development of the Action Plan from relevant groups, fora, community or policy areas
- To keep the needs and strengths of Black, Asian and Minority Ethnic communities at the heart of discussions
- To consider intersectional facets of equality and ensure this is reflected in the Action Plan
- To ensure a Human Rights approach is embedded within the Action Plan
- To ensure the Equality Act, PSED and the Well-being of Future Generations Act are all embedded within the Race Equality Action Plan.
- To advise on the different components of the Race Equality Action Plan including the vision, values, goals and actions
- To develop a governance framework which will underpin the implementation of the Race Equality Action Plan and future work on race equality
- To share and respect different types of knowledge lived experiences, policy levers, past failures and successes, best practice, research, grassroots wisdom, experience of working within and outside Government
- To ensure the Race Equality Action Plan has a strong emphasis on accountability and utilised the levers available for delivery

#### Ways of working

The Steering Group and each member is asked to commit to:

- having difficult conversations in a supportive way so we all learn and to provide a safe environment for these conversations to take place
- keeping the lived experiences of Black, Asian and Minority Ethnic people at the heart of the conversation and draw out intersectionality
- · valuing different types of knowledge
- committing time for meetings and work in between
- being open to learning from each other and to be able to provide examples of how equalities will be / is integrated in the delivery of work

### Wider co-construction approach and governance

The development of the Action Plan will be characterised by a co-construction approach. The Steering Group will have an important role to play but there will be other ways in which a much broader range of people will be involved directly in the development of the Action Plan.

Relevant policy leads and the Welsh Government Equality Team will engage directly with organisations and communities in developing specific parts of the Action Plan.

Welsh Government will use existing mechanisms, for example through the Equality and Inclusion programme partner organisations, wider networks and partners and with grassroots organisations (through the community engagement funding) with a view to establishing longer term arrangements.

The Wales Race Forum will provide strategic oversight of the development of the Action Plan, with the Steering Group undertaking the more detailed support work.

#### Time line

The Steering Group will meet approximately three weekly to start.

The Steering Group will operate until March 2021 and the publication of the Action Plan. New governance arrangements will be proposed and ready to be established after the Senedd elections.

#### Members

The following groups or organisations will put forward a representative. This list is not exhaustive and others may be invited to join as the work develops. Senior policy officials from across the Welsh Government will also be represented.

- The Wales Race Forum
- COVID-19 BAME Health Advisory Group
- COVID 19 BAME Socio-economic Sub-Group
- COVID 19 Risk Assessment Subgroup
- Audit of Public Monuments in Wales
- Communities, contributions and cynefin: BAME experiences and the new curriculum' working group
- The Wales TUC
- The Equality and Human Rights Commission
- A representative of Gypsies, Roma and Travellers.
- The Welsh Refugee Coalition
- Welsh Government's Minority Ethnic Staff Network
- EYST
- WI.GA
- The Wales Faith Forum
- NHS Wales

#### Secretariat

The Steering Group will be supported by Welsh Government officials

### Appendix 2: Terminology

#### Intersectionality

Intersectionality refers to the fact that people from Black, Asian and Minority Ethnic groups also hold other social statuses (e.g. gender, sexual orientation, migration status, religion/faith, disability etc.) which influence their experience, needs and outcomes.

#### Diversity

Difference between groups including the protected groups

#### Inclusion

Enabling people to participate fully in what we do.

#### Positive action

Measures allowed under the Equality Act 2010 which can be lawfully taken to encourage and train people form under-represented groups to help overcome disadvantages.

#### Positive discrimination

Treating one person more favourably then another because they have a protected characteristic.

#### Protected characteristic

Age, disability, gender identity and expression, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

### Appendix 3: Community Grant groups

We are also grateful to many groups and organisations who delivered insightful reports on their communities' experiences, either through the Community Grant work, or by sending in their reports, hosting events and participating in conversations. They include the following:

Antur Teifi

**Avant Cymru** 

BLM Wales and Race Council Cymru

Cardiff University Centre for Islamic Studies and Muslim Council of Wales

Henna Foundation

**Hyatt Womens Trust** 

**KIRAN** 

Mudiad Meithrin

National BAME Youth Forum

Neath Port Talbot BME Association

**NWREN** 

North Wales Africa Society

RCC - Cardiff Region

RCC - Newport Region

RCC - N Wales Region

RCC - Swansea Region

RCC - West Wales Region

Sub-Sahara Advisory Panel

The Romani Cultural and Arts Company

**Women Connect First** 

TGP Cymru

Diverse Cymru

Hindu Association Wales

Horn Development Association

### Appendix 4: Community Mentors

The following 'Community Mentors' have supported policy officials by offering their insights and experiences, and this assistance is much appreciated.

- 1. Jacqueline Alcinder
- 2. Aisha Ali
- 3. Cindy Ikie
- 4. Michelle Alexis
- 5. Mohid Khan
- 6. Star Mayo
- 7. Indu Deglurkar
- 8. Juhela Rahman-Daultry
- 9. Richard Desir
- 10. Yaina Samuels
- 11. Abubakar Askira
- 12. Daljit Nijjer
- 13. Jan Birch
- 14. Saadia Abubakar
- 15. Helal Uddin
- 16. Thomas Hendy