



**Black
Leadership
Group**



**ColegauCymru
CollegesWales**



A young woman with curly hair and a headband, wearing a white shirt, sits at a desk in a library, looking down at some papers. A young man with dark hair, wearing a blue t-shirt, sits next to her, also looking down at papers. They are surrounded by bookshelves filled with books.

AN INITIAL ASSESSMENT OF THE FURTHER EDUCATION SECTOR'S CONTRIBUTION TO THE WELSH GOVERNMENT'S ANTI-RACIST WALES ACTION PLAN

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Ariennir gan
Lywodraeth Cymru
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Black Leadership Group (BLG)¹ in Partnership with ColegauCymru

An Initial Assessment of The Further Education Sector's Contribution to the Welsh Government's Anti-Racist Wales Action Plan²

Research Report: 31 March 2022

¹ The Black Further Education Leadership Group (BFELG) changed its name to the Black Leadership Group (BLG) on the 16 March 2022. The new name of the organisation and logo are used throughout the report, including the annexes.

² The Anti-Racist Wales Action Plan had a working title of the Race Equality Action Plan during the course of this project. The final title for the plan, the Anti-Racist Wales Action Plan, has been used throughout the report, including the annexes.

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Definition

The term *Black is used by the BLG in the report as an inclusive definition for people from ethnically diverse backgrounds who share a lived experience of the effects of racism.

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Executive Summary

Summary of Project Remit

This report presents the results of a scoping project commissioned by the Welsh Government in January 2022 and co-delivered by ColegauCymru and the BLG. The project remit was to undertake initial work to help prepare for a programme of equality research, analysis and development for the further education sector that could be delivered from 2022-2023 to progress the Government's [Anti-Racist Wales Action Plan](#).

Summary of Findings

The project findings are that to effect timely change, action needs to be taken at institutional and national level, requiring direction and leadership by the Welsh Government. There are significant requirements associated with building the quantitative and qualitative evidence base the Government is seeking to form prior to identifying actions that will lead to dismantling structural racial inequities within the further education system. Furthermore, institutions are at different starting points in terms of strategic and operational Anti-racist practice, and all will require considerable support to build confidence and capacity. It is very positive for future developments that all further education institutions express willingness for change.

Summary of Recommendations

The recommendations contained within the report provide a detailed interrelated set of actions to take the Anti-racist agenda forward within the Welsh further education sector. Recommendations 1, 2 and 3 provide the starting point for developing bespoke and viable Anti-racism Action Plans for each further education institution. By taking these three recommendations together, plans will reflect and meet individual needs and priorities, as well as enable further education institutions to fully contribute to the goals and desired outputs of the Anti-Racist Wales Action Plan.

Immediate Priorities

- Recommendation 1** Further Education Anti-racism Action Plans: All further education institutions should develop and publish Anti-racist Action Plans that are live documents, in a prescribed format with measurable quantitative and qualitative targets and milestones for intended outcomes, particularly for those actions that span a number of years, including towards 2030. *Black learners, apprentices and staff should be consulted and involved in developing Anti-racist Action Plans.

Institutional Anti-racist Action Plans will strengthen a) each further education institution's Strategic Equality Plan and b) their contribution to the Anti-Racist Wales Action Plan. The Further Education Institutional Profile Reports produced for each institution as part of this project provide a foundation for this work.

Recommendation 2

Quantitative and qualitative data collection, monitoring and/or reporting: To underpin strategy and practice and to measure progress, as a matter of urgency, the Welsh Government should work collaboratively with ColegauCymru, further education institutions, Equality and Human Rights Commission (EHRC Wales) and other relevant stakeholders to support improvements in the collection, monitoring and/or reporting of comprehensive, comparable, ethnicity related data for learners and apprentices (by level), staff, HR processes, incidences of bullying, harassment, discrimination and racism, and lived experiences of *Black learners, apprentices and staff.

Recommendation 3

Implementation of the BLG 10-Point Plan: The Welsh Government should put plans in place, with appropriate funding, to support implementation of the BLG 10-Point Plan, including an associated collaborative programme of professional learning, a National Programme for *Black Talent Placements in further education in Wales and a national Estyn inspector shadowing programme for *Black Staff in further education. The latter will need to be tested with Estyn.

Recommendation 4

Wider organisational Anti-racism plans: On a case-by-case basis, the Welsh Government should consider including in current and future remit/grant letters to key further education stakeholders it funds, a requirement to develop specific Anti-racist action plans aligned to the Anti-Racist Wales Action Plan.

Medium Term Priorities

Recommendation 5

Curriculum review: The Welsh Government should fund pilot curriculum reviews that embed Anti-racism content and pedagogy, with a view to developing a National Anti-racist Curriculum Framework for further education. This should be a collaborative

project involving Anti-racism curriculum experts, key awarding organisations, and further education institutions, and should align with current post-16 qualification initiatives and relevant aspects of the recommendations already accepted by the Welsh Government for the secondary school curriculum.

Recommendation 6

ESOL progression pathways: In order to support its goal of “ensuring ESOL provision fully supports the needs of Black, Asian and Minority Ethnic communities”, the Welsh Government should, in collaboration with further education institutions, ColegauCymru and Qualification Wales, develop and publicise progression pathways for ESOL learners to vocational training, apprenticeships and higher education. Data on progression to these programmes should be used to a) determine the effectiveness of current provision and b) identify priorities for development in line with the outcomes of the ESOL policy review currently being undertaken.

Recommendation 7

Requirements for development of post-16 qualifications: The Welsh Government should put policy expectations in place to ensure that the Anti-racist agenda has been taken into account in the development of all future post-16 qualifications in terms of content, pedagogy and design and delivery approaches.

Recommendation 8

Supporting and encouraging the *Black learner and *Black staff voice: The Welsh Government should work with ColegauCymru, further education institutions and related stakeholders to develop appropriate enabling structures and mechanisms that will ensure contribution of *Black learner, apprentice, staff and wider community voice to the Anti-racist agenda and to dismantling racial inequities that exist throughout the further education system.

Recommendation 9

Leadership of Anti-racism: The Welsh Government has a vital role to play in showing demonstrable leadership of Anti-racism by: collaborating with ColegauCymru and further education institutions to articulate a clear vision for Anti-racism within the sector and what this means in practice, developing a specific plan showing how the Leadership and Representation sections on pages

34-40 of the Anti-Racist Wales Action Plan will apply in the context of further education and the education sector more broadly.

Recommendation 10 Anti-Racist Wales Ambition: The Welsh Government should clarify the status of the Anti-Racist Wales Ambition – for example whether it is guidance and non-statutory – and how it intersects with the Equality Act.

Recommendation 11 Proposed Board for the Commission of Tertiary Education and Research in Wales: The Welsh Government should ensure that the Board is representative in its membership, as part of a strategy for increasing visible *Black representation in important leadership positions through Public Appointments to Boards of Public Bodies more widely.

Longer Term Priority

Recommendation 12 Further research: The Welsh Government should fund further research and projects to support innovative Anti-racist initiatives and practice including data collection, monitoring and reporting, *Black learner, apprentice, staff and community voice, curriculum review and development, pedagogy, assessment, resources, good practice, quality assurance and scrutiny, leadership including governance and capacity building, recruitment and career progression strategies for to attract and retain *Black staff.

Summary of Next Steps

This report provides an initial assessment of the current contribution that further education institutions can make to the Welsh Government's Anti-Racist Wales Action Plan (now and for areas that require further development to realise the ambition of an Anti-racist Wales by 2030).

The report's findings and recommendations help prepare for a programme of equality research, analysis and development for the further education sector at institutional and national level that could be delivered from 2022-2023.

The next step for the Welsh Government is to develop a resourced plan with timescales to support the achievement of the report's recommendations, with an initial focus on recommendations 1, 2 and 3 to provide the framework for progressing the Anti-racist agenda within further education institutions and across the sector. The plan should be developed in An Initial Assessment of The Further Education Sector's Contribution to the Welsh Government's Anti-Racist Wales Action Plan

collaboration with further education institutions and relevant organisations and in consultation with *Black learners and staff. Secondly, the Welsh Government should secure the expertise necessary to fulfil the plan.

1. Introductions

Background

- 1.1 This report presents the results of the scoping project commissioned by the Welsh Government in January 2022. The project remit was to undertake initial work to help prepare for a programme of equality research, analysis and development for the further education sector that could be delivered from 2022-2023 to progress the Welsh Government's ambitious and radical plan for making Wales an Anti-racist nation, *An Anti-Racist Wales: The Race Equality Action Plan for Wales* (the Anti-Racist Wales Action Plan).
- 1.2 The project was co-delivered by the BLG and ColegauCymru with the BLG undertaking desk research and meetings with further education leaders and key stakeholders, and ColegauCymru administering the project. With the active engagement of key participants, the project was completed by 31 March 2022.
- 1.3 The recommendations contained within the report provide a detailed interrelated set of actions to take the Anti-racist agenda forward within the Welsh further education sector.

Project Aims and Outputs

- 1.4 The aims and outputs of the project were to:
 - a) develop an overview of where further education institutions in Wales and key stakeholders currently stand in relation to Anti-racism in its widest sense,
 - b) gain an understanding of data needs (learners, staff and governance),
 - c) identify interest in and curriculum areas and/or qualifications for a further education curriculum review from April 2022,
 - d) identify interest in and support needed to implement the BLG's 10-Point Plan Diagnostic Toolkit across Welsh further education institutions, and
 - e) produce a report for the Welsh Government with a series of recommendations and ways to effectively implement the Anti-Racist Wales Action Plan in the further education sector from April 2022.

Project Governance

1.5 The steering committee (*Appendix C*), comprised of representatives from further education institutions, ColegauCymru and the BLG, had oversight of the project. The remit of the steering group was to ensure achievement of the project's aims and outputs. A representative of the Welsh Government attended meetings in an observer capacity.

Context

1.6 The scoping project sits within the context of the Welsh Government's transformational Anti-racist agenda articulated in the Anti-Racist Wales Action Plan's vision, aims and goals. The project seeks to support the further education sector in tackling racial inequities within the education system with a focus on creating an Anti-racist culture, closing attainment gaps in skills, training and employment for *Black learners and apprentices, and achieving an ethnically diverse and representative workforce, including leadership and governance roles. Furthermore, the project supports the Wellbeing of Future Generations (Wales) Act by making an important contribution to the goals of 'A more equal Wales' and 'A Wales of cohesive communities.'

1.7 The project's four strands of strategic framework and practice, data collection, monitoring and reporting, curriculum review, and implementation of the BLG 10-Point Plan to leverage change are closely aligned to the Anti-Racist Wales Action Plan's a) aims and goals for further education, b) goals for apprenticeships within the skills sector and c) three of the five cross-cutting goals and actions (more meaningful impact assessments, the need for more up-to-date data on lived experiences and data that is robust and granular).

1.8 The Anti-Racist Wales Action Plan's aims and goals for the further education sector focus on building an evidence base and understanding of quantitative and qualitative information prior to identifying actions that will lead to dismantling structural racial inequities within the education system. The project assesses the current contribution further education institutions are making to the evidence base and understanding of:

- ethnicity data on participation and outcomes for further education learners, and the underlying reasons for any gaps and disparities between groups,
- ethnicity data on further education staff and the underlying reasons for any underrepresentation,

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- lived experiences of *Black learners and staff, *and*
- how further education institutions are working to ensure that harassment and discrimination are not tolerated.

Methodology

1.9 The outcomes and recommendations of the report arise from quantitative and qualitative information gathered through desk research, structured meetings with further education institutions, and meetings with key stakeholders (Annex A includes the list of participants).

Desk Research: Further Education Institutions

1.10 Desk research was undertaken on each further education institution's strategic and policy frameworks and practice, including their equality objectives, Strategic Equality Plan, annual report on progress against the plan and race equality data. and other equality information and initiatives.

1.11 The purpose of the research was twofold. Firstly, it assisted in building a picture of where each further education institution stands at the current time, including:

- a) policies, procedures and initiatives in relation to race equality and Anti-racism,
- b) objectives for and progress in furthering race equality and Anti-racism within the institution and the wider community,
- c) the evidence base for evaluating and monitoring progress against institutional equality objectives, including types of ethnicity data being collected,*and*
- d) the extent to which current plans and equality objectives support the goals of the Welsh Government's Anti-Racist Wales Action Plan and ambition for an Anti-racist Wales by 2030.

Secondly, the research will help:

- e) provide the framework for a programme of more comprehensive equality research, analysis and development for the Further Education sector that could be delivered from 2022-2023.

Meetings with Further Education Leaders

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1.12 Initial and follow up meetings (where necessary) of an hour each were held with chief executives of each of the thirteen Welsh further education institutions. Some chief executives chose to attend with one or more of their senior leadership team members. A structured agenda was followed for the meetings.

1.13 The purpose of the meetings with further education leaders was to:

- gain a better understanding of where each institution currently stands in relation to Anti-racism and racial equity in the widest sense,
- have an in-depth discussion of each institution's contribution to the Welsh Government's Anti-Racist Wales Action Plan goals for the further education sector and an Anti-racist Wales by 2030,
- explore current and future data needs (learners, staff and governance),
- identify potential curriculum areas and/or qualifications for pilot reviews, *and*
- assess interest in BLG Affiliation and implementation of the 10-Point Plan and what support is needed to facilitate this.

Meetings with Key Stakeholders

1.14 Meetings were held with twelve key stakeholders to gain an understanding of each organisation's:

- remit, ambitions and hopes in relation to Anti-racism and racial equity in relation to the Anti-Racist Wales Action Plan's aims and goals including those for the further education sector,
- roles and responsibilities for promoting Anti-racism and addressing racial inequities,
- priorities for furthering Anti-racist and racially equitable practice,
- contribution to the Welsh Government's Anti-Racist Wales Action Plan and aim for an Anti-racist Wales by 2030, *and*
- how organisations across the sector can collectively tackle and address racial inequities within the system and build a better future for Wales' diverse communities.

1.15 It should be noted that FE *Black Learner, *Black Staff, and *Black Governor Voices were significantly absent from the research.

2. Key Findings: Further Education

2.1 As a result of desk research and meetings, individual profile reports have been produced detailing:

- a) where each institution currently stands in relation to Anti-racism in its widest sense,
- b) data needs (learners, staff and governance),
- c) interest in and curriculum areas and/or qualifications for a further education curriculum review from April 2022
- d) interest in and support needed to implement the BLG's 10-Point Plan

These profile reports which include areas for development provide a roadmap for each individual institution Anti-racism agenda to move forward and make more effective contributions to the Anti-Racist Wales Action Plan aims and objectives.

Strategic Equality Frameworks and Practice

2.2 As listed bodies, Welsh further education institutions are required to publish their equality objectives and a Strategic Equality Plan³. All but two of the further education institutions publish a plan on their website. These two further education institutions are part of university groups and have a combined plan with their partner university which is available on the university's website.⁴

2.3 The requirements for Strategic Equality Plans include:

³ Guidance, Equality Objectives and Strategic Equality Plans: A Guide for Listed Public Authorities in Wales, Equality and Human Rights Commission.

⁴ Coleg Sir Gar and Coleg Ceredigion, and The College Merthyr Tydfil. The former has a link to the UWTSD website which does not work, and the latter only makes reference to the USW's plan in its Strategic Equality Plan Annual Equality Report. Coleg Sir Gar and Coleg Ceredigion have stated in their Black Lives Matter pledge that they intend to publish their own Strategic Equality Plan and The College Merthyr Tydfil states in its Strategic Equality Plan Annual report 2019-20 that they have published a separate 2020-2024 Strategic Equality Plan. An Initial Assessment of The Further Education Sector's Contribution to the Welsh Government's Anti-Racist Wales Action Plan

- a) equality objectives and the steps (actions) for achieving the objectives with timescales,
 - b) arrangements for monitoring progress, *and*
 - c) arrangements each institution has for publishing the relevant equality information that it holds and which it considers appropriate to publish, including any information about pay differences related to a protected characteristic and the causes of these.
- 2.4 The quality and detail of each further education institution's Strategic Equality Plan vary. In the best plans, equality objectives are focussed, targeted at those inequities the institution needs to address and developed in consultation with learners, staff and wider stakeholders. In too many plans the equality objectives tend to be aspirational statements which do not identify underlying problems and how the institution intends to address these.
- 2.5 Most further education institutions' Strategic Equality Plans do not include:
- the quantitative and qualitative evidence base for each objective,
 - the exact nature of the problem or problems each objective and its corresponding actions are seeking to address,
 - measurable quantitative and qualitative targets,
 - milestones for intended outcomes, particularly for those actions that span a number of years,
 - objectives or actions concerned with curriculum content, pedagogical approaches and the nature of assessment despite these being critical to learners' attainment and outcomes (actions tend to be around accessibility and inclusion), or
 - a full and consistently reported set of data on learners, apprentices, staff, governors, HR processes, grievances, disciplinaries, incidences of harassment, bullying, discrimination, and the lived experiences of *Black learners, apprentices, staff, and governors.

The individual Further Education Institution Profile Reports provide guidance on and recommendations for the institution's Strategic Equality Plan (and Annual Equality Report). The profiles will support more focussed target setting and greater consistency in what is reported on in relation to equality generally and race equality specifically. Professional learning and associated programmes through implementation of the 10-Point Plan will also support development of templates, including those for data.

- 2.6 Objectives and actions to promote Anti-racism and ensure equitable experiences and outcomes for *Black learners and staff do not feature prominently in Strategic Equality Plans. In many cases, the focus is on all protected characteristics rather than targeting actions to address the inequities faced by a particular group. There are a number of ways of addressing this. For example, developing a separate race equality action plan (as Grŵp Llandrillo Menai and UWTSD both have done) or a broader range of race equality objectives with corresponding actions as an annex to existing Strategic Equality Plans, may assist further education institutions in a) making a more targeted contribution to the Welsh Government's Anti-Racist Wales Action Plan and the aim of an Anti-racist Wales and b) tracking and monitoring progress in taking the Anti-racist agenda forward within institutions and across the sector.
- 2.7 Another challenge for further education institutions is ensuring that their Strategic Equality Plan remains current and relevant. i.e., ensuring it is a 'living document'. Some institutions have addressed this by making reference in their annual equality reports to current issues, providing in effect an annual update to their Strategic Equality Plan. In one case, the Strategic Equality Plan has been updated as an annual action plan. Too many actions are ongoing from one year to the next or are carried forward or carried over from the previous four-year plan to the next. This trend can also be seen in many annual published equality reports (2.9) below.
- 2.8 Further education institutions all express a strong commitment to equality, diversity and inclusion. Some convey a commitment to equity and recognise that ensuring equity requires actions that may be distinct from those for diversity and inclusion. Whilst challenging racism does not feature strongly in the majority of Strategic Equality Plans, a number of further education institutions have published statements of commitment to race equality and/or an Anti-racist pledge, including one institution that has published a Black Lives Matter pledge⁵.
- 2.9 All institutions produce annual published equality reports bar St David's⁶ (NB the report for Coleg Sir Gar and Coleg Ceredigion is produced by UWTSD. St David's includes progress made against its priority areas/objectives for equality in its Annual Equality & Diversity Action Plan). The contents and quality of the reports are highly variable. Some

⁵ BLM pledge: Coleg Ceredigion and Coleg Sir Gâr. B LM statement: Coleg y Cymoedd. Zero Racism pledge: Bridgend College. Anti-racism/race equality statements: UWTSD (Coleg Ceredigion and Coleg Sir Gâr, although UWTSD does not say the statement represents all its institutions), USW (the university does not explicitly say this applies to The College Merthyr Tydfil College), Adult Learning Wales and Coleg Gwent.

⁶ St David's Financial Statements 2020-2021 state that An Annual Equality Report is produced but this does not appear to be available on the College's website. The College's Equality & Diversity Action Plan 2020-2021 includes progress made against the priority areas/objectives in the plan.

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reports include progress against the objectives and actions in their Strategic Equality Plans, some do not. Many of the reports that include progress, provide an overview or ‘highlights’ of the progress made rather than detailing progress for each action. Some reports contain data, some do not. Of those reports that include data, the nature of what is included varies. It would be expected that reports include ethnicity data on learners (participation and outcomes for the type of provision offered; i.e., further and/or higher education), apprentices (participation and outcomes), workforce composition overall and by grade, governing body composition, staff recruitment processes, staff HR processes (grievances and disciplinary, including incidences of bullying, harassment, racism and discrimination) and learner incidences of bullying, harassment, racism and discrimination. Few institutions report on all these data. The formats used for reporting on data are often inconsistent within individual institutions.

- 2.10 Other documentation available on websites tends to be a) policies and procedures associated with conduct (including bullying and harassment) or those for key processes, often for administrative matters, b) strategic plans, c) annual reports and accounts, d) and information on institutional, staff and student awards. Some further education institutions have an equality and diversity policy which is separate from their Strategic Equality Plan. None of the further education institutions have policies for dealing with racial harassment and/or promoting Anti-racism. However, a number of institutions make a reference to race in their anti-bullying and harassment policies, usually in a list of protected characteristics or examples of misconduct/gross misconduct towards people based on their race.
- 2.11 Whilst some further education institutions publish details of their equality activities, including race equality, many do not. In general, there are many missed opportunities to promote Anti-racism within institutions and across the sector and to showcase the work of individual further education institutions in respect to Anti-racism.
- 2.12 As part of the desk research, Estyn inspection reports for each further education institution were examined. Reporting on equality and diversity is variable, as while Estyn does consider equality and diversity matters in inspections, reports focus on strengths and areas for improvement. In a few cases, no reference is made to equality and diversity at all (Adult Learning Wales, Coleg Gwent, Coleg Sir Gâr and Coleg Sir Ceredigion. For the latter, the inspections were in 2014 prior to merger⁷). In most cases reports contain a few general references to equality, diversity and inclusion. Equality

⁷ Before becoming constituent colleges of UWTSD in 2014 and pre-merger of the two colleges in 2017.

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and diversity are covered in more detail in a few reports; for example, the reports for Coleg y Cymoedd and Grŵp Llandrillo Menai include references to strategic leadership of equality and diversity, along with more detailed examples of activities undertaken by learners and staff.

Data collection, monitoring and/or reporting

- 2.13 Data collection, monitoring and/or reporting are key to implementation of the Welsh Government's Anti-Racist Wales Action Plan, but desk research and meetings with leaders identify these are key areas for development. Data in annual equality reports are patchy. For example, learner and apprentice attainment data are not always included in reports. This makes it difficult to ascertain firstly, the extent to which attainment data are scrutinised for any disparities in outcomes between groups of learners or apprentices and secondly, the impact of any actions taken to address disparities.
- 2.14 Where data are included in plans and reports, there is often inconsistency in the data sets used, making it difficult to ascertain trends. Formats for reporting data differ and there is little standardisation of how ethnicity data are aggregated into top-level categories. Few further education institutions disaggregate data by detailed ethnic category when analysing, for example, outcomes for learners or workforce composition. Whilst disaggregation may result in some very small numbers for specific ethnic groups, it is important to evaluate data at this level where possible to establish gaps and disparities in participation and outcomes, particularly in relation to trends over time. The importance of disaggregation of ethnicity data was identified in the Wales Centre for Public Policy Evidence Review Report "Disaggregating ethnicity data and considering other relevant variables would allow for better targeting of interventions, which should include a focus on increasing retention, success, and progression, in addition to access." (Stevenson et al., 2019)."⁸

⁸ Wales Centre for Public Policy Evidence Review Report, Arday, J, Improving Race Equality in Education, Durham University, March 2021.

- 2.15 In many institutions, data for apprentices, staff recruitment, the governing body, HR processes, incidences of bullying, harassment, racism and discrimination and the lived experiences of *Black learners, apprentices and staff have not been included and analysed in plans and reports. Staff non-disclosure rates for ethnicity are extremely high in a number of institutions (for example, non-disclosure currently stands at 50.0% in one case). Generally, there is an urgent need to accelerate the rate of improvement in reporting ethnicity and whilst doing so appears in a number of plans, details of how this will be achieved are not included. Local strategies, including professional learning through implementation of the 10-Point Plan, are needed to raise staff awareness of the importance of collecting, monitoring and reporting ethnicity data to progress the Anti-racist agenda.
- 2.16 Desk research has identified that further education institutions need to review their use of and reporting on ethnicity data in relation to the aggregation of detailed categories into high-level categories, including terminology used. This is likely to require training for support staff, assessors, lecturers and managers so that everyone understands how ethnicity data should be presented and evaluated. Standardised templates would also be of benefit.
- 2.17 Few further education institutions have interrogated data in sufficient depth to identify underlying reasons for any disparities in learners' or apprentices' outcomes and underrepresentation.
- 2.18 In relation to *Black staff, few further education institutions analyse representation by type of staff and grade, nor do they look at recruitment processes and practice in sufficient detail to determine the actions needed to tackle underrepresentation.
- 2.19 Data issues need to be addressed if the Welsh Government is to achieve a) the aim of establishing a robust evidence base for the sector and b) the intended outcomes of the Anti-Racist Wales Action Plan.

Curriculum review

- 2.20 All further education institutions have expressed an interest in undertaking a pilot curriculum review and the awarding bodies. City and Guilds and VTCT have expressed interest in supporting reviews. The focus of these pilots is to develop Anti-racist

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vocational curricula. The list of potential curriculum areas for the pilot is included in Annex B.

- 2.21 Most further education institutions have an equality objective that is associated with the curriculum, courses and/or learning. These objectives, however, do not on the whole include actions concerned with providing Anti-racist curricula, pedagogy, assessment and/or equitable learning experiences. The exceptions to this are UWTSD's Strategic Equality Plan and Race Equality Plan (which applies to Coleg Sir Gâr and Coleg Ceredigion) and USW's Strategic Equality Plan (which applies to The College Merthyr Tydfil) and Grŵp Llandrillo Menai's Race Equality Action Plan, all of which give prominence to curriculum and pedagogy, including decolonisation of the curriculum. It should be noted that the UWTSD and USW plans are higher education oriented and do not cover further education provision. Neither Coleg Sir Gâr and Coleg Ceredigion or The College Merthyr Tydfil report on how the Anti-racist curricular initiatives identified in the Strategic Equality Plans are being or will be implemented in the further education context.
- 2.22 Developing Anti-racist curricula, pedagogy and assessment are key areas for development for all Welsh further education institutions, particularly given the emphasis on promoting Anti-racism and racial equity within the Curriculum for Wales through the work of the Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group.
- 2.23 Reviews will need to ensure any revisions to the curriculum can be delivered through the Welsh language.
- 2.24 The Programme for Government and the Co-operation Agreement with Plaid Cymru set out shared commitments to significantly expand the range of "made for Wales" vocational qualifications, to meet the needs of Welsh learners and the Welsh economy. The Welsh Government should ensure that its review of the current offer of vocational qualifications, and any subsequent reforms to qualifications, take opportunities to incorporate anti-racist concepts and practices.

Implementation of the BLG 10-Point Plan

- 2.25 Two colleges – Cardiff and Vale College and Coleg Gwent - are affiliated to the BLG and another, St David's, is in the process of doing so. Affiliation involves implementing the 10-Point Plan. The other ten further education institutions have expressed interest in An Initial Assessment of The Further Education Sector's Contribution to the Welsh Government's Anti-Racist Wales Action Plan

using the 10-Point Plan Diagnostic Toolkit and/or affiliation. One of these is part of an HEI group and is discussing implications of affiliation, if any, within the group's structure.

- 2.26 Several further education institutions said they would welcome Welsh Government funding support for implementing the 10-Point Plan.
- 2.27 Many further education institutions described difficulties in recruiting staff and would welcome support to recruit *Black staff. There is an opportunity to develop local strategies and an innovative national Black talent placement programme within the context of implementing the 10 Point-Plan.

3. Key Findings: Major Stakeholders

- 3.1 The meetings held with stakeholders provided understanding of their role in relation to the Anti-Racist Wales Action Plan and explored their organisational position on Anti-racism. Emerging themes were:
 - 3.2 All stakeholders expressed support for an Anti-racist Wales by 2030 and welcomed Ministers' and senior officials' commitment to Anti-racism. It was suggested that a programme of Anti-racism awareness raising and capacity building for officers would be beneficial so they can properly support the Anti-racism agenda.
 - 3.3 Most stakeholder organisations appear to fall into the 'non-racist' category. There is limited understanding of the implications of adopting an Anti-racist position. Some significant and radical work (and an associated budget) is a priority to improve understanding of Anti-racist thinking and behaviours so that the ambition can be realised within the 2030 demanding timeframe. The Welsh Government, in collaboration with ColegauCymru and further education institutions, should undertake work to articulate a clear vision for Anti-racism for the further education sector and what "anti-racist" actually means in practice.
 - 3.4 Most stakeholders lack confidence about Anti-racism and would themselves benefit from implementing aspects of the BLG 10-Point Plan to build internal organisational capacity in order to contribute meaningfully to the Anti-racism 2030 agenda.
 - 3.5 Whilst most stakeholder organisations interviewed had responded to the Anti-Racist Wales Action Plan consultation, generally, there appeared to be a lack of clarity about their own planning and priorities, roles and responsibilities, and expectations going forward.

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- 3.6 It would appear that only two stakeholders had a specific post which included responsibility for promoting Anti-racism and addressing racial inequities - Coleg Cymraeg Cenedlaethol (from January 2022) and NTfW (fixed term project post ending in July 2022). Estyn have mentioned that they approach equality and diversity across all protected characteristics, so they have a lead inspector for equality and diversity rather than a separate one for Anti-racism.
- 3.7 Stakeholders have had very little structured engagement with further education institutions and ColegauCymru in relation to race equality and there appear to be missed opportunities for collaboration to tackle racial inequities within the system.
- 3.8 Careers Wales holds a wealth of historical information and continues to collect data on, for example, learner destinations, progression, and young people who are not in education, employment or training (NEET) . If analysed, this information could provide useful trends to support qualifications reform, curriculum reviews, college curricular and plans.
- 3.9 With the introduction of the new inspection framework, closer alignment to the Anti-Racist Wales Action Plan provides an opportunity for Estyn to have an influential role in progressing Anti-racism in practice. This will require asking difficult questions, use of comparative ethnicity data to ensure equitable learning experiences and outcomes, role modelling and consistency and rigorous scrutiny across the sector. It is critical that inspectors are well versed and confident in making judgements about Anti-racist practice and that inspection teams are representative.
- 3.10 Qualifications Wales has a regulatory role in ensuring that regulated qualifications are designed and assessed in a way that is fair to all learners. A major piece of work in recent years has involved sector reviews of vocational qualifications and it is critical that future reviews incorporate Anti-racism within the content, design, delivery and assessment of qualifications.

4. Recommendations

The Welsh Government has given clear direction about the critical agenda of Anti-racism and the role of further education institutions in achieving the goal of an Anti-racist Wales by 2030. The institutions are committed to progressing Anti-racism and, with support, are poised to make a significant contribution to the goals of the Anti-Racist Wales Action Plan.

The recommendations provide a detailed interrelated set of actions the Government can take to ensure success. Recommendations 1, 2 and 3 provide the starting point for developing bespoke (reflecting individual needs and priorities) and viable Anti-racism Action Plans for each further education institution. Additionally, the plans will enable further education institutions to fully contribute to the goals and desired outputs of the Anti-Racist Wales Action Plan.

Immediate Priorities

Recommendation 1: Further Education Anti-racism Action Plans

All further education institutions (including Coleg Sir Gâr and Coleg Ceredigion, part of a dual sector partnership with UWTSD and The College Merthyr Tydfil part of the USW Group) should develop and publish specific evidence-based, Anti-racism action plans addressing local needs and aligned to the Welsh Government's objectives and ambitions for Anti-racist Wales 2030.

Plans should be live documents, in a prescribed format with measurable quantitative and qualitative targets and milestones for intended outcomes, particularly for those actions that span a number of years, including towards 2030.

Objectives or actions concerned with curriculum content, pedagogical approaches and the nature of assessment are critical to learner attainment and outcomes. These should be a clear feature of the action plan.

Further education institutions should include ethnicity pay gap reporting in their action plans if they are not already doing so.

In developing their Anti-racism plans, further education institutions should refer to their individual Profile Reports which have been produced as part of this scoping project. The reports include detailed recommendations which should be useful in strengthening institutional equality objectives, Strategic Equality Plans and Annual Equality and Diversity reports.

Understanding lived experiences is critically important to developing Anti-racism approaches and practice. *Black learners and *Black staff should be consulted and involved in developing Anti-racist action plans.

Recommendation 2: Quantitative and qualitative data collection, monitoring and/or reporting

To underpin strategy and practice and to measure progress, as a matter of urgency, the Welsh Government should work collaboratively with ColegauCymru, further education institutions, EHRC Wales and other relevant stakeholders to:

- categorise and improve monitoring and reporting of comprehensive, comparable, disaggregated performance and ethnicity related learner and apprentice data; these should include participation, retention, achievement, progress, progression and destination data,
- categorise and improve collection, monitoring and reporting of staffing and governance data,
- improve collection, monitoring and reporting of data on HR processes, incidences of bullying, harassment, discrimination and/or racism and the lived experiences of *Black learners, apprentices and staff.
- allocate responsibilities for data analysis, holding, monitoring and publishing, and at what levels (institutional and national),
- define accountability mechanisms,
- define ethnic diversity impact measures for further education,
- develop a methodology for understanding the experience of different ethnicities in Wales.

Recommendation 3: Implementation of the BLG 10-Point Plan

The Welsh Government should support implementation of the BLG 10-Point Plan. This should include funding for:

- an associated collaborative programme of professional learning in terms of curriculum content, resources and delivery (tutorial, pedagogy and teacher training), sharing of good practice and quality assurance,
- a National Programme for *Black Talent Placements in further education in Wales in order to help a) tackle the current recruitment crisis, b) increase *Black staff representation and c) increase the number of *Black role models in further education institutions, *and*

a national Estyn inspector shadowing programme for *Black Staff in further education. This could include a programme of training and development delivered by Estyn, coaching and mentoring by Estyn inspectors, and shadowing of inspectors during inspections or other work. The programme would be of benefit to shadows, inspectors,

and institutions and would help to raise the profile of *Black staff in the Welsh further education system. This recommendation should be tested with Estyn.

Recommendation 4: Wider organisational Anti-racism plans

The Welsh Government should consider including, on a case by case basis, in current and future remit/grant letters to key further education stakeholder organisations it funds, a requirement to develop specific Anti-racist action plans aligned to the Anti-Racist Wales Action Plan. Organisational level plans should include roles and responsibilities for promoting Anti-racism and addressing racial inequities, and priorities for furthering Anti-racist and equitable practice. Plans should also include, where appropriate, priorities for supporting, inspecting/reviewing and engaging with further education institutions.

Medium Term Priorities

Recommendation 5: Curriculum review

The Welsh Government should fund pilot curriculum reviews that embed Anti-racism content and pedagogy, with a view to developing a National Anti-racist Curriculum Framework for further education. This should be a collaborative project involving Anti-racism curriculum experts, key awarding organisations, and further education institutions, and should align with current curriculum reform and relevant aspects of the recommendations already accepted by the Welsh Government for the secondary school curriculum. Given the sector's remit for skills the reviews should focus on vocational subjects and/or qualifications. Consideration should be given to prioritising those areas which are of significant economic importance to Wales.

Recommendation 6: ESOL Progression Pathways

In order to support its goal of “ensuring ESOL provision fully supports the needs of Black, Asian and Minority Ethnic communities”, the Welsh Government should, in collaboration with further education institutions, ColegauCymru and Qualification Wales, develop and publicise progression pathways for ESOL learners to vocational training, apprenticeships and higher education.

Data on progression from ESOL programmes to vocational training, apprenticeships and higher education should be used to a) determine the effectiveness of current

provision and b) identify priorities for development in line with the outcomes of the ESOL policy review currently being undertaken.

Recommendation 7: Requirements for development of post-16 qualifications

The Welsh Government should introduce a mandatory requirement to show how meeting the Anti-racist agenda has been taken into account in the development of all future post-16 qualifications in terms of content, pedagogy and design and delivery approaches.

Recommendation 8: Supporting and encouraging the *Black learner and *Black staff voice

It is critical that *Black learners, apprentices, staff and wider community have a formal collective voice and confidence to hold individuals, institutions and organisations to account and are represented at all levels within the further education system, including governance, leadership and management, staffing, advisory boards, committees, the inspectorate and other bodies with educational oversight.

The Welsh Government should work with ColegauCymru, further education institutions and related stakeholders to develop appropriate enabling structures and mechanisms that will ensure contribution of the *Black learner, apprentice, staff and wider community voice to the Anti-racist agenda and to dismantling any racial inequities that exist in the further education system.

Recommendation 9: Leadership of Anti-racism

The Welsh Government has a vital role to play in showing demonstrable leadership of Anti-racism by:

Collaborating with ColegauCymru and further education institutions to articulate a clear vision for Anti-racism within the sector and what this means in practice.

Developing a specific plan showing how the Leadership and Representation sections on pages 34-40 of the Anti-Racist Wales Action Plan will apply in the context of further education and the education sector more broadly.

Recommendation 10: Anti-racist Wales Ambition

The Welsh Government should clarify the status of the Anti-racist Wales Ambition – for example whether it is guidance and non-statutory – and how it intersects with the Equality Act – a legislative requirement that has, for the past 11+ years, prioritised a ‘policies and procedures’ approach, but has not, in practical terms, greatly improved the position of any of the ‘protected characteristic’ groups.

Recommendation 11: Proposed Board for the Commission of Tertiary Education and Research in Wales

The Welsh Government should, as part of a strategy for increasing visible *Black representation in important leadership positions through Public Appointments to Boards of Public Bodies more widely, ensure that the Board of the proposed Commission for Tertiary Education and Research in Wales is representative in its membership.

Longer Term Priority

Recommendation 12: Further research

The project remit was to undertake initial work to help prepare for a programme of equality research, analysis and development for the further education sector:

The Welsh Government should fund further research and collaborative projects that will support implementation of the above recommendations, and development of innovative Anti-racist initiatives and practice. This should include data collection, monitoring and reporting, *Black learner, apprentice, staff and community voice, curriculum review and development, pedagogy, assessment, resources, good practice, quality assurance and scrutiny, leadership including governance and capacity building, recruitment and career progression strategies to attract and retain *Black staff.

5. Next Steps

An Initial Assessment of The Further Education Sector’s Contribution to the Welsh Government’s Anti-Racist Wales Action Plan

- 5.1 This report provides an initial assessment of the current contribution that further education institutions can make to the Welsh Government's Anti-Racist Wales Action Plan and areas that require further development to realise the ambition of an Anti-racist Wales by 2030.
- 5.2 The findings have identified that to effect timely change, action needs to be taken at institutional and national level, requiring direction and leadership by the Welsh Government. In addition, there are significant requirements associated with building the quantitative and qualitative evidence base the Government is seeking to form prior to identifying actions that will lead to dismantling structural racial inequities within the further education system:

Further Education Institutions

- 5.3 Further education institutions have a vital role to play in advancing Anti-racism in Wales and contributing fully to the evidence base through a) developing, implementing and monitoring resourced Anti-racist action plans and b) active participation in national FE projects that further the Anti-racist Wales 2030 ambition. Institutions will require support, including:
- Guidance on the format for Anti-racist Action Plans aligned to the Welsh Government's Anti-Racist Wales Action Plan and training on developing and delivering an institutional Anti-racist plan.
 - Standard ethnicity data reporting formats for Strategic Equality Plans, Anti-Racism Action Plans and Annual Equality Reports and training on aggregation, evaluation, monitoring and reporting of data for:
 - learners and apprentices
 - staff
 - governors
 - HR processes
 - incidences of bullying, harassment, discrimination and or racism – learners, apprentices and staff
 - lived experiences of *Black learners, apprentices and staff
 - Training on Anti-racist pedagogy for leaders, managers, lecturers and observers.
 - Training on incorporating scrutiny of Anti-racist practice in quality assurance processes.
 - Training and a framework for reviewing and developing current curricula, ensuring it reflects contemporary values, incorporating the importance of colonial history

and its influence on society, historically and now; the impact of racism on *Black and white communities; the contributions made by *Black people to society.

- Strategies and programmes to increase recruitment of and career progression for *Black staff.
- Strategies to improve non-disclosure of ethnicity and how to increase reporting.
- Training on developing equality impact measures.

Welsh Government

5.4 Nationally, the Government will need to be the lead organisation for:

- Commissioning the framework for Anti-racist Action Plans.
- Commissioning Anti-racist curriculum content.
- A Wales-wide recruitment strategy to increase the proportion of *Black staff at all levels within the further education sector.
- Developing and implementing a strategy for external scrutiny, including inspection (in collaboration with Estyn), of Anti-racist practice. This could include thematic reviews and needs to be considered as part of the future Commission for Tertiary Education and Research's quality responsibilities.
- Development of a strategy and fora to strengthen the *Black learner, *Black staff, and *Black governor voice.

Welsh Government, Further Education Institutions and ColegauCymru

5.4 Jointly and individually, take action to raise awareness through national, regional and local promotion of Anti-racist initiatives and publication of good news stories.



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ANNEX A

LIST OF PARTICIPANTS

An Initial Assessment of The Further Education Sector's Contribution to the Welsh Government's Anti-Racist Wales Action Plan

List of Project Participants

Further Education Institutions

- Adult Learning Wales
- Bridgend College
- Cardiff and Vale College
- Coleg Cambria
- Coleg y Cymoedd
- Coleg Gwent
- Coleg Sir Gâr and Coleg Ceredigion ⁹ constituent colleges of University of Trinity St David (UWTSD)
- Gower College Swansea
- Grŵp Llandrillo Menai
- NPTC Group of Colleges
- Pembrokeshire College
- St David's Sixth Form College
- The College Merthyr Tydfil, part of the University of South Wales (USW) Group

Key Stakeholders

- Careers Wales
- Children's Commissioner for Wales
- Y Coleg Cymraeg Cenedlaethol
- Education Workforce Council (EWC)
- Equality and Human Rights Commission (EHRC) Wales
- Estyn
- Ethnic Minorities & Youth Support Team Wales (EYST)
- Learning and Work Institute
- National Training Federation for Wales (NTfW)
- NUS Cymru
- Qualifications Wales
- Unison

⁹ Combined analysis with Coleg Ceredigion as the two further education institutions merged in 2017 but the separate names have been maintained.

An Initial Assessment of The Further Education Sector's Contribution to the Welsh Government's Anti-Racist Wales Action Plan



ANNEX B

CURRICULUM PILOT SUBJECT MAP

CURRICULUM PILOT REVIEW SUBJECT MAPPING GRID

College	Expression of Interest	Curriculum Area	Curriculum Area
Adult Learning Wales	✓	ESOL	ESOL and Work Preparation
Bridgend College	✓	Agriculture, Horticulture and Animal Care	
Cardiff and Vale College	✓	Construction and Building Services	Green technologies
Coleg Cambria	✓	Engineering Construction	Health and Social Care
Coleg y Cymoedd	✓	Tutorial	Enrichment
Coleg Gwent	✓	Health and Care	Catering
Coleg Sir Gar and Coleg Ceredigion	✓	Outward facing areas: Leisure and Tourism Performing Arts	For Impact: Construction Challenge: Agriculture
Gower College Swansea	✓	ESOL and alignment to vocational training	
Grŵp Llandrillo Menai	✓	Hair and Beauty	Tutorial Programme
NPTC Group of Colleges	✓	Hair and Beauty	
Pembrokeshire College	✓	Health and Social Care	
St David's Sixth Form College	✓	Humanities and Social Sciences	
The College Merthyr Tydfil	✓	Hair and Beauty	Childcare

An Initial Assessment of The Further Education Sector's Contribution to the Welsh Government's Anti-Racist Wales Action Plan



ANNEX C

SCOPING PROJECT STEERING COMMITTEE

An Initial Assessment of The Further Education Sector's Contribution to the Welsh Government's Anti-Racist Wales Action Plan



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ColegauCymru/Black Leadership Group Scoping Project for the Welsh Government's Anti-Racist Wales Action Plan - Steering Committee Membership and Terms of Reference:

Membership:

Mike James (Chair)	Cardiff and Vale College
Stella Mbubaegbu	BLG
Robin Landman	BLG
Guy Lacey	Coleg Gwent/Chair of ColegauCymru
Kathryn Robson	Adult Learning Wales
Lisa Thomas	The College Merthyr Tydfil
Lucy Webb	Bridgend College
Marian Jebb	Welsh Government (Observer)
Rachel Bowen	ColegauCymru

Purpose:

To provide oversight of the Anti-Racist Wales Action Plan Scoping Project.

Responsibilities:

To ensure the aims of and outputs for the Anti-Racist Wales Action Plan Scoping Project are achieved with the final report and recommendations submitted to the Welsh Government by the agreed delivery date.

Specific responsibilities are to:

- a) document meetings, including any conflicts of interest,
- b) receive progress reports on the project and the delivery of its outputs,
- c) monitor delivery of the specified outputs within the agreed timeline,
- d) review and provide feedback on the draft project report and recommendations,
- e) approve/sign off the final report and recommendations for submission to the Welsh Government

An Initial Assessment of The Further Education Sector's Contribution to the Welsh Government's Anti-Racist Wales Action Plan

- f) contribute to and support communications regarding the project, including dissemination of findings and final report.