

Strategic Equality and Human Rights Plan 2025 to 2029: Integrated Impact Assessment (March 2025)

Context

A new Strategic Equality and Human Rights Plan (SEHRP) is being drawn up to provide an integrated delivery framework to take forward the strengthening and advancing of equality and human rights in Wales. This plan will streamline future work, providing a more concise framework to rationalise and focus existing cross-Government delivery of equality and human rights commitments, while supporting more effective delivery.

The proposed SEHRP 2025 - 2029 sets out how Welsh Government plans to deliver against calls to integrate equality and human rights policy. The SEHRP brings together the recommendations in the Equality and Human Rights Commission (EHRC) [is Wales Fairer? report](#), and others in the [Strengthening and advancing equality and human rights in Wales](#) report and responses to Welsh Government consultation [Strategic Equality Plan 2024 to 2028: proposed principles of approach and objectives](#) by providing a public commitment to this new approach.

This Integrated Impact Assessment (IIA) is the third in a sequence of IIAs in relation to the creation and publication of the Welsh Government National Equality Objectives 2024-2028 (NEOs 2024 - 2028) which informed the development of the related Strategic Equality and Human Rights Plan (SEHRP) for the same period.

The first IIA (IIA-1) was the pre-consultation exercise carried out in May 2023; a second IIA (IIA-2) was actioned post consultation in February 2024. It informed Cabinet agreement to the text of the then proposed NEOs 2024 - 2028 and development of a linked Strategic Equality Plan (which now includes human rights).

This third IIA (IIA-3) focuses on the SEHRP itself; a delivery framework to realise the NEOs and provide a more effective and consistent approach to achieving these outcomes. This IIA also reflects that the SEHRP brings in for the first time a human rights statement of commitment to equality and human rights and a human rights approach to the development of policy and programmes. The SEHRP does not contain any direct actions but rather brings together a number of more specific plans under a single framework.

It accompanies the publication of the SEHRP 2025 - 2029 and reflects responses to the consultation [Strategic Equality Plan 2024 to 2028: proposed principles of approach and objectives](#), which closed 12 February 2024. The same consultation informed the development of the NEOs approved and published in [Written Statement: Achieving an equitable Wales: The National Equality Objectives 2024-28 \(18 March 2024\)](#).

Welsh Government has a statutory duty to publish and review our Equality Objectives every four years. The current set of Equality Objectives were published on 2 April 2020.

The Equality Act 2010 protects people from discrimination because of:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

These categories are known as the ‘Protected Characteristics’.

Since the publication of the SEP for 2020 - 2024, several distinct equality plans which link to, or are focussed on action to support individual protected characteristic groups have been published, each with their own defined set of Actions. Some of the plans listed below are not regarded as direct equality plans per se, but are primary vehicles for action which impact those within communities of interest which are also encapsulated within protected characteristic groups

- Age friendly Wales: our strategy for an ageing society
- Children and Young People Plan
- Action on disability: the right to independent living framework and action Plan (The Disability Rights Taskforce is developing a successor plan)
- Maternity Care in Wales – A five-year vision for the future 2019-2024
- Anti-racist Wales Action Plan (2 iterations)
- Refugee and Asylum Seeker Plan (Nation of Sanctuary)
- Advancing Gender Equality in Wales Plan 2020-2023
- Violence against women, domestic abuse and sexual violence: strategy 2022 to 2026
- LGBTQ+ Action Plan for Wales

Since distinct plans for several protected characteristic areas exist, with different policies covering all protected characteristics, the NEOs and SEHRP adopt an intersectional approach uniting equality policies through shared outcomes.

All Welsh Government plans that relate to protected groups or human rights are required to set out objectives and actions. Any revised versions of these plans or additional plans will also be required to demonstrate actions which align with the SEHRP 2025 – 2029 and delivering the NEOs (and any successive iterations of NEOs or the SEHRP going forward). The SEHRP 2025 - 2029. Measurement frameworks are being developed which will show

progress against the delivery of the NEOs 2024 - 2028, which are at the heart of the SEHRP 2025 – 2029.

The SEHRP has also been developed as a framework to support reforming the internal levers of Welsh Government as part of the wider systemic and cultural change this plan has been developed to support. This separate work will consider the associated impacts as these reforms are undertaken so again the SEHRP itself does not contain direct actions (more details are below).

Assessment to support the creation of the SEHRP

In line with the Well-being of Future Generations (Wales) Act 2015 'Ways of Working', the decision to integrate equality and human rights policy was taken to better support the maximisation of impact in delivering fairer and more equal policy outcomes across these areas, while also seeking to consider and mitigate against wider intersectional unintended or negative impacts.

This new framework directly responds to the research commissioned in January 2020 to examine options to strengthen and advance equality and human rights in Wales. The subsequent report, [Strengthening and advancing equality and human rights in Wales](#) (SAEHR) noted the strong connections between equality and human rights and recommended: *'The Welsh Government and public authorities in Wales should integrate human rights as standards for policy making to provide a stronger vision to advance equality and well-being. Human rights should be embedded in all policy and strategic planning processes.'*

The SAEHR research report notes the persistent 'implementation gap' between the aspirations of policy in Wales on equality and human rights, and people's lived experience, suggesting that stronger leadership is needed from the Welsh Government. The SEHRP creates the platform for this leadership by linking equality and human rights approaches across policy design and intervention delivery.

It also identifies that mainstreaming (embedding) is key to implementing equality and human rights. The SEHRP focuses not only on providing the framework to support more effective delivery of actions but also includes how the levers of Government can be reformed and strengthened to support mainstreaming.

Research literature establishes that Equality Impact Assessment (EIA) and Human Rights Impact Assessment (HRIA) are key mechanisms to support progressive policy development on equality and human rights. As one of the key reforms supported by the SEHRP is, we are confident that the creation of a new integrated equality and human rights impact assessment (EqHRIA) model will lead to better policy integration.

The evidence also highlights that monitoring progress needs to lead to action. To support this, measurement indicators ensuring compliance and accountability are needed. This SEHRP establishes a new monitoring framework to address these points.

Assessment of Evidence

In developing the SEHRP intersectional evidence has also been considered to identify how the framework created by the SEHRP can support delivery of outcomes. This includes reducing inequalities of outcome borne out of socio-economic disadvantage, in line with the requirements and aspirations of the [Socio-economic Duty](#) (Equality Act, section 1-3).

Intersectional evidence further illustrates impact on reducing inequalities of outcome because of socio-economic disadvantage. As identified in the 2025-26 Draft Budget and based on evidence produced by the Welsh Government Equality Evidence Unit, [A review of evidence on socio-economic disadvantage and inequalities of outcome](#), the ongoing effects of previous high inflation and the cost-of-living crisis, including energy, food and higher interest rates, continue to have a greater effect on those from lowest income household cohorts who are also at greater risk of reducing spending on essentials such as food and heating.

For example, although the rate of price increases is falling, people on low incomes are still affected by food prices. The Trussell Trust delivered more food parcels in the last year than previous years in Wales. More than half of the people referred for emergency financial payments to cover essentials in mid-2022 were women. Almost one in five had experienced domestic violence in the last 12 months. Disabled people, single adults living alone and families with children are also at the greatest risk of food insecurity, with a greater need of using food banks.

There is also evidence of the impacts of climate change disproportionately affecting disadvantaged groups. These include those people from low-income households, who are more likely to live in areas with high air pollution and have fewer resources to prepare for, and recover from, the effects of climate change.

Additionally, people from poorer households, disabled, LGBTQ+ or from Black, Asian, and wider ethnic minority communities are at greater risk of poor mental health and loneliness.

Maternal and infant mortality remains higher among women from Black, Asian, and wider ethnic minority community backgrounds compared to non-Black, Asian or wider ethnic minority communities for 2020-22 in the UK.

Both PISA and GCSE results, show a significant gap between the level of performance for the least disadvantaged pupils and the most disadvantaged pupils across Wales.

Disabled people and Black, Asian and wider ethnic minority people are more likely to be unemployed, experience pay inequalities or be in insecure work. The gender gap continues, with women from ethnic minority backgrounds are especially affected.

Those from poorer backgrounds as well as people who are disabled, LGBTQ+ or from ethnic minority backgrounds are also more likely to face housing inequalities or be at risk of homelessness, highlighting the need for more social housing.

Households with children, a single-person, disabled people or whose main income earner is from an ethnic minority community are disproportionately affected by poverty. Poverty is associated with increased risk of domestic violence, poorer general health and reduced ability to engage in healthy lifestyle behaviours. Rates of material deprivation have increased overall among working-age adults, with children and those in social housing at greatest risk. Evidence suggests that children are the population group most likely to be in relative income poverty, and rates continue to remain high.

While the above represents only some of the evidence considered, the evidence demonstrates inequalities and the extent to which human rights are linked. Delivering an integrated approach through the SEHRP provides a firm basis to respond to these intersectional impacts and avoid the risks of unintended impacts if these areas were considered in isolation.

The decision to associate human rights with equality within one plan was taken in recognition of the significant overlap between the two spheres. As an example, children are individuals protected under the protected characteristic of age within the Equality Act 2010, but they also have a specific set of rights afforded to them under the UNCRC. In considering the development of our NEOs, we have consulted with a range of stakeholders representing different protected characteristic groups, as outlined above.

As required in law, the Welsh Government publishes Annual Reports for our Strategic Equality Plans. These can be seen and downloaded from our website, with accessible versions made available on request. [Welsh Government Annual Equality Reports](#).

The Annual Report on Equality 2023 – 2024 will be published as soon as possible after the 31st March 2025. This report will reflect on the objectives set out in the SEP 2020 – 2024 only, as the NEOs 2024 – 2028 measurement framework will not be ready to reflect this period. Subsequent Annual Reports will place a greater emphasis on the complementarity of equality and human rights in line with the SEHRP 2025 - 2029.

The Well-being of Future Generations (Wales) Act 2015

In line with the [Well-being of Future Generations \(Wales\) Act 2015](#) 'ways of working', the decision to integrate equality and human rights policy was taken because doing so will better enable the delivery of fairer and more equal policy outcomes across these areas. It will also help us to mitigate against unintended or negative impacts.

This new framework directly responds to the research commissioned in January 2020 to examine options to strengthen and advance equality and human rights in Wales

The research quotes The UN Resolution, ‘Transforming our world: the 2030 Agenda for Sustainable Development’ which describes a relationship between equality, human rights and well-being based around the 2030 sustainable development goals. More than 90 percent of the sustainable development goals are embedded in human rights treaties. Failure to embed human rights in policy making means that the goals cannot be met.

Non-discrimination is a principle of international human rights. Article 14 of the Human Rights Act 1998 requires that all of the rights and freedoms set out in the Human Rights Act must be protected and applied without discrimination. It is well established (from the literature) that inequality is both a cause and result of failures in human rights protection. Human rights treaties specifically recognise discrimination and disadvantage experienced by different social groups, for example women, disabled people, and groups subject to racial discrimination. However, research on the legislative and policy framework in Wales shows that equality and human rights are dealt with as discrete aspects of public policy. The inter-relationship between equality and human rights, or between these policy areas and well-being, receives little attention.

However, the research suggests that the [Well-being of Future Generations \(Wales\) Act 2015](#) (and its associated guidance) delivers only ‘limited alignment’ between equality and human rights, and well-being in Wales. Research suggests that adopting a human rights approach to policy development provides an opportunity to address these challenges because of the recognised relationship between equality and human rights, and between human rights, sustainable development and well-being.

The research recommends *“The Welsh Government and public authorities in Wales should integrate human rights as standards for policy making to provide a stronger vision to advance equality and well-being. Human rights should be embedded in all policy and strategic planning processes.”*

This SEHRP specifically responds to this evidence-based recommendation by integrating a human rights statement of commitment with equality to better advance equality, human rights and well-being.

The research also highlighted a persistent ‘implementation gap’ between the aspirations of policy in Wales on equality and human rights, and people’s lived experience. The evidence suggests stronger leadership is needed from the Welsh Government. By linking equality and human rights approaches across policy design and intervention delivery, the SEHRP creates a framework for this leadership. While recognising the independence of other public sector organisations, which are free to meet their own commitments under the Public Sector Equality Duty. However, creating the SEHRP is intended to show leadership in combining equality and human rights approaches to interventions that could be replicated across the wider public sector in Wales, bringing benefit to all.

[The Well-being of Future Generations \(Wales\) Act 2015](#) contains seven well-being goals to make Wales a prosperous, resilient, healthier, more equal and globally responsible

country with cohesive communities, a vibrant culture and a thriving Welsh language. The Act also requires public bodies to reflect the diversity of the population in applying the Sustainable Development principle.

Creating a more equal Wales, where everyone has the opportunity to participate, reach their full potential and is able to contribute fully to the economy, will enable Wales to be more healthy, prosperous and innovative, to have more cohesive communities and contribute to a vibrant culture and Welsh language.

SEHRP 2025 - 2029 cuts across all of the well-being goals:

- **A prosperous Wales** – by strengthening the understanding and implementation of the Socio-economic Duty within Welsh government.
- **A healthier Wales** – by recognising that inequality of outcome relating to health is often linked to protected characteristic groups, also by strengthening people's understanding of their rights to healthcare.
- **A more equal Wales** - by mainstreaming equality across the work of Welsh government, in particular understanding the intersectional nature of inequality.
- **A Wales of cohesive communities** - strengthening the implementation of the PSED and when specific duties necessarily mean strengthening and fostering good relationships between communities.

The five ways of working have guided the development of the NEOs which are underpinned by, and will support, the Well-being of Future Generation (Wales) Act 2015. This is also being factored into the measurement framework being developed for the SEHRP 2025 - 2029.

Long term

The SEHRP provides a framework to balance of short and longer-term consideration, connecting strategic interventions and linked plans to equality and human rights policy over time. Improving the coordination of delivery across respective protected characteristic plans, including through improved monitoring, will support improved realisation of the NEOs as longer-term outcomes for Wales. The SEHRP also provides a platform for the systemic reforms of internal government levers which over time are intended to lead to better decision making and improved outcomes.

Prevention

Within the SEHRP 2025 - 2029, each NEO drives preventative action across a range of policy areas and themes. Actions within the SEHRP will be taken forward via the separate protected characteristic plans and strategies and will incorporate all areas of equality and human rights policy. Both the NEOs and SEHRP will inform the development of future actions and plans. The work to reform the levers of government such as in relation to

impact assessment covered by this plan are also intended to lead to better consideration of prevention through reforms of these levers.

Integration

Integrating equality and human rights into a single plan should allow the maximisation of impacts while also considering and mitigating against wider intersectional unintended or negative impacts. The NEOs 2024 – 2028 and the approach taken to develop the SEHRP 2025–2029 were developed in consultation with internal and external stakeholders across all the protected characteristic and communities of interest. Working in this way allowed us to consider the intersectional challenges when designing NEO's that will impact broadly across equality and human rights issues. The Welsh Government strongly encourages public sector organisations in Wales to take a similar approach, aligning their Equality Objectives to the NEO's set by Welsh Government.

Collaboration and Involvement

The SEHRP is underpinned by the NEOs, which were developed based upon research from a range of organisations and experts including the Equality and Human Rights Commission (EHRC), as well as consultation with stakeholders across protected characteristic communities of interest.

Welsh Government has engaged with internal and external partners across all the protected characteristics and communities of interest as part of the process of developing the NEOs and the SEHRP. Prior to the launch of the consultation, evidence and feedback evidence captured in EHRC's [Is Wales Fairer? \(2018\)](#) Report, was analysed by policy leads. An initial consultation was carried out with equality stakeholders across all the protected characteristics communities of interest in July 2023 on the Initial Discussion Document via electronic feedback to questions and an online workshop. This informed the full consultation [Strategic Equality Plan 2024 to 2028: proposed principles of approach and objectives](#) which opened on 13 November 2023 and closed on 12 February 2024.

The EHRC published [Equality and Human Rights Monitor 2023: Is Wales Fairer?](#) after the consultation was launched, but that report has also informed the subsequent development of the SEHRP.

The consultation document was published online for comment from the public and from stakeholders across all the protected characteristic communities of interest. An online event was also held to gather additional feedback. Accessible versions of the consultation included BSL, Easy Read and Youth-friendly versions to maximise opportunities to contribute views and feedback.

The consultation addressed both the NEOs and the potential framework and the development of the full SEHRP. Following the consultation, an overarching Long-term Equality Aim and NEOs were approved by Welsh Government Cabinet and published 18

March 2024. A summary response report will be published on the Welsh Government website alongside the SEHRP 2025 – 2029.

It is intended to engage further with stakeholders including children and young people, on the SEHRP and when changes are needed.

Impact

The Long-Term Equality Aim and NEOs 2024 – 2028 contained in the SEHRP 2025 - 2029 focus on priority equality issues to have impact where it is needed most. Work has been undertaken with internal and external stakeholders across all the protected characteristic communities of interest during the consultation on the NEOs 2024 – 2028 and SEHRP 2025 – 2029. The engagement and collaborative work with internal and external stakeholders during consultation on the NEOs and SEHRP will continue and so that they have impact on equalities and human rights across governmental policies to reduce discrimination and improve equity of outcomes.

As a unified framework for how Welsh Government action will work towards delivering against our NEOs, the SEHRP's primary impact will be to help realise these goals. It will rationalise Welsh Government action across different protected characteristic plans, reducing duplication and helping to identify areas of commonality where resources may be pooled to maximise beneficial impacts. The plan will also support wider systemic and cultural change across Welsh Government.

Establishing a monitoring framework to measure progress towards the NEOs will also help to evaluate policies and recognise where there are successes or areas to improve. Through updating tools including the Equality Impact Assessment processes, the SEHRP will have an impact on policy development and delivery more broadly.

Continued engagement with internal and external stakeholders is planned to help assess the impact of the SEHRP.

Costs and Savings

Actions linked to the NEOs 2024 – 2028 and SEHRP 2025 – 2029 sit within distinct policy areas. It is not anticipated that there will be any costs directly attributable to the SEHRP 2025 – 2029 (other than publication costs for accessible format versions) and resourcing costs in terms of staff resources linked to monitoring and reforms of levers. As wider strategies and plans are developed, they will take into account the SEHRP 2025 - 2029, with costs and savings analyses linked to Value for Money consideration placed before Welsh Ministers for consideration and approval linked to each distinct plan. Progress of delivery of the SEHRP 2025 - 2029 will be reported on over their life cycle and published on the Welsh Government website through the [Welsh Government annual equality reports](#).

The SEHRP will deliver Value for Money by maximising the positive impacts across the respective action plans and wider reforms of levers while also identifying and mitigating

against unintended and negative impacts. It will align plans, providing opportunities to target resource and effort. For example, where currently some groups will be experiencing disproportionate intersectional impacts leading to more costly interventions (as well as worse outcomes) the SEHRP as a framework is intended to help identify intersectional considerations and support preventative action.

This approach supports the streamlining of action and is intended to reduce duplication of effort where interventions have the potential to impact those with intersectional needs.

Introducing one monitoring framework across the SEHRP and NEOs will enable smarter working and the ability to holistically consider progress across SEHRP, NEO's and those plans that contribute towards their delivery. It is consistent with the approach of the Equality Act, 2010 which brought together a myriad of separate pieces of equality legislation in one place, to better streamline and to make it easier for public bodies to understand compliance. It also supports better mainstreaming of equality and human rights considerations alongside other responsibilities of government such as in relation to climate change by reforming levers like equality and human rights impact assessment aligned to wider impact assessment changes. This will reduce the complexities currently involved with the demonstration and assurance of compliance with equality and human rights obligations across Welsh Government.

Mechanism

Welsh Government has sufficient powers under existing legislation to carry out its current functions in this area.

2.1 People and Communities

How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal affect people and communities?

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It covers nine protected characteristics: Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex and Sexual orientation. The NEOs 2024 – 2028 and SEHRP 2025 - 2029 are focused on ensuring people's rights in the Equality Act 2010 are upheld and the cross-cutting objectives aim to ensure policy has a positive impact on all people, especially those with protected characteristics.

It is believed that the SEHRP will leverage significant impact in advancing equality and human rights. The framework will provide opportunity to target resource and effort where it is needed most across a broad set of NEO's that have intersectional relevance across many protected characteristics and human rights.

Implementing a monitoring framework will provide the ability to understand the impact of Welsh Government actions. Through strengthening internal levers and systems such as impact assessment and governance arrangements the SEHRP has the potential to integrate the consideration of equality and human rights as part of policy development and decision making, and delivery; creating policy interventions which have the potential to achieve fairer more equal outcomes for the people of Wales.

2.2 Children's Rights

United Nations Convention on the Rights of the Child (UNCRC)

By integrating Welsh Government's work on equality with human rights, as recommended in the Strengthening and Advancing Equality & Human Rights report, this will ensure that consideration of the rights of children and young people is further embedded into delivery of Welsh Government policy (as set out in the Rights of Children and Young Persons (Wales) Measure 2011) through an intersectional approach across protected characteristics and communities of interest. Adopting a human rights approach will further strengthen and embed a children's rights approach within Welsh Government building on the platform created by Children's Rights. Work underway on redeveloping the internal EqIA process to include human rights, including Children's Rights specifically, will complement the existing Children's Rights Impact Assessment processes.

As age is one of the Protected Characteristics in the Equality Act 2010, the integration of equality & human rights within the SEHRP responds to a natural overlap with the UNCRC. Our NEOs are intended to support people of all ages, including children and young people.

This new framework directly responds to the research commissioned in January 2020 to examine options to strengthen and advance equality and human rights in Wales

The [Strengthening and advancing equality and human rights in Wales](#) research report, led by Prof. Simon Hoffman, Swansea University, in collaboration with Bangor University, Diverse Cymru and Young Wales concludes that there are strong connections between equality and human rights.

Non-discrimination is a principle of international human rights and forms the basis of Article 14 of the Human Rights Act 1998 which requires that all of the rights and freedoms set out in the Human Rights Act must be protected and applied without discrimination. It is well established that inequality is both a cause and result of failures in human rights protection. Human rights treaties specifically recognise discrimination and disadvantage experienced by different social groups, for example women, disabled people, and groups subject to racial discrimination. However, research on the legislative and policy framework in Wales shows that equality and human rights are dealt with as discrete aspects of public policy. There is little attention given to the inter-relationship between equality and human rights, or between these policy areas and well-being.

As a key recommendation of this research, it recommends *“The Welsh Government and public authorities in Wales should integrate human rights as standards for policy making to provide a stronger vision to advance equality and well-being. Human rights should be embedded in all policy and strategic planning processes.”*

The SEHRP 2025 - 2029 will reinforce and build on the Welsh Government’s commitment to using the UNCRC as the basis for policy making for children and young people, and to ensuring that their rights remain central to the promotion of equality and Human Rights in Wales. During the consultative phase of the development of the NEOs and SEHRP, Welsh Government has engaged with stakeholders which represent children and young people, including the office of the Children’s Commissioner for Wales.

The SEHRP is also intended to enable better collaboration and involvement in the taking forward of this plan. This includes consideration to engage with children and young people and stakeholder groups around the launch of the plan. It is also intended to engage with stakeholder groups on the reform of government levers as an impactful lever that they can best influence to lead to meaningful longer-term reforms.

Programme for Government

Equality, as a cross cutting theme, links to the [Programme for Government](#) with the following commitments set out as follows:

Celebrate diversity and move to eliminate inequality in all of its forms

Within the Programme for Government, Welsh Ministers are committed to:

- Implement and fund the commitments made in our Race Equality Action Plan (now called Anti-racist Wales Action Plan).
- Explore legislation to address pay gaps based on gender, sexual orientation, ethnicity, disability, and other forms of discrimination.
- Ensure public bodies and those receiving public funding address pay disparities.
- Pilot an approach to the Basic Income.
- Ensure the history and culture of our Black, Asian, and Minority Ethnic communities are properly represented by investing further in our cultural sector and museum network.
- Make our Welsh public transport system more accessible to disabled people.
- Continue our strong partnership with voluntary organisations across the range of our responsibilities.
- Implement targets around Gender Budgeting.
- Strengthen the Violence against Women, Domestic Abuse and Sexual Violence Strategy to include a focus on violence against women in the street and workplace as well as the home.

Social Justice

- Expand the income maximisation work and the Single Advice Fund.
- Explore the necessary infrastructure required to prepare for the devolution of the administration of welfare.
- Progress the Fair Work Commission's recommendations.
- Expand the 'Ask and Act' and 'Don't be a Bystander' training and awareness campaigns.
- Establish an equalities legal service to provide support on unfair or discriminatory employment practices.
- Incorporate the United Nations Convention for the Elimination of all forms of Discrimination against Women and the UN Convention on the Rights of Disabled People into Welsh law.
- Address fully the recommendations from the Monuments and Street Names Audit.
- Create a Race Disparity Unit alongside an Equality Data Unit to ensure an inclusive evidence base to inform decision making in government.
- Ensure the justice elements of the Race Equality Action Plan are robust and address these matters with the police and the courts.
- Expand our Access to Elected Office programme.
- Implement the recommendations of the Reflecting Wales in Running Wales: Diversity and Inclusion Strategy for Public Appointments in Wales (2020 – 2023).
- Support Prides across Wales by sponsoring Pride Cymru, establishing a Wales-wide Pride Fund and appoint a Wales Pride Coordinator.
- Use all available powers to ban all aspects of LGBTQ+ conversion therapy that are in our powers and seek the devolution of any necessary additional powers.
- Trigger a request to devolve the Gender Recognition Act and support our Trans community.
- Work with the tech companies and media platforms to tackle hate crime and misinformation.
- Embed period dignity in schools

Some actions supporting the above commitments are being taken forward via the individual plans and strategies. The SEHRP 2025 - 2029 will be linked to and underpin these plans by providing the overarching framework.

2.3 Equality

The Welsh Government remains committed to the principles and direction laid down in the Equality Act 2010 and subsequent Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 (the 2011 Regulations). As this matter relates to the provision and ongoing development of SEHRP 2025 – 2029 as a substantive lever in support of Welsh Government discharging its duties, an Equality Impact Assessment has been prepared (Annex B).

2.4 Rural Proofing

The SEHRP 2025 – 2029 and NEOs 2024 – 2028 will impact across all communities in Wales, including rural communities. People in rural communities may experience difference inequalities and barriers to those in urban communities.

Stakeholders and members of the public from rural communities participated in the engagement and consultation process leading to the SEHRP. There may be significant or moderate beneficial impacts for those individuals with protected characteristics living in rural areas. However, by considering human rights and taking an intersectional approach as proposed in the SEHRP, impact can be considered beyond and across protected characteristic groups. Such impacts might include, for example, improved and more accessible services, providing the opportunity to participate in community activity, and/or improved transport links. This can only support people and communities to thrive.

Where policy and interventions are developed, they will be required to take account of the SEHRP, in addition to the Rural Proofing Assessment required to be submitted to Welsh Ministers by policy makers as part of their decision-making process on their future policy direction.

Consultation feedback: The challenges of transport in rural areas were highlighted in the consultation.

Given that interventions across rural areas will, in future, need to demonstrate complementarity take with the SEHRP, a full Rural Proofing Impact Assessment has not been undertaken.

2.5 Health

The SEHRP 2025 - 2029 will have an impact in relation to health. Through taking an intersectional approach to equality and human rights when delivering against the NEO's 2024 - 2028, inequalities such as Health and mental health will be better considered as outlined on page 8 in the assessment evidence section. Welsh Government recommends that public bodies in Wales align their own equality plans and objectives with the NEO's, this approach has the potential to achieve targeted and greater impact. In addition, The SEHRP will promote better utilisation of the Socio-economic Duty across Welsh Government. This will ensure that when taking decisions of a strategic nature 'due regard' is given to reducing inequalities of outcome associated with socio-economic disadvantage including health.

There may also be beneficial impacts which may come out of the delivery of the SEHRP, for example improved access to health services by communities which research indicates are currently experiencing barriers to access, and more accessible preventative/support services, as highlighted in NEO 3: "We will create a Wales where everyone can be aware of and has equitable access to high quality public services."

Individual policy decisions taken forward which have a health impact, and which support the SEHRP will be submitted to Welsh Ministers as part of relevant decision-making process. External public sector partners should develop Equality Objectives and supporting equality and human rights plans according to their own stakeholder and user needs.

A Health Impact Assessment for the NEOs 2024 – 2028 or SEHRP 2025 – 2029 has not been carried out.

2.6 Privacy

Where the Welsh Government, its partners and stakeholders, are working to take forward the delivery of the SEHRP 2025 - 2029 and NEOs 2024 – 2028, each engagement will require an assessment of the privacy needs of individuals and relevant legislation designed to protect privacy as standard.

Additionally, where Welsh Government policy makers develop actions which impact or support groups with protected characteristics, they will be required to assess the Privacy Impacts of those actions.

Within the consultation and engagement as part of the development of the SEHRP 2025 – 2029 and NEOs 2024 – 2028, respondents were given the option to remain anonymous and in the publication of the consultation responses associated with this exercise, it will be ensured only permitted names are shared.

A Privacy Impact Assessment for the NEOs 2024 – 2028 and SEHRP 2025 – 2029 has not been carried out.

3.1 Cultural Well-being

3.1a How can the proposal actively contribute to the goal to promote and protect culture and heritage and encourage people to participate in the arts sports and recreation? (for Welsh Language see section 3.2)

The SEHRP indirectly encourages and enables individuals with protected characteristics to take part in cultural activities, mainstreaming and embedding equality and human rights into policy making, and ensuring people of all communities in Wales are involved in the mechanisms of implementation of policy.

Actions identified in distinct protected characteristic plans will be the drivers of change at local and national levels. For example, Actions to ensure easier transport and accessible venues, alongside improved access to tourism venues and heritage sites and related services, are included in plans to support Disabled people. These actions promote greater engagement in the cultural life of Wales and add to it by increasing diversity of users and contribute to the delivery of the SEHRP.

3.1b Is it possible that the proposal might have a negative effect on the promotion and protection of culture and heritage, or the ability of people to participate in arts, sport and recreation? If so, what action can you take to avoid or reduce that effect (for example by providing alternative opportunities)?

There are no direct anticipated negative impacts expected as a result of the SEHRP.

The SEHRP has the ability to drive positive impact; the risk and impacts of low participation will be considered more holistically across equality plans with action and progress being monitored through one monitoring framework. A new approach to equality and human rights impact assessment processes will strengthen consideration of equality and human rights in decision making, alongside better utilisation of the Socio-economic Duty.

3.2 Welsh Language

Language is not a protected characteristic under the Equality Act 2010; the protection of the Welsh language is taken forward under separate legislation (the Welsh Language (Wales) Measure 2011 and related Standards). However, equality, human rights and Welsh language policy agendas complement and inform each other.

There are no direct anticipated negative impacts expected on the Welsh language as a result of the SEHRP. Any actions to be taken forward will remain within the scope of specific protected characteristic plans. This includes interventions which are aimed to ensure accessed services are provided in the Welsh Language where this is appropriate.

These actions will engender engagement in the cultural life of Wales and add to it by at least maintain or increasing Welsh Language provision. This will contribute to one of the core targets of our Welsh Language Strategy: *Cymraeg 2050: A million Welsh speakers* to double the daily use of Welsh.

4.1 Business, the general public and individuals

How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal impact business and the public?

The SEHRP is not expected to negatively impact the activities of the business community. NEO 5 specifies that “we will create a Wales where everyone from the full diversity of backgrounds can participate in public life, have their voices heard and see themselves reflected in leadership positions.” International evidence indicates the broad positive impacts of equality on the economy, and it is anticipated that this will also apply to the Welsh economy by ensuring more people from all backgrounds become leaders across the sectors of Wales. However, as the direct impacts are not known at this stage, the impact has been described as “minimal” at present for this reason.

Actions identified in distinct protected characteristic plans will be the main drivers of change at local and national levels. For example, actions which are aimed to ensure accessible venues for Disabled people can reasonably be expected to increase customer throughput, and by extension, increase the potential for completed sales.

There is likely to be an increased cost to business where these venues are not currently fully accessible. Actions to improve access and related services are included in plans to support Disabled people and will improve service provision and (potentially) increase profitability for Welsh businesses as well as positively affecting the quality of access for customers.

4.2 Public Sector including local government and other public bodies

How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal impact the public sector?

Public Sector organisations are required to comply with Equality law.

The 2010 Act also introduced the Public Sector Equality Duty (PSED), which has 3 overarching aims. Those subject to the duty must have due regard to the need to:

- eliminate discrimination, harassment and victimisation and other conduct prohibited by the Act
- advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not

The aim of the PSED is to ensure those subject to it consider advancement of equality when carrying out their day-to-day business.

The SEHRP has been designed as a framework to support the delivery of actions in individual plans. As this will include actions undertaken by other public bodies the plan will support Welsh Government in meeting its duties. This will also bring potential benefits for other public sector organisations for the reasons set out in this IIA.

Public Sector organisations are under no statutory obligation to replicate our SEHRP and are not prohibited from developing their own approach to delivering equality and human rights – based interventions and policies (a more tailored approach may be preferred). However, Welsh Government encourages public sector organisations in Wales to set Equality Objectives that reflect those of the Welsh Government, taking into account any regional or local context as necessary.

4.3 Third Sector

How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal impact third sector organisations and what they do?

The importance of the third sector's contribution to advancing equality and human rights in Wales is recognised. Working in partnership with the third sector to support the SEHRP will continue with each individual plan having its own established stakeholder groups involving the third sector.

Welsh Government may continue to support third sector organisations which provide services delivering against our SEHRP, protected characteristics plans and equality and human rights supporting policies, in line with the principles set out in the [Third Sector Scheme](#).

As the SEHRP is taken forwards work will continue with third sector organisations to support the delivery of the distinct protected characteristic plans and their embedded actions, alongside all equality and human rights policies. Engagement is also intended with the third sector as part of the reforms of levers.

4.4 Justice Impact

Welsh Government recognises that there is not always sufficient clarity between legislation relating to human rights and equality. The SAEHR report also noted that some duty bearers were not clear on their obligations.

Within the SEHRP, NEO 2 focuses on creating “a Wales where everyone can be aware of their human rights, and where those rights are protected, promoted, and underpin all public policy.”

Welsh Government continues to raise awareness of human rights and the legislative landscape, for example through the production of on-line materials, such as a video released on Human Rights Day 2024 which explained clearly the difference between equality and human rights. The SEHRP provides the framework for human rights policy within Welsh Government. This will include providing a structure for further raising awareness activity around the history and timeline of the Human Rights Act 1998 (which came into force in 2000) (in particular Article 11 which focussed on non-discrimination), which incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law, the Equality Act 2010, and the Well-Being of future Generations Act 2015.

Further work will be undertaken on raising awareness of the United Nations Human Rights Treaties and communication from the Council of Europe. Work to take forward the commitments to incorporate the Convention on the Elimination of Discrimination Against

Women (CEDAW) and the United Nations Convention on Rights of Disabled People (UNCRRDP) is being led by the independent Legislative Options Working Group for which the Welsh Government provides the secretariat functions. The LOWG reports to the Human Rights Advisory Group. The LOWG is assessing options for the enforceability of rights and will aim to provide options against regression of rights.

Welsh Ministers will be asked to demonstrate that they have considered rights when making decisions as part of the impact assessment (Equality and Human Rights Impact Assessment (EqHRIA)).

4.5 Socio-economic Impact

The SEHRP 2025 – 2029, NEOs 2024 – 2028, and the actions within the protected characteristic plans, alongside all equality and human rights supporting policies, will have the needs of individuals, communities and communities of interest taken into consideration as part of their delivery. Impacts will primarily be through the distinct protected characteristic plans and equality and human rights policies. Any further interventions or additional NEO development during the next four-year cycle will be determined through further consultation and added to a refreshed SEHRP 2024 – 2029 and any successor plans.

Welsh Ministers will be asked to show how they have considered the Socio-economic Duty as they take strategic decisions in line with the NEOs 2024 – 2028 and SEHRP 2025 – 2029 and the distinct protected characteristic plans and policies. IIAs (which include Economic, Socio-economic, and EqHRIA components) will inform decision-making.

5.1 Natural Resources

As outlined earlier the SEHRP as a framework is intended to provide an intersectional and integrated approach including to better understand the links between equality and nature.

The SEHRP 2025 – 2029 and NEOs 2024 – 2028 include a specific NEO on the environment, NEO 7: We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change.

Responses to the NEO 7 in the consultation called for more engagement with the public and those impacted by any changes but did not raise any concerns.

Welsh Ministers' decisions relating to implementation of the SEHRP 2025 – 2029, NEOs 2024 – 2028, and the distinct protected characteristic plans and other equality and human rights supporting policies will be informed by IIAs. By providing a framework to support the NEOs the SEHRP is intended to better maximise the impacts of the individual plans containing specific actions having impacts on natural resources in support of NEO 7 for example work linked to a just transition in relation to climate change as referenced in section 5.3 below.

5.1a How will the proposal deliver one or more of the National Priorities in the Natural Resources Policy (NRP)?

- Delivering nature-based solutions;
- Increasing renewable energy and resource efficiency; and in doing so,
- Taking a place-based approach.

See Section 5.1 overview above.

The SEHRP 2025 – 2029 and NEOs 2024 – 2028 include a specific NEO on the environment, NEO 7: We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change.

5.1b Does the proposal help tackle the following national challenges and opportunities for the sustainable management of natural resources?

- ♦ *Reverse the decline in biodiversity – by developing resilient ecological networks;*
- ♦ *Safeguard and increase carbon stores in soils and biomass;*
- ♦ *Maintain productive capacity, in particular by improving soil quality and biosecurity;*
- ♦ *Reducing the risk of flooding;*
- ♦ *Supporting climate change mitigation and adaptation through ecosystem approaches;*
- ♦ *Reducing noise pollution and pollution levels in our air, and enhance air quality;*
- ♦ *Improve the quality and ensure the quantity of our water;*
- ♦ *Taking action to reduce the pressures on natural resources, such as through resource efficiency and renewable energy;*
- ♦ *Supporting preventative approaches to health outcomes, with a particular focus on key public health issues of transport related air and noise pollution, tackling physical inactivity and mental health;*
- ♦ *Supporting action to tackle health and economic inequalities;*
- ♦ *Supporting community cohesion; and,*
- ♦ *Supporting secure and stable employment.*

See Section 5.1 overview above.

The SEHRP 2025 – 2029 and NEOs 2024 - 2028 help tackle the following national challenges and opportunities for the sustainable management of natural resources:

- ♦ *Supporting preventative approaches to health outcomes, with a particular focus on key public health issues of transport related air and noise pollution, tackling physical inactivity and mental health:*
 - NEO 3: We will create a Wales where everyone can be aware of and has equitable access to high quality public services.
- ♦ *Supporting action to tackle health and economic inequalities:*
 - NEO 3: We will create a Wales where everyone can be aware of and has equitable access to high quality public services.
- ♦ *Supporting community cohesion:*
 - NEO 4: We will create a Wales free from discrimination, victimisation, harassment, abuse, hate crime and/or bullying against all people.
- ♦ *Supporting secure and stable employment:*
 - NEO 6: We will create a Wales with fair and equal opportunities to gain employment and for fair and equal treatment in the workplace, including fair pay and conditions.

5.2 Biodiversity

To demonstrate compliance with Section 6 of the Environment (Wales) Act 2016, you must complete the Error! Reference source not found., at annex F below.

See Section 5.1 overview above.

5.3 Climate Change

5.3a Carbon

How will the proposal affect greenhouse gas emissions?

Climate change has been identified as one of the biggest threats facing our future generations. We need to reduce our emissions through decarbonisation action and to adapt to the impacts of climate change by increasing our resilience. See Section 5.1 overview above. As this impact assessment relates to the SEHRP as a delivery framework, no impacts have been identified in relation to the SEHRP and therefore these assessments are not considered necessary.

No significant change in emissions

With reference to the SEHRP 2025 – 2029, Officials have considered the carbon impact of this advice. The emissions associated with the SEHRP have not been quantified because these are expected to fall below the threshold for a quantitative analysis. The SEHRP framework itself is unlikely to have a significant impact on Carbon emission.

There is a high confidence in this assessment.

Net Zero policy officials supported the drafted of the SEHRP 2025 – 2029, NEO 7 which focuses particularly on the environment: “We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change.”

Is this proposal consistent with the Welsh Government’s latest plan to reduce emissions, [Net Zero Wales](#)? YES

1. Just transition

The Welsh Government is committed to a just transition to net zero by 2050. Have you considered the implications of this proposal from a just transition perspective? YES

See Section 5.3a. Work with the net zero policy team brought about the following NEO and its details:

“We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change.”

This includes measures discussed with Net Zero Policy Team to move to the “Just Transition” phase of their overall goal for ameliorating and combatting climate change.

5.3b Climate resilience

Will this proposal be affected by any of the risks set out in the UK Climate Change Risk Assessment?

No. It is recognised that people with protected characteristics or from different socio economic backgrounds are at disproportionately greater risk of suffering the effects of climate change. The SEHRP has been designed as a framework to support a response in relation to these risks in relation to these groups in supporting the realisation of NEO7.

See Section 5.3a. Embedded in the SEHRP 2025 – 2029, work with the policy team brought about the following NEO and its details:

NEO 7: We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change.

Will this proposal exacerbate any of the risks set out in the UK Climate Change Risk Assessment? No

See Section 5.3a. Embedded within SEHRP 2025 – 2029, work with the policy team brought about the following NEO and its details:

NEO 7: We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change.

- Will this proposal reduce any of the risks set out in the UK Climate Change Risk Assessment? Yes
If yes, please describe how.

See Section 5.3a. work with the policy team brought about the following NEO and its details:

NEO 7: We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change.

The SEHRP as a delivery framework is intended to better support action in relation to NEO 7 in supporting a just transition thereby mitigating risks associated with protected groups being disproportionately impacted.

5.4 Strategic Environmental Assessment (SEA)

Refer to the integrated impact assessment guidance and relevant onward links to determine whether a Strategic Environmental Assessment is required.

Please explain your decision about whether or not an SEA is required by law.

See Section 5.1 overview.

No impacts have been identified in relation to these issues and therefore these assessments are not considered necessary. The environment has been taken into consideration in our SEHRP 2025 – 2029 and NEOs 2024 - 2028 and included a specific NEO and details on the environment:

NEO 7: We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change.

5.5 Habitats Regulations Assessment (HRA)

Please explain your decision about whether or not an HRA is required by law.

See Section 5.1 overview above. No impacts have been identified in relation to these issues and therefore these assessments are not considered necessary.

5.6 Environmental Impact Assessment (EIA)

Please explain your decision about whether or not an EIA is required by law.

See Section 5.1 overview above. No impacts have been identified in relation to these issues and therefore these assessments are not considered necessary.

Section 6. Socio-economic Duty

What will be impact on Socio-economic disadvantage?

6.1 The Socio-economic Duty.

The Socio-economic Duty requires relevant public bodies, including Welsh Ministers to have due regard to the need to reduce inequality of outcome that results from socio-economic disadvantage. This duty applies only to decisions which are of a strategic nature.

In development of the SEHRP 2025 – 2029, and the associated consultation on the NEOs 2024 – 2028 and principles of approach, the nature of the Socio-economic Duty was explained as requiring that certain public authorities, when making decisions of a “strategic” nature about how to exercise their functions, must have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage. The Duty refers to aspects of life ‘socio’ (your life chances and where you live) and ‘economic’ (how much money you have for essential and non-essential items).

Page 8 of this IIA discusses how intersectionality can be better considered through an integrated approach to equality and human rights, which is reflected in the proposed SEHRP framework. Whilst the PSED requires consideration of intersectionality across protected characteristics and socio-economic background, it does not recognise socio-economic disadvantage as a protected characteristic. It is recognised in the [Strengthening and advancing equality and human rights in Wales](#) that by considering human rights as part of strategic decision making it would strengthen the aspirations of the Socio-economic Duty.

Examples of inequalities of outcome are described in the Socio-economic Duty guidance as Poorer health and mental health, Lower healthy life expectancy, Poorer skills and educational attainment, lower paid work, greater chance of being a victim of crime and not

feeling safe, poorer participation in public life, greater chance of living in less than adequate housing and poorer access to transport and public services.

The following evidence has been considered in understanding opportunity to reduce such inequality through the NEOs, each which will be delivered through actions being taken forward via the distinct protected characteristic plans

[Evidence review: socio-economic disadvantage and inequalities of outcome](#)

[Socio-economic Duty: examples of inequalities of outcome](#)

NEO 1: We will create a Wales where everyone has opportunities to prosper in line with our organisational goal to reduce poverty. Disadvantageous socio-economic circumstances have long-lasting impacts on all areas of someone's life, from birth through to adulthood. Poverty is linked to poorer educational and work or health-related outcomes.

NEO 2: We will create a Wales where everyone can be aware of their human rights, and where those rights are protected, promoted, and underpin all public policy. Ensuring that people are aware of their human rights has the potential to empower people to challenge for their rights, this could impact on reducing inequality associated with socio-economic disadvantage.

NEO 3: We will create a Wales where everyone can be aware of and has equitable access to high quality public services. Access to services can be limited by many factors, from the adequate provision of services to difficulty fully participating in cultural life due to discrimination, with full participation in social and cultural life in Wales being linked to race, gender identity and disability. This NEO will provide a framework for Equality plans to focus attention where it is needed most. Research suggests there are several areas that could be addressed to ensure that Wales continues to embody the values of an open, fair country where everyone can access and participate in the aspects of community life that they desire (FGC, 2020)

NEO 4: We will create a Wales free from discrimination, victimisation, harassment, abuse, hate crime and/or bullying against all people. Socio-economic disadvantage disproportionately affects certain groups, including women, lone parents, racial and ethnic minorities, children, disabled people, and those living in rural areas (Alston, 2018) This NEO will provide a framework for Equality plans to focus attention where it is needed most.

NEO 5: We will create a Wales where everyone from the full diversity of backgrounds can participate in public life, have their voices heard and see themselves reflected in leadership positions. [Participation in public life and the ability are affected by intersectional qualities](#). This NEO will provide a framework for Equality plans to focus attention where it is needed most.

NEO 6: We will create a Wales with fair and equal opportunities to gain employment and for fair and equal treatment in the workplace, including fair pay and conditions. Pay gaps and in-work poverty affect certain groups much more than others. The risk of in-work poverty is greater for disabled and Minority Ethnic workers.

Black, Asian and Minority Ethnic workers are more likely to be in relative income poverty and households including someone who is disabled are more likely to struggle financially (EHRC, 2018).

Disabled people are less likely to work in high-pay occupations, compared to nondisabled people, and disabled people are twice as likely to be unemployed as those without an impairment (EHRC, 2018). The Well-being of Wales 2020 report shows that pay gaps exist for women, disabled people, and Minority Ethnic in Wales.

The SEHRP 2025-2029 and NEOs 2024 - 2028 will provide a framework for Equality plans to focus attention where it is needed most

NEO 7: We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change. Socio-economic disadvantage impacts on the capability to access net zero provisions, such as transport and home improvements. Impacts of climate change, such as flooding in Wales is likely to impact across those groups who suffer SED. This NEO will provide a framework for Equality plans to focus attention where it is needed most.

The below question was asked and received numerous responses. Some focused on the NEOs and addressing the Socio-economic Duty within them whilst others focused more on the development mechanism of the SEHRP 2025 - 2029.

Question 6: Do you believe the National Equality Objectives will help us fulfil the Socio-economic Duty?

Numerous detailed responses were received to this question, which have informed the re-drafting of the NEOs 2024 – 2028 and the development of the SEHRP 2025 – 2029 as they relate to implementation of the NEOs.

As an example of responses received:

"It is important to note that the definitions of groups go beyond protected characteristics, which is acknowledged by both the Strategic Equality Plan and the Socio-Economic Duty."

"We welcome the recognition of public sector bodies as employers and their capacity to reduce inequalities through this role. We also support the emphasis placed on lived experience within the Strategic Equality Plan. Those with lived experience of socio-economic (or other types of) disadvantage can be considered experts by experience. Engaging experts by experience provides an opportunity to demonstrate commitment to the Socio-economic Duty by treating them in the same regard as any other expert that might be consulted."

"As this is WG's first iteration of the SEP since the SED has been enacted, the inclusion of a dedicated objective supporting tackling socio-economic deprivation is a positive development. However, as has been suggested [in another question], Welsh Government may wish to consider reorganising its objectives to ensure that the SED does not

overshadow the key principles of the pre-existing equality framework i.e. that of protected characteristics."

"Some of the goals have stronger ties to fulfilling the socio-economic duty but all 7 contribute in a way. There are many deep-rooted, and systemic issues in Wales and the UK, that adversely impact on those with protected characteristics, and their socio-economic circumstances which will take a long time to improve. And as you say 'equality and human rights arena can evolve rapidly' so will work will constantly need reviewing, integrating engagement."

Welsh Ministers will be asked to show how they have taken the Socio-economic Duty into consideration as they take decisions in line with the SEHRP 2025 – 2029, NEOs 2024 - 2028, distinct protected characteristic plans and equality and human rights policies as they develop policies, interventions and delivery, with relevant IIAs (which will include an Economic and equality and human rights Impact Assessment as component elements) being required to inform each decision.

Conclusion

8.1 How have people most likely to be affected by the proposal been involved in developing it?

A new Strategic Equality and Human Rights Plan (SEHRP) is being proposed to provide an integrated delivery framework to take forward the strengthening and advancing of equality and human rights in Wales. This plan will streamline future work, providing a more concise framework to rationalise and focus existing cross-Government delivery of equality and human rights commitments, while supporting more effective delivery.

The proposed SEHRP 2025 - 2029 sets out how Welsh Government plans to deliver against calls to integrate equality and human rights policy. The SEHRP brings together the recommendations in the Equality and Human Rights Commission (EHRC) [is Wales Fairer? report](#), and others in the [Strengthening and advancing equality and human rights in Wales](#) report and responses to Welsh Government consultation [Strategic Equality Plan 2024 to 2028: proposed principles of approach and objectives](#) by providing a public commitment to this new approach.

This Integrated Impact Assessment (IIA) relates to the creation and publication of the Welsh Government National Equality Objectives 2024- 2028 (NEOs 2024 - 2028) which informed the development of the related Strategic Equality and Human Rights Plan (SEHRP) for the same period.

It focuses on the SEHRP itself; a delivery framework to realise the NEOs and provide a more effective and consistent approach to achieving these outcomes. This IIA also reflects that the SEHRP brings in for the first time a human rights statement of commitment to equality and human rights and a human rights approach to the development of policy and programmes. Please note the SEHRP does not contain any direct actions.

Welsh Government engaged stakeholders and the public throughout the development of the NEOs, taking on board feedback to arrive at the final set of NEOs 2024 – 2028 and SEHRP 2025 - 2029.

In July 2023, an initial discussion document was shared with equality organisations, experts and other key stakeholders and an online workshop held to discuss this. Feedback and responses from the document responses and workshop were used to develop the full, public consultation document (linked above).

The consultation on the Long-Term Aim, NEOs 2024 – 2028 and SEHRP 2025 – 2029 was launched on 13 November. An additional online event was held in February 2024, during the consultation period. The feedback received in the responses and during the workshop informed the development of the final NEOs 2024 – 2028 and SEHRP 2025 - 2029.

Continued engage will be undertaken with stakeholders, the public, and other experts on the delivery and future of the SEHRP and any specific policy changes or actions which arise from the framework we are proposing.

8.2 What are the most significant impacts, positive and negative?

It is anticipated that significant or moderate beneficial impacts may come out of the delivery of the SEHRP 2025 - 2029, and associated actions within individual protected characteristic plans and policies, for example improved and more accessible preventative/support services.

By responding to the Evidence outlined in the [Strengthening and advancing equality and human rights in Wales](#) report and integrating human rights into our strategic equality planning, positive impacts will be maximised by considering policy through a more intersectional lens and better understanding and mitigating unintended and negative impacts.

Ministers will consider the actions under each protected characteristic plan as part of their decision-making on future policy direction.

The SEHRP 2025 – 2029 includes a commitment to developing clear monitoring mechanisms – these are being developed separately.

No negative impacts have been identified as a result of the SEHRP 2025 - 2029 or NEOs 2024 – 2028.

UN Convention on the Rights of Persons with Disabilities (UNCPRD)

The SEHRP is expected to have a positive impact on the rights of disabled people in Wales. The SEHRP provides the framework for Human Rights policy. – Work towards the Programme for Government commitment to incorporate the human rights treaty, the

UNCRDP, into Welsh Law is progressing via the Legislative Options Working Group, a sub-group of the Human Rights Advisory Group. Rights under the UNCRDP are being analysed on a right-by-right basis to establish whether incorporation of each right is the preferred and practicable option.

The actions of the Welsh Government must be compatible with international obligations, as set out in section 82 of the Government of Wales Act 2006, including the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

The SEHRP sets out how the Welsh Government will be taking forward the principles of the Convention in terms of its continuing equality and human rights duties.

Disability is one of the protected characteristics in the Equality Act 2010 and the SEHRP 2025 – 2029 and NEOs 2024 – 2028 support disabled people. Engagement was undertaken with disability rights organisations during the consultation and in addition to receiving online responses (including Disability Wales), stakeholders joined an online event. No discernible negative impacts on the UN Convention on the Rights of Persons with Disabilities (UNCRPD) were identified. This engagement will continue throughout the implementation of the NEOs 2024 – 2028 and SEHRP 2025 - 2029.

The SEHRP is expected to positively impact Disabled people's rights within Wales – by mainstreaming consideration for human rights within our existing equality impact processes. A human rights approach will complement the existing commitment to advance the social model of disability by asking policy officials to consider inclusion of disabled people through a 'rights-based' angle as well as through the lens of existing equality act legislation.

UN Convention on the Rights of the Child

By integrating Welsh Government's work on equality with human rights, as recommended in the SAEHR report, this will ensure that consideration of the rights of children and young people is further embedded into delivery of Welsh Government policy (as set out in the Rights of Children and Young Persons (Wales) Measure 2011) through an intersectional approach across protected characteristics and communities of interest. Adopting a human rights approach will further strengthen and embed a children's rights approach within Welsh Government building on the platform created by Children's Rights within Welsh Government. Work underway on redeveloping an internal EqIA process to include human rights makes specific reference to Children's Rights under the umbrella of human rights, which will complement the existing Children's Rights Impact Assessment processes.

As age is one of the Protected Characteristics in the Equality Act 2010, the integration of equality & human rights within the SEHRP responds to a natural overlap with the UNCRC. The SEHRP 2025 – 2029 and NEOs 2024 – 2028 will reinforce and build on the Welsh Government's commitment to using the UNCRC as the basis for policy making for children and young people and ensure that their rights remain central to the promotion of equality in

Wales. Engagement was undertaken with children's rights organisations (e.g. The Children's Commissioner for Wales; Whizz Kidz, Young Voice Wales) during the consultation and received responses to consultation questions. It is expected the awareness of the rights of children and young people to be strengthened by the approach advocated in the SEHRP.

This engagement will continue throughout the implementation of the SEHRP 2025 – 2029 and NEOs 2024 – 2028.

Welsh Language

Although language is not a protected characteristic under the Equality Act 2010 and the protection of the Welsh language is taken forward under separate legislation (the Welsh Language (Wales) Measure 2011 and related Standards), the equality and Welsh language policy agendas complement and inform each other.

No discernible negative impact on the Welsh Language has been identified. The SEHRP 2025 – 2029 and NEOs 2024 - 2028 will be published in Welsh and English; the delivery of any linked actions attributed to distinct protected characteristic plans will also be taken forward in Welsh and English. A Welsh Language Impact Assessment has also been completed.

Promoting Economic Opportunity for All (tackling poverty)

The SEHRP 2025 – 2029, NEOs 2024 – 2028, any linked actions attributed to distinct protected characteristic plans and equality and human rights policies will directly support the Welsh Government priorities for promoting economic activity and tackling poverty.

Evidence shows people with particular Protected Characteristics are more likely to be living in poverty. Equality organisations, including those focused on reducing poverty, participated in the consultation and attended our online event. No discernible negative impacts have been identified. This engagement will continue throughout the implementation of the SEHRP 2025 – 2029 and NEOs 2024 – 2028.

NEO 1 focuses on tackling poverty: We will create a Wales where everyone has opportunities to prosper in line with our organisational goal to reduce poverty.

8.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

In line with the [Well-being of Future Generations \(Wales\) Act 2015](#) 'ways of working', the decision to integrate equality and human rights policy aims to maximise impact and deliver

fairer and more equal policy outcomes across these areas, while also seeking to consider and mitigate against wider intersectional unintended or negative impacts.

This SEHRP integrates a human rights statement of commitment with equality to better advance equality, human rights and well-being.

SEHRP 2025 - 2029 cuts across all of the well-being goals:

- **A prosperous Wales** – by strengthening the understanding and implementation of the Socio-economic Duty within Welsh government.
- **A healthier Wales** – by recognising that inequality of outcome relating to health is often linked to protected characteristic groups, also by strengthening people's understanding of their rights to healthcare.
- **A more equal Wales** - by mainstreaming equality across the work of Welsh government, in particular understanding the intersectional nature of inequality.
- **A Wales of cohesive communities** - strengthening the implementation of the PSED and when specific duties necessarily mean strengthening and fostering good relationships between communities.

The five ways of working have guided the development of the NEOs which are underpinned by, and will support, the Well-being of Future Generation (Wales) Act 2015. The Well-being of Future Generations (Wales) Act 2015 brings a sustainable development principle or 5 ways of working. These ways of working should be applied to policy development to ensure that decisions take into account the impact they could have on people living their lives in Wales in the future, driving positive impact for our communities, and mitigating against potential adverse impact. The SEHRP aligns with the sustainable development principle and further supports the 5 ways of working (as below).

Long term – The SEHRP provides a clear long-term aim and provides national equality objectives to frame equality plans and ensure that resource is targeted to areas of the greatest long term impact.

Prevention – The NEO's have been designed to target impact where it is needed most to ensure that inequalities do not escalate. Improved understanding of impact across equality, human rights and inequality will ensure that potential negative impact is mitigated against, taking every opportunity to positively impact.

Integration – The NEO's directly deliver against the Programme for Government Commitment and the Welsh Government Well-being objective 'Celebrate diversity and move to eliminate inequality in all of its forms'. Taking an integrated approach to the consideration of Equality and Human Rights will ensure a clearer focus on intersectionality.

Collaboration – The alignment of equality plans will ensure that resource is targeted where it is needed to tackle persistent inequality, whilst realising human rights.

Involvement – Delivery of the SEHRP will require commitment and partnership working across Welsh Government and beyond. Through the measurement framework and through stakeholder relationships, it will be necessary to be sure that the action taken across equality plans is achieving the impact required.

This is also being factored into the measurement framework being developed for the SEHRP 2025 - 2029.

Long term

The SEHRP is intended to provide a framework to better support the balancing of short and longer-term consideration.

The NEOs and SEHRP also build on progress made in previous years and create a platform to extend beyond the life of the SEHRP 2025–2029.

Improving the coordination of delivery across respective protected characteristic plans, including through improved monitoring supports improved realisation of the NEOs as longer-term outcomes for Wales. The SEHRP also provides a platform for the systemic reforms of internal government levers, leading to lead to better decision making and improved outcomes. The SEHRP 2025 - 2029 is intended to connect strategic interventions and linked plans (current and future) to equality and human rights policy as they develop over time.

Impact

The Long-Term Equality Aim and NEOs 2024 – 2028 contained in the SEHRP 2025 - 2029 focus attention on priority equality issues to have impact where it is needed most. Close working has been undertaken with internal and external stakeholders across all the protected characteristic communities of interest during the consultation on the NEOs 2024 – 2028 and SEHRP 2025 – 2029.

This engagement and collaborative work will continue and look to ensure that the NEOs 2024 - 2028 and SEHRP 2025 – 2029 impact the consideration of equalities and human rights across governmental policies to reduce discrimination and improve equity of outcomes overall.

As a unified framework for how Welsh Government action will work towards delivering against the NEOs, the SEHRP's primary impact will be to help realise these goals. The SEHRP will rationalise Welsh Government action; reducing duplication and helping to identify areas of commonality where resources may be pooled to maximise beneficial impacts. In particular the SEHRP has been developed as a framework to support reforming the internal levers of Welsh Government as part of the wider systemic and cultural change this plan has been developed to support.

Engagement will continue with internal and external stakeholders to help assess the impact of the SEHRP.

The NEOs 2024 – 2028 and SEHRP 2025 – 2029 demonstrate the ‘5 ways of working’ set out in the sustainable development principle and this way of working will continue throughout the implementation of the NEOs 2024 – 2028 and SEHRP 2025 – 2029. This will ensure people with Protected Characteristics have the same freedom, dignity, choice and control as other citizens in the community. This has been detailed in section 1.

Programme for Government: Prosperity for All

Equality, as a cross cutting theme, links to the [Programme for Government](#) with the following commitments set out as follows:

Celebrate diversity and move to eliminate inequality in all of its forms

Within the Programme for Government, Welsh Ministers are committed to:

- Implement and fund the commitments made in our Race Equality Action Plan (now known as the Anti-racist Wales Action Plan).
- Explore legislation to address pay gaps based on gender, sexual orientation, ethnicity, disability, and other forms of discrimination.
- Ensure public bodies and those receiving public funding address pay disparities.
- Pilot an approach to the Basic Income.
- Ensure the history and culture of our Black, Asian, and Minority Ethnic communities are properly represented by investing further in our cultural sector and museum network.
- Make our Welsh public transport system more accessible to disabled people.
- Continue our strong partnership with voluntary organisations across the range of our responsibilities.
- Implement targets around Gender Budgeting.
- Strengthen the Violence against Women, Domestic Abuse and Sexual Violence Strategy to include a focus on violence against women in the street and workplace as well as the home.

Each of the above commitments is being taken forward in their own right. There are some Actions which support the above commitments being taken forward via the distinct Protected Characteristic Plans. The NEOs 2024 – 2028 and SEHRP 2025 – 2029 will not replicate these Actions, but these actions form part of the delivery of the Welsh Minister’s commitments to the Electorate.

There are no discernible negative impacts.

8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

Progress against the NEOs 2024 – 2028 and SEHRP 2025 – 2029 will be monitored through tracking the delivery of linking Actions attributed to distinct Protected Characteristic Plans, owned by different policy Groups across Welsh Government. The SEHRP 2025 – 2029 sets out arrangements for monitoring delivery.

In line with the requirements of Section 77 of the Government of Wales Act 2006, an annual summary report on progress against the NEOs 2024 – 2028 and SEHRP 2025 – 2029 will be published.

Full Impact Assessments

A. Children's Rights Impact Assessment

The Rights of Children and Young Persons (Wales) Measure 2011 places a duty on the Welsh Ministers to pay due regard to the [United Nations Convention on the Rights of the Child \(UNCRC\) and its Optional Protocols](#) when exercising any of their functions.

1. Policy objectives

This Children's Rights Impact Assessment (CRIA) is completed in reference to Welsh Government's proposed Strategic Equality & Human Rights Plan (SEHRP). The Strategic Equality & Human Rights Plan responds to calls in both the Strengthening And Advancing Human Rights in Wales and the EHRC's 'Is Wales Fairer' report to better integrate human rights and a human rights approach with Welsh Government's equality goals and policy making.

The SAEHR in Wales report, for example, outlines: "The Welsh Government [...] should integrate human rights as standards for policy-making to provide a stronger vision to advance equality and well-being. Human rights should be embedded in all policy and strategic planning processes."

The decision to integrate human rights with equality within one plan was taken in recognition of the significant overlap between the two spheres. As an example, children are individuals protected under the protected characteristic of age within the Equality Act 2010, but they also have a specific set of rights afforded to them under the UNCRC.

The Strategic Equality & Human Rights Plan also provides a framework to outline how Welsh Government will work towards achieving its National Equality Objectives (NEOs). These NEOs provide the ultimate goal to which the plan work and have been subject to their own Integrated Impact Assessment and children's rights impact assessment.

Cabinet approved the National Equality Objectives, and are now asked to approve the SEHRP that will provide the framework for how they will be delivered.

The SEHRP has also been developed as a framework to support reforming the internal levers of Welsh Government as part of the wider systemic and cultural change this plan has been developed to support. This separate work will consider the associated impacts as these reforms are undertaken so again the SEHRP itself does not contain direct actions

2. Gathering evidence and engaging with children and young People

Welsh Government has engaged with internal and external partners on the development of the NEOs, which underpin the Strategic Equality & Human Rights Plan.

This new framework directly responds to the research commissioned in January 2020 to examine options to strengthen and advance equality and human rights in Wales

The [Strengthening and advancing equality and human rights in Wales](#) research report, led by Prof. Simon Hoffman, Swansea University, in collaboration with Bangor University , Diverse Cymru and Young Wales concludes that there are strong connections between equality and human rights.

As a key recommendation of this research, it recommends *“The Welsh Government and public authorities in Wales should integrate human rights as standards for policy making to provide a stronger vision to advance equality and well-being. Human rights should be embedded in all policy and strategic planning processes.”*

The SEHRP 2025 - 2029 will reinforce and build on the Welsh Government’s commitment to using the UNCRC as the basis for policy making for children and young people, and to ensuring that their rights remain central to the promotion of equality and Human Rights in Wales. During the consultative phase of the development of the NEOs and SEHRP, Welsh Government has engaged with stakeholders which represent children and young people, including the office of the Children’s Commissioner for Wales (CCfW) and with main children’s charity in Wales, ‘Children in Wales’.

An initial round of consultation on the NEOs was carried out with equality stakeholders in July 2023, through electronic feedback and an online workshop. Points raised in this engagement contributed to building the full consultation document [Strategic Equality Plan 2024 to 2028: proposed principles of approach and objectives](#) which opened on 13 November and closed on 12 February 2024. During the consultation period, the consultation document was published online in accessible formats, including a Youth Friendly version, for feed-in from the public, to capture comments, perspectives and suggestions, and an online event was also held to gather additional feedback.

The consultation addressed the development approach for the full SEHRP 2025 – 2029. This work has been completed in two stages: initial approval and publication of the NEOs 2024 – 2028 and followed by the development of the SEHRP 2025 – 2029 and its subsequent publication. The Welsh Ministers have agreed a Long-term Equality Aim, a new set of NEOs for 2024 – 2028, and the SEHRP 2025 – 2029.

The Strategic Equality & Human Rights Plan, incorporating the Long-Term Equality Aim– and NEOs focus attention on priority equality and human rights issues to deliver improved policies and service delivery including resource allocation. Welsh Government will continue to work collaboratively with internal and external partners.

Organisations which support children and young people were able to contribute their views on the content of the NEOs 2024 – 2028 and SEHRP 2025 – 2029 during the consultation phase. which took place between 13 November 2023 and 12 February 2024. Feedback was provided from the Office of the Children’s Commissioner for Wales, Ethnic Minority Youth Support Team (EYST) and from an anonymous person completed via a Youth-friendly completed return form. Engagement was also undertaken with children-support members of the various Welsh Government equality forums. Feedback from the Children’s Commissioner for Wales (CCfW) noted that NEO 2 “would encourage the use of CRIAs at a more in-depth and meaningful level and through a considered and proactive approach across Government. ‘No discernible negative impacts on the Rights of the Child have been identified.

The SEHRP as a framework is also intended to enable better collaboration and involvement in the taking forward of this plan. This includes consideration to engage with children and young people and stakeholder groups around the launch of the plan. It is also the intention to engage with stakeholder groups on the reform of government levers leading to meaningful longer-term reforms.

3. Analysing the evidence and assessing the impact

In informing development of the SEHRP an analysis of the responses to the consultation was carried out. Responses relating specifically to children and child-supporting organisations, including from the CCfW informed the development of the NEOs 2024 – 2028 and SEHRP 2025 – 2029. Engagement and discussion is also intended on any further NEOs or actions with children and young people and organisations that represent them, to gather more information and take their views into account, thereby satisfying article 12 of the UNCRC.

The SEHRP framework is expected to have a positive impact on Children’s Rights in Wales. The UNCRC recognises not only children’s human rights but gives them additional rights to protect them from harm as one of the most vulnerable groups in society.

As well as being a framework, the SEHRP is intended to enable better collaboration and involvement, including engagement with children and young people and stakeholder groups around the launch of the plan. Engagement will also be undertaken with stakeholder groups on the reform of government levers to lead to meaningful longer-term reforms.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
ARTICLE 2 (non-discrimination) The rights set out in the UNCRC apply to every child whatever their race, colour, gender, language, religion, ethnicity, disability or any other status.	X		The ongoing refresh of the SEHRP, the Welsh Government Long-term Aim and the delivery of actions to support NEOs 2024 – 2028 contained across all Welsh Government plans and interventions aim to positively impact children's rights. Even actions not directly targeting children will benefit them indirectly through their parents and carers. Inequality appears in different forms, such as differences in health outcomes, poverty levels, and living standards, all of which are potentially rooted in structural and systemic inequality. SEHRP 2025 – 2029 and the embedded NEOs 2024 - 2028 seek to address these disparities and promote the rights outlined in the UNCRC, particularly those affecting marginalised groups.
ARTICLE 3 That the best interests of the child must be a primary consideration in all actions concerning children.	X		
ARTICLE 6 That every child has the right to life, survival and development.	X		
ARTICLE 8 (identity) Every child has the right to their identity – including their nationality, name and family relationships.	X		
ARTICLE 12 (respect for children's views) Every child has the right to express their views on matters that affect them, and for these views to be taken into consideration.	X		
			Because of the overarching strategic nature of the SEHRP, and the commitment to embed equality and human rights within all areas of policy, the framework will naturally support many of the other articles. For example, the articles that deal with children's education (Art 28) will be supported by our revised EqHRIA process, which will strengthen consideration of equalities & human rights in education as it will across WG policy.

ARTICLE 13 (freedom of expression) Every child has the right to find out and distribute information and to express their ideas – through talking, writing, art or any other form of expression.	X		SEHRP 2025 – 2029 and NEOs 2024 – 2028 will continue to influence Welsh Government strategies, such as the Child Poverty Strategy and the Mental Health and Wellbeing Strategy, the Nation of Sanctuary Plan – and all protected characteristic specific plans and intervening action.
ARTICLE 22 (Sanctuary Seekers) Children who come into a country as refugees should have the same rights as children born in that country.	X		
ARTICLE 23 (disabled children) Disabled children have the right to enjoy a full life, with dignity, and to participate as far as possible in their community.	X		
ARTICLE 24 (health and healthcare) Every child has the right to the best possible health and to healthcare.	X		
ARTICLE 27 (adequate standard of living) Every child has the right to a decent standard of living to enable them to grow and develop.	X		

ARTICLE 29 (education and children's development) Education should help develop every child's personality, talents and mental and physical abilities to the full.	X		
ARTICLE 30 (minority and indigenous groups) A child from minority group has the right to enjoy their own culture, practise their own religion and use their own language.	X		
ARTICLE 31 (play and cultural and artistic activities) Every child has the right to relax, play and take part in cultural and artistic activities.	X		

4. Ministerial advice and decision

This CRIA is being submitted to inform Welsh Ministers to assist them in considering the Strategic Equality and Human Rights plan.

5. Publication of the CRIA

Publication of the IIA will follow prescribed guidelines.

6. Communicating with Children and Young People

As outlined above a consultation process informed development of the SEHRP. Children and young people were able to engage in the consultation process, as were child supporting organisations such as the Children's Commissioner for Wales and the charity, Children In Wales. A Children and Youth-friendly version of the full consultation on the Welsh Government website was published. Responses were received from the

Children's Commissioner for Wales and a range of children's and young people's organisations who had engaged directly with the children and young people to provide their feedback on the consultation. As outlined earlier engagement will continue during the life cycle of the SEHRP 2024 – 2029 in the taking forward of this plan. This includes consideration to engage with children and young people and stakeholder groups around the launch of the plan. It is also intended to engage with stakeholder groups on the reform of government levers as an impactful lever that they can best influence to lead to meaningful longer-term reforms. The Children's Commissioner for Wales and Children In Wales are members of the Human Rights Advisory Group and will be involved in monitoring progress of the delivery of the recommendations withing the SAEHR report.

Children and young people were also a key part of the consortium which produced the SAEHR research report. The consortium was led by Swansea university, in collaboration with Bangor university, Diverse Cymru and Young Wales.

7. Monitoring and Review

This CRIA is part of a series of IIAs carried out during the process of developing the SEHRP 2025 – 2029. Engagement will continue during the life cycle of the SEHRP 2025 – 2029 and will reflect performance against measures to enhance children's rights in the related Annual Report on Equality. At the latest, the CRIA will be reviewed in 2029 at the end of the current life-cycle of the SEHRP and NEOs.

B. Equality Impact Assessment

1. Describe and explain the impact of the proposal on people with protected characteristics as described in the Equality Act 2010.

Building on Equality Act 2010, Welsh Regulations laid a further foundation for taking equality forward in Wales. Under these Regulations, listed bodies must prepare and publish equality objectives every four years.

Welsh Government Strategic Equality Objectives

Since the publication of the SEP 2020 - 2024, several distinct equality plans focussing on several Protected Characteristics have been published, each with their own defined set of Actions.

- Age friendly Wales: our strategy for an ageing society
- Children and Young People Plan
- The Disability Rights Taskforce
- Maternity Care in Wales – A five-year vision for the future 2019-2024
- Anti-racist Wales Action Plan
- Refugee and Asylum Seeker Plan (Nation of Sanctuary)
- Advancing Gender Equality in Wales Plan 2020-2023

- Violence against women, domestic abuse and sexual violence: strategy 2022 to 2026
- LGBTQ+ Action Plan for Wales

Since distinct plans for several Protected Characteristic areas exist, with different policies covering all Protected Characteristics, the NEOs 2024 – 2028 and SEHRP 2025 – 2029 adopt an intersectional approach focusing on: making links across those plans and equality policies; mainstreaming equality; and policy implementation to address perceived systemic implementation gaps between the design and delivery of Actions (and demonstrating how these Actions affect individuals).

The related consultation [Strategic Equality Plan 2024 to 2028: proposed principles of approach and objectives](#) helped focus attention on all equality issues and promote an understanding of how each intersects, with the aim to deliver improved policies and service delivery, including resource allocation.

The NEOs 2024 – 2028 and SEHRP 2025 - 2029 will also continue to deliver outcomes delivering equality, anti-discrimination and good relations between people in Wales.

Each of the distinct Protected Characteristic plans (listed above) have their own set of Objectives and Actions where the developmental evidence tells us that targeted action has been identified. They have separate IIAs. These Actions contribute to the delivery of the NEOs 2024 – 2028 and SEHRP 2025 - 2029.

During development of the draft NEOs, evidence was analysed by policy leads including that which was provided by the Equality and Human Rights Commission's (EHRC) [Is Wales Fairer? \(2018\)](#) Report. Subsequent to opening the consultation on 13 November, the EHRC published [Equality and Human Rights Monitor 2023: Is Wales Fairer?](#) which has further informed the development of the NEOs 2024 – 2028 and the SEHRP 2025 – 2029.

Engagement & Consultation

Welsh Government has engaged with internal and external stakeholders to develop the NEOs 2024 – 2028 and development of the SEHRP 2025 – 2029.

Feedback has been captured from the public both online and through pre-consultation workshops attended by a wide range of stakeholders and members of the public.

An initial round of consultation was carried out with equality stakeholders in July 2023 on the Initial Discussion Document via electronic feedback to questions and an online workshop. Points raised in this engagement contributed to building the full consultation [Strategic Equality Plan 2024 to 2028: proposed principles of approach and objectives](#) which from 13 November 2023 to 12 February 2024.

The consultation document was published online for feed-in from the public, to capture comments, perspectives and suggestions, and an online event was also held to gather additional feedback.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
Age (think about different age groups)	Positive	The proposals included in the distinct Protected Characteristic Plans, equality and human rights policies and the NEOs 2024 – 2028 and SEHRP 2025 - 2029 will positively impact upon people of all ages. For example, ensuring health and social services are equipped to support individuals of all ages	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.
Disability (consider the social model of disability and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different	Positive	The proposals included in the distinct Protected Characteristic Plans, equality and human rights policies and NEOs 2024 – 2028 and SEHRP 2025 – 2029 will positively impact upon Disabled People. Development will also be informed by the findings and recommendations of the Disability Rights Taskforce, <i>Action on disability: the right to independent living framework and action plan</i> , and the emerging <i>Disabled People's Rights Plan</i> .	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.

types of impairments)			
Gender Reassignment (the act of transitioning and Transgender people)	Positive	<p>The proposals included in the distinct Protected Characteristic Plans, equality and human rights policies and NEOs 2024 – 2028 and the SEHRP 2025 - 2029 will positively impact upon persons undertaking Gender Reassignment in Wales including, but not limited to, easier access to information and advice.</p> <p><i>Advancing Gender Equality in Wales Plan</i></p> <p><i>LGBTQ+ Action Plan</i></p>	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.
Pregnancy and maternity	Positive	<p>The proposals included in the distinct Protected Characteristic Plans, equality and human rights policies and NEOs 2024 – 2028 and SEHRP 2025 – 2029 will positively impact upon Pregnancy and Maternity. It is anticipated that the proposals which facilitate access to healthcare will have a positive effect on pregnant persons.</p> <p><i>Advancing Gender Equality in Wales Plan</i></p> <p><i>Maternity services strategy (2019 to 2024)</i></p>	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.
Race (include different ethnic	Positive	The proposals included in the distinct Protected Characteristic Plans, equality	Engagement with policy leads where any negative impacts

minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)		and human rights policies and the NEOs 2024 – 2028 and SEHRP 2025 – 2029 will positively impact upon persons regardless of their race, cultural identity, or migrant status. <i>Anti-Racist Wales Action Plan</i>	are identified in individual policy areas to assess mitigation and delivery where needed.
Religion, belief and non-belief	Positive	The anticipated benefits will be available to all people in Wales regardless of their religion, belief or non-belief status.	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.
Sex / Gender	Positive	The proposals included in the distinct Protected Characteristic Plans, equality and human rights policies and NEOs 2024 – 2028 will positively impact upon persons of all Genders. <i>Advancing Gender Equality in Wales Plan</i>	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.
Sexual orientation (Lesbian, Gay and Bisexual)	Positive	The proposals included in the distinct Protected Characteristic Plans, equality and human rights policies, NEOs 2024 – 2028 and SEHRP 2025 - 2029 will positively impact upon persons of all sexual orientations including, but not limited to, easier access to information and advice.	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.

		<i>LGBTQ+ Action Plan</i>	
Marriage and civil partnership	Positive	Equality and Human Rights policies, NEOs 2024 – 2028 and SEHRP 2025 - 2029 include Actions which will address the needs of persons undertaking or participating in a marriage or civil partnership in Wales including, but not limited to, easier access to information and advice.	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.
Children and young people up to the age of 18	Positive	See CRIA Assessment. The proposals included in the distinct Protected Characteristic Plans, equality and human rights policies, NEOs 2024 – 2028 and SEHRP 2025 – 2029 will positively impact Children and young people up to the age of 18.	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.
Low-income households	Positive	See Economic Assessment in Section 4 and Socio-economic detail in Section 6 and in Socio-economic Impact Assessment in Section G of this IIA. The proposals included in the distinct Protected Characteristic Plans, equality and human rights policies, NEOs 2024 – 2028 and SEHRP 2025 - 2029 will positively impact persons in low-income households.	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.

Human Rights and UN Conventions

Do you think that this policy will have a positive or negative impact on people's human rights? *(Please refer to point 1.4 of the EIA Guidance for further information about Human Rights and the UN Conventions).*

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
	Positive	<p>Raising awareness of the Human Rights legal landscape (Both UK legislation, the Human Rights Act and obligations on the Welsh Government as the UK Government is a signatory to UN Human Rights Treaties and Conventions) is a key part of the SEHRP, taking forward recommendations in the SAEHR research report, a National Objective (NEO2) and incorporation of rights under two Conventions, the CEDAW and the UNCRDP which are Programme for Government Commitments.</p> <p>The NEOs 2024 – 2028 and SEHRP 2025 - 2029 include references to Actions to be taken to strengthen and enhance human rights in NEO 2, including those contained in distinct Protected Characteristic plans under development. For example, United Nations Convention on the Rights of Persons with Disabilities UNCRDP – and the</p>	Engagement with policy leads where any negative impacts are identified in individual policy areas to assess mitigation and delivery where needed.

		work of the Disability Rights Taskforce	
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EU/EEA and Swiss Citizens' Rights

Part 2 of the EU-UK Withdrawal Agreement, along with the EEA EFTA Separation Agreement and Swiss Citizens Rights Agreement ("Citizens Rights Agreements") give EU, EEA and Swiss citizens who were lawfully resident in the UK by 31 December 2020 certainty that their citizens' rights will be protected.

The Citizens Rights Agreements are implemented in domestic law by the European Union (Withdrawal Agreement) Act 2020 (EUWAA)

Eligible individuals falling within scope of the Citizens Rights Agreements will have broadly the same continued entitlements to work, study and access public services and benefits, in as far as these entitlements have derived from UK membership of the EU as well as its participation in the EEA Agreement and the EU-Swiss Free Movement of Persons Agreement. Subject to certain limited exceptions, individuals needed to have applied for a new residence status (either pre-settled or settled status) through the EU Settlement Scheme by 30 June 2021.

Please consider the impacts of your policy on the areas below, indicating whether the impact is positive or negative and any action required to eliminate potential negative impact. Please note the basis for your answer, including where legal advice has been sought and please also indicate where a right is not relevant for your policy:

Residency – the right to reside and other rights related to residence: rights of exit and entry, applications for residency, restrictions of rights of entry and residence;

There are no negative impacts anticipated as a result of the Cabinet approval of the SEHRP. No feedback was received in the consultation that would indicate this. More broadly the SEHRP is a framework to positively strengthen and enhance human rights.

Mutual recognition of professional qualifications –the continued recognition of professional qualifications obtained by EU/EEA/Swiss citizens in their countries (and already recognised in the UK);

There are no negative impacts anticipated as a result of the Cabinet approval of the SEHRP. No feedback was received in the consultation that would indicate this. More broadly the SEHRP is a framework to positively strengthen and enhance human rights.

Access to social security systems – these include benefits, access to education, housing and access to healthcare

The recent (February 2025) UN examination of International Convention on Economic Social and Cultural rights (ICESCR) recognised that this issue was non-devolved. Welsh Government has some responsibility under Article 10 but only in relation to protection of the family and children and partial responsibility under poverty, food and housing.

There are no negative impacts anticipated as a result of the Cabinet approval of the SEHRP. No feedback was received in the consultation that would indicate this. More broadly the SEHRP is a framework to positively strengthen and enhance human rights.

Equal treatment – this covers non-discrimination, equal treatment and rights of workers;

Under ICESCR the equal rights of men and women are covered at Article 3. ICESCR is mainly non devolved and not incorporated. The Equal Power Equal voice programme is not affected by this IIA.

Work continues by Welsh Government to work towards the Programme for Government commitment on the incorporation of CEDAW and the UNCRDP.

There are no negative impacts anticipated as a result of the Cabinet approval of the SEHRP. No feedback was received in the consultation that would indicate this. More broadly the SEHRP is a framework to positively strengthen and enhance human rights.

Workers rights - Workers and self-employed persons who are covered under the Citizens Rights Agreements are guaranteed broadly the same rights as they enjoyed when the UK was a Member State. They have a right to not be discriminated against due to nationality, and the right to equal treatment with UK nationals.

There are no negative impacts anticipated as a result of the Cabinet approval of the SEHRP. No feedback was received in the consultation that would indicate this. More broadly the SEHRP is a framework to positively strengthen and enhance human rights.

C. Socio-economic Duty Impact Assessment

Undertaking the impact assessment

What evidence has been considered to understand how the proposal contributes to inequalities of outcome experience as a result of socio-economic disadvantage?

Examples of inequalities of outcome are described in the Socio-economic Duty as Poorer health and mental health, Lower healthy life expectancy, Poorer skills and educational attainment, lower paid work, greater chance of being a victim of crime and not feeling safe, poorer participation in public life, greater chance of living in less than adequate housing and poorer access to transport and public services.

The following evidence has been considered in understanding opportunity to reduce such inequality through the National Equality Objectives Each, which will be delivered through actions being taken forward via the distinct Protected Characteristic Plans

[Evidence review: socio-economic disadvantage and inequalities of outcome | GOV.WALES](#)

[Socio-economic Duty: examples of inequalities of outcome | GOV.WALES](#)

NEO 1: We will create a Wales where everyone has opportunities to prosper in line with our organisational goal to reduce poverty. Disadvantageous socio-economic circumstances have long-lasting impacts on all areas of someone's life, from birth through to adulthood. This is because differences in wealth or opportunity, i.e., socio-economic deprivation, restrict people's opportunities and options in life. Thus, poverty is linked to poorer educational and work or health-related outcomes.

NEO 2: We will create a Wales where everyone can be aware of their human rights, and where those rights are protected, promoted, and underpin all public policy. Ensuring that people are aware of their human rights has the potential to empower people to challenge for their rights, this could impact on reducing inequality associated with socio-economic disadvantage.

NEO 3: We will create a Wales where everyone can be aware of and has equitable access to high quality public services. Access to services can be limited by many factors, from the adequate provision of services to difficulty fully participating in cultural life due to discrimination, with full participation in social and cultural life in Wales being linked to race, gender identity and disability. This NEO will provide a framework for Equality plans to focus attention where it is needed most. Research suggests there are several areas that could be addressed to ensure that Wales continues to embody the values of an open, fair country where everyone can access and participate in the aspects of community life that they desire (FGC, 2020)

NEO 4: We will create a Wales free from discrimination, victimisation, harassment, abuse, hate crime and/or bullying against all people. Socio-economic disadvantage disproportionately affects certain groups, including women, lone parents, racial and ethnic minorities, children, disabled people, and those living in rural areas (Alston, 2018) This NEO will provide a framework for Equality plans to focus attention where it is needed most.

NEO 5: We will create a Wales where everyone from the full diversity of backgrounds can participate in public life, have their voices heard and see themselves reflected in leadership positions. [Participation in public life and the ability are affected by intersectional qualities](#). This NEO will provide a framework for Equality plans to focus attention where it is needed most.

NEO 6: We will create a Wales with fair and equal opportunities to gain employment and for fair and equal treatment in the workplace, including fair pay and conditions. Pay gaps and in-work poverty affect certain groups much more than others. The risk of in-work poverty is greater for disabled and Minority Ethnic workers. Black, Asian and Minority

Ethnic workers are more likely to be in relative income poverty and households including someone who is disabled are more likely to struggle financially (EHRC, 2018).

Disabled people are less likely to work in high-pay occupations, compared to nondisabled people, and disabled people are twice as likely to be unemployed as those without an impairment (EHRC, 2018). The Well-being of Wales 2020 report shows that pay gaps exist for women, disabled people, and Minority Ethnic in Wales. This NEO will provide a framework for Equality plans to focus attention where it is needed most

NEO 7: We will create an environmentally sustainable Wales with the capacity to both ensure our journey to net zero is fair and to respond to the inequitable impacts of climate change. Socio-economic disadvantage impacts on the capability to access net zero provisions, such as transport and home improvements. Impacts of climate change, such as flooding in Wales is likely to impact across those groups who suffer SED. Poor and marginalised communities in Wales are most likely to be hit by climate disasters such as flooding, a new report has found. This NEO will provide a framework for Equality plans to focus attention where it is needed most.

The below question was asked and received numerous responses. Some focused on the NEOs and addressing the Socio-economic Duty within them whilst others focused more on the development mechanism of the SEHRP 2025 - 2029.

Question 6: Do you believe the National Equality Objectives will help us fulfil the Socio-economic Duty?

Numerous detailed responses were received to this question, which have informed the re-drafting of the NEOs 2024 – 2028 and the development of the SEHRP 2025 – 2029 as they relate to implementation of the NEOs.

As an example of responses received:

"It is important to note that the definitions of groups go beyond protected characteristics, which is acknowledged by both the Strategic Equality Plan and the Socio-Economic Duty."

"We welcome the recognition of public sector bodies as employers and their capacity to reduce inequalities through this role. We also support the emphasis placed on lived experience within the Strategic Equality Plan. Those with lived experience of socio-economic (or other types of) disadvantage can be considered experts by experience. Engaging experts by experience provides an opportunity to demonstrate commitment to the Socio-economic Duty by treating them in the same regard as any other expert that might be consulted."

"As this is WG's first iteration of the SEP since the SED has been enacted, the inclusion of a dedicated objective supporting tackling socio-economic deprivation is a positive development. However, as has been suggested [in another question], Welsh Government may wish to consider reorganising its objectives to ensure that the SED does not

overshadow the key principles of the pre-existing equality framework i.e. that of protected characteristics."

"Some of the goals have stronger ties to fulfilling the socio-economic duty but all 7 contribute in a way. There are many deep-rooted, and systemic issues in Wales and the UK, that adversely impact on those with protected characteristics, and their socio-economic circumstances which will take a long time to improve. And as you say 'equality and human rights arena can evolve rapidly' so will work will constantly need reviewing, integrating engagement."

Welsh Ministers will be asked to show how they have taken the Socio-economic Duty into consideration as they take decisions in line with the NEOs 2024 - 2028, the SEHRP 2025 - 2029, distinct Protected Characteristic Plans and equality and human rights policies as they develop policies intervention and delivery, with relevant IIAs (which will include an Economic and equality and human rights Impact Assessment as component elements) being required to inform each decision.