

Strategic Equality Plan 2024 to 2028: integrated impact assessment (February 2024)

Context

This Integrated Impact Assessment (IIA) is the second in a sequence of IIA in relation to the publication of the Welsh Government National Equality Objectives 2024-2028 (NEOs) which will inform the development of the related Strategic Equality Plan (SEP) for the same period. The IIAs are designed to support the development of the proposed National Equality Objectives 2024-2028 (NEOs) which will inform the related Strategic Equality Plan (SEP).

This IIA accompanies the publication of the National Equality Objectives. It reflects responses received through the consultation on the NEOs, which closed 12 February 2024. If approved by Welsh Ministers, they will be published by 1 April 2024.

Welsh Government has a statutory duty to publish and review our Equality Objectives every four years. Our first set of Equality Objectives were published in 2012. These were reviewed and refreshed for publication in 2016, with the current set of Equality Objectives being published on 2 April 2020.

This IIA relates to the reviewing and refreshing of our Equality Objectives (now NEOs) for 2024 – 2028. A separate IIA will be completed for the work and publication of the SEP 2024 – 2028.

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 focussing on individual 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 and subsequent SEP for 2024 – 2028 will adopt an intersectional approach linking the SEP with 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 of delivering improved policies and service delivery, including resource allocation.

Each of the Protected Characteristic plans (listed above) set out Objectives and Actions and have separate IIAs. The actions for the NEOs 2024 – 2028 will be published as part of the SEP 2024 – 2028 later in 2024.

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

The Annual Report on Equality 2022 – 2023 will be published shortly. This report will reflect on the Objectives set out in the SEP 2020 – 2024 only.

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

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. The principle is made up of five key ways of working:

- **Long term:** the importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.
- **Prevention:** how acting to prevent problems occurring or getting worse may help public bodies meet their objectives.
- **Integration:** Considering how the public body's well-being objectives may impact upon each of the well-being goals, on their other objectives, or on the objectives of other public bodies.
- **Collaboration:** acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives.
- **Involvement:** the importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves.

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.

While our NEOs cut across all of the well-being goals, they will in particular support progress towards at least the following:

- **A prosperous Wales** – An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
- **A healthier Wales** – A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- **A more equal Wales** - A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- **A Wales of cohesive communities** - Attractive, viable, safe and well-connected communities.

These 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.

Long term

The purpose of the development of the NEOs for 2024 - 2028 will be to build on progress made under previous years. NEOs are about strengthening and advancing equality and human rights in Wales. This work is likely to extend beyond 2028 and the life of the subsequent SEP 2024 – 2028. NEOs need to connect Protected Characteristic Plans (current and future) to equality policy as it develops over time.

Prevention

Each NEO will drive preventative action across a range of policy areas and themes. Actions will be taken forward via the separate Protected Characteristic Plans and will incorporate all areas of equality policy for the people of Wales. This will include, for example, action to tackle hate crime, discrimination in all its forms, and inequality of access to public services. The NEOs will sit alongside intended outcomes which will drive policy development across the Welsh Government. More detail will be set out in the SEP.

Integration

The NEOs were developed in consultation with internal and external stakeholders, to ensure inclusion of stakeholders in policy development. The cross-cutting objectives aim to focus on intersectionality and reducing inequality. The Welsh Government strongly encourages public sector organisations in Wales to take a similar approach and set Equality Objectives reflecting those of the Welsh Government, adjusted for regional or local context as necessary.

Collaboration and Involvement

Welsh Government has engaged with internal and external partners on the development as part of the process of developing the NEOs 2024 - 2028.

In advance of the development of the proposed NEOs, prior to the launch of the consultation, 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. Since the opening of the consultation on 13 November, the EHRC has published [Equality and Human Rights Monitor 2023: Is Wales Fairer?](#) The recommendations contained therein have informed the development of the NEOs and the SEP.

An initial consultation was carried out with equality stakeholders 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. During the consultation period, the consultation document was published online for feed-in from the public, and an online event was also held to gather additional feedback.

The consultation addressed both the National Equality Objectives and the full SEP 2024 – 2028. This IIA covers the publication of the NEOs and takes into account the responses to the overarching Long-term Equality Aim, a new set of NEOs. Responses were analysed and an overarching Long-term Equality Aim, a new set of NEOs (if approved by Welsh Government Cabinet), and a summary response report, will be published on the Welsh Government website. A separate IIA will be produced for the SEP.

Impact

The Long-Term Equality Aims and NEOs focus attention on priority equality issues in order to deliver improved policies and service delivery including resource allocation.

We have worked closely with internal colleagues and external stakeholders during the consultation on the NEOs and SEP 2024 – 2028. This engagement and collaborative work will continue and look to ensure that the NEOs have impact on equalities across governmental policies to reduce discrimination and improve equity of outcomes.

Costs and Savings

At present, actions linked to the NEOs sit within distinct policy areas and we do not anticipate costs directly attributable to the NEOs. As sector specific plans are developed, they will take into account the NEOs, and costs and savings analyses will be placed before Welsh Ministers for consideration and approval. Progress of delivery of the NEOs will be reported on over a four-year cycle and published on the Welsh Government website. [Welsh Government annual equality reports.](#)

Mechanism

Following publication of the NEOs, Welsh Government and external Stakeholders will work to develop the related SEP 2024 – 2028.

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 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.

2.2 Children's Rights

UN Convention on the Rights of the Child (UNCRC)

Age is one of the Protected Characteristics in the Equality Act 2010. It is essential that our NEOs support people of all ages, including children and young people.

The NEOs 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 in Wales. We will consult and engage with stakeholders as we move into the development the SEP 2024 – 2028 and its methods of implementation.

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.

The above Actions form part of the delivery package promoted by Welsh Ministers as their commitment to the Electorate. Some actions supporting the above commitments are being taken forward via the individual Protected Characteristic Plans. The NEOs will underpin these plans.

2.3 Equality

The Welsh Government remains committed to the principles and direction laid down in the Equality Act 2010 and subsequent Regulations for Wales. As this matter relates to the provision and ongoing development of NEOs, an Equality Impact Assessment has been prepared (as attached at Annex B).

2.4 Rural Proofing

The NEOs 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 have been part of the engagement and consultation on the NEOs. There may be significant or moderate beneficial impacts for those individuals with Protected Characteristics living in rural areas. Impacts may include, for example, improved and more accessible services, improved transport links etc. in their areas. This can only improve the vibrancy, diversity and accessibility of rural communities. Engagement with communities will continue.

Where policy and interventions are developed and take into account the NEOs, a Rural Proofing Assessment will 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 was highlighted in the consultation. We will continue to link in with rural community members during the development of the SEP 2024 – 2028.

A full Rural Proofing Impact Assessment has not been undertaken for the NEOs for 2024 - 2028. This will be re-assessed for the SEP 2024 – 2028 IIA.

2.5 Health

The NEOs will have an impact across all communities in Wales, including via health service provision.

There may be significant or moderate beneficial impacts which may come out of the delivery of the NEOs, for example improved access to health services by communities 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 support the NEOs will be submitted to Welsh Ministers as part of their decision-making process on future policy direction. In developing supporting policy actions, Welsh Government Groups will be required to undertake their own impact assessments. We are also conscious that external public sector partners should develop their own Equality Objectives and supporting Equality Plans according to their own stakeholder and user needs.

Consultation feedback: the consultation responses highlighted areas related to health inequalities. The Equalities team and the Health and Social Services Group are collaborating on the development of the SEP 2024 – 2028 to ensure we are aligned.

We have not carried out a Health Impact Assessment for the NEOs 2024 – 2028 and will reassess this for the development of the SEP 2024 – 2028.

2.6 Privacy

Where the Welsh Government, its partners and Stakeholders, are working to take forward the development of the NEOs and the SEP 2024 - 2028, each engagement and consultation response will require an assessment of the privacy needs of individuals and relevant legislation designed to protect privacy as standard.

Additionally, where Welsh Government Groups develop actions which impact or support those identified as within Protected Characteristic areas for the purposes of distinct plans of action and equality policies, each Group will be required to assess the Privacy Impacts of those actions.

Within the consultation, respondents were given the option to remain anonymous and in any publication of the consultation responses, we will ensure only permitted names are shared.

We have not carried out a Privacy Impact Assessment for the NEOs 2024 – 2028 and will reassess this for the SEP 2024 – 2028.

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 NEOs will encourage and enable individuals with Protected Characteristics to take part in cultural activities, mainstreaming equality 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 will engender greater engagement in the cultural life of Wales and add to it by increasing diversity of users.

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 NEOs.

The NEOs are focused on widening opportunities for inclusion and participation for people with protected characteristics across all aspects of their lives.

Specific actions sit in the different equality plans (as listed at the top of the document), and plans will be expected to have actions which encourage increased accessibility for communities, individuals and communities. For example, in the Anti-racist Wales Action Plan (ArWAP) there are goals and actions that are “intended to acknowledge and combat past and present disadvantages experienced by Black, Asian and Minority Ethnic groups. They aim to eliminate discrimination and barriers to the full enjoyment of all aspects of culture, heritage and sport, and to recognise and celebrate past and present racial and ethnic diversity in Wales.”

These Actions will remain within the scope of the Protected Characteristic Plans, with Welsh Government interventions detailed in those plans, linked to wider Group activity which supports the intentions of those plans and the NEOs 2024-2028.

3.2 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), equality 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 NEOs 2024 - 2028. Any Actions to be taken forward will remain within the scope of the 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.

A Welsh Language Impact Assessment has been completed/

4.1 Business, the general public and individuals

The NEOs themselves are not expected to have a negative impact on 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.” We anticipate that this will have an impact on the Welsh economy by ensuring more people from all backgrounds become leaders across the sectors of Wales. However, we do not know the impact this may have, and have described it 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 can reasonably be expected to increase customer throughout, and by extension increase 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 affecting the quality of access for customers.

4.2 Public Sector including local government and other public bodies

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 that those subject to it consider advancement of equality when carrying out their day-to-day business.

The Welsh Government is convinced that the NEOs set out earlier in this IIA have the potential to bring benefits for other public sector organisations for the reasons we have set out in this IIA.

Public Sector organisations are under no statutory obligation to replicate our NEOs and are not prohibited from developing their own approach (indeed a more tailored approach may be preferred). Welsh Government encourages public sector organisations in Wales to set Equality Objectives that reflect those of the WG, 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?

We recognise the importance of the third sector's contribution to advancing equality and anti-discrimination in Wales. We will continue to work in partnership with the third sector to support our NEOs.

Welsh Government may continue to support third sector organisations who are providing services which deliver against NEOs, Protected Characteristics plans and equality policies, in line with the principles set out in the [Third Sector Scheme](#).

The third sector has been consulted throughout the development of the NEOs and will continue to be consulted and encouraged to be part of the development of the SEP 2024 – 2028. Third sector

organisations will be asked to consider how they can continue to support the delivery of the distinct Protected Characteristic Plans and their embedded Actions, alongside all equality policies.

4.4 Justice Impact

All Equality policies, the NEOs and the Actions within the distinct Protected Characteristic Plans take stakeholder needs into consideration as part of their delivery, as well the demonstrating any impact on justice matters (within the scope and remit of the Welsh Government's legislative competence).

Welsh Ministers will be asked to demonstrate that they take decisions in line with the NEOs the SEP 2024 – 2028, and the distinct Protected Characteristic plans and policies. Decisions will be informed by IIAs, including an Equality Impact Assessment.

While it is not proposed to bring forward any new duties other than those already enacted in Wales at this point, this cannot be discounted as a potential action over the next four years.

We have taken Human Rights into account in the NEOs as part of our aim to strengthen equality and human rights through this work. 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.”

4.5 Socio-economic Impact

Each NEO and the Actions within the Protected Characteristic Plans, alongside all equality policies, will have the needs of individuals, communities and communities of interest taken into consideration as part of their delivery and it is expected that there will be clear impacts on those areas mentioned above, primarily through the distinct Protected Characteristic Plans and equality policies. Any further interventions or NEOs development during the next four-year cycle will be determined through further consultation and added in the development of the SEP 2024 - 2028.

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 and the distinct Protected Characteristic Plans and policies. IIAs (including an Economic and Equality Impact Assessment) will inform decision-making.

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 our consultation on the NEOs we have explained the nature of the Socio-economic Duty 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).

The Socio-economic Duty therefore seeks to improve the strategic decision-making of specified public bodies to better support those who are socio-economically disadvantaged in terms of income and/or status. It puts tackling inequality at the heart of decision-making and builds on the work public bodies are already doing. As part of our consultation to discuss the NEOs we asked the following question:

Question 6: Do you believe the National Equality Objectives will help us fulfil the Socio-economic Duty? Please explain your answer.

The consultation responses we received have informed revisions to the NEOs and will support the development of the SEP 2024 – 2028.

Example consultation feedback:

"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."

Conclusion

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

We must review our Equality Plan and Objectives every four years.

Welsh Government has used the analysis from engagement with stakeholders and the evidence contained in "[Is Wales Fairer? \(2018\)](#)" and other relevant research material to prepare a set of draft NEOs which formed the basis of the consultation.

[Strategic Equality Plan 2024 to 2028: proposed principles of approach and objectives](#)

Welsh Government engaged stakeholders and the public throughout the development of the NEOs, taking on board feedback to arrive at the final set of National Equality Objectives.

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 and National Equality Objectives was launched on 13 November 2023. 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.

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 NEOs and the subsequent SEP 2024 - 2028, and associated actions within individual Protected Characteristic Plans and policies, for example improved and more accessible preventative/support services.

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

The SEP will include monitoring mechanisms – these will be developed separately and a further IIA will be completed for them.

No negative impacts have been identified as a result of the NEOs.

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

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 (UNCPRD).

The NEOs 2024 - 2028 will set out how the Welsh Government will be taking forward the principles of the Convention in terms of its continuing equality duties.

Disability is one of the protected characteristics in the Equality Act 2010 and the NEOs 2024 – 2028 support disabled people. We engaged with disability rights organisations during the consultation and in addition to receiving online responses, stakeholders joined our online event. No discernible negative impacts on the UN Convention on the Rights of Persons with Disabilities (UNCRPD) were identified. We will continue this engagement throughout the implementation of the NEOs.

UN Convention on the Rights of the Child

Age is one of the protected characteristics in the Equality Act 2010 and our NEOs 2024 – 2028 support people of all ages.

The NEOs and SEP 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. We engaged with children's rights organisations (e.g. The Children's Commissioner for Wales; Whizz Kidz) during the consultation and received responses to our consultation questions. No discernible negative impacts on the Rights of the Child have been identified.

We will continue this engagement throughout the implementation of the NEOs.

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 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 as part of the Integrated Impact Assessment.

Promoting Economic Opportunity for All (tackling poverty)

The NEOs 2024 – 2028 and any linked Actions attributed to distinct Protected Characteristic Plans and equalities 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. We will continue this engagement throughout the implementation of the NEOs.

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?**

The NEOs 2024 – 2028 and any linked Actions attributed to distinct Protected Characteristic Plans will align with the aims of the Well-being of Future Generations (Wales) Act 2015, through enabling people to fulfil their potential and through promoting equality of opportunity in accessing services.

The Well-being goals that are particularly relevant are **a prosperous Wales, a healthier Wales, a more cohesive Wales and a more equal Wales.**

The NEOs 2024 – 2028 demonstrate the ‘5 ways of working’ set out in the sustainable development principle and we will continue this way of working throughout the implementation of the NEOs and the SEP 2024 – 2028. 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. Our NEOs 2024 – 2028 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 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 SEP 2024 – 2028 will set out arrangements for delivery of the NEOs.

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 SEP 2024 – 2028 will be published.

In addition, in the SEP 2024 – 2028, we will outline the necessary mechanisms for evaluation of performance against the NEOs.

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 IIA is completed in reference to the publication of Welsh Government's National Equality Objectives (NEOs) for 2024 – 2028. Publication of the NEOs is a statutory duty under the Equality Act 2010. Age is one of the protected characteristics in the Equality Act 2010 and the NEOs and SEP 2024 – 2028 support people of all ages.

Our NEOs to which this CRIA refers are intended to 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.

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 and the SEP 2024 - 2028.

Prior to the launch of the consultation on the NEOs, policy leads considered evidence including the Equality and Human Rights Commission's (EHRC) [Is Wales Fairer? \(2018\)](#) Report. Since the opening of the consultation on 13 November, the EHRC has published [Equality and Human Rights Monitor 2023: Is Wales Fairer?](#) This has informed the development of the NEOs and the SEP.

An initial round of consultation 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. During the consultation period, 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.

The consultation addressed the full SEP 2024 – 2028. This work will be completed in two stages: initial approval and publication of the NEOs 2024 – 2028 and followed by the development of the SEP 2024 – 2028. This IIA covers the publication of the NEOs and takes into account the responses to the overarching Long-term Equality Aim and NEOs. The Long-term Equality Aim, a new set of NEOs (if approved by Welsh Government Cabinet), and a summary response report, will be published on the Welsh Government website.

The Long-Term Equality Aim and NEOs focus attention on priority equality issues in order to deliver improved policies and service delivery including resource allocation.

The importance of a collaborative approach to the development of the NEOs cannot be understated. 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 during the consultation phase. which took place between 13 November 2023 and 12 February 2024.

No discernible negative impacts on the Rights of the Child have been identified.

3. Analysing the evidence and assessing the impact

An analysis of the responses to the consultation has been carried out. Responses relating specifically to children and child-supporting organisations, including from the Children's Commissioner for Wales, have informed the development of the NEOs, and as we develop the SEP 2024 – 2028 based on the approved NEOs, and any further Actions to be included, we will continue our engagement and discussions with children and young people and organisations that represent them to gather more information and take into account their views.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
UNCRC			Further work as we develop the related SEP 2024 – 2028 will include action to meet Programme for Government commitments to UNCRC

4. Ministerial advice and decision

This IIA is being submitted to inform Welsh Ministers to assist them in considering the NEOs, based on the responses received to the consultation. A separate IIA will be provided as we develop the SEP 2024 – 2028. Ministerial Decisions must be informed by a related IIA which includes a CRIA.

5. Publication of the CRIA

Publication of the IIA will follow prescribed guidelines.

6. Communicating with Children and Young People

Children and young people have been able to engage in the consultation process, at each stage so far, as were child supporting organisations. We published a Children and Youth-friendly version of the full consultation on the Welsh Government website. We received responses 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. We will continue our engagement and repeat this process for the development of the SEP 2024 – 2028.

7. Monitoring and Review

This CRIA is part of a series of IIAs carried out during the process of developing the SEP 2024 – 2028. We will repeat this process for the related SEP 2024 – 2028. We will continue to engage with children and young people during the life cycle of the NEOs 2024 – 2028 and will reflect the performance against measures to enhance children's rights in the related Annual Report on Equality.

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 and SEP for 2024 – 2028 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 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. The actions for the NEOs 2024 – 2028 will be published as part of the SEP 2024 – 2028 later in 2024.

In advance of the development of the proposed NEOs, prior to the launch of the consultation, 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. Since the opening of the consultation on 13 November, the EHRC has published [Equality and Human Rights Monitor 2023: Is Wales Fairer?](#) which has informed the development of the NEOs and the SEP 2024 – 2028).

Engagement & Consultation

Welsh Government has engaged with internal and external stakeholders to develop the NEOs and is working on development of the SEP 2024 – 2028.

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](#). Following Cabinet approval of the draft NEOs, a formal consultation ran 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.

Responses to the full consultation have been analysed and a summary report will be submitted for Ministerial approval, laying before the Senedd, and publication on the Welsh Government website.

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 policies and the NEOs 2024 – 2028 will positively impact upon people of all ages. For example, ensuring health and social services are equipped to support individuals of all ages	To be set out in the IIA for the Final version of the SEP 2024 - 2028.
Disability (consider the social model of disability ¹ and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different types of impairments)	Positive	The proposals included in the distinct Protected Characteristic Plans, equality policies and NEOs 2024 – 2028 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>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.

¹ Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search 'social model'.

Gender Reassignment (the act of transitioning and Transgender people)	Positive	<p>The proposals included in the distinct Protected Characteristic Plans, equality policies and NEOs 2024 – 2028 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>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.
Pregnancy and maternity	Positive	<p>The proposals included in the distinct Protected Characteristic Plans, equality policies and NEOs 2024 – 2028 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>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.
Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)	Positive	<p>The proposals included in the distinct Protected Characteristic Plans, equality policies and the NEOs 2024 – 2028 will positively impact upon persons regardless of their race, cultural identity, or migrant status.</p> <p><i>Anti-Racist Wales Action Plan</i></p>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.
Religion, belief and non-belief	Positive	<p>The anticipated benefits will be available to all people in Wales regardless of their religion, belief or non-belief status.</p>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.

Sex / Gender	Positive	<p>The proposals included in the distinct Protected Characteristic Plans, equality policies and NEOs 2024 – 2028 will positively impact upon persons of all Genders.</p> <p><i>Advancing Gender Equality in Wales Plan</i></p>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.
Sexual orientation (Lesbian, Gay and Bisexual)	Positive	<p>The proposals included in the distinct Protected Characteristic Plans, equality policies and NEOs 2024 – 2028 will positively impact upon persons of all sexual orientations including, but not limited to, easier access to information and advice.</p> <p><i>LGBTQ+ Action Plan</i></p>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.
Marriage and civil partnership	Positive	<p>The proposals 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.</p>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.
Children and young people up to the age of 18	Positive	<p>See CRIA Assessment. The proposals included in the distinct Protected Characteristic Plans, equality policies and NEOs 2024 – 2028 will positively impact Children and young people up to the age of 18.</p>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.
Low-income households	Positive	<p>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,</p>	To be set out in the IIA for the Final version of the SEP 2024 - 2028.

		equality policies and NEOs 2024 – 2028 will positively impact persons in low-income households.	
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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>A respect for fundamental human rights as well as equality is built into all Welsh Government work.</p> <p>The NEOs 2024 – 2028 will 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 UNCPRD – and the work of the Disability Rights Taskforce</p>	To be set out in the IIA for the Final version of the SEP post consultation

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, EEA² and Swiss citizens who were lawfully resident in the UK by 31 December 2020 certainty that their citizens' rights will

² The EAA includes the EU countries as well as Iceland, Liechtenstein and Norway.

be protected. The Citizens Rights Agreements are implemented in domestic law by the European Union (Withdrawal Agreement) Act 2020 (EUWAA)³

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 exceptions⁴, 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;

We do not anticipate any negative impacts as a result of the Cabinet approval of the NEOs and have received no feedback in our consultation that would indicate this. Additional work in this area will inform the development of the SEP 2024 – 2028.

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);

We do not anticipate any negative impacts as a result of the Cabinet approval of the NEOs and have received no feedback in our consultation that would indicate this. Additional work in this area will inform the development of the SEP 2024 – 2028.

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

We do not anticipate any negative impacts as a result of the Cabinet approval of the NEOs and have received no feedback in our consultation that would indicate this. Additional work in this area will inform the development of the SEP 2024 – 2028.

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

³ Sections 5 and 6 of EUWAA.

⁴ E.g. where an individual has Irish citizenship (including dual British and Irish citizenship) or where they had indefinite leave to enter or remain in the UK)

We do not anticipate any negative impacts as a result of the Cabinet approval of the NEOs and have received no feedback in our consultation that would indicate this. Additional work in this area will inform the development of the SEP 2024 – 2028.

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.

We do not anticipate any negative impacts as a result of the Cabinet approval of the NEOs and have received no feedback in our consultation that would indicate this. Additional work in this area will inform the development of the SEP 2024 – 2028.

G. 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?

Each of the NEOs set out above and the Actions being taken forward via the distinct Protected Characteristic Plans, alongside all equality policies, will have the needs of individuals, communities and communities of interest taken into consideration as part of their delivery. We expect to see impacts on the areas above, primarily through the distinct Protected Characteristic Plans and equality policies. As part of the consultation process specific evidence was gathered to identify whether consultees considered that NEOs were likely to have an Impact on the delivery of interventions which supported action to ensure organisations were mindful of the Socio-economic Duty.

We asked the below question 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 SEP. For the purposes of this IIA, we have captured responses on the NEOs and drafted NEOs in relation to these responses.

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

We received numerous detailed responses to this question, which have informed the re-drafting of the NEOs. These responses also will support us in the development of the SEP 2024 – 2028 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."

Any further interventions which have the potential to enhance the Socio-economic Duty will be set out as part of the work on developing the SEP 2024 – 2028.

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, the SEP, and distinct Protected Characteristic Plans and policies, with relevant IIAs (which will include an Economic and Equality Impact Assessment as component elements) being required to inform each decision.