

## **Strategic Equality Plan 2024 to 2028: integrated impact assessment (May 2023)**

### **Context**

This Integrated Impact Assessment is the first of a sequence designed to support early interaction prior to a formal and full consultation on the proposed Strategic Equality Plan 2024-28 and the Objectives. Post Consultation, a second IIA will be carried out which will reflect on responses received and any changes made to the format of the Strategic Equality Plan 2024-28 prior to its recommendation to Welsh Ministers for consideration and approval, which may or may not include additional Objectives and supporting Actions.

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 Integrated Impact Assessment (IIA) relates to the reviewing and refreshing of our Equality Objectives and a move to a new type of Strategic Equality Plan for 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 Strategic Equality Plan (SEP) for 2020-24, several distinct equality plans focussing on individual Protected Characteristics have been published, each with their own defined set of actions.

- Action on disability: the right to independent living framework and action plan
- Advancing Gender Equality in Wales Plan
- Anti-Racist Wales Action Plan
- LGBTQ+ Action Plan

Since distinct plans for several Protected Characteristic areas exist, with different policies covering all Protected Characteristics, it is proposed that the new SEP Plan 2024-28 will adopt an intersectional approach which focuses 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 Equality Objectives within the SEP 2024-28 will help 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 SEP 2024-28 proposed Equality Objectives will also continue to deliver outcomes which really matter and go to the heart of 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. A wealth of 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.

It is currently proposed, prior to consultation, that the Objectives for the Strategic Equality Plan 2024-28 are narrowed to no more than three. It is possible that this will evolve and/or change during the consultation period. These would sit alongside and support the individual Protected Characteristic plans and specific policy plans for all equality areas and can be applied to more than one Protected Characteristic area. These are:

### **Mainstreaming Equality in the Design and Delivery of Welsh Government**

**Interventions and Policy Development** – introducing Mainstreaming Equality across the organisation at the start of the policy development process; and usage of Equality Impact Assessments (EIA) as a required-to-be-published component of IIAs (It is not currently a

requirement to publish the EIA component). Understanding and consideration of equality and EIAs will be strengthened and made more meaningful;

**Delivering an Intersectional Approach to Policy Development and Delivery** – The Strategic Equality Plan should provide a framework to support policy makers to identify themes that intersect across Protected Characteristics within the existing distinct plans. Policy development within and across Welsh Government Groups will need to demonstrate how interventions support this intersection across multiple Protected Characteristic areas; and

**Addressing the Gap Between Intention and Delivery** – Demonstrating implementation and delivery of Action: the effective ability to show how the intervention is clearly reflected in processes and actions, and improved access, participation, inclusion and quality of life for the end user (this is the intended Outcome of all three Objectives).

Unless inequalities faced by people in Wales are further addressed, these disadvantages could become entrenched, causing impacts for generations to come.

## **Engagement & Consultation**

**Welsh Government will work together with internal and external partners on the development of the Strategic Equality Plan 2024-28.**

Following on from approval by MSJCW of the proposed objectives, engagement and design will begin with the internal and external groups of Welsh Government-led Equality fora **alongside** other stakeholders. This will inform the development of a full consultation document setting out the Welsh Government's draft Equality Objectives SEP 2024-28.

This full consultation is estimated to begin in **September** 2023. During the consultation period, the consultation document will be published online for feed-in from the public, to capture comments, perspectives and suggestions, and workshops will be held across Wales. These workshops will be led by Welsh Government officials in partnership with members of the various Welsh Government Equality fora, and attended by a wide range of stakeholders and members of the public, with the aim of working together on the suitability, relevance and deliverability of the document in order to draft the final SEP 2024-28.

Responses to the full consultation will be analysed and a Strategic Equality Plan 2024-28, along with a summary report, will be published to be submitted for Ministerial approval, laying before the Senedd, and publication on the Welsh Government website.

The phases are summarised below:

1. Initial draft Objectives agreed by MSJCW;
2. Workshop on intersectionality and its definition within the SEP with stakeholder fora;
3. Objectives shared with internal and external stakeholders during a single month period;
4. Comments on the Objectives received, analysed and considered by policy team – this will form the initial public full SEP consultation document;
5. Full consultation document to be presented to stakeholders via 12-week consultation:
  - a. Online public consultation of initial draft SEP; and concurrently
  - b. Stakeholder engagement workshops held across Wales
6. Consultation closes, responses analysed, and final draft SEP shared with internal and external stakeholders;
7. Final SEP approved by Welsh Ministers, laid before the Senedd and published on Welsh Government website;
8. Analysis of performance against the final SEP measured and published annually.

### **Welsh Government Strategic Equality Plan 2020-24 (Current Live Plan)**

The published 2020-24-plan can be found here: <https://gov.wales/equality-plan-and-objectives-2020-2024>. For ease to the reader, the published Equality Aims and Objectives are set out below:

#### **Long-term Aim 1: Elimination of inequality caused by poverty.**

**Equality Objective 1:** We will take action to mitigate the risk of people falling into poverty, improving outcomes for those most at risk and who live in low-income households.

#### **Long-term Aim 2: Strong and progressive equality and human rights protections for everyone in Wales.**

**Equality Objective 2:** We will take action to identify and utilise all levers possible to protect, strengthen and advance equality and human rights in Wales.

**Long-term Aim 3:** The needs and rights of people who share protected characteristics are at the forefront of the design and delivery of all devolved public services in Wales.

**Equality Objective 3:** We will adopt an approach based on improving outcomes and removing barriers which prevent people fulfilling their potential. We will embed the Social Model of Disability to create better policy and services.

**Long-term Aim 4:** Wales is a world leader for gender equality. A gender equal Wales means an equal sharing of power, resources and influence for all women, men and non-binary people.

**Equality Objective 4:** We will deliver the objectives set out in the first stage of the Advancing Gender Equality in Wales Plan and take action to address and reduce the gender pay gap encouraging other devolved public service organisations in Wales to do likewise.

**Long-term Aim 5:** Elimination of discrimination, victimisation, abuse, harassment, hate-crime and bullying based on protected characteristics.

**Equality Objective 5:** We will take action to prevent discrimination, victimisation, harassment, abuse, hate crime and/or bullying against people as a result of them having one or more protected characteristics. We will ensure victims have access to advice and support to help them live without fear and protect their wellbeing.

**Long-term Aim 6:** A Wales of cohesive communities that are resilient, fair and equal.

**Equality Objective 6:** We will build on our existing policies and interventions and develop a monitoring framework to measure progress towards community cohesion and the fostering of good relations.

**Long-term Aim 7:** Everyone in Wales is able to participate in political, public and everyday life.

**Equality Objective 7:** By 2024, we will have increased the diversity of decision-makers in public life and public appointments, identifying areas where further action is needed to ensure greater balance of diversity among decision-makers and identify and investigate mechanisms to redress inequality.

**Long-term Aim 8: The Welsh public sector leads the way as exemplar inclusive and diverse organisations and employers.**

**Equality Objective 8:** By 2024 the Welsh Government will be an exemplar employer, increasing diversity by: addressing in particular the under-representation of disabled people and people from minority ethnic communities at all levels of the organisation and the underrepresentation of women in senior roles; removing barriers; and supporting staff from all backgrounds to reach their potential, creating equality of opportunity for all.

The Long-Term Equality Aims and Objectives set out above focused attention on priority equality issues in order to deliver improved policies and service delivery including resource allocation.

As required in law, the Welsh Government has published Annual Reports which set out what actions the Welsh Government has taken forward to deliver against the Aims and Objectives set out on 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 | GOV.WALES](#)

## **Overall Purpose of the Strategic Equality Plan 2024-28**

The purpose of the development of the Strategic Equality Plan 2024-28 will be to build on progress made under previous plans. We are clear that the intended Objectives are about strengthening and advancing equality and human rights in Wales; that they are likely to extend beyond the life of the 2024-28 plan (in the same way that the Objectives of the Strategic Equality Plan 2020-2024 are) and that there will need to be connection between Strategic Equality Plans and Protected Characteristic Plans (current and future) and equality policy which will be developed over time.

Taken as a whole, we are clear in our hope that we will be able to effect change, which will need to continue to develop and evolve with societal and attitudinal change, and as the

Objectives and any supporting Actions linked to distinct Protected Characteristic Plans and equality policies we have agreed with our partners begin to bear fruit.

## **Prevention**

Each of the Objectives will drive preventative action across a range of policy areas relevant to the Strategic Equality Plan 2024-28, with Actions which will be taken forward via separate and distinct Protected Characteristic Plans and 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 Objectives will sit alongside intended outcomes which will drive policy development across the Welsh Government.

## **Collaboration**

The importance of a collaborative approach to the development of the Strategic Equality Plan 2024-28 to be taken cannot be understated. Welsh Government will work collaboratively with internal and external partners.

Equality policy areas work with stakeholder groups and as stated earlier, we are clear that the need for collaboration is key to developing work on the SEP 2024-28 and delivering our Objectives. We intend to continue work closely with and bring our partners and Stakeholders along as critical friends to inform, develop and scrutinise how we deliver to bring about the change we all recognise we need.

This collaborative working during the consultation and throughout the life of the SEP 2024-28 will further ensure that the Actions are implemented in order to combat structural inequality.

## **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.

**Our Proposed Objectives for the Strategic Equality Plan 2024-28 will cut across all of the well-being goals, they support progress towards the following:**

- **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.

**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.

**These five ways of working have guided our work in developing our Equality Objectives and the Actions to be taken forward via distinct Protected Characteristic Plans and policies which will help ensure we fulfil them.**

## **Costs and Savings**

**As Welsh Government considers the actions necessary to deliver the Objectives which will be part of the Strategic Equality Plan 2024-28 and the distinct Protected Characteristic Plans, cost and savings analyses will be placed before Welsh**



**Ministers for consideration and approval. Progress of delivery of the Strategic Equality Plan 2024-28 will be reported on over its four-year cycle.**

### **Mechanism**

**The next phase of delivery will be to engage with internal Welsh Government Groups and external Stakeholders to identify whether the suggested Objectives can be agreed (the consultation phase may suggest other approaches may be beneficial, so we do not want to pre-judge this at this point) and delivered without the need for additional legislation.**

**Given the draft nature of the Proposed Objectives, we cannot confirm at this time if additional legislation will need to be developed. Welsh Government has sufficient powers under existing legislation to carry out its current functions in this area, provided the Objectives are as described above.**

### **Well-being of Future Generations (Wales) Act 2015**

**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 prosperous and innovative.**

**The Strategic Equality Plan 2024-28 will set out in detail how its Objectives are underpinned by, and will support, the Well-being of Future Generation (Wales) Act 2015.**

Together, the seven well-being goals and five ways of working provided by the Act are designed to support and deliver a public service that meets the needs of the present without compromising the ability of future generations to meet their own needs.

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

- **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

The effect in particular of the SEP 2024-28 in relation to the WBFGA will be to ensure inclusion of communities of people with Protected Characteristics in the drafting and implementation of the Plan, in a way that will focus on intersectionality and reduce inequality.

## **Children's Rights**

### **UN Convention on the Rights of the Child (UNCRC)**

Age is one of the Protected Characteristics in the Equality Act 2010 and it is essential that our Strategic Equality Objectives support people of all ages.

Similarly, the commitment to safeguarding and advancing the rights of Welsh citizens must include children and young people.

The Strategic Equality Plan 2024-28 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 by ensuring all communities in Wales are consulted on the Plan and are involved in 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***

Welsh Ministers are committed to:

- Implement and fund the commitments made in our Race Equality 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 Strategic Equality Plan 2024-28 will not replicate these Actions, but, naturally, the suggested Objectives to be considered will need to be mindful that the above Actions form part of the delivery package promoted by Welsh Ministers as their commitment to the Electorate.

## **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 Equality Objectives, an Equality Impact Assessment has been prepared (as attached at Annex B).

## **Rural Proofing**

The development of the Strategic Equality Plan 2024-28 will include objectives which will impact across all communities in Wales, including rural communities.

There may be significant or moderate beneficial impacts for those individuals with Protected Characteristics living in rural areas. These impacts will be addressed as part of the delivery mechanism within the Plan and will be included in the proposed objectives for stakeholders to review. 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.

Where policy and plans are being developed outside of the SEP 2024-28, but taking into account the objectives and actions of the plan, a clear Rural Proofing Assessment will be submitted to Welsh Ministers by policy makers as part of their decision-making process on their future policy direction. From the perspective of the delivery of the objectives of the SEP 2024-28, we will expect clear demonstration of an intersectional approach to this delivery. For the reasons above, a full Rural Proofing Impact Assessment has not been undertaken for the SEP 2024-28.

## **Health**

The development of the Strategic Equality Plan 2024-28 includes Proposed Objectives which 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 Proposed Objectives suggested for the Plan, for example improved access to health services by communities currently experiencing barriers to access and more accessible preventative/support services. Individual policy decisions taken forward which support the Proposed Objectives for the Plan will be submitted to Welsh Ministers as part of their decision-making process on future policy direction. From the perspective of the delivery of the objectives of the SEP 2024-28, we will expect clear demonstration of an intersectional approach to delivery and consideration of barriers faced by communities of people with protected characteristics.

In developing supporting policy actions, Welsh Government Groups will be required to undertake their own impact assessments. Anecdotal evidence suggested that NHS organisations in Wales, which are also required to develop their own Strategic Equality Plans, have previously used the Welsh Government's plans as the basis of their own plans. It is expected that this trend will continue, but we are also conscious that external partners are free to develop their own plans according to their own stakeholder and user needs.

For this reason, we have not carried out a Health Impact Assessment.

## **Privacy**

Where the Welsh Government, its partners and Stakeholders, are working to take forward the development of the Proposed Objectives for the Strategic Equality Plan 2024-28, 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.

For this reason, we have not carried out a Privacy Impact Assessment for the initial IIA.

### **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 Proposed Objectives (which are subject to change as a result of the continuation of a collaborative approach to their development pre and post consultation) set out above as part of the development of the Strategic Equality Plan 2024-28 will encourage and enable individuals with Protected Characteristics to take part in cultural activities, through mainstreaming equality into policy making and ensuring people of all communities in Wales are involved in the mechanisms of implementation of policy. This will give further rise to the inclusion of the voices and ideas of people with Protected Characteristics to actively contribute and participate in drafting the SEP 2024-28.

Actions identified in distinct Protected Characteristic Plans will be the drivers of change at local and national levels and will be aimed at ensuring inclusivity of all the people of Wales. 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 Proposed Objectives set out in the Strategic Equality Plan 2024-28.

All Protected Characteristic Plans will be expected to have Actions which will be carried out in a manner which increases accessibility for communities, individuals and communities of interest. 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 Proposed Objectives for the Strategic Equality Plan 2024-28 also.

### **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), it has long been recognised that the 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 Proposed Objectives set out in the Strategic Equality Plan 2024-28. Any Actions to be taken forward 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. 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.

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A Welsh Language Impact Assessment has been completed.

## **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 proposed Objectives (subject to change as a result of the continuation of a collaborative approach to their development pre and post consultation) set out above as part of the development of the Strategic Equality Plan 2024-28 will encourage and enable individuals within Protected Characteristic areas to develop a more intersectional approach to their activities. The proposed Objectives themselves are not expected to have a significant negative impact on the activities of the business community. Consequently, the impact is described as “minimal” for this reason.

Actions identified in distinct Protected Characteristic Plans will be the 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 throughput, and by extension increase sales.

There is likely to be an increased cost to business where these venues are not currently fully accessible. However, Actions to improve access and related services are included in plans to support disabled people (although it is not known whether financial assistance will be available for this purpose). These Actions will improve service provision and (potentially) increase profitability for Welsh businesses (and those who operate in Wales) as well as affecting the quality of access for customers and service users who would otherwise be unable to make use of the services offered at premises which are not accessible.

## **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?**

There remains a requirement for Public Sector organisations 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.

There is anecdotal evidence which indicates that many Public Sector organisations in Wales take a lead from the Welsh Government's approach to these matters. However, they are under no obligation to replicate our Strategic Equality Plan and are not prohibited from developing their own approach (indeed a more tailored approach may be preferred).

However, the Welsh Government is convinced that the Proposed Objectives 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.

Where Welsh Government funds Public Sector organisations in Wales (such as NHS Wales or Local Government organisations, or Welsh Government Sponsored Bodies) we will continue to work closely with our colleagues in the Public Sector to deliver against the Proposed Objectives and to encourage them to develop their own Strategic Equality Plans (with their own locally-appropriate Actions to support these) while being mindful of the potential impact on the services they provide locally.

### **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 will continue to work closely with our colleagues in the third sector with regard to the Welsh Government's Proposed Objectives for the Strategic Equality Plan 2024-28, while being mindful of the potential impact on the services they provide.



Where it is appropriate to do so, we will continue to provide financial support where the final Objectives are linked to distinct Protected Characteristic Plans and equality policies, linked to services which are either already being provided or will be provided by the third sector (which may already be funded by the Welsh Government). This will be subject to the requirements of the [Third Sector Scheme](#) and embedded principle of Full Cost Recovery as set out in the Code of Practice for Funding the Third Sector.

**In addition, since the best desirable outcome involves the third sector across Wales, the third sector will be consulted and encouraged to be part of the development of the final Objectives throughout the consultation process. 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**

Each of the Proposed Objectives set out above and the Actions being taken forward via the distinct Protected Characteristic Plans, alongside all equality policies, will have the needs of the public private and third sectors taken into consideration as part of their delivery, as well the demonstrating any impact on justice matters (where such matters fall 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 Proposed Objectives which will form the basis of the Strategic Equality Plan 2024-28 and the distinct Protected Characteristic Plans and policies, with relevant Integrated Impact Assessments (which will include an Equality Impact Assessment as a component element) being required to inform each decision.

We will continue to work closely with our partners, commensurate with their roles, while being mindful of the potential impact on the services they provide.

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.

## **4.5 Socio-economic Impact**

Given that each of the Proposed Objectives 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, 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 Objective development will be determined through the consultation process of the Strategic Equality Plan 2024-28 and as the Strategic Equality Plan 2024-28 nears its final form.

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 Proposed Objectives which will form the basis of the Strategic Equality Plan 2024-28 and the distinct Protected Characteristic Plans and policies, with relevant Integrated Impact Assessments (which will include an Economic and Equality Impact Assessment as component elements) being required to inform each decision. This is repeated at Annex G.

## **5.1 Natural Resources**

The Proposed Objectives suggested to be applied to the Strategic Equality Plan 2024-28 will have the needs of the environment taken into consideration as part of their delivery.

Welsh Ministers will be asked to take decisions on delivery against the Proposed Objectives and the Actions set out in the distinct Protected Characteristic Plans and equality policies which will include relevant Integrated Impact Assessments being required to inform each decision.

We will continue to work closely with our partners to deliver the Proposed Objectives and Actions of the SEP 2024-28 which are commensurate with their roles, while being mindful of the potential impact on the both the environment and services they provide.

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

See Section 5.1 overview above.

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

See Section 5.1 overview above.

## **5.2 Biodiversity**

See Section 5.1 overview above. To demonstrate compliance with Section 6 of the Environment (Wales) Act 2016, a Biodiversity Impact Assessment is at Annex C below.

## **5.3 Climate Change**

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. No impacts have been identified in relation to these issues and therefore these assessments are not considered necessary.

### **5.3a Decarbonisation**

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

### **5.3 b Adaptation**

See Section 5.1 overview above and Annex 1 to the Strategic Equality Action Plan 2020-2024. No impacts have been identified in relation to these issues and therefore these assessments are not considered necessary.

## **5.4 Strategic Environmental Assessment (SEA)**

See Section 5.1 overview.

No impacts have been identified in relation to these issues and therefore these assessments are not considered necessary.

## **5.5 Habitats Regulations Assessment (HRA)**

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)**

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

## **Conclusion**

### **7.1 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.

Engagement events with equality organisations, experts and other key stakeholders regarding the Proposed Equality Objectives will be held in 2023. Following this, public events will be held and a formal consultation will be published on the Welsh Government website.

The Welsh Government will use 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 Final Equality Objectives which will form the basis of the Strategic Equality Plan 2024-28 to which this IIA refers.

### **7.2 What are the most significant impacts, positive and negative?**

It is anticipated that there might be significant or moderate beneficial impacts which may come out of the delivery of the proposed Objectives for the Strategic Equality Plan 2024-28, and the Actions identified to be taken forward within distinct Protected Characteristic Plans and policies, for example improved and more accessible preventative/support services.

Individual policy decisions taken forward in each of the Actions in the distinct Protected Characteristic Plans will be submitted to Welsh Ministers as part of their decision-making process on future policy direction.

No negative impacts have been identified as a result of the Proposed Objectives to be suggested for the Strategic Equality Plan between 2024 and 2028.

### **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).

This Strategic Equality Plan 2024-28 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 it is essential that our Strategic Equality Aims and Objectives support disabled people.

### **UN Convention on the Rights of the Child**

Age is one of the protected characteristics in the Equality Act 2010 and it is essential that our Strategic Equality Aims and Objectives support people of all ages.

Accordingly, the Strategic Equality Plan 2024-28 Proposed Objectives will continue 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. Consequently, no discernible negative impacts on the Rights of the Child have been identified.

### **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), it has long been recognised that the equality and Welsh language policy agendas complement and inform each other.

No discernible negative impact on the Welsh Language has been identified. The Proposed Objectives set out for the Strategic Equality Plan 2024-28 will be published in Welsh and English; the delivery of the Proposed Objectives and 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 Proposed Objectives set out for the Strategic Equality Plan 2024 – 28 and 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. No discernible negative impacts have been identified.

#### **7.3 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 Proposed Objectives set for the Strategic Equality Plan 2024-28 and 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 Welsh Government's Strategic Equality Plan 2024-28 will demonstrate the '5 ways of working' set out in the sustainable development principle. As part of the consultation, we will collaborate with Stakeholder organisations on the Proposed Objectives and hold public engagement events, alongside a published online consultation, for the continuing development of the final version of the Strategic Equality Plan 2024-28. This will ensure people with Protected Characteristics have the same freedom, dignity, choice and control as other citizens in the community.

## **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***

Welsh Ministers are committed to:

- Implement and fund the commitments made in our Race Equality 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 Strategic Equality Plan 2024-28 will not replicate these Actions, but, naturally, the proposed Objectives to be considered will need to be mindful that the above Actions form part of the delivery package promoted by Welsh Ministers as their commitment to the Electorate.

There are no discernible negative impacts.

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

The Proposed Objectives (and the Objectives to be set out in the final version of the Strategic Equality Plan 2024-28) for the Strategic Equality Plan 2024-28 will be monitored through linking Actions attributed to distinct Protected Characteristic Plans which themselves will be owned by different policy Groups across Welsh Government. These will be monitored by the officials working in those policy areas.

An annual summary report on progress against the Objectives (and the final Strategic Equality Plan for 2024-28) will be prepared and published in accordance with the requirements of Section 77 of the Government of Wales Act 2006, which requires Welsh Ministers to publish a report containing a statement of the arrangements made in pursuance of their duties which had effect during that financial year, and an assessment of how effective those arrangements were in promoting equality of opportunity.

In addition, the Final Strategic Equality Plan 2024 will outline the necessary mechanisms for evaluation of performance against the Objectives contained therein.

### **Full Impact Assessments**

#### **A. Children's Right Impact Assessment**

##### **UN Convention on the Rights of the Child**

Age is one of the protected characteristics in the Equality Act 2010 and it is essential that our Strategic Equality Aims and Objectives support people of all ages.

Accordingly, the Proposed Objectives 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. Consequently, no discernible negative impacts on the Rights of the Child have been identified.



## **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 the Act itself, distinctive 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.

The Welsh Government's 2016-2020 Equality Objectives were published in March 2016.

As part of its review process the Welsh Government carried out initial stakeholder discussions, public events and a formal consultation to frame set of Long-Term Aims and Objectives and Actions (shown above) which are contained within the Welsh Government Strategic Equality Action Plan 2020-2024.

### **Welsh Government Strategic Equality Objectives**

Since the publication of the Strategic Equality Plan for 2020-24, several distinct equality plans focussing on several Protected Characteristics have been published, each with their own defined set of actions.

- Action on disability: the right to independent living framework and action plan
- Advancing Gender Equality in Wales Plan
- Anti-Racist Wales Action Plan
- LGBTQ+ Action Plan

Since distinct plans for several Protected Characteristic areas exist, with different policies covering all Protected Characteristics, it is proposed that the new Strategic Equality Plan 2024-28 will change to an intersectional approach which focuses more on making links across 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 Equality Objectives will help 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 Strategic Equality Plan 2024-28 Proposed Objectives will also continue to deliver outcomes which really matter and go to the heart of 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. A wealth of 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.

It is currently proposed, prior to consultation, that the Objectives for the Strategic Equality Plan 2024-28 be narrowed to no more than three. These would sit alongside and support the individual Protected Characteristic plans and specific policy plans for all equality areas and can be applied to more than one Protected Characteristic area. These are:

### **Mainstreaming Equality in the Design and Delivery of Welsh Government**

**Interventions and Policy Development** – introducing Mainstreaming Equality across the organisation at the start of the policy development process; and usage of Equality Impact Assessments (EIA) as a required-to-be-published component of IIAs (It is not currently a requirement to publish the EIA component). Understanding and consideration of equality and EIAs will be strengthened and made more meaningful;

**Delivering an Intersectional Approach to Policy Development and Delivery** – The Strategic Equality Plan should provide a framework to support policy makers to identify themes that intersect across Protected Characteristics within the existing distinct plans. Policy development within and across Welsh Government Groups will need to demonstrate how interventions support this intersection across multiple Protected Characteristic areas; and

**Addressing the Gap Between Intention and Delivery** – Demonstrating implementation and delivery of Action: the effective ability to show how the intervention is clearly reflected in processes and actions, and improved access, participation, inclusion and quality of life for the end user (this is the intended Outcome of all three Objectives).

Unless these inequalities are addressed now, the disadvantage that too many people in Wales face could become entrenched for generations to come.

## Engagement & Consultation

### **Welsh Government will work together with internal and external partners on the development of the Strategic Equality Plan 2024-28.**

Following on from approval by MSJCW of the proposed objectives, engagement and design will begin with the internal and external groups of Welsh Government-led Equality fora **alongside** other stakeholders. This will inform the development of a full consultation document setting out the Welsh Government's draft Equality Objectives SEP 2024-28.

This full consultation is estimated to begin in **September** 2023. During the consultation period, the consultation document will be published online. Feedback will be captured from the public both online and through workshops which will be convened across Wales. These will be led by Welsh Government officials in partnership with members of the various Welsh Government Equality fora, and attended by a wide range of stakeholders and members of the public.

Responses to the full consultation will be analysed and a summary report will be published as part of the final Strategic Equality Plan 2024-28 to be submitted for Ministerial approval, laying before the Senedd, and publication on the Welsh Government website.

The phases are summarised below:

1. Initial draft Objectives agreed by MSJCW;
2. Workshop on intersectionality and its definition within the SEP with stakeholder fora;
3. Objectives shared with internal and external stakeholders during a single month period;
4. Comments on the Objectives received, analysed and considered by policy team – this will form the initial public full SEP consultation document;
5. Full consultation document to be presented to stakeholders via 12-week consultation:
  - a. Online public consultation of initial draft SEP; and concurrently
  - b. Stakeholder engagement workshops held across Wales
6. Consultation closes, responses analysed, and final draft SEP shared with internal and external stakeholders;

7. Final SEP approved by Welsh Ministers, laid before the Senedd and published on Welsh Government website;

8. Analysis of performance against the final SEP measured and published annually.

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 prosperous and innovative.

### **Record of Impacts by protected characteristic:**

Lack of evidence is not a reason for *not assessing equality impacts*. Please highlight any gaps in evidence that you have identified and explain how/if you intend to fill these gaps.

<b>Protected characteristic or group</b>	<b>What are the positive or negative impacts of the proposal?</b>	<b>Reasons for your decision (including evidence)</b>	<b>How will you mitigate Impacts?</b>
Age (think about different age groups)	Positive	The proposals included in the distinct Protected Characteristic Plans (with their own accompanying Actions where appropriate), equality policies and the Final Strategic Equality Plan for 2024-28 will positively impact upon people of all ages. In particular, (but amongst others), ensuring health and social services are equipped to support individuals of all ages, but also as contained in the Programme for Government by implementing	To be set out in the IIA for the Final version of the SEP post consultation.

		the linked UN Convention Rights set out therein.	
Disability (think about different types of disability)	Positive	<p>The proposals included in the distinct Protected Characteristic Plans (with their own accompanying Actions where appropriate), equality policies and the Final Strategic Equality Plan for 2024-28 will positively impact upon Disabled People.</p> <p><i>Action on disability: the right to independent living framework and action plan</i></p>	To be set out in the IIA for the Final version of the SEP post consultation.
Gender Reassignment (the act of transitioning and Transgender people)	Positive	<p>The proposals included in the distinct Protected Characteristic Plans (with their own accompanying Actions where appropriate), equality policies and the Final Strategic Equality Plan for 2024-28 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>	To be set out in the IIA for the Final version of the SEP post consultation.

		<i>LGBTQ+ Action Plan</i>	
Pregnancy and maternity	Positive	<p>The proposals included in the distinct Protected Characteristic Plans (with their own accompanying Actions where appropriate), equality policies and the Final Strategic Equality Plan for 2024-28 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>	To be set out in the IIA for the Final version of the SEP post consultation.
Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum)	Positive	<p>The proposals included in the distinct Protected Characteristic Plans (with their own accompanying Actions where appropriate), equality policies and the Final Strategic Equality Plan for 2024-28 will positively impact upon persons regardless of</p>	To be set out in the IIA for the Final version of the SEP post consultation.

seekers and Refugees)		<p>their race, cultural identity, or migrant status.</p> <p><i>Anti-Racist Wales Action Plan</i></p>	
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> <p>There are no current plans to develop Protected Characteristic Plans for this area, however the Consultation which will be linked to the proposed Strategic Equality Plan 2024-28 may recommend the development of such a plan.</p>	To be set out in the IIA for the Final version of the SEP post consultation.
Sex / Gender	Positive	<p>The proposals included in the distinct Protected Characteristic Plans (with their own accompanying Actions where appropriate), equality policies and the Final Strategic Equality Plan for 2024-28 will positively impact upon persons of all Genders.</p>	To be set out in the IIA for the Final version of the SEP post consultation

		<i>Advancing Gender Equality in Wales Plan</i>	
Sexual orientation (Lesbian, Gay and Bisexual)	Positive	<p>The proposals included in the distinct Protected Characteristic Plans (with their own accompanying Actions where appropriate), equality policies and the Final Strategic Equality Plan for 2024-28 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 post consultation
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> <p>There are no current plans to develop Protected Characteristic Plans for this area, however the Consultation which will be linked to the proposed</p>	To be set out in the IIA for the Final version of the SEP post consultation



		Strategic Equality Plan 2024-28 may recommend the development of such a plan.	
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## Human Rights and 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 Strategic Equality Action Plan 2024-28 Proposed Objectives will include references to actions to be taken to strengthen and enhance Human Rights.</p>	To be set out in the IIA for the Final version of the SEP post consultation

**Undertaking the impact assessment hat evidence has been considered to understand how the proposal contributes to inequalities of outcome experience as a result of socio-economic disadvantage?**

Given that each of the Proposed Objectives 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, 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 Objective development will be determined through the consultation process of the Strategic Equality Plan 2024-28 and as the Strategic Equality Plan 2024-28 nears its final form.

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 Proposed Objectives which will form the basis of the Strategic Equality Plan 2024-28 and the distinct Protected Characteristic Plans and policies, with relevant Integrated Impact Assessments (which will include an Economic and Equality Impact Assessment as component elements) being required to inform each decision. This is repeated at Annex G.

### **G: Socio-economic Duty 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?**

Given that each of the Proposed Objectives 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, 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 Objective development will be determined through the consultation process of the Strategic Equality Plan 2024-28 and as the Strategic Equality Plan 2024-28 nears its final form.

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 Proposed Objectives which will form the basis of the Strategic Equality Plan 2024-28 and the distinct Protected Characteristic Plans and policies, with relevant Integrated Impact Assessments (which will include an Economic and Equality Impact Assessment as component elements) being required to inform each decision.