

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	Ethnic Minority Initial Teacher Education Incentive
Official(s) completing the Integrated Impact Assessment (name(s) and name of team):	██████████ (ITE Team)
Department:	Education (EPS)
Head of Division/SRO (name):	Kevin Palmer
Cabinet Secretary/Minister responsible:	Jeremy Miles Minister for Education & Welsh Language
Start Date:	July 2022

Section 1. What action is the Welsh Government considering and why?

This proposal concerns the implementation of a new Initial Teacher Education Incentive scheme intended to attract Black, Asian and Ethnic Minority applicants into ITE and the teaching profession. This policy intervention follows from the previous Minister for Education accepting the recommendations made by the Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group within their final report. Published March 2021 the [Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group Final Report](#) makes numerous recommendations with regards to the curriculum, resources, professional learning and the workforce including ITE including *Recommendation 9: Welsh Government should provide specific scholarships to support Initial Teacher Education students from Black, Asian and Minority Ethnic groups.*

Background

The OECD in their report [A Flying Start: Improving Initial Teacher Preparation Systems](#) (2019) noted that:

“In many OECD countries, the increasingly diverse student population does not match with a teacher workforce that is largely homogeneous ([Nusche, 2009\[20\]](#)). This is particularly important given the growing literature on the positive effect of same-race teachers on ethnic-minority students in terms of performance, role-modelling, motivation and the overall educational experience of not only ethnic minority students, but of low-income students of both sexes ([Gershenson et al., 2017\[21\]](#)).”

In 2019 the Welsh Government commissioned the Education Workforce Council (EWC) to undertake a multi-phase review of evidence about ethnic diversity in the school workforce¹. The data collected at that time confirmed the OECD report and showed a stark under-representation in the teaching workforce with only 3% of teachers identifying as being from an ethnic minority against a learner population of 12% (EWC, 2020:11)². Data from the Schools Workforce Annual Census from November 2021³ showed that only 1.1% were of Black, Asian, Mixed or Other ethnicity.

The conclusions from the first of the EWC's reports (2020:50) noted that the “Lack of ethnic diversity in the school workforce has been persistently identified as a problem that should be addressed in Wales (GTCW, 2003⁴; Evans, 2013⁵; Betteley, 2017⁶; Wiegand and Cifuentes, 2018⁷).” EWC advise that Welsh Government should “Consider providing specific scholarships to support ITE students from ethnic minority groups.” In their final

¹ [Increasing diversity within the school workforce in Wales \(ewc.wales\)](#)

² *Ethnic minority representation within the school workforce in Wales: Phase 2 report for the Welsh Government*. EWC, 2012. Accessed at [file.html \(ewc.wales\)](#)

³ [School Workforce Census results: as at November 2021 | GOV.WALES](#)

⁴ *Action Plan for Teacher Recruitment and Retention in Wales*. GTCW, 2003. Accessed at [file.html \(ewc.wales\)](#)

⁵ [Our classrooms must reflect our diverse society - Wales Online](#)

⁶ [Racism in schools 'putting off' non-white teachers - BBC News](#)

⁷ [experiences-of-racism-and-race-in-schools-in-wales.pdf \(eyst.org.uk\)](#)

report⁸ to Welsh Government, the EWC tested their initial recommendations with stakeholders to finalise them. The final recommendations included: “The Welsh Government should fund a new bursary to encourage students from Black, Asian and Minority Ethnic backgrounds to undertake ITE courses.” (2021:27).

Alongside and in tandem with this work the Welsh Government commissioned Professor Charlotte Williams to chair a Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group in July 2020. The final report⁹ of this group was published in March 2021 and included recommendations, based on the available recruitment data, called for more to be done to attract more applicants to ITE programmes from ethnic minorities. These recommendations were accepted by the previous Minister for Education. These included *Recommendation 9: Welsh Government should provide specific scholarships to support Initial Teacher Education students from Black, Asian and Minority Ethnic groups.*

Welsh Government also commissioned a report via Cardiff Metropolitan University to examine recruitment and retention of teachers from minority ethnic backgrounds in Wales. *The Recruitment and Retention of Black, Asian and Minority Ethnic Teachers in Wales – a Qualitative Research Study*¹⁰ was published in 2021 and drew from the perspectives of learners aged 14 plus, students and teachers from minority ethnic backgrounds, focusing on participants’ perceptions and the lack of diversity in the education workforce in Wales.

There is a clear synergy across the various reports’ findings, evidence, and independent recommendations alongside the need to address the situation urgently. *The Initial Teacher Education Black, Asian and Minority Ethnic Recruitment plan* was published October 21st 2021 and is intended to take forward the recommendations made under the referenced reports. This plan also sits under and complements the broader work of Welsh Government under the *Anti-racist Wales Action Plan*.

The Anti-racist Wales Action plan commits to:

- a public sector workforce (which would include teachers) that ‘at least properly represents the population it serves’
- representative and inclusive senior leadership teams and Boards of public bodies
- public bodies using their spending power to improve leadership and representation across the public, private and third sectors.

Addressing racial, ethnic, and religious intolerance that is systemic and institutional is one of Welsh Government’s key goals under the Anti-racist Wales Action Plan and forms a part of the wider work Welsh Government is taking forward to ensure future generations can

⁸ Black, Asian and Minority Ethnic representation within the school workforce in Wales: Phase 3 report and final recommendations for the Welsh Government. EWC, 2021. Accessed at <https://ewc.wales/site/index.php/en/documents/research-and-statistics/research-reports/3094-black-asian-and-minority-ethnic-representation-within-the-school-workforce-in-wales-phase-three-report.html>

⁹ <https://gov.wales/final-report-black-asian-and-minority-ethnic-communities-contributions-and-cynefin-new-curriculum>

¹⁰ The recruitment and retention of black, asian and minority ethnic teachers in wales – a qualitative research study. (gov.wales)

live in a diverse, safe, and cohesive Wales. The recommendations with respect to education within the Race Equality Action Plan were developed with the support of the Wales Centre for Public Policy (WCPP) who produced evidence reviews for the Welsh Government on *Improving Race Equality in Education*¹¹ (WCPP, 2021) and *Improving Race Equality in Employment and Income*¹² (WCPP, 2021)

The WCPP's education report set out a series of recommendations for the recruitment of a diverse teaching workforce and for training and professional development. These also fed into the Race Equality Action Plan and were largely aligned with the policy ideas and recommendations outlined within the EWC's reports.

As the *Anti-Racist Wales: The Race Equality Action Plan Impact Assessment* notes:

“The roots of inequality often lie in childhood and furthering race equality will improve the life chances of the children of today and tomorrow. Education is a central policy area within the Plan and some of the goals and actions include,... increasing the representation of Black, Asian and Minority Ethnic [teachers] in the workforce and contributions in the curriculum. These goals and actions, along with the others in different policy areas will all directly benefit all children and young people, particularly Black, Asian and Minority Ethnic ones”.

There is a clear commitment within the *Anti-Racist Wales Action Plan* to increase recruitment of teachers from ethnic minority communities into the Education sector including recruitment onto Initial Teacher Education (ITE) programmes with the plan advising:

“A lack of representation within practitioner and leadership roles, including on governing bodies, does nothing to promote ambition within our children and young people, who need to recognise themselves and their own experiences within their leaders.”

The proposal also aligns with the *Well-being of Future Generations (Wales) Act 2015* goal to create a more equal Wales, where everyone has the opportunity to participate, reach their full potential and is able to contribute fully to their own learning and development, enabling Wales to be more prosperous and innovative. As the impact for learners will be increased visibility in the classroom of teachers from ethnic minorities. This will support learners from ethnic minorities in terms of representation but will also increase the awareness of the cultural and racial diversity in Welsh society to all learners (Welsh Government 2021). As the GTCW (2003) notes “there is a need to ensure that more pupils come into contact with individuals from different ethnic and cultural backgrounds. Teachers from different ethnic and cultural backgrounds, as well as making excellent teachers, can also help develop an understanding among pupils of the needs of individuals from different

¹¹ [Improving-Race-Equality-in-Education.pdf \(wcpp.org.uk\)](#)

¹² [Improving-Race-Equality-in-Employment-and-Income.pdf \(wcpp.org.uk\)](#)

backgrounds.” This is aligned to the aims of the *Anti-Racist Wales Action Plan* and indirectly supports the Well-being Goal for a Wales of cohesive and safe communities.

Initial Teacher Incentives in Wales

The implementation of the new curriculum in Wales presents us with specific challenges including ensuring a workforce of sufficient size, quality, and expertise to develop and teach the curriculum and deliver positive impacts for Welsh learners. The success of several Government strategies and Ministerial Commitments¹³ are dependent on ensuring a sufficient supply of teachers and attracting people into the teaching profession as an underpinning assumption in their delivery.

Welsh Government provides financial incentives for specific groups of student teachers where there are poor levels of recruitment and representation in the workforce; the priority subject incentive scheme and the Welsh medium incentive scheme (the Iaith Athrawon Yfory). The primary aim of all Welsh Government’s ITE incentives schemes are to address recruitment issues for ITE and broader shortages in the teaching workforce ensuring an appropriate supply of competent, thoughtful, reflective, and innovative practitioners who are committed to providing high-quality teaching and learning for all learners. They are intended as a recruitment intervention to proportionally address immediate, identifiable shortages in the teaching workforce to support specific, targeted recruitment into ITE. The incentives form a suite enabling eligible student teachers to access multiple incentives where appropriate; those most needed in our education system can receive the highest levels of incentivisation. Students who participate in ITE may also be eligible for a range of financial support packages via their institutions as well as a student grant or loan administered by Student Finance Wales. Access to the ITE incentives does not impact on eligibility for student finance.

The EWC report (2020) showed, via the most recent available data from the Higher Education Statistics Agency¹⁴ (HESA), that the proportion of graduates coming from each of the minority ethnic groups is higher than those entering ITE in Wales “underlining the extent to which those entering the teaching profession are less diverse than the overall cohort group of leavers from Welsh universities.” (2020:24). As noted above the intention of the existing incentive schemes is to tackle recruitment issues for ITE, to attract graduates into ITE, and to address broader shortages in the teaching workforce. This intention aligns with the various reports, evidence reviews, and Government plans detailed above, to address the ongoing poor diversity of student teachers recruited into ITE specifically from ethnic minorities with the aim of addressing the poor levels of ethnic diversity within our teaching workforce in Wales.

¹³ [Welsh Government Programme for government: update \[HTML\] | GOV.WALES](#)

¹⁴ HESA produce official statistics about higher education (HE) in the UK on behalf of their Statutory Customers. [HESA - Experts in higher education data and analysis](#)

We propose that this ‘scholarship’ be structured as an ITE incentive scheme in a similar manner to the Iaith Athrawon Yfory (IAY) Initial Teacher Education (ITE) Incentive Scheme as the IAY scheme has successfully doubled the number of its target applicants within 2 years. This new scheme will form part of this incentivisation package working and aligning with existing arrangements including ongoing development, and strategic fit within Welsh Government’s broader commitments.

As the *ITE Black, Asian and Minority Ethnic Recruitment plan* notes attracting more teachers from ethnic minority communities will require concerted actions across the whole Education sector, by a wide range of organisations, over a period of several years. As such this proposal is one of our short to mid-term actions to support the wider work to address this issue.

The existing IAY scheme encourages applicants to apply for Welsh medium ITE and awards their completion of a PGCE (with QTS) and thereafter their completion of Induction in specific maintained settings in Wales; to retain the talent in Welsh-medium settings as well as ensure the continuation of their professional learning to teach through the medium of Welsh.

The IAY scheme has encouraged eligible students to enter Welsh medium ITE and the numbers coming through the system have increased since its introduction; the proposals could mean a similar trend could occur for minority ethnic student teachers should other aspects under the *ITE Black, Asian and Minority Ethnic Recruitment plan* and the *Anti-racist Wales* action plan Education commitments be addressed and completed in tandem. Please see table below (please note the AY2021/22 period only opened for claims from 1st August 2022)

Table: Number of Initial Teacher Education students receiving the Iaith Athrawon Yfory incentive, 2018/19- 2021/22 (correct as of 25th November 2022)

Academic Year Cohort:	2018/19	2019/20	2020/21	2021/22
QTS Claims	60	95	130*	100*
Induction Claims	45*	80*	70*	n/a
QTS Deadline	31/08/2020	31/08/2021	31/08/2022	31/08/2023
Induction Deadline	31/08/2023	31/08/2024	31/08/2025	31/08/2026

Total Claimants	60	95	130*	100*
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Only those claiming the first payment (QTS) are eligible for the second payment

**this number may rise as the deadline has not yet passed*

Numbers are rounded to the nearest 5.

The structure and operational delivery of the IAY is subject to a virtuous circle of improvement via engagement with our ITE Partnerships; responsible for directly recruiting student teachers. As such learning in the ongoing development of the IAY can be applied to this new incentive scheme.

The ITE incentive schemes are reviewed annually to determine whether they are targeting the most in need ITE Students / future teachers based on data sets including but not limited to HESA data and the current results of the School Workforce Annual Census (SWAC). This proposal will be included in that annual review.

Legislation

Sections 14 to 17 of the Education Act 2002 enable the Welsh Ministers to give financial assistance for purposes related to education. This includes enabling any person to receive any training for teachers and providing for a person's maintenance while they undertake such education. The current ITE Incentive Schemes are both subject to subordinate legislation in the form of a 'legal scheme'¹⁵¹⁶. The Ethnic Minority incentive will also require a legal scheme in a similar form. These schemes do not require Senedd scrutiny typically associated with Subordinate Legislation and therefore requires no time on the Senedd's legislative timetable nor a Regulatory Impact Assessment.

The incentive scheme will be available to all those eligible students who are studying ITE full or part-time and as such operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students. Providers will be aware of their statutory responsibilities in relation to age, religion and belief (or no religion or belief), disability, gender, sexual orientation and racial equality, and to Welsh language requirements. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants.

Higher Education Institutions (HEIs) have legal requirements to monitor and publish data as part of the public sector equality duty (PSED) of the Equality Act 2010. HEIs have a statutory obligation to submit certain data to the HESA. Currently higher education institutions are required to return data on staff and students' sex, race/ethnicity, disability

¹⁵ [Teacher training incentive scheme 2021 \(2021 WG20-62\) | GOV.WALES](#)

¹⁶ [Iaith Athrawon Yfory incentive scheme 2021 to 2022 academic year \(2021 WG20-64\) | GOV.WALES](#)

and age as part of their annual staff and student records, and from 2017/18 religion or belief for the student record.

As such all ITE Partnerships in Wales provide data via HESA including data on protected characteristics. As such this data is already collected and is not an additional burden on ITE Students and their Partnerships.

SECTION 2. WHAT WILL BE THE EFFECT ON SOCIAL WELL-BEING?

2.1 People and Communities

This scheme will positively impact on ethnic minority communities both in terms of the education workforce and learners. The increase of teaching staff from ethnic minorities will promote the profession as an attractive and inclusive one (EWC, 2021, Cardiff Met, 2021 and Welsh Government, 2021) whilst giving greater representation within the teaching workforce. The impact for learners will be increased visibility in the classroom of teachers from ethnic minorities. This will support learners from ethnic minorities in terms of representation but will also increase the awareness of the cultural and racial diversity in Welsh society to all learners (Welsh Government 2021).

As the GTCW (2003) notes “there is a need to ensure that more pupils come into contact with individuals from different ethnic and cultural backgrounds. Teachers from different ethnic and cultural backgrounds, as well as making excellent teachers, can also help develop an understanding among pupils of the needs of individuals from different backgrounds.”

2.2 Children’s Rights

The Welsh Ministers are subject to a duty to have regard to the UNCRC, when exercising their functions. This duty is imposed by section 1 of the Rights of Children and Young Persons (Wales) Measure 2011.

Increasing the numbers of teachers from ethnic minorities will give greater representation within the teaching workforce for those learners who are from a minority ethnic background. This will also support increasing the awareness of the cultural and racial diversity in Welsh society to all learners and meets the aim of developing learners to be ethical, informed citizens.

The following UNCRC articles are most relevant to the proposal:

- Article 3 1. In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration.
- Article 28 1. States Parties recognize the right of the child to education, and with a view to achieving this right progressively and on the basis of equal opportunity.

- Article 29 1. States Parties agree that the education of the child shall be directed to:
(a) The development of the child's personality, talents and mental and physical abilities to their fullest potential;
- Article 30 (children from minority or indigenous groups) Every child has the right to learn and use the language, customs and religion of their family, whether or not these are shared by the majority of the people in the country where they live

The needs and rights of learners is one of the values and dispositions that underpin the professional standards which qualified teachers are required to meet to be able to practise in Wales.

It is not expected that the proposal will have any negative impact on children's rights.

2.3 Equality

A full Equality Impact Assessment has been carried out illustrating the impact of the delivery of the Ethnic Minority incentive scheme on people with protected characteristics as outlined by the Equality Act 2010

The Equality Act 2010, Section 158, Positive action applies for this proposal.

(1) This section applies if a person (P) reasonably thinks that –

(c) participation in an activity by persons who share a protected characteristic is disproportionately low.

(2) This Act does not prohibit P from taking any action which is a proportionate means of achieving the aim of—

(c) enabling or encouraging persons who share the protected characteristic to participate in that activity.

Race is an eligibility criteria for the proposal and it has been determined that this meets the criteria of 1c and 2c as above. While there is no negative impact on those unable to access the incentive as this would be no change from the status quo this will be monitored carefully to ensure that the general duty under the Equality Act - Foster good relations between people who share protected characteristics and those who do not – is maintained. For those meeting the race criteria of the proposal there would be a positive impact. These impacts will be carefully monitored by officials in partnership with the ITE providers who also have duties under the Equality Act.

There are variable or uncertain levels of impact with regards to different age groups/disability due to levels of digital inclusion. Actions have been identified to mitigate:

- Maintain a watching brief on digital inclusion:
 - widening access to HE schemes
 - digital inclusion schemes

- student finance Wales
- Hwb infrastructure and tools for maintained settings
- Ensure grant claim guidance and forms are mobile friendly
- Ensure grant claim guidance and forms meet the needs of disabled student teachers and ITE Partnership / Welsh Government staff

2.4 Rural Proofing

Rural communities are more likely to suffer from digital exclusion than other communities and as such individuals from such communities may find it difficult to access the digital guidance and claim administration (forms etc.)

There is an expectation that most if not all University level (and therefore ITE) students utilise ICT infrastructure (including email addresses) and equipment provided by their institution. In addition, there is an expectation within all ITE programmes that for QTS to be awarded that all student teachers be digitally literate requiring access to digital technologies. Grants and bursaries via Student Finance Wales and institutions own digital access schemes may also provide IT equipment direct to individuals.

All qualified teachers in Wales working in maintained settings have access to the Hwb network which provides them email address and their schools digital infrastructure.

To mitigate any unintended consequences that may arise from the scheme being operated via digital spaces Welsh Government will ensure that claim forms and guidance can be accessed via Smart Phones / mobile view display.

2.5 Health

No impacts have been identified.

2.6 Privacy

The proposal includes the processing of personal level data to administer and evaluate the grant scheme, as such a full DPIA has been completed.

SECTION 3. WHAT WILL BE THE EFFECT ON CULTURAL WELL-BEING AND THE WELSH LANGUAGE?

3.1 Cultural Well-being

The Well-being of Future Generations (Wales) Act 2015's goal for culture is 'A society that promotes and protects culture, heritage and the Welsh language and which encourages people to participate in the arts and sports and recreation'. Culture includes museums, archives, libraries and the arts; heritage includes the built historic environment as well as intangible heritage such as traditions; arts encompasses performance and creative sectors including music, literature, theatre and art, whilst sports and recreation include both elite and community sports as well as opportunities to participate in wider outdoor recreation.

It is possible that improving the diversity of ITE students and therefore the teaching workforce will, under the Curriculum for Wales, enable more varied teaching in respect to the diversity of culture, heritage, and traditions (as defined above) in Wales' communities. In turn learner cultural participation and achievement could be impacted positively – for those learners from diverse communities to supporting an increase in awareness of the cultural and racial diversity in Welsh society to all learners.

3.2 Welsh Language

The operational delivery of the scheme will meet the Welsh language standards and Welsh Government rules/best practise with regards to the bilingual delivery of grant schemes. A full assessment is detailed under annex E.

SECTION 4. WHAT WILL BE THE EFFECT ON ECONOMIC WELL-BEING?

4.1 Business, the general public and individuals

This proposal concerns the implementation and administrative process of the new incentive scheme for student teachers. As such there are no identified impacts for Business and the public. For individual eligible student teachers, the operational delivery of the scheme will be informed by best practice and lessons learnt from the delivery of other ITE incentive grant schemes.

4.2 Public Sector including local government and other public bodies

The ITE Partnerships will be intermediaries for the delivery of the first part of this incentive scheme as it operates as a grant. They are paid for this involvement via a contract. Due to the small scale of this contract/grant scheme (due to the small numbers of those potentially eligible for the scheme) this additional money is not considered to be sufficient to positively impact the ITE Partnerships other than to indirectly increase potential applications to ITE resulting in a higher student fee income for the providers. The ITE Partnership already provide this function in relation to other incentive grants and will not be required to provide more than minimal / no additional resource to manage the intermediary contract and grant. In addition, the ITE Partnerships will be involved in the ongoing virtuous cycle of improvement relating to the operational delivery of the incentive mitigating against any unidentified impacts such as burdensome administration.

The EWC will also be intermediaries for the delivery of the second part of this incentive scheme via existing grant funding arrangements. The EWC already provide this function in relation to other incentive grants and will not be required to provide more than minimal / no additional resource to manage the delivery above that already provided in respect to the other incentives. EWC will be involved in the ongoing virtuous cycle of improvement relating to the operational delivery of the incentive mitigating against any unidentified impacts such as burdensome administration.

4.3 Third Sector

No impact has been identified for the Third Sector.

4.4 Justice Impact

No impact has been identified for the justice system.

SECTION 5. WHAT WILL BE THE EFFECT ON ENVIRONMENTAL WELL-BEING?

We do not consider there to be any impact on the environment due to the operational delivery of the scheme; other than indirect carbon costs rising from the use of digital technologies (computers / phones) and spaces (the internet / email) to submit a claim to the scheme and the scheme administration. We are unable to measure this impact in any meaningful way. As such a Strategic Environmental Assessment, Habitats Regulations Assessment and Environmental Impact Assessment are not required.

SECTION 6. SOCIO-ECONOMIC DUTY WHAT WILL BE IMPACT ON SOCIO-ECONOMIC DISADVANTAGE?

6.1 The Socio-economic Duty.

As noted above the development of this proposal came from recommendations and evidence contained within several reports and reviews. It also forms part of the Anti-racist Wales Plan which also bolsters the aim of the Socio-economic Duty and requires relevant public bodies 'to consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage.'¹⁷ This is of relevance as Black, Asian and Minority Ethnic communities are more likely to have lower socio-economic backgrounds.

¹⁷ 41912 An Anti-Racist Wales: Integrated Impact Assessment (gov.wales)

SECTION 7. RECORD OF FULL IMPACT ASSESSMENTS REQUIRED

You have now decided which areas need a more detailed impact assessment. Please list them below.

Impact Assessment	Yes/No	If yes, you should
Children's rights	Yes	Complete the Children's Rights Impact Assessment below
Equality	Yes*	Complete the Equality Impact Assessment below
Socio-economic Duty	Yes	Complete the Socio-economic Duty Assessment below
Rural Proofing	Yes	Complete the Rural Proofing Impact Assessment below
Health	No	Refer to the Integrated Impact Assessment Guidance
Privacy	Yes	Complete the Data Protection Impact Assessment below
Welsh Language	Yes	Complete the Welsh Language Impact Assessment below
Economic / RIA	No	Refer to the Integrated Impact Assessment Guidance
Justice	No	Complete the Justice System Impact Identification form on the intranet
Biodiversity	Yes*	Complete the Biodiversity Impact Assessment below
Climate Change	No	Refer to the Integrated Impact Assessment Guidance
Strategic Environmental Assessment	No	Refer to the Integrated Impact Assessment Guidance
Habitat Regulations Assessment	No	Refer to the Integrated Impact Assessment Guidance
Environmental Impact Assessment	No	Refer to the Integrated Impact Assessment Guidance

SECTION 8. CONCLUSION

Both the work conducted by EWC (2021:6), Cardiff Metropolitan University (2021) and the Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group (2021:72) which led to this proposal included extensive stakeholder engagement. The methods included meetings, interviews, and focus groups. These included

- People with protected characteristics under the Equality Act 2010;
- Welsh speakers and Welsh language specialist groups; and,
- Other people who may be affected by the proposal.

Except for the Welsh Children's Commissioner, the representatives for children were the education professionals consulted during the work. Children were not consulted directly on this specific proposal however learners over the age of 14 were included in the Cardiff Metropolitan research.

The most significant impacts will be the direct positive effect for minority ethnic student teachers. It will also positively impact on ethnic minority communities and their children. The increase of teaching staff from ethnic minorities will promote the profession as an attractive and inclusive one whilst giving greater representation within the teaching workforce. The impact for learners will be increased visibility in the classroom of teachers from ethnic minorities. This will support learners from ethnic minorities in terms of representation but will also increase the awareness of the cultural and racial diversity in Welsh society to all learners. Improving the diversity of ITE students and therefore the teaching workforce will, under the Curriculum for Wales, enable more varied teaching in respect to the diversity of culture, heritage, and traditions in Wales' communities. In turn learner cultural participation and achievement could be impacted positively – for those learners from diverse communities to supporting an increase in awareness of the cultural and racial diversity in Welsh society to all learners. The proposal may have an indirect positive impact on the Welsh language - there is the potential for an increase of Welsh speakers from Black, Asian, and Minority Ethnic communities to enter the profession improving existing community use and potentially spreading the use into new communities / multi-lingual communities.

The proposal will support our aims to ensure everyone in Wales has the opportunity to participate, reach their full potential and is able to contribute fully to their own learning and development, enabling Wales to be more prosperous and innovative. It will also support the Well-being Goal for a Wales of cohesive and safe communities.

The impact of the proposal will be monitored through the number of applications and acceptances from ethnic minority students on to ITE programmes. This is gathered monthly from the ITE Partnerships as part of their ongoing processes to monitor levels of

recruitment. This is also supported more broadly by official statistics provided by HESA. This will be supplemented by workforce data from EWC on the numbers who are successfully awarded Qualified Teacher Status and complete Induction. Diversity data is also collected on the teaching workforce through the School Workforce Annual Census and the EWC annual workforce census.

All ITE incentive schemes are reviewed annually against the most up to date available data to ascertain whether they are still required to support their targeted recruitment. This proposal will be included. In addition, in conducting the Teacher Planning and Supply model and ITE Programme allocation process in partnership with the EWC, Welsh Government sets a 5% marker for diverse recruitment into ITE to evaluate how Welsh Government and our partners are performing against the *ITE Black, Asian and Minority Ethnic Recruitment plan*. This proposal will be included in this broader work.

SECTION 9. DECLARATION

Declaration

I am satisfied that the impact of the proposed action has been adequately assessed and recorded.

Name of Senior Responsible Officer / Deputy Director:

Kevin Palmer

Department:

PLPL Division – Education Directorate

Date: 12th December 2022

FULL IMPACT ASSESSMENTS

A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

(Please note that this Section will be published)

All completed Children's Rights Impact Assessments must be sent to the [REDACTED] mailbox

1. Describe and explain the impact of the proposal on children and young people.

Increasing the representation of people from minority ethnic communities within the teaching workforce in schools will have a positive impact on children and young people as outlined and described in Welsh Government's *Anti-racist Wales Action Plan* (2021) and its supporting evidence base (WCPP reports), and EWC's 2020 and 2021 report findings (*Black, Asian and Minority Ethnic representation within the school workforce in Wales*). However, this proposal is directly related to student teachers so the positive impacts as noted above are not direct and will take some time to come into effect.

2. Explain how the proposal is likely to impact on children's rights.

The programme may positively and indirectly impact on the following articles:

Article 3 (best interests of the child) The best interests of the child must be a top priority in all decisions and actions that affect children.

Article 29 (goals of education) Education must develop every child's personality, talents and abilities to the full. It must encourage the child's respect for human rights, as well as respect for their parents, their own and other cultures, and the environment.

Article 30 (children from minority or indigenous groups) Every child has the right to learn and use the language, customs and religion of their family, whether or not these are shared by the majority of the people in the country where they live

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.

The Equality Act 2010 has three general duties which are to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
3. Foster good relations between people who share protected characteristics and those who do not.

The nine protected characteristics are:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race (including immigration status)
- religion or belief
- sex
- sexual orientation
- marriage and civil partnership

This proposal falls under Section 158 Positive Action of the equality act.

(1) *This section applies if a person (P) reasonably thinks that –*

(c) participation in an activity by persons who share a protected characteristic is disproportionately low.

(2) *This Act does not prohibit P from taking any action which is a proportionate means of achieving the aim of—*

(c) enabling or encouraging persons who share the protected characteristic to participate in that activity.

Welsh Government has identified that persons with a protected characteristic of race are participating in low numbers in initial teacher education in Wales and thereafter the teaching profession. As such the proposal is intended to encourage minority ethnic applicants to apply for ITE programmes in Wales.

As the proposal relates to students undertaking study at a HEI the race identification categories utilised to determine those eligible have been taken from the HESA data fields. These are already utilised by HEIs when processing and submitting statutory data related to their students for submission to HESA.

The incentive scheme is available to all ITE Student subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students.

Providers will be aware of their statutory responsibilities in relation to age, religion, and belief (or no religion or belief), disability, gender, sexual orientation, and racial equality, and to Welsh language requirements. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants. As such an individual's eligibility or not to this incentive scheme will not affect a provider's decision to offer a place onto an ITE Programme.

Welsh Government sets a high level nation-wide 'desired-stock' level of ITE students to be recruited each year and EWC distributes this as programme specific allocations that should be met across the accredited ITE Partnerships. It could therefore be argued that the introduction of this incentive to attract more diverse students into ITE may mean fewer placements on ITE programmes for students not meeting the race eligibility criteria for the incentive scheme, especially when considered holistically alongside the 5% marker for diverse recruitment into ITE to evaluate how Welsh Government and our partners are performing against the *ITE Black, Asian and Minority Ethnic Recruitment plan*.

However, except for Primary ITE recruitment during the extraordinary circumstances of the COVID pandemic, the national level allocations have not been met since 2015/16¹⁸ and even with an increase in ethnic minority recruitment it is highly unlikely that a student not eligible for this incentive but eligible in all other ways (as determined by the HEI under their statutory responsibilities as noted above) would not be able to gain access to an ITE programmes.

Moreover, should the above highly unlikely circumstance occur, there are other factors which mean a level of discretion is available to HEIs, that make the individual and programme level recruitment decisions, EWC and Welsh Government who determine the number of places on institutions programmes and nationally. These discretionary levers would ensure that student teachers not eligible for this incentive are not negatively impacted or discriminated against by its introduction:

- Welsh Government currently has a 20% tolerance for allocations for student teachers recruited onto Primary ITE Programmes.
- There is no limit to how many Secondary subject specialists that can be recruited to programmes except for PGCE PE.

¹⁸ Initial teacher education: September 2020 to August 2021 | GOV.WALES

- The tolerances and ‘caps’ / no ‘caps’ are reviewed annually in consideration of the most current available data pertaining to recruitment into ITE and the teaching workforce in Wales
- The only lever that Welsh Government could utilise to stop over-recruitment by ITE Partnerships is theoretically the removal of accredited status of programmes via the EWCs accreditation functions. This has not been tested and the situation would have to be exceptional and ongoing to do so. Utilising this lever and removing otherwise high quality ITE provision would directly impact the availability of ITE places Wales-wide in future years. This would lead to direct impacts on the HEI, the region’s schools, and learners as well as teacher educator expertise across the whole system. As such this is a final backstop that would only be considered under exceptional circumstances; the arrangements are in reality more nuanced and collaborative with ITE Partnerships, EWC and Welsh Government understanding the TPSM and allocations process is intended to support the health of ITE recruitment (over a number of years) and therefore teacher workforce supply at a national and regional level; if significant, consistent over supply of new teachers occurs could lead to potential under-employment of teachers, causing recruitment into ITE / the attractiveness of the profession, to decrease and therefore risk provision and the workforce overall in future.
- Where over recruitment of students does occur to individual programmes this does not imply that the national level of required stock of teachers via ITE is met.

As the above indicates the Welsh Government has the discretion to manage this issue with its key partners on a context informed and nuanced basis. Given the current data on recruitment into ITE shows (Welsh Government, 2022) this is currently a very unlikely possibility.

As with the other existing incentive schemes eligibility for this incentive has no bearing on whether an individual is awarded their teaching qualification and can therefore enter the teaching profession. It also does not impact on their employment as a teacher in a maintained setting.

Record of Impacts by protected characteristic:

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)	Variable. No impact on those under the age of 18 as they are unable / unlikely to be accessing	The incentive scheme will be available to those studying ITE and as such operate within, and be subject to, existing ITE requirements and	Ensure that claim forms and guidance can be accessed via Smart Phones / mobile view display.

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?
	programmes of ITE and therefore the incentive scheme. While there is no impact related to age directly for those aged over 18 it is known that older age groups (50+) are less likely to have access to ICT equipment or skills to negotiate the claiming process; guidance for claimants will require internet access and the claiming process also requires an email address / access to the internet. As such some older individuals may be excluded from the scheme should they be unable to access the internet / digital tools however this impact will be small and most likely avoided under existing digital outreach schemes for the digitally excluded / widening access to HE schemes.	regulations which are placed on ITE providers and ITE students. Providers will be aware of their statutory responsibilities in relation to age, religion and belief (or no religion or belief), disability, gender, sexual orientation and racial equality, and to Welsh language requirements. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants. The age range accessing ITE tends to be the 18-49 age group. There is an expectation that most if not all University level (and therefore ITE) students utilise ICT infrastructure (including email addresses) and equipment provided by their institution. In addition there is an expectation within all ITE programmes that	Maintain a watching brief on widening access to HE schemes, digital inclusion schemes, student finance wales, and the Hwb network continues to avoid potential negative impacts.

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?
		for QTS to be awarded that all student teachers be digitally literate requiring access to digital technologies. Grants and bursaries via student finance wales and institutions own digital access schemes may also provide IT equipment direct to individuals. All qualified teachers in Wales have access to the Hwb network which provides them email address and their schools digital infrastructure.	
Disability (consider the social model of disability ¹⁹ and the way in which your proposal could inadvertently cause, or	None / Negligible. The incentive scheme is available to all ITE Student subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are	All employers and providers have a statutory obligation under the Equality Act. Whilst the safeguarding of children is of paramount importance no individual should be prevented from	Claim forms, guidance, etc. must meet online access requirements.

¹⁹ 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'.

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?
could be used to proactively remove, the barriers that disable people with different types of impairments)	placed on ITE providers and ITE students. Consideration for the administrative 'paperwork' including guidance, forms and monitoring tools must ensure it meets industry best practise for eligible students accessing the incentives and ITE Partnership and Welsh Government staff who administrate the scheme.	undertaking an ITE course solely because they have a disability. Many people with disabilities or chronic illnesses have the capacity to teach and should not be excluded from training on the grounds of simply having a disability. Providers need to be confident that trainees can meet legislative requirements²⁰ to have the health or physical capacity to undertake a teacher's responsibilities. Providers have a responsibility to ensure that this Requirement is met having due regard to the relevant regulations, and to their statutory obligations under the Disability Discrimination Act (DDA) as amended.	

²⁰ The Education (Health Standards) (Wales) Regulations 2004 (legislation.gov.uk)

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?
Gender Reassignment (the act of transitioning and Transgender people)	None / Negligible. The incentive scheme is available to all ITE Student subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students.	The incentive scheme will be available to those studying ITE and as such operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students. Providers will be aware of their statutory responsibilities in relation to age, religion and belief (or no religion or belief), disability, gender, sexual orientation and racial equality. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants. The ITE partnerships should provide advice, support and guidance, including counselling, as well as medical and careers services.	

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?
Pregnancy and maternity	None / Negligible. The incentive scheme is available to all ITE Student subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students.	Within the context of the requirements for the provision of ITE programmes and compliance with the accreditation criteria, institutions should ensure that they deliver, or will deliver, ITE in a way that meets their statutory responsibilities to staff and students under equalities legislation, eliminating discrimination and positively promoting equality. The ITE partnerships should provide advice, support and guidance, including counselling, as well as medical and careers services.	
Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)	Positive impact for ethnic minorities as outlined above. No impact for non-ethnic minorities as not accessing this incentive would be no change from the current position. The proposal does not affect either white or ethnic minorities	The incentive scheme will be available to those studying ITE and as such operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students. Providers will be aware of their statutory	

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?
	accessing the other incentive schemes, ITE programmes (education) or employment. The proposals align with existing HESA Data collection arrangements meaning that self-identification as falling into an eligible category need only occur once with the ITE Partnership minimising administrative burdens on eligible student teachers. The administration of the second payment will only be made to those receiving the first again removing the admin burden on early career teachers. The incentive scheme is available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE	responsibilities in relation to age, religion and belief (or no religion or belief), disability, gender, sexual orientation and racial equality. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants. Higher education institutions (HEIs) have legal requirements to monitor and publish data as part of the public sector equality duty (PSED) of the Equality Act 2010. HEIs have a statutory obligation to submit certain data to the Higher Education Statistical Agency (HESA). Currently higher education institutions are required to return data on staff and students' sex, race/ethnicity, disability and age as part of their annual staff and student records, and from 2017/18 religion or belief for the student record.	

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?
	providers and ITE students.	As such all ITE Partnerships in Wales provide data via HESA including data on protected characteristics. As such this data is already collected and is not an additional burden on ITE Students and their Partnerships.	
Religion, belief and non-belief	No direct impact. While the incentive scheme is available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students. It should be noted that the eligibility criteria around race may mean that those holding minority religious beliefs, who tend to be members of minority ethnic communities, are more likely to access the incentive. However religious belief is not a	The incentive scheme will be available to those studying ITE and as such operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students. Providers will be aware of their statutory responsibilities in relation to age, religion and belief (or no religion or belief), disability, gender, sexual orientation and racial equality, and to Welsh language requirements. They need to ensure that their admission policy promotes equality of opportunity and does	

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?
	criteria for the incentive.	not discriminate against any group of potential applicants.	
Sex / Gender	No impact. The incentive scheme is available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students.	The incentive scheme will be available to those studying ITE and as such operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students. Providers will be aware of their statutory responsibilities in relation to age, religion and belief (or no religion or belief), disability, gender, sexual orientation and racial equality, and to Welsh language requirements. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants.	
Sexual orientation	No impact. The incentive scheme is	The incentive scheme will be available to	

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?
(Lesbian, Gay and Bisexual)	available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students.	those studying ITE and as such operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students. Providers will be aware of their statutory responsibilities in relation to age, religion and belief (or no religion or belief), disability, gender, sexual orientation and racial equality, and to Welsh language requirements. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants.	
Marriage and civil partnership	No impact. The incentive scheme is available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are	The incentive scheme will be available to those studying ITE and as such operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE	

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?
	placed on ITE providers and ITE students.	students. Providers will be aware of their statutory responsibilities in relation to age, religion and belief (or no religion or belief), disability, gender, sexual orientation and racial equality, and to Welsh language requirements. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants.	
Children and young people up to the age of 18	No direct impact on those under the age of 18 as they are unable / unlikely to be accessing programmes of ITE and therefore the incentive scheme. However as noted above improving the diversity of ITE recruitment and therefore the teaching workforce can have a positive impact on children and young people.	ITE Programmes are Universities degrees and as such are not typically accessed by those under the age of 18. However should someone under the age of 18 be admitted onto an ITE Programme the incentive scheme is available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and	

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?
		regulations which are placed on ITE providers and ITE students.	
Low-income households	Indirect positive and negative impact. As noted in the Anti-racist Wales action plan minority ethnic communities tend to also be from lower-income groups and as such this financial incentive may indirectly benefit low-income households where the student teacher is eligible. The incentive scheme is available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students. However as detailed under the Age Impact section low income households may also be digitally excluded and therefore unable to access the scheme.	See information under Age Impact assessment section relating to digital exclusion	See information under Age Impact assessment section relating to digital exclusion

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?
Fairness, Respect, Equality, Diversity, Autonomy	As discussed above the proposal utilises the race identification (categories as per HESA) as an eligibility criteria for access with most 'White' categories being ineligible. However, this is required to meet the aims of the proposal to diversify the workforce on the basis of the evidence gathered. The incentive scheme is available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers. The incentive scheme is demand led and as such accessing the	The incentive scheme will be available to those studying ITE and as such operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students. Providers will be aware of their statutory responsibilities in relation to age, religion and belief (or no religion or belief), disability, gender, sexual orientation and racial equality, and to Welsh language requirements. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants.	Annual monitoring against clear criteria, success indicators and official statistics. The scheme is part of the implementation of the Anti-racist Wales plan; the actions required across the plan need to be taken forward in order for this proposal to have an adequate impact and cease once the success indicators have been.

	scheme and administration requirements is voluntary.		
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EU/EEA and Swiss Citizens' Rights

All Welsh Government ITE incentive schemes are available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers and ITE students.

Providers will be aware of their statutory responsibilities. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants.

C. RURAL PROOFING IMPACT ASSESSMENT

Negligible.

Rural communities are more likely to suffer from digital exclusion than other communities and as such individuals from such communities may find it difficult to access the digital guidance and claim administration (forms etc.)

There is an expectation that most if not all University level (and therefore ITE) students utilise ICT infrastructure (including email addresses) and equipment provided by their institution. In addition, there is an expectation within all ITE programmes that for QTS to be awarded that all student teachers be digitally literate requiring access to digital technologies. Grants and bursaries via student finance wales and institutions own digital access schemes may also provide IT equipment direct to individuals.

All qualified teachers in Wales have access to the Hwb network which provides them email address and their schools digital infrastructure.

To mitigate any unintended consequences that may arise from the scheme being operated via digital spaces Welsh Government will ensure that claim forms and guidance can be accessed via Smart Phones / mobile view display.

D. DATA PROTECTION IMPACT ASSESSMENT SCREENING

Please send your assessment to the Information Rights Unit copied to your Information Asset Owner.

Implementation of the Minority Ethnic Incentive Scheme
Kevin Palmer
PIA reference number: [REDACTED]
Please describe your proposal: (i) If this is a change to an existing system/ project/ process/ policy then please outline the present arrangements (and how personal data is currently processed) and then outline the changes, including whether personal data will now be shared with third parties. (ii) If this is a new system/ project/ process/ policy then please detail how the new system/ project/ process/ policy will work, including how the personal data will be processed and whether the personal data will be shared with 3rd parties. (iii) IMPORTANT - Will the proposal involve the development of new legislation/measures that will require the processing of personal data by Welsh Government or any other parties? Summary: This is a new Incentive Scheme, the purpose of which is to encourage individuals from ethnic minority backgrounds to apply for initial teacher education (ITE) and enter the teaching workforce in Wales. The scheme would pay out at two points in a teacher's early career: a) £2,500 at the end of a programme of ITE (on achievement of Qualified Teacher Status (QTS)) and b) £2,500 on successful completion of induction within a school in Wales. The processing of some personal data, including special category data (ethnicity/ ethnic group) is necessary to administer, monitor and evaluate the scheme. The WG, ITE university providers (ITE providers) and the Education Workforce Council (EWC) will be involved in operating the scheme and processing the data.

Organisations' Roles (Controller or processor):

- **The WG – controller**

The WG will determine the purposes of the data processing (and for the scheme overall) and will stipulate requirements on processors in relation to it.

- **ITE providers – processors**

ITE providers will undertake processing for the scheme as described in a grant offer between the WG and each ITE provider, and in related scheme documentation or other manner of instruction used the WG. The grant offer letter to ITE providers will include a *Requirements of the UK GDPR* schedule which will stipulate requirements set out in UK GDPR, Article 28 (3).

- **The EWC:**

Processor (scheme administration) – The EWC will undertake processing in relation to the administration of the scheme as described in a grant offer/ or other form of contract between WG and the EWC, and in related scheme documentation or other manner of instruction used the WG. The grant offer letter to the EWC will stipulate the requirements set out in UK GDPR, Article 28 (3).

Controller (scheme evaluation) – The EWC will, potentially, be involved in an evaluation of the scheme which will involve linking data for participants to its register of education practitioners to provide analysis on their retention within the profession. This is a distinct project which will involve the expertise of the EWC (including knowledge of, and information from the register of educational practitioners as well as statistical analysis); for this reason the EWC will be a controller. A data access agreement will be considered for this work.

High-level processes in the scheme (involving personal data):

NB. Further details can be found in the DPIA attached in the next section.

1.0 – Student applies for the scheme (managed by ITE providers)

2.0 – ITE providers notify WG of the eligible participants

2.1 – WG undertakes a process of checking data received and resolving queries with ITE providers

3.0 – ITE providers claim funds from WG for the QTS payment to participants

3.1 – WG processes the QTS claim (including checking and query resolution), resulting in WG paying the ITE provider the claim value (overall for all participants). The ITE provider will then in-turn pay each participant.

4.0 – ITE provider informs the EWC which students receive a QTS payment, so it knows who would be eligible to receive an induction payment if induction is successfully completed.

5.0 – Participant claims induction payment from EWC. The EWC pays the participant.

6.0 – The EWC passes a claim to WG for funds matching the values claimed by participants. (A list of participants is provided to WG)

6.1 – WG processes the EWC's Induction claim (including checking and query resolution)

7.0 – Evaluation – retention in profession (Potential process) – EWC to link participants to its register of educational practitioners and check annually (for a period agreed with WG) whether they have remained within the profession.

8.0 - Evaluation (WG internal analysis) – WG evaluation of scheme numbers and costs across years and incentive schemes.

Has data protection impact screening or assessment already been carried out?

- Yes

Does the proposal involve the processing of personal data by Welsh Government or any other parties?

- Yes

Please tick the personal data items that will be processed (this list is not exhaustive):

Personal (Note – some of these items will already be held by ITE partnerships and EWC)

Name – Yes (WG, ITE partnerships, EWC)

Address – Yes (WG, ITE partnerships, EWC)

Postcode – Yes (WG, ITE partnerships, EWC)

Business address – Yes (EWC)

Email address – Yes (WG, ITE partnerships, EWC)

Telephone numbers - Yes (WG, ITE partnerships, EWC)

Date of birth – Yes (ITE partnerships and EWC)

Driving licence number - no

Passport / ID card number - no

Photographs / images (which could be used to identify an individual) - no

	Other (please specify): Teacher Reference Number (WG, ITE partnerships, EWC) ITE programme, partnership and year of study (WG, ITE partnerships, EWC) Bank details (ITE partnerships and EWC)
Special Category	
Racial / ethnic origin - yes Political opinions - no Religious / philosophical beliefs - no Trade union membership - no Physical / mental health conditions - no Sexual life - no Sexual orientation – no Criminal & court records (inc. alleged offences) - no	Biometric data e.g. DNA, finger-prints - no
If special category personal data is being processed, is this data being collected mandatorily (i.e. without the data subjects having an option to not provide it)? • Yes – please provide details The scheme itself IS NOT mandatory however to be eligible for the scheme and to claim student teachers MUST self-identify as being of an ethnicity or ethnic group eligible for the scheme. The Incentive scheme is specifically targeted at ethnic minority student teachers and as such we must ask this question to establish eligibility. It is also important that we can monitor how effective the scheme is in attracting students from different ethnic backgrounds into the teaching profession. To do this, we need to know the ethnicity/ ethnic group of the applicant.	

Do any of the data subjects whose personal data will be processed fall into the following categories? Children (under the age of 12) – No Patients - see Asylum Seeker Asylum Seekers - Should a HEI providing an ITE Programme determine that an applicant can enter the course that is an Asylum Seeker (and / or a patient) and they meet eligibility for the grant funding under the Incentive Scheme the details as above would be collected. Welsh Government employees - While most ITE Programmes are full-time a part-time PGCE is available meaning that eligible candidates which may include WG Employees, can remain in employment while studying for their PGCE.	
Please give an indication of the scale of the processing (e.g. pan-Wales; targeted group) Pan-Wales scheme for student teachers identifying as being from an ethnic minority group. The numbers eligible to claim the incentive are relatively small. The Initial teacher education Black, Asian and Minority Ethnic recruitment plan GOV.WALES has set a 5% marker of success in its first year, for the percentage of the ITE cohort that come from an ethnic minority background. However, indications are that this will not be reached in 2022-23. The latest estimate suggests that less than 40 students would be eligible for the scheme in its first year, but this number should increase in future years as strategies to encourage and support students from ethnic minority backgrounds to go into teaching bed-in.	
For the personal data being processed, please indicate	
Who the data controller is?	Details: For scheme administration: Welsh Government For scheme evaluation, involving data linking: Welsh Government and EWC
Any data processors?	Details:

	ITE providers (also a controller, <u>for different purposes</u>, for much of the data) EWC - for the administration of the scheme (also a controller, <u>for different purposes</u>, for some of the data)
Will the data be shared?	Details: <u>For scheme administration:</u> From ITE providers to: - WG for financial and scheme administration, monitoring and scheme evaluation purposes. - EWC for scheme administration purposes (second scheme payment) (through UK GDPR compliant arrangements to be determined between these two organisations). From EWC to WG for financial administration purposes. <u>For statistical and research purposes:</u> From WG to EWC (for which both are controllers) should it be necessary to link data sets as part of the evaluation of whether participants in the scheme have remained in the profession and thereby providing evidence for future policies aimed at improving diversity.
What is the statutory basis for processing the data? NB – GDPR itself does <u>not</u> provide a statutory legal basis to process personal data. It is intended to process this data for the following purposes as set out in UK GDPR and DPA 2018: - <u>UK GDPR: Article 6(1)(e)</u>, where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.	

For special category personal data (ethnicity) specifically:

- [UK GDPR: Article 9\(2\)\(g\)](#) – Reasons of substantial public interest (with a basis in law)
- [DPA 2018, schedule 1, para 6 \(substantial public interest condition\)](#):
Condition 6 - Statutory etc. and Government Purposes (with a basis in law)

The **legal basis** for the above ‘public interest’ articles/ conditions are:

- [Sections 14 to 17 of the Education Act 2002](#) enable the Welsh Ministers to give financial assistance for purposes related to education. This includes enabling any person to receive any training for teachers and providing for a person’s maintenance while they undertake such education.

The incentive will have a ‘legal scheme’ (form of subordinate legislation) which will be drafted and cleared by Legal Services. The data is required for the processing and evaluating grant claims – without this information we are unable to make payments under the scheme.

For information, other ITE Incentives with legal schemes are:

- [Initial Teacher Education \(ITE\) Priority Subject incentive scheme 2022 \(No. WG22-23\) | GOV.WALES](#)
- [Iaith Athrawon Yfory incentive scheme 2022 to 2023 academic year \(2022 WG20-64\) | GOV.WALES](#)
- [Equality Act 2010, 158 Positive action](#): general:
 - (2) *This section applies if a person (P) reasonably thinks that –*
 - (c) *participation in an activity by persons who share a protected characteristic is disproportionately low.*
 - (2) *This Act does not prohibit P from taking any action which is a proportionate means of achieving the aim of—*
 - (c) *enabling or encouraging persons who share the protected characteristic to participate in that activity.*

The data is required to understand the ethnic diversity of the students who start the scheme and who go onto enter the workforce. This will be used to evaluate the success of the scheme and to make an on-going assessment (annually) as to whether there remains a sound basis for positive action in the form of a financial incentive for these groups.

ITE Providers:

Higher education institutions (HEIs) have legal requirements to monitor and publish data as part of the public sector equality duty (PSED) of the Equality Act 2010. HEIs have a statutory obligation to submit certain data to the Higher Education Statistical Agency (HESA). Currently higher education institutions are required to return data on staff and students' sex, race/ethnicity, disability, and age as part of their annual staff and student records, and from 2017/18 religion or belief for the student record.

As such all ITE providers in Wales provide data via HESA including data on protected characteristics. As such this data is already collected from student teachers by HEIs.

EWC:

The EWC has duties under Education (Wales) Act 2014, Section 4 (Functions of the Council) (1):

- (c) to establish and maintain a register in accordance with section 9;
- (d) to keep itself informed about the induction of persons in accordance with section 17 and to hear appeals in relation to induction decisions in accordance with section 19;

Due to these functions the EWC already knows which students gained QTS and which newly qualified teachers completed induction. It will not necessarily know the ethnicity of these registered individuals, but it will hold this information where it has been voluntarily provided.

Have legal Services confirmed that the basis outlined above provides the necessary statutory gateway for processing (including any proposed sharing)?

- Yes

Will the proposal involve new or significantly changed processing of personal data about each individual?

- ITE providers already hold this data, but the processing of this data for the requirements of this scheme is new.
- The EWC will already hold some of the required information about individuals for the purpose of maintaining the register of educational practitioners, which it has a duty to do. This includes ethnicity data however this information is volunteered by the individual and is not mandatory for the Register.

Will the personal data be consolidated, linked, or matched with data from other sources? Yes. It will potentially be linked to EWC's register of educational practitioners to evaluate the effectiveness of the incentive scheme in attracting and retaining recruits to the profession. This will allow for an on-going assessment of whether there remains a sound basis for positive action in the form of a financial incentive for these groups. This however will be a separate project and a separate IIA and DPIA will be conducted as part of the scoping of that work.
Will the personal data be used for automated decision making? • No
Will the personal data result in systematic monitoring of data subjects? • It will potentially be linked to EWC's register of educational practitioners to evaluate the effectiveness of the incentive scheme in attracting and retaining recruits to the profession. This will allow for an on-going assessment of whether there remains a sound basis for positive action in the form of a financial incentive for these groups. However this data will be anonymised; it will be the trends not individual data points that are evaluated to determine the success of the scheme. This however will be a separate project and a separate IIA and DPIA will be conducted as part of the scoping of that work.
Does the proposal involve new or changed data collection, retention or sharing policies/practices for personal data? • Yes. This is a new scheme, however the WG operates similar schemes for which similar data items are processed. The main difference with this new scheme is the additional collection of special category data (ethnicity). Consideration will need to be given to whether policies and practices should be changed/ adapted because of this. Ethnicity data is required in order to assess the eligibility of claimants for the scheme as well as to evaluate the scheme as mentioned above. • HEIs (Data Processor for the scheme) already request collect this data for their own purposes (HESA stats) • EWC (Data Processor for the scheme) already request and collect this data for their purposes (Teacher register)

Do you have a clear retention policy and what practical things are in place for you to ensure that your Retention Policy is applied? • Yes. As per previous years we will retain the data for 7 years for financial monitoring purposes however going forward data collected that is older than 7 years will be anonymised at that point for statistical and research purposes. Where the scheme continues in the longer-term data, a project to match data to the register of education practitioners to evaluate the scheme and ensure there remains a sound basis to continue it, may continue beyond 7 years. Where this happens, for the purpose of this project alone, records will be kept until the project ends, at which point data will be anonymised.
Will the proposal involve the introduction of privacy-intrusive technologies such as • Smart cards • RFID tags • Biometrics • Visual surveillance (e.g. CCTV) • Digital image and video recording • Profiling, data mining or logging electronic traffic • Locator technologies (e.g. GPS, mobile phone tracking) • Other (please provide details) No
Will the proposal involve new or changed identity management or authentication processes? • No
Will the proposal have the effect of enabling identification of individuals who were previously anonymous? • Yes. Welsh Government will have the names (and other personal and special category information stated above) of minority ethnic student teachers eligible for the new incentive scheme.

Please send your assessment to the Information Rights Unit copied to your Information Asset Owner.

Is a Data Protection Impact Assessment (DPIA) required for this proposal? • Yes Article 35(1) of the UK GDPR states that a DPIA is required when processing is “likely to result in a high risk”. The Article 29 Working Party (WP29) has set out nine criteria that should be considered and meeting two or more of these would require a DPIA to be carried out. This proposal meets the following WP29 criteria: 4. Sensitive data or data of a highly personal nature. Met due to the processing of special category data in the form of ethnicity / ethnic group. 6. Matching or combining datasets. Met due to the potential for the data being linked to EWC’s Register of Educational Practitioners in order to evaluate the effectiveness of the incentive scheme in attracting and re-training recruits to the profession. 7. Data concerning vulnerable data subjects. Met due to the processing of personal data about asylum seekers and patients. These individuals are deemed to be a vulnerable segment of the population that require special protection. Article 35(4) requires the ICO to publish a list of processing operations that are likely to be high risk and require a DPIA. The ICO’s list includes 10 types of processing that automatically require a DPIA, one of which is: • Match data or combine datasets from different sources. This will be met due to the potential for the data being linked to EWC’s Register of Educational Practitioners in order to evaluate the effectiveness of the incentive scheme in attracting and re-training recruits to the profession. This however will be a separate project and a separate IIA and DPIA will be conducted as part of the scoping of that work. Although there is no set template for undertaking a DPIA, either of the attached templates can be used to document the DPIA. The completed DPIA should be returned to Information Rights Unit for comment.
Has advice on UK General Data Protection Regulation (UK GDPR) compliance been provided? • Yes (see below): • Does the proposal require a Privacy Notice to be drafted? Yes. To inform students of how their personal data will be used in order to access the incentive scheme. • Does the proposal require consultation with the ICO under GDPR Art 36(4)? No.

- Does the proposal require a contract between Welsh Government as data controller and a third party processor? Yes (see note). Where personal data is processed on behalf of the Welsh Government by ITE Partnerships and EWC.
- Does the proposal require a data sharing agreement to be drafted? Yes (see note). Where the personal data is being shared from one controller to another controllers for a different purpose (e.g. between ITE Partnerships and the Welsh Government; between EWC and the Welsh Government).

Note: All the parties involved need to be clear as to what personal data is being processed as a controller for their own purpose and what personal data is being processed on behalf of another controller (as a processor). This is important not only to determine what type of agreement needs to be in place, but also to ensure responsibility in relation to data subjects rights.

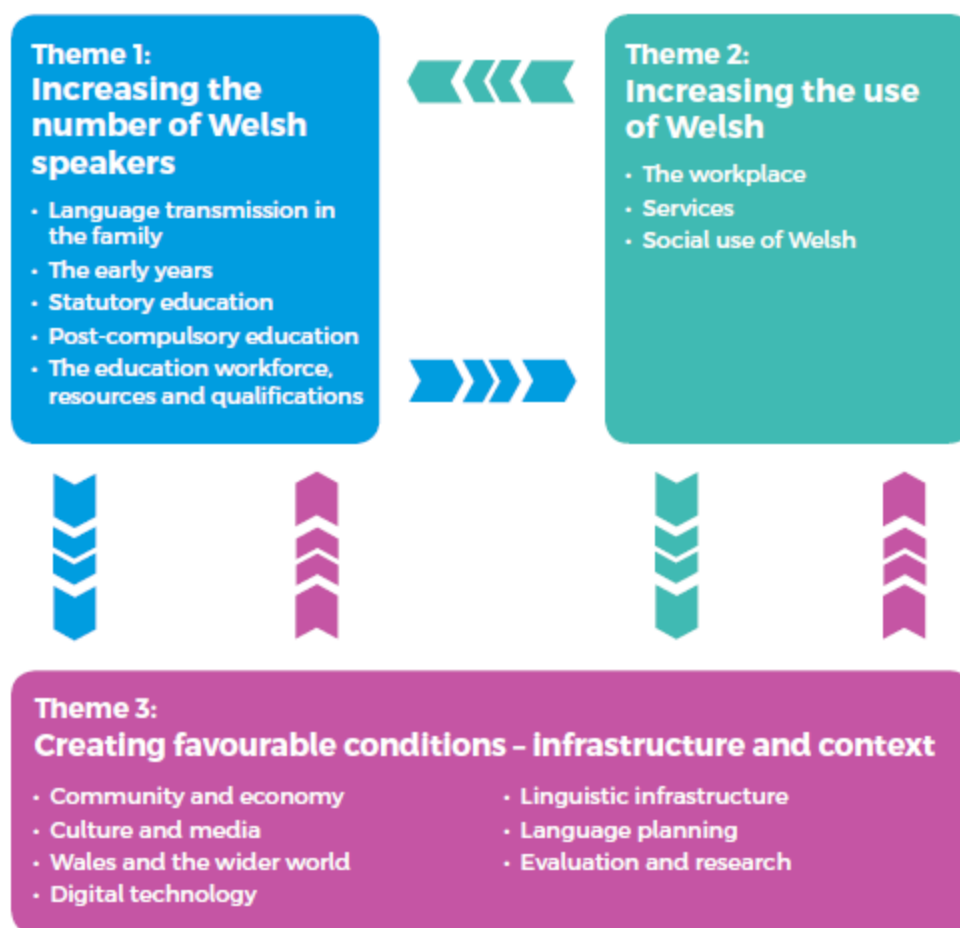
E. WELSH LANGUAGE IMPACT ASSESSMENT

Cymraeg 2050 is our national strategy for increasing the number of Welsh speakers to a million by 2050.

The Welsh Government is fully committed to the new strategy, with the target of a million speakers included in its Programme for Government. A thriving Welsh language is also included in one of the 7 well-being goals in the Well-being of Future Generations (Wales) Act 2015.

We also have a statutory obligation to fully consider the effects of our work on the Welsh Language. This means that any Welsh Government policy should consider how our policies affect the language and those who speak it.

The *Cymraeg 2050* strategy has three themes:



The headings under each theme outline the scope of activities that can affect the language.

As a general rule, if your policy has the potential to impact on people, it will impact in some way on Welsh speakers and therefore on the Welsh language.

1. Welsh Language Impact Assessment reference number **02/12/2022**

2. Does the proposal demonstrate a clear link with the Welsh Government's strategy for the Welsh language? – *Cymraeg 2050 A million Welsh speakers* and the related Work Programme for 2017-2021?

No. This proposal concerns the implementation of the new incentive scheme as recommended and agreed by the previous Education minister by the *Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group Final Report - Recommendation 9: Welsh Government should provide specific scholarships to support Initial Teacher Education students from Black, Asian and Minority Ethnic groups.*

The proposal falls under both the above report and the commitments made under the Anti-racist Wales action plan. Attracting new cohorts into teaching which this proposal seeks to do may result in more teachers able to teach through the medium of Welsh however this is not the direct purpose of this proposal.

The operational delivery of the scheme will meet the Welsh language standards and Welsh Government rules/best practise with regards to the bilingual delivery of grant schemes. The proposal will be marketed alongside the other ITE incentive schemes via the Teach in Wales campaign. The campaign targets:

- STEM/MFL and Welsh Graduates
- Welsh speaking Graduates
- Career Changes
- Black Asian and Minority Ethnic Graduates

Describe and explain the impact of the proposal on the Welsh language and explain how you will address these impacts in order to improve outcomes for the Welsh language. How will the proposal affect Welsh speakers of all ages (both positive and/or adverse effects)? You should note your responses to the following in your answer to this question, along with any other relevant information:

There is no impact on the Welsh language directly as it does not seek to deter, amend, or remove existing policy interventions intended to support the Government's existing commitments in this space. There may be an indirect positive impact as attracting new cohorts into teaching, which this proposal seeks to do, may result in more teachers able to teach through the medium of Welsh.

How will the proposal affect the sustainability of Welsh speaking communities²¹ (both positive and/or adverse effects)?

The proposal may have an indirect positive impact on the Welsh language - there is the potential for an increase of Welsh speakers from Black, Asian and Minority Ethnic communities to enter the profession improving existing community use and potentially spreading the use into new communities / multi-lingual communities. It could also highlight another ITE incentive scheme targeted to Welsh speaking graduates - the Iaith Athrawon Yfory - as this will be marketed alongside that ITE incentive.

F. BIODIVERSITY IMPACT ASSESSMENT

The Nature Recovery Action Plan for Wales contains six objectives to reverse the decline of biodiversity which should be used to assess the impacts on biodiversity. They can also help develop and guide actions to comply with the S6 duty. They have been simplified as a set of questions to guide you through the impact assessment.

These questions should be considered whether your proposal has a land management element or not, although some will be particularly relevant if your policy area relates to land management in any way.

You should take a pro-active approach to considering the potential impacts on biodiversity – this is one area where unintended consequences are often overlooked, either through lack of awareness, or because it is difficult to assign a monetary value to biodiversity.

Moreover, the duty requires that we positively seek opportunities to maintain and enhance biodiversity, both directly (where the intervention involves land management or construction), and indirectly (for example, where there may be an opportunity to raise awareness of the importance of biodiversity). In completing this assessment consider how enhancing biodiversity and promoting resilience of ecosystems contribute reciprocally to the aims of your policy or project.

You will need to record decisions and impacts arising from this assessment. Please note how you have answered each question, or you can use the template at the end of the assessment. Further guidance is available on the intranet.

²¹ These can be close-knit rural communities, dispersed social networks in urban settings, and in virtual communities reaching across geographical spaces.

Consider Questions 1 - 9 for ALL policies:

Embedding biodiversity

1. How will your proposal integrate biodiversity into decision making?

- ♦ Have you considered the impacts and positive opportunities for action for biodiversity at the early stages of thinking or project design?
 - What impacts will procurement have on biodiversity, including global biodiversity?
 - Are products sourced sustainably?
 - Does your project include the use of materials or practices harmful to biodiversity?
- ♦ Does it require partners and beneficiaries to consider the impacts and opportunities for positive action for biodiversity at the early stages of thinking and project design?
 - Is the consideration of biodiversity a requirement of funding applications and project specifications?
 - Does your evaluation of these seek to ensure that biodiversity is maintained and enhanced?

No direct impacts identified, either positive or negative on biodiversity as the proposal relates to ensuring a diverse teaching profession via recruitment into initial teacher education.

Access to the grant scheme and its operation can be conducted entirely virtually.

2. Has your proposal ensured biodiversity is accounted for in business decisions?

- ♦ Has it considered whole of life costs which include the value of biodiversity and natural resources within the cost benefit analysis, even if this is an informal process?
 - Have you thought about how enhancing biodiversity can help deliver across WG's activities for example, to support active recreation, education, flood prevention, and local food growing. (For example, green roofs help to provide wildlife habitats, reduce energy consumption and improve drainage systems.)
- ♦ Has it considered the long term costs of degradation of biodiversity and natural resources, and the potential for savings for health and well-being, flood risk etc?
- ♦ Can it encourage partners and beneficiaries to take these costs and savings into account?

No direct impacts identified, either positive or negative on biodiversity

3. How does your proposal improve understanding and raise awareness of the importance of biodiversity, encouraging others to act?

- ♦ Can you work with partners and beneficiaries to promote understanding of biodiversity?
- ♦ Can you promote the benefits of access to biodiversity through the delivery of public goods and services such as social care, community development, health and recreation?
- ♦ Can you provide, or source, specialist training where necessary?
- ♦ Can you link to other communications strategies and initiatives for biodiversity, for example award schemes, local events?

No direct impacts identified, either positive or negative on biodiversity

Improving our evidence, understanding and monitoring

4. Have you used the best available evidence of biodiversity to inform your proposal and this assessment?

- ♦ You **must** have regard to
 - the lists of species and habitats of principal importance published under Section 7 of the Environment (Wales) Act
 - the State of Natural Resources Report
 - any relevant area statement published by NRW.
- ♦ If your proposal is in regard to construction or land management directly or indirectly, it should reference biodiversity records available through
 - Local Environment Record Centres
 - Atlas of Living Wales
 - Lle

No direct impacts identified, either positive or negative on biodiversity

5. Have you used up to date knowledge of the key impacts on biodiversity to make evidence-based decisions?

- ♦ Do you know what the drivers of change and key negative factors are which could arise from your proposal?
- ♦ Are you satisfied that these do not apply or have been avoided?

No direct impacts identified, either positive or negative on biodiversity

6. Can your proposal contribute to our body of knowledge for biodiversity?

- ♦ Can it support citizen-science initiatives, and monitoring schemes?
- ♦ Have you ensured that any biodiversity data collected is made publicly available?

No direct impacts identified, either positive or negative on biodiversity

Governance and support for delivery of biodiversity action

7. Can your proposal support biodiversity action in any way?

- ♦ Can staff get involved in practical action?
- ♦ Can you fund action directly, or indirectly?
- ♦ Can you support partnerships and/or collaboration for local and community-based biodiversity action?

No direct support identified, either positive or negative on biodiversity

8. Can your proposal help to build capacity for biodiversity action?

- ♦ Can you support skills acquisition and training?
- ♦ Does your proposal ensure the appropriate level of qualifications of those involved in decision making regarding biodiversity?
- ♦ Can your proposal fund capacity building for biodiversity action?

No direct impacts identified, either positive or negative on biodiversity

9. Have you recorded decisions and actions to maintain and enhance biodiversity?

- ♦ A report on what the public authority has done to comply with the duty must be published by the end of 2019 and then every three years after this date.

No direct impacts identified, either positive or negative on biodiversity

If your proposal concerns construction or management of land and/or sea, please also consider Questions 10 – 16:

Not applicable

Safeguarding species and habitats of principal importance

10. Is all legislation complied with to ensure protection of marine and terrestrial species and habitats?

- ♦ Has any requirement for licences, monitoring and/or enforcement been considered and actioned?
- ♦ Has any requirement for EIA/SEA/HRA been identified and actioned?
- ♦ Have any impacts or opportunities for positive action for Section 7 species and habitats been identified and actioned?

11. Does the proposal seek first to maintain and enhance biodiversity?

- ♦ Have you selected the option which avoids loss and/or damage to biodiversity, and promotes the resilience of ecosystems?
- ♦ Only where the balance of environmental, economic, social and cultural benefits²² provided by your proposal is such that there may be some loss of habitat or species, have you sought to enhance biodiversity elsewhere on the site, or, where there is no other option, offsite?
- ♦ Does your proposal contribute to maintaining and enhancing biodiversity across Wales?

Increasing the resilience of our natural environment

12. Does your proposal contribute to building the resilience of our ecosystems?

- ♦ Does it work with nature, and consider the use of nature-based solutions first and foremost?
- ♦ Are any nature-based solutions native and bio-diverse?

²² Taking proper account of the benefits and intrinsic value of natural resources, including biodiversity, and ecosystems

- ♦ Can it restore or contribute to the restoration of degraded habitats?
- ♦ Can it contribute to building resilient ecological networks of habitats?
- ♦ Does the proposal improve site management to improve habitat or species condition at **any** scale? e.g. planting native species, providing wildflower areas for pollinators, leaving areas of unmown grass; and improving connectivity between valuable habitats?

13. Does your proposal contribute to the creation of new habitat?

- ♦ Does your proposal support the creation of new habitats, such as local orchards, native hedges, wildflower meadows or other areas of native, bio-diverse green space?
- ♦ Can habitat creation contribute to developing resilient ecological networks?

Tackling key pressures on species and habitats

14. Will the proposal have any negative impacts on habitats or species through

- ♦ change in land use?
- ♦ causing air, water, light, noise or vibration pollution?

15. Has all legislation regarding the pressures on species and habitats been complied with?

This would include:

- ♦ Pollution control
- ♦ Invasive non-native species
- ♦ Sustainable Urban Drainage Systems
- ♦ Climate Change etc.

16. How will any negative impacts be mitigated?

- ♦ Have whole system approaches and native, bio-diverse nature based solutions been used to reduce pollution and mitigate climate change?
- ♦ Does your proposal employ best practice for the sustainable management of agriculture, fisheries, forestry and construction?
- ♦ Does your proposal include action to support pollinators?

Question number	Opportunities for positive action	Negative impacts of the proposal	Actions needed to maximise positive opportunities and prevent negative impacts

G. SOCIO-ECONOMIC DUTY 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?

While the proposal seeks to diversify the recruitment into ITE and therefore the teaching workforce it is part of a wider set of proposals under the *Anti-racist Wales Action Plan*. The evidence collected to inform the Anti-racist plan as it pertains to education as well as specific reports as they relate to ITE and the teaching workforce (EWC, 2020 and 2021, Cardiff Met, 2021, *Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group Final Report* 2021, and OECD, 2019) suggest that diversification of the teaching workforce not only supports outcomes for minority ethnic learners but of low-income learners as well.

What information has been gained through engagement with those effected by the proposal/decision and specifically those who suffer socio-economic disadvantage?

The policy rationale for the scheme was considered by the as one of a multitude of actions under the Race Equality Action Plan which included third sector groups and community organisation who consulted with minority ethnic communities as well as by the Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group who made the recommendation to the previous Minister for Education. The final EWC report commissioned by Welsh Government also made recommendations on the basis of extensive expert stakeholder engagement as did the research report provided by Cardiff Met.

Have protected characteristics been considered?

An Equality impact Assessment has been carried out.

Have communities of interest and places interest been considered. (Refer to page 8 in the statutory [guidance](#)).

In developing the scheme the ITE Partnerships and EWC – our intermediaries for the delivery of the scheme have been consulted with.

What information has been considered regarding future trends?

The success, lessons learnt and ongoing delivery of similar ITE incentives schemes in Wales such as the Iaith Athrawon Yfory.

What data has been considered (National and local)

ITE Recruitment data (HESA) with specific regard to numbers of minority ethnic student teachers to establish a baseline for the grant funding envelop

[Students in Wales \(gov.wales\)](https://gov.wales) contains detail on student teachers and their demographics

[School Workforce Census results: as at November 2021 | GOV.WALES](#) provides census detail on the teaching workforce more broadly

[Workforce Statistics \(ewc.wales\)](https://ewc.wales)

and data collected and presented in the reports noted at the start of this IIA.

How could the proposal potentially further exacerbate inequality of outcome experienced as a result of socio-economic disadvantage?

Teaching is a graduate profession and as such the financial incentive awarded will further support those already able to access higher education. The student finance package as well as institutions widening access programmes would work to mitigate this impact as they do currently. Studying a PGCE requires payment of student fees (up to £9000) and can mean more student debt for individuals however it could also enable access to employment with higher levels of wages than they could otherwise get.

Provide a summary of evidence and links

See above – full HTMLs provided for all reports earlier in the IIA

[Home](#) | [Student Finance Wales](#)

How could the decision potentially improve outcomes for those who experience socio-economic disadvantage?

Please provide detail regarding outcomes that will be improved and for who.

The proposal seeks to diversify recruitment into ITE so would positively affect minority ethnic student teachers. Minority ethnic communities tend to have greater socio-economic disadvantage.

While the proposal seeks to diversify the recruitment into ITE and therefore the teaching workforce it is part of a wider set of proposals under the *Anti-racist Wales Action Plan*. the evidence collected (EWC, 2020 and 2021, [Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group Final Report](#) 2021, OECD, 2019) suggest that diversification of the teaching workforce not only supports outcomes for minority ethnic learners but of low-income learners as well.

Provide a summary of evidence and links

See above – full HTMLs provided for all reports earlier in the IIA

How will you monitor the impact of this decision? (Please consider wider outcomes)

Welsh Government will work with the ITE Partnerships to establish a virtuous cycle of feedback to improve the operational delivery of the scheme as well as monitor the take up of the grant funding. HESA ITE recruitment data as well as workforce data from Welsh Government and EWC will also inform the impact of improving diversity in the teaching profession. Broader work under the *Anti-racist Wales Plan* will be subject to evaluation against its aims.

Does new monitoring information need to be collected? If so, what?

Yes – data relating to grant administration and evaluation. A Privacy Impact Assessment has been carried out.

Provide a summary of evidence and links