

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):	[REDACTED] (ITE Team, PLPL Division)
Department:	Education
Head of Division/SRO (name):	Kevin Palmer
Cabinet Secretary/Minister responsible:	Cabinet Secretary for Education
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Contents

Section 1. What action is the Welsh Government considering and why?	3
Section 2. What will be the effect on social well-being?	8
Section 3. What will be the effect on cultural well-being and the Welsh language?	12
Section 4. What will be the effect on economic well-being?	13
Section 5. What will be the effect on environmental well-being?	14
Section 6. Socio-economic Duty What will be impact on Socio-economic disadvantage?	16
Section 7. Record of Full Impact Assessments Required	17
Section 8. Conclusion	19
Section 9. Declaration	21
Full Impact Assessments	22
A. Children’s Rights Impact Assessment	22
B. Equality Impact Assessment	27
C. DATA PROTECTION IMPACT ASSESSMENT SCREENING	27
D. WELSH LANGUAGE IMPACT ASSESSMENT=	37
E. Biodiversity Impact Assessment	40

SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

Summary

This integrated impact assessment (IIA) is an update for the Minority Ethnic incentive scheme AY2025/26 (the ‘proposal’). The initial IIA was conducted in 2022 with a further iteration completed 2023, assessing changes to the scheme made at that time. Following the annually scheduled review on the proposal ready for delivery in AY2025/26 no changes to the scheme have been identified as being required. This IIA is therefore intended to bring together the previous versions of the IIA, update any data and evidence that has been published since the last iteration and to assess new areas of impact now required or identified since the last iteration was completed.

This proposal concerns the ongoing delivery of the Minority Ethnic Incentive scheme intended to attract Black, Asian and Ethnic Minority applicants into ITE and the teaching profession. This incentive scheme was put in place following a 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 workforce*. 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). Data from the *Schools Workforce Annual Census (SWAC) from November 2021* showed that only 1.1%

were of Black, Asian, Mixed or Other ethnicity. [Updated data from the SWAC](#) (November 2022) shows this is now 1.2%.

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, 2003](#); [Evans, 2013](#); [Betteley, 2017](#); [Wiegand and Cifuentes, 2018](#))." EWC advise that Welsh Government should "Consider providing specific scholarships to support ITE students from ethnic minority groups." [In their final report](#) 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 report](#) 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](#) 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 intended to take forward the recommendations made under the referenced reports. The actions under the first iteration of the ITE recruitment plan have been completed and work is underway in collaboration with the ITE Partnerships to develop a new plan which is currently expected to be published by the end of 2024.

This previous and refreshed ITE recruitment plan continues to sit under and complement 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 includes 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 live in a diverse, safe, and cohesive Wales. The recommendations with respect to education within the 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* (WCPP, 2021) and *Improving Race Equality in Employment and Income* (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 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 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 Commitments](#) 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.

Welsh Government commissioned [several research reports](#) looking at specific facets of incentivisation strategies for teacher education via the EWC. Published in 2019 many of the report’s findings with regards to Wales’ incentive schemes have been taken forward. This evidence alongside [other Welsh Government commissioned reports](#) does suggest that financial incentives are not the key issue for most students who choose to enter ITE. However, as noted in the reports the issue is a complex one and needs to be set in the context of developing the profession as an attractive career proposition.

In contrast recent evidence related to England’s ITT incentive schemes (NfER 2022) advises that “There is strong and consistent evidence that training bursaries are associated with increases in ITT recruitment”. Further NfER research into England’s incentives, published November 2023, corroborated and expanded on these findings.

A data sharing agreement is currently being developed so that the Welsh Government and EWC can share data pertaining to the priority subject incentives and teachers who have

received this incentive for this purpose. Should this exercise be successful similar work on this proposal will be undertaken once a sufficient data has been collected. In addition, research is being scoped to go out to procurement to update our evidence base on the use of financial incentives as a recruitment tool. This research is not expected to report until 2026. The incentive package must be in place one academic year in advance of its implementation to support recruitment. The findings of the report will be explored and utilised to make appropriate changes which will be announced Autumn 2026 for the incentive package available AY2027/28.

The 2020 EWC report showed, via the [most recent available data](#) from the Higher Education Statistics Agency (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.

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 proposal encourages eligible applicants to apply for ITE and awards their completion of a PGCE (with QTS) and thereafter their completion of Induction in maintained settings in Wales; to retain our teaching talent in Wales.

The structure and operational delivery of the proposal 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 proposal is applied to each iteration.

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 proposal continues to be available to all 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 (Higher Education Institutions (HEIs)) and ITE students. HEIs 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.

HEIs have a 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 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 and is not an additional burden on ITE Students and their ITE providers.

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

2.1 People and Communities

The proposal does not make any fundamental changes to existing policy with this impact assessment reevaluating the proposal to record and mitigate any identified negative impacts. Student teachers are the direct beneficiaries of the proposal. There may be a small positive impact on those supporting a student teacher to qualify (more income coming into households), should student teachers have those support structures available to them.

The proposal 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.”

This proposal incentivises people into the teaching workforce via ITE. The teaching workforce can be considered to have access to [fair work](#) where [pay and employment](#)

conditions (including hours worked) are nationally considered and set in social partnership; access to a pension scheme and entitlement to further professional development is also provided; unions representing specific aspects of the education workforce are also available to the profession with these unions working in social partnership with the Welsh Government. The proposal therefore has a small positive impact to promote a profession with fair working practices supporting those that go into teaching (following successful completion of ITE)

2.2 Children's Rights

The proposal does not make any fundamental changes to existing policy with this impact assessment revaluating the Scheme to record and mitigate any identified negative impacts. 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.

Student teachers are direct beneficiaries with children and young people also receiving a minimal positive impact as the proposal is intended to support broader work to ensure a sufficient teaching workforce with the skills and knowledge required to teach the curriculum and ensure learners attainment and aspirations via education.

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.

The proposal does not 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. There have been no complaints from non-eligible student teachers since the implementation of the proposal. For those meeting the 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

The proposal does not make any fundamental changes to existing policy with this impact assessment reevaluating the proposal to record and mitigate any identified negative impacts.

Student teachers are the direct beneficiaries of the proposal, and they may or may not be living in a rural area as the proposal applies pan-Wales. Student teachers may also travel to study in other non-rural areas of Wales. It should be noted that with the recent loss of Aberystwyth University that there is only one ITE Partnership not located within south Wales (Bangor University) however Swansea University and UWTSD do provide some coverage across West and mid Wales with Cardiff Met and USW providing some coverage to mid-East Wales. The OU also provides coverage pan-Wales. Student teachers decide which ITE Partnership to study with and there is no impact on whether they would receive an incentive due to this decision nor due to their normal (non-term time) domicile.

There are not significant enough impacts via the proposal to warrant a full rural proofing impact assessment. While the operation of the proposal via digital spaces may exclude some there are expectations in place with regards to participating in ITE (a HEI qualification) more broadly (participation in ITE is a requirement to access the incentive) and the sources of support that can mitigate against those impacts. This is explored in more detail below.

Rural communities are more likely to suffer from digital exclusion than other communities (to note that other communities have also been identified as suffering disproportionate digital exclusion <https://www.gov.wales/sites/default/files/publications/2021-12/future-trends-report-wales-2021-infographic.pdf>) and as such individuals from such communities may find it difficult to access the internet and therefore digital guidance and mailboxes for specific queries and claim administration (HEIs administrate the first part of the incentive and eligible persons are required to claim on an individual basis direct to Welsh Government on completion of induction). 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, which include new teachers completing induction who are eligible for the final incentive payment, have access to the

Hwb network which provides them an email address alongside access to their schools digital infrastructure.

To mitigate any unintended consequences that may arise from the proposal being operated via digital spaces Welsh Government will ensure that claim forms and guidance can be accessed via smart phones mobile view display. All publications on gov.wales must also meet specific accessibility requirements meeting or exceeding the required statutory requirements.

2.5 Health

No impact positive or negative. For those eligible persons in receipt of the proposal there is a direct positive impact, but this is not a direct health impact. For the purposes of the proposal, we have never collected health data, economic backgrounds, mental wellbeing etc. of recipients. The impact of the proposal is most obviously a one-off economic benefit however with no secondary data on the above it is difficult to evidence health impacts stemming from that benefit. There could be a very small positive impact on mental wellbeing, economic conditions affecting health, living conditions affecting health (on a short/mid-term basis as it is one grant made in two instalments only, typically over 2 academic years / three financial years). This small impact may be differential depending on the demographic group a recipient belongs to – in this case ethnic minority communities. Gathering data and evidence of health impact of this proposal could be considered disproportionate as it would require significant resource.

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 proposal does not make any fundamental changes to existing policy with this impact assessment revaluating the Scheme to record and mitigate any identified negative impacts.

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. There is however no evidence of this positive impact and research into evidencing, or not, this impact would be hard to parse from the broader anti-racist Wales work and the new curriculum.

No negative impacts have been identified.

3.2 Welsh Language

The operational delivery of the proposal 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 proposal. There are no identified impacts for Business and the public. Student teachers are direct beneficiaries with children and young people also receiving a minimal positive impact as the proposal is intended to support broader work to ensure a sufficient teaching workforce with the skills and knowledge required to teach the curriculum and ensure learners attainment and aspirations via education. The broader purpose and goals of education has positive impacts on economic wellbeing however the impact of this proposal is not significant.

4.2 Public Sector including local government and other public bodies

The ITE Partnerships are the intermediaries for the operational delivery of the first part of the proposal as it operates as a grant. They are paid for this involvement via a contract framework which is open to any HEI that provides ITE with QTS in Wales. 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 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.

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?

Under Section 9 of the Environment (Wales) Act 2016, the Welsh Ministers are required to prepare, publish and implement a natural resources policy and to take all reasonable steps to implement it and to encourage others to take such steps. The [Natural Resources Policy](#) was published in August 2017.

You will need to consider and, where required, complete the following assessments to ensure all reasonable steps have been taken:

Required for all proposals:	Natural Resources Policy national priorities, challenges and opportunities	5.1a 5.1b
Required for all proposals	Biodiversity	5.2 and Annex F
Required for all proposals	Climate Change	5.3
Certain plans and programmes requiring SEA under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004	Strategic Environmental Assessment	5.4 and IIA Guidance
Proposals which may affect a Special Area for Conservation or a Special Protected Area (SAC/SPA):	Habitats Regulations Assessment	5.5 and IIA Guidance

Certain projects relating to town and country planning; transport; agriculture; forestry; marine, land drainage; and electricity which require EIA under the various EIA Regulations	Environmental Impact Assessment	5.6 and IIA Guidance
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5.1 Natural Resources

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

The proposal does not make any fundamental changes to existing policy with this impact assessment reevaluating the proposal to record and mitigate any identified negative impacts.

The proposal does not deliver on the National priorities in the Natural Resources Policy.

Tangential aspects are however related to teaching children and young people the Curriculum for Wales and aspects within the Curriculum pertaining to the natural environment. The proposal supports work to ensure a teaching workforce with the skills and knowledge to deliver the Curriculum for Wales which is the primary vehicle for educating children and young people on the natural world however the direct positive impact of the proposal will be negligible to none.

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

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

The proposal supports work to ensure a teaching workforce with the skills and knowledge to deliver the Curriculum for Wales which is the primary vehicle for educating children and young people on the natural world and the management of our natural resources however the direct positive impact of the proposal will be minimal.

5.2 Biodiversity

To demonstrate compliance with Section 6 of the Environment (Wales) Act 2016, you must complete the How will the proposal affect Welsh medium education and Welsh learners of all ages, including adults (both positive and/or adverse effects)?

No impact. However, programmes of ITE (and the teaching standards) require student teachers (and teachers on entry to the workforce) to improve their Welsh language skills across their career. The proposals may support a student to enter a programme of ITE where they may not have done otherwise and thereby improving their Welsh language skills whatever their starting point.

- ♦ How will the proposal affect services available in Welsh (both positive and/or adverse effects)? (e.g. health and social services, transport, housing, digital, youth, infrastructure, environment, local government etc.)

The proposal is an intervention to support the diversification of student teachers. There is likely no impact in this area.

How will you ensure that people know about services that are available in Welsh and are able to access and use them as easily as they can in English? What evidence / data have you used to inform your assessment, including evidence from Welsh speakers or Welsh language interest groups?

The incentive package for ITE in Wales (of which this proposal is one part) is marketed via Welsh Government channels and Educators Wales. Other stakeholders including the Coleg also share social media posts and other collateral. The marketing work is undertaken by the Welsh Government comms team (via contractors) and EWC in partnership with others (such as the Coleg). They undertake audience research to ensure that the incentives and how they are marketed is relevant to potential applicants. Welsh speakers (Welsh speaking graduates) are a key audience for this marketing.

The ITE Partnerships also utilise the proposal as part of their recruitment work. The partnerships also provide ongoing feedback on the high-level policy and operational delivery to support a virtuous cycle of improvement.

Operational delivery: All documentation and the application process related to the proposal is subject to the Welsh language standards.

- ♦ What other evidence would help you to conduct a better assessment?

An evaluation into the use of incentives as a recruitment tool is planned for 2026 and will inform the use of incentives in future.

- ♦ How will you know if your policy is a success?

Race / ethnicity data is collected by HESA and currently shows that BAME students are not entering ITE compared to other postgraduate courses. An improvement in this statistic

and an increase in the number of BAME student teachers will indicate that the incentivisation has worked and can end. In addition, An evaluation into the use of incentives as a recruitment tool is planned for 2026 and will inform the use of incentives in future.

Biodiversity Impact Assessment, at annex F below.

5.3 Climate Change

5.3a Carbon

How will the proposal affect greenhouse gas emissions?

Officials have considered the carbon impact of this advice. We have not quantified the emissions associated with it because we expect them to fall below the threshold for a quantitative analysis. We have high confidence in our assessment.

5.3b Climate resilience

Not applicable

5.4 Strategic Environmental Assessment (SEA)

The proposal does not have any impacts in the specified key areas (as per the guidance) – agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, tourism, town and country planning or land use.

5.5 Habitats Regulations Assessment (HRA)

The proposal does not affect any of the protected sites as listed in the guidance.

5.6 Environmental Impact Assessment (EIA)

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

The proposal does not require a SEA by law as it does not involve the list as outlined under the guidance (Doc name: Publish – IIA Guidance – English – v.3.3)

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.’ This is of relevance as Black, Asian and Minority Ethnic communities are more likely to have lower socio-economic backgrounds.

The proposal is not a strategic decision but is an output related to, and supporting the aims of, the broader education reforms in Wales through ensuring a sufficient teaching workforce to deliver the Curriculum for Wales to children and young people.

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	No	Complete the Socio-economic Duty Assessment below
Rural Proofing	No	Complete the Error! Reference source not found. 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 How will the proposal affect Welsh medium education and Welsh learners of all ages, including adults (both positive and/or adverse effects)? No impact. However, programmes of ITE (and the teaching standards) require student teachers (and

		teachers on entry to the workforce) to improve their Welsh language skills across their career. The proposals may support a student to enter a programme of ITE where they may not have done otherwise and thereby improving their Welsh language skills whatever their starting point. ♦ How will the proposal affect services available in Welsh (both positive and/or adverse effects)? (e.g. health and social services, transport, housing, digital, youth, infrastructure, environment, local government etc.) The proposal is an intervention to support the diversification of student teachers. There is likely no impact in this area. How will you ensure that people know about services that are available in Welsh and are able to access and use them as easily as they can in English? What evidence / data have you used to inform your assessment, including evidence from Welsh speakers or Welsh language interest groups? The incentive package for ITE in Wales (of which this proposal is one part) is marketed via Welsh Government channels and Educators Wales. Other stakeholders including the Coleg also share social media posts and other collateral. The marketing work is undertaken by the Welsh Government comms team (via contractors) and EWC in partnership with others (such as the Coleg). They undertake audience research to ensure that the incentives and how they are marketed is relevant to potential applicants. Welsh speakers (Welsh speaking graduates) are a key audience for this marketing. The ITE Partnerships also utilise the proposal as part of their recruitment work. The partnerships also provide ongoing feedback on the high-level policy and operational delivery to support a virtuous cycle of improvement.
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		Operational delivery: All documentation and the application process related to the proposal is subject to the Welsh language standards. ♦ What other evidence would help you to conduct a better assessment? An evaluation into the use of incentives as a recruitment tool is planned for 2026 and will inform the use of incentives in future. ♦ How will you know if your policy is a success? Race / ethnicity data is collected by HESA and currently shows that BAME students are not entering ITE compared to other postgraduate courses. An improvement in this statistic and an increase in the number of BAME student teachers will indicate that the incentivisation has worked and can end. In addition, An evaluation into the use of incentives as a recruitment tool is planned for 2026 and will inform the use of incentives in future. 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

* Mandatory for all proposals in order to meet statutory obligations.

Please refer to the supporting information found on the Integrated Impact Assessment intranet page. This page contains a list of [Integrated Impact Assessment Policy Area Leads & Experts](#) who offer support for impact assessment. An early conversation with an internal expert advisor will set you on the right path.

SECTION 8. CONCLUSION

(Please note that this section will be published)

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 also has the potential for a small positive impact on ethnic minority communities and their children. The increase of teaching staff from ethnic minorities will promote the profession (which can be considered a fair work 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 in a small way – 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. There is also a planned evaluation to include the use of incentives as a recruitment tool within its scope, due to report late 2026, which will be used to review the proposal alongside the other data sources noted.

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

Date: 23/09/2024

FULL IMPACT ASSESSMENTS

A. CHILDREN’S RIGHTS IMPACT ASSESSMENT

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

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

The CRIA process is the agreed mechanism officials should use to support Ministers to meet this duty and ensure they give balanced consideration to children’s rights in their decision making. A CRIA should be used to inform ministerial advice and must be completed prior to a ministerial decision being made. Once a decision has been reached, your CRIA must also be published.

Policy objectives

What decision are you impact assessing?

The proposal does not make any fundamental changes to existing policy with this impact assessment reevaluating the proposal to record and mitigate any identified negative impacts.

The proposal 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

1. Gathering evidence and engaging with children and young People

- What existing research and data on children and young people is available to inform your specific policy? Your policy objective may impact on other policy areas – discussions with other policy teams will be an important part of the impact assessment process ensuring you have gathered a range of information and evidence.

- Using this research, how do you anticipate your policy will affect different groups¹ of children and young people, both positively and negatively? Please remember policies focused on adults can impact children and young people too.
- What participatory work with children and young people have you used to inform your policy? If you have not engaged with children and young people, please explain why.²

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 small, indirect, and will take some time to come into effect.

Young people (aged 14 and up) were interviewed as part of the research and reports that underpins this policy but were not asked directly about this proposal.

2. Analysing the evidence and assessing the impact

- Using the evidence you have gathered, what impact is your policy likely to have on children and young people? What steps will you take to mitigate and/or reduce any negative effects?
- How does your proposal enhance or challenge children's rights, as stipulated by the UNCRC articles and its Optional Protocols? Please refer to the [articles](#) to see which ones apply to your own policy.

¹ You may, for instance, consider how your policy would affect the following groups of children and young people differently: early years, primary, secondary, young adults; children with additional learning needs; disabled children; children living in poverty; Black, Asian and minority ethnic children; Gypsies, Roma and Travellers; migrants; asylum seekers; refugees; Welsh-language speakers; care experienced children; LGBTQ+ children. Please note that this is a non-exhaustive list and within these cohorts there will not be one homogenous experience.

² Article 12 of the UNCRC stipulates that children have a right to express their views, particularly when adults are making decisions that affect them, and to have their opinions taken into account.

UNCRC Articles or Optional Protocol		Enhances (X)	Challenges (X)	Explanation
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.		X		Supporting the development of a more diverse teaching workforce allows for teachers with lived experience of racism to work with similarly affected children. It also has the potential to place those teachers in decision making positions where they may be able to reach nuanced outcomes where those without lived experience may not.
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.		X		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 in a small way for those learners from diverse communities to supporting an increase in awareness of the cultural and racial diversity in Welsh society to all learners.
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		X		

country where they live				
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- Consider whether any EU Citizens Rights (as referenced in the Equality Impact Assessment) relate to young people up to the age of 18.

N/A for this proposal. The direct beneficiaries are student teachers over the age of 18. Any indirect impacts applying to children and young people will apply to those holding EU citizen status.

3. Ministerial advice and decision

- How will your analysis of these impacts inform your ministerial advice?
 - *Once completed, your CRIA must be signed off by your Deputy Director.*
 - *Your CRIA findings should be integrated into your ministerial advice to inform their decision.*

The advice will recommend that the proposal should remain in its current form and continue.

4. Publication of the CRIA

- *Following the ministerial decision, the CRIA should be published on the Welsh Government website.*
- *Send sections 1 and 8 of your IIA and the CRIA (Annex A) to your departmental web manager for publishing.*
- *All completed CRIAs must also be sent to the [REDACTED] mailbox.*

5. Communicating with Children and Young People

- If you have sought children and young people's views on your proposal, how will you inform them of the outcome?
N/A

6. Monitoring and Review

It is essential to revisit your CRIsAs to identify whether the impacts that you originally identified came to fruition, and whether there were any unintended consequences.

Where you are taking forward secondary legislation, it will not be sufficient to rely on the CRIA for the primary legislation; you will need to update the CRIA to consider how the details of the proposals in the regulations or guidance may affect children.

The policy lead can revisit the published version of their CRIA, rename it as a review of the original CRIA, and update the evidence of impact. The reviewed impact assessment should be presented to Ministers with any proposals to amend the policy, practice or guidance. This review CRIA should also be published.

- Please outline what monitoring and review mechanism you will put in place to review this CRIA.

The proposal is reviewed annual against the ITE recruitment data and workforce data. Alongside this any new evidence, research or relevant data including feedback from stakeholders is considered to determine whether the proposal should continue. ITE Policy team continue to work with stakeholders including DARPL – who are continuing their research into supporting the diversity of student teachers, and ITE community mentors to research and develop how to attract BAME applicants to ITE and how to diversify the teaching workforce. This may on occasion include research into children and young people’s views. This work does not occur annually but will inform the ongoing development and delivery of the proposal. There is also research planned in 2026 that will investigate the use of incentivisation as a recruitment tool; this may seek the views of young people (under 18’s)

- Following this review, are there any revisions required to the policy or its implementation?

No



B. EQUALITY IMPACT ASSESSMENT

C. DATA PROTECTION IMPACT ASSESSMENT SCREENING

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

Title of proposal: Implementation of the Minority Ethnic Incentive Scheme
Name of Information Asset Owner: Kevin Palmer
PIA reference number: [REDACTED]
Summary: This is an existing 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 and ITE university providers (ITE providers) 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 by the WG. The grant offer letter to ITE providers will include a <i>Requirements of the UK GDPR</i> schedule which will stipulate requirements set out in UK GDPR, Article 28 (3).

The EWC:

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 – On completion of their statutory induction period participant claims induction payment from WG

5.0 – The WG checks the information against that already held for the participant and processes the claim prior to payment direct to the individual.

6.0 – 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.

7.0 - 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)	
Name – Yes Address – Yes Postcode – Yes Business address – – employing school where induction was completed Yes Email address – Yes	Telephone numbers - Yes Date of birth – Yes Driving licence number - no Passport / ID card number - no Photographs / images (which could be used to identify an individual) - no <u>Other (please specify):</u> Teacher Reference Number Yes ITE programme (and start/ resumption date), ITE partnership and year of study Yes Previous degree qualification Yes Award of QTS Yes Completion of Induction Yes Where applicable (does not apply to the majority of participants): Withdrawal / Suspension of studies Yes Reason for withdrawal / suspension (from a specified list): Mitigation Circumstances; Yes Insufficient Academic achievement; Unknown. Yes

	Expectation and timeframe (academic year) participant is expected to resume studies. Yes Bank details Yes
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 proposal 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 proposal 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 Seekers 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, this was not reached in 2022-23. The latest information from AY2023-24 suggests that 61 students are eligible for the scheme in its an increase from the 41 in the first year 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)

Will the data be shared?	Details: <u>For scheme administration:</u> From ITE providers (processor) to: - WG (controller) for financial and scheme administration, monitoring and scheme evaluation purposes. <u>For statistical and research purposes:</u> From WG to EWC (for which both are controllers) in order 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: - <u>UK GDPR: Article 9(2)(g)</u> – Reasons of substantial public interest (with a basis in law) - <u>DPA 2018, schedule 1, para 6 (substantial public interest condition):</u> Condition 6 - Statutory etc. and Government Purposes (with a basis in law) The legal basis for the above ‘public interest’ articles/ conditions are: Scheme Administration: • <u>Sections 14 to 17 of the Education Act 2002</u> 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 on to enter the workforce. This will be used to evaluate the success of the scheme (see ‘[scheme evaluation](#)’ below) 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.

[Scheme evaluation:](#)

[Section 10 of the Education Act 1996](#), which allows the Secretary of State to promote the education of people in England and Wales, together with section 58A of the Government of Wales Act 2006 (which allows the Welsh Ministers to do anything which is calculated to facilitate, or is conducive or incidental to, the exercise of any of their other functions).

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.
Have legal Services confirmed that the basis outlined above provides the necessary statutory gateway for processing (including any proposed sharing)? The information requested is exempt from disclosure under section 42(1) of the Freedom of Information Act 2000, which relates to legal professional privilege.
Will the proposal involve new or significantly changed processing of personal data about each individual? No – the scheme is continuing as normal
Will the personal data be consolidated, linked or matched with data from other sources? • Yes (please provide details) 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 the DPIA will be updated as part of that work. At present (July 2024) there are insufficient cohorts that have received the incentive to undertake this work at this time.
Will the personal data be used for automated decision making? • No
Will the personal data result in systematic monitoring of data subjects? • No

See above - 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 the data WG will receive as a result of this project will be anonymised and amalgamated. This information will be unsuppressed and unrounded, so potentially disclosive, but it will be the trends that are evaluated to determine the success of the scheme. **This however will be a separate project** and the DPIA will be updated as part of that work.. At present (July 2024) there are insufficient cohorts that have received the incentive to undertake this work at this time.

Does the proposal involve new or changed data collection, retention or sharing policies/practices for personal data?

- No
- This is a relatively new scheme which has now been operating for two academic years, 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). Ethnicity data is required 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)
-

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 standard WG grant conditions we will retain the data for 10 years for financial monitoring purposes however going forward data collected that is older than 10 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 10 years. Where this happens, for the purpose of this project alone, records will be kept until the project ends.

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.

For completion by Information Rights Unit

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.

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.

A full DPIA was undertaken for previous years processing, and this should be reviewed and updated where appropriate to reflect the changes in the processing for this DPIA screening. The updated completed DPIA should be returned to Information Rights Unit for comment.

Has advice on General Data Protection Regulation (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. Where personal data is processed on behalf of the Welsh Government by ITE Providers.](#)
- Does the proposal require a data sharing agreement to be drafted? No. There is no sharing of personal data beyond that with the appointed contractor which will be covered by the data processor contract.

Note: The proposed evaluation has not been considered as part of this DPIA screening as it will be a separate project and separate DPIA screening will be conducted as part of the scoping of that work.

D. WELSH LANGUAGE IMPACT ASSESSMENT=

1. Welsh Language Impact Assessment reference number

Clearance code - 05/09/2024

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 2021-2026? [Cymraeg 2050 work programme 2021-2026](#)

No. This proposal concerns the ongoing delivery of the Minority Ethnic 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 meets the Welsh language standards and Welsh Government rules/best practise with regards to the bilingual delivery of grant schemes. The proposal is 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 / 'free-lancers'
- Black Asian and Minority Ethnic Graduates
- 'Stay at home' parents and carers

3. 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 negative 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. Welsh Government does not collect data from eligible persons (eligible for this proposal) on their Welsh speaking ability as it does not pertain to the eligibility criteria of this proposal. We therefore have no data nor evidence on this potential impact.

How will the proposal affect the sustainability of Welsh speaking communities⁷ (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.

- ♦ How will the proposal affect Welsh medium education and Welsh learners of all ages, including adults (both positive and/or adverse effects)?

No impact. However, programmes of ITE (and the teaching standards) require student teachers (and teachers on entry to the workforce) to improve their Welsh language skills across their career. The proposals may support a student to enter a programme of ITE where they may not have done otherwise and thereby improving their Welsh language skills whatever their starting point.

- ♦ How will the proposal affect services⁸ available in Welsh (both positive and/or adverse effects)? (e.g. health and social services, transport, housing, digital, youth, infrastructure, environment, local government etc.)

The proposal is an intervention to support the diversification of student teachers. There is likely no impact in this area.

How will you ensure that people know about services that are available in Welsh and are able to access and use them as easily as they can in English? What evidence / data have you used to inform your assessment, including evidence from Welsh speakers or Welsh language interest groups?

The incentive package for ITE in Wales (of which this proposal is one part) is marketed via Welsh Government channels and Educators Wales. Other stakeholders including the Coleg also share social media posts and other collateral. The marketing work is undertaken by the Welsh Government comms team (via contractors) and EWC in

⁷ These can be close-knit rural communities, dispersed social networks in urban settings, and in virtual communities reaching across geographical spaces.

⁸ The Welsh Language Strategy aims to increase the range of services offered to Welsh speakers, and to see an increase in use of Welsh-language services.

partnership with others (such as the Coleg). They undertake audience research to ensure that the incentives and how they are marketed is relevant to potential applicants. Welsh speakers (Welsh speaking graduates) are a key audience for this marketing.

The ITE Partnerships also utilise the proposal as part of their recruitment work. The partnerships also provide ongoing feedback on the high-level policy and operational delivery to support a virtuous cycle of improvement.

Operational delivery: All documentation and the application process related to the proposal is subject to the Welsh language standards.

- ♦ What other evidence would help you to conduct a better assessment?

An evaluation into the use of incentives as a recruitment tool is planned for 2026 and will inform the use of incentives in future.

- ♦ How will you know if your policy is a success?

Race / ethnicity data is collected by HESA and currently shows that BAME students are not entering ITE compared to other postgraduate courses. An improvement in this statistic and an increase in the number of BAME student teachers will indicate that the incentivisation has worked and can end. In addition, An evaluation into the use of incentives as a recruitment tool is planned for 2026 and will inform the use of incentives in future.

E. BIODIVERSITY IMPACT ASSESSMENT

Consider Questions 1 - 9 for ALL policies:

The Courts have established that public bodies are those whose functions are governmental in a broad sense. Such bodies are generally characterised by having one or more of the following characteristics - special powers, democratic accountability, public funding, obligations to act in the public interest, providing a public service and statutory constitutions. A distinction may be drawn between core public authorities such as central and local governments that are purely public in nature and hybrid public authorities that may conduct both public and private functions.

ITE providers are accountable as public authorities or public bodies in several contexts including under the provisions of the Freedom of Information Act 2000, Equality Act 2010, under the public procurement regime, the Welsh Language Standards and are susceptible to judicial review.

In the context of the ITE incentive grant schemes, these are publicly funded via a statutory scheme and are specifically administered on behalf of the Welsh Ministers who are a core public authority.

In all the circumstances even if the ITE providers might be considered hybrid bodies generally, in the context of the incentive grant schemes in question there is a strong argument that they are exercising public functions and therefore for these purposes are public bodies subject to the section 6 duty under the Environment (Wales) Act 2016.

HEIs are already subject to the public procurement regime and as such will already have regard to procurement practises that support and embed biodiversity. This proposal does not require HEIs to procure services or resources that fall outside of those functions the HEI will already undertake – administration of qualifications. Admin staff and ICT equipment is therefore already a requirement for HEIs to undertake their core function of providing education. The proposal has no impact beyond staff time (as per the contract) and utilisation of existing equipment / digital communication and 'spaces'.

ITE qualifications continue to require that student teachers are prepared to deliver the Curriculum for Wales which includes teaching and raising awareness about biodiversity and the environment. The proposal supports work to ensure a teaching workforce with the skills and knowledge to deliver the Curriculum for Wales which is the primary vehicle for educating children and young people on the natural world and the importance of biodiversity however the direct positive impact of this specific proposal will be minimal.

The proposal does not make any fundamental changes to existing policy with this impact assessment revaluating the Scheme to record and mitigate any identified negative impacts. We do not consider there to be any impact on biodiversity 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.

Embedding biodiversity

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

The proposal is on the continuation of an existing policy intervention and does not make any fundamental changes. This impact assessment revaluates the proposal to record and mitigate any identified negative impacts and identify where positive impacts maybe enhanced. The proposal does not integrate biodiversity into decision making. HEIs and Schools/Local Authorities are public bodies and therefore will already have processes in place that consider their responsibilities under the Environmental (Wales) Act 2016.

The operational delivery of the scheme is subject to a virtuous cycle of improvement with our delivery partners. For all our incentive schemes we have updated the delivery to become more streamlined and utilise digital processes as opposed to heavy carbon cost processes such as paper forms. This improvement cycle continues, and should possible adjustments be available that support the environment and biodiversity these will be taken forward.

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

No direct impacts identified, either positive or negative on biodiversity. No action has been taken in this regard. The proposal does not integrate biodiversity into decision making beyond improvements to operational delivery.

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

No direct impacts identified, either positive or negative on biodiversity. ITE qualifications continue to require that student teachers are prepared to deliver the Curriculum for Wales which includes teaching and raising awareness about biodiversity and the environment. This proposal is part of broader work to ensure that there is a sufficiently skilled and knowledgeable specialist teaching workforce to deliver all aspects of the curriculum.

Improving our evidence, understanding and monitoring**4. Have you used the best available evidence of biodiversity to inform your proposal and this assessment?**

No direct impacts identified, either positive or negative on biodiversity

There is no requirement under the proposal for construction or land management.

As noted above the proposal does not directly impact upon the environment and biodiversity other than indirect carbon costs arising from operational delivery. We are unable to measure these impacts in any meaningful way and therefore we consider that there are no impacts related 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.

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

No direct impacts identified, either positive or negative on biodiversity. As noted above the only impact noted related to the environment and therefore biodiversity is indirect carbon costs which we are unable to measure in a meaningful way.

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

No direct impacts identified, either positive or negative on biodiversity. There are no explicit or direct links to support the body of knowledge for biodiversity however ITE qualifications continue to require that student teachers are prepared to deliver the Curriculum for Wales which includes teaching and raising awareness about biodiversity

and the environment. This indirectly means the education of children and young people to our existing knowledge base for biodiversity (and support their potential to engage in future to further enhance our knowledge base and capacity). This proposal is part of broader work to ensure that there is a sufficiently skilled and knowledgeable teaching workforce to deliver all aspects of the curriculum.

Governance and support for delivery of biodiversity action

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

The proposal could indirectly support biodiversity - ITE Partnerships are required to support schools and beginner/student teachers to understand and support their local communities which could include practical action with children and young people under activity to deliver the local/national curriculum. The proposal is part of broader work to ensure a sufficient supply of teachers to teach the curriculum and therefore enough student teachers / teachers overall. However, there is no funding available to support such initiatives within the context of initial teacher education.

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

No direct impacts identified, either positive or negative on biodiversity. There are no explicit or direct links to support the body of knowledge of capacity for biodiversity action however ITE qualifications continue to require that student teachers are prepared to deliver the Curriculum for Wales which includes teaching and raising awareness about biodiversity and the environment. This indirectly means the education of children and young people to our existing knowledge base for biodiversity (and support their potential to engage in future to further enhance our knowledge base and capacity). The proposal is part of broader work to ensure that there are sufficient teachers to teach all aspects of the curriculum including biodiversity aspects.

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

No direct impacts identified, either positive or negative on biodiversity. No except for impact assessments for various ITE policy proposals.

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

Not applicable