

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	Ethnic Minority Initial Teacher Education Incentive
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SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

Summary

This integrated impact assessment (IIA) is an update for the Ethnic Minority Initial Teacher Education (ITE) incentive scheme AY2026/27 (the 'proposal'). The initial IIA was conducted in 2022, with further iterations completed 2023 and 2024, assessing changes to the scheme made at that time. Following the annually scheduled review on the proposal ready for delivery in AY2026/27 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 the then Minister for Education's accepting the recommendations made in the March 2021 [Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group Final Report](#). The report makes numerous recommendations about the curriculum, resources, professional learning and the workforce including Recommendation 9: *Welsh Government should provide specific scholarships to support Initial Teacher Education students from people from ethnic minority groups.*

Current Context

[The Anti-racist Wales Action Plan: 2024 update](#) commits Welsh Government and the organisations for which we have a direct responsibility to actions whereby ethnic minority staff are represented in all areas of the workforce at a level that matches the society we serve. School teachers in Wales are not directly employed by Welsh Government however this commitment to a representative public sector includes our school teaching workforce and is in addition to our education specific goal to increase recruitment of teachers from ethnic minority communities into the education sector with a clear focus on recruitment on to initial teacher education programmes.

The Ethnic Minority Initial Teacher Education Scheme has been in place since AY2022/23. [At that time the Schools Workforce Annual Census](#) showed that 1.2% of the teaching workforce were of Black, Asian, Mixed or Other ethnicity. As of [November 2024](#) 1.3% of the teaching workforce are Black, Asian, Mixed or Other ethnicity.

The Black, Asian and Minority Ethnic learner population during the implementation of the proposal was 12%. The [Schools Census results from January 2025](#) show an increase to 15% Black, Asian and Minority Ethnic learners in Wales.

The latest HESA data shows that 16% of enrolments for non ITE postgraduate courses in Wales were from Black, Asian and Minority Ethnic students compared to 6% of enrolments for ITE postgraduate courses in Wales from Black Asian and Minority Ethnic students.

Since the implementation of the proposal further research by the Children’s Commissioner for Wales in the 2023 [Spotlight Report: ‘Take it Seriously’: Children’s experiences of Racism within Secondary Schools](#) provided further evidence on the need to diversify the teaching workforce and improve all children’s and young people’s experiences in schools:

"Children stated that they would like to see more ethnically diverse teachers, who would better understand diverse ethnic cultures as well as relating more to their experiences of racism." (Children’s Commissioner for Wales, 2023:31)

The United Nations Committee on the Elimination of Racial Discrimination advises in its 2024 report [Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of the United Kingdom of Great Britain and Northern Ireland](#) of its concerns regarding the “underrepresentation of teachers from ethnic minorities in the school system” recommending to “Take effective steps to increase the representation of teachers from ethnic minorities in the school system to reflect better the communities they serve.”

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 underrepresentation in the teaching workforce with only 3% of teachers on the EWC register identifying as being from an ethnic minority against a learner population of 12% (EWC, 2020:11) (in 2025 this is now 15%). Data from the [Schools Workforce Annual Census \(SWAC\) from November 2021](#) showed that only 1.1% of teachers were of Black, Asian, Mixed or Other ethnicity. In 2024 this had risen to 1.3%.

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 advised 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 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 then 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, and students and teachers from minority ethnic backgrounds, focusing on participants’ perceptions and the lack of diversity in the education workforce in Wales.

A clear synergy was apparent 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 in October 2021 to take forward these and other recommendations. The actions under the first iteration of the ITE recruitment plan have been completed. Work in collaboration with the ITE Partnerships and our community mentors has been completed to develop a refreshed plan and is expected to be published Autumn 2025. The previous and forthcoming refreshed recruitment plan continues to sit under and complement the Welsh Government’s broader work and commitment to an [anti-racist Wales](#).

Addressing racial, ethnic, and religious intolerance that is systemic and institutional is one of Welsh Government’s key goals towards an Anti-racist Wales 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 2022 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 2022 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”.

Our commitment to an Anti-Racist Wales includes increasing recruitment of teachers from ethnic minority communities into the Education sector including recruitment on to Initial Teacher Education (ITE) programmes with the *Anti-Racist Wales Action Plan (2022)* 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.”

This commitment to improving the recruitment of diverse teachers via ITE continues under the *Anti-Racist Wales Action Plan: 2024 Update*. 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 an Anti-Racist Wales and supports the Well-being Goal for a Wales of cohesive and safe communities.

Initial Teacher Education 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 all Wales' learners as required under the Well-being of Future Generations Act (2015). 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.

We support the recruitment of graduates into Wales' ITE programmes and thereafter the teaching workforce through a range of activities. Financial incentives are one set of actions to make the teaching profession attractive to graduates most needed in the teaching workforce. They are specifically targeted at cohorts of graduates where recruitment into ITE is most challenging and an identified requirement in the school teaching workforce, needed to ensure the education for our children and young people, and their positive experiences in schools. The ITE incentive schemes are intended to incentivise graduates, who may have numerous career options available to them, to consider teaching as a career and to complete the key points of a teacher's statutory training to become fully qualified. The other incentive schemes on offer in Wales are the:

- Priority Subject Incentive scheme
- Iaith Athrawon Yfory Incentive scheme

The primary aim of all Welsh Government's ITE incentives schemes is 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 highly-targeted recruitment intervention to proportionally address immediate, identifiable shortages in ITE recruitment and the teaching workforce. 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 enrolled on ITE programmes in Wales 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 a student finance package.

The efficacy of financial incentives to encourage graduates to enter specific professions is a complex one and needs to be set in the context of developing the teaching profession as an attractive career proposition. [2022 research](#) and [further 2023 research](#) (using England's ITE data and incentive scheme broadly equivalent to the Priority Subject Incentive scheme) shows consistent evidence that increases in incentives increase recruitment. Welsh [research into recruitment](#) (and retention) of teachers into the workforce (conducted by EWC on behalf of the Welsh Government), [Welsh Government research](#) and [OECD research](#) indicate that incentivising entry into ITE is not the only consideration for ITE applicants and should form part of a wider holistic package of policy interventions. These include considerations around graduate levels of pay and conditions, early years support and professional development, and actions around pay, workload and well-being.

Further [research](#) into Wales' Priority Subject Incentive scheme is underway and expected to report in 2026. Analysis into the retention levels of teachers that received a priority subject incentive scheme grant payment over the last decade is also underway following a

data sharing project with the EWC. This report is expected to be published Autumn 2025. Cardiff Metropolitan University are undertaking a second study on the recruitment and retention of minority ethnic teachers in Wales. It aims to assess the current situation, identify any progress made, and highlight ongoing challenges since the [original research commissioned by the Welsh Government in 2021](#). Findings from the research and reports will be considered regarding the future of this proposal, and the other ITE incentive schemes on offer in Wales.

The 2020 EWC report showed, via the data available from the Higher Education Statistics Agency (HESA) at that time, 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). [The latest HESA data](#) (see current context section) indicates that while our percentage of Black, Asian and Minority Ethnic student teachers has increased (to 6% from [5% in 2021/22](#)) as a proportion of total ITE enrolments, the percentage of enrolments from Black, Asian and Minority Ethnic students is lower for ITE postgraduate courses compared with non ITE postgraduate courses.

As noted above the intention of the ITE incentive schemes is to tackle specific recruitment issues for ITE by attract graduates into ITE programmes that, as a cohort, are not enrolling on the programmes, and to address broader shortages in the teaching workforce. The HESA data shows a continued need to attract Black, Asian and Minority Ethnic graduates into considering teaching as a career via programmes of ITE. While improvements in ITE recruitment data can be seen, which may be attributable to the proposal’s implementation since 2022 (alongside the implementation of the Black, Asian and Minority Ethnic ITE Recruitment plan), workforce data continues to show low levels of diversity when compared to the increasing diversity of our learners in Wales. The continuation of the Ethnic Minority ITE incentive scheme is therefore required to address the ongoing low recruitment levels of Black, Asian and Minority Ethnic student teachers recruited into ITE with the aim of addressing the poor levels of ethnic diversity within our teaching workforce in Wales. The proposal continues to align with the various reports, evidence reviews, and Government plans detailed above, including more recent reports since first implementation in AY2022/23.

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 the issue of low levels of diversity in our teaching workforce. Welsh Government will continue to monitor the data and evidence for the ongoing continuation of the proposal alongside evidence for the efficacy of financial incentivisation to support recruitment into ITE via the ITE incentive schemes in Wales.

The proposal will continue its current payment structure; on award of completion of a PGCE (with QTS) and thereafter completion of Induction in maintained settings in Wales; to retain our teaching talent in Wales after completion of a Welsh ITE programme.

Should a person be eligible for any of the ITE Incentive schemes it does not impact on:

- the statutory ITE entry requirements in Wales that all ITE applicants must meet,
- assessment decisions made by universities regarding their achievement of an ITE qualification including the award of Qualified Teacher Status (QTS), and
- employment decisions made by local authorities and school governors when determining the needs of the children and young people in their schools and thereby their specific requirements for their teaching workforce.

The financial incentives to enter ITE are kept under review and decisions on the financial support offered are made on an annual basis. The structure and operational delivery of the proposal is subject to a virtuous circle of improvement via engagement with our ITE Partnerships, student teachers and early career teachers. As such learning in the ongoing development of the proposal is applied to each iteration every academic year. From AY2025/26 an online application process for all ITE incentives schemes will be implemented and has been designed following feedback from student teachers, ITE Partnerships and early career teachers. These groups have been involved in the development and testing of the new system and this operational change has been impact assessed as part of this wider impact assessment.

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 requirement 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 re-evaluating 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 (with more income coming into households at certain points in a student teacher's/early career teacher's statutory training), should eligible persons 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 re-evaluating 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 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 can achieve their 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 criterion 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 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 has been one concerned correspondent, identifying as a prospective applicant for ITE, who submitted a Freedom of Information request expressing concerns as someone who identified as White. There have been no complaints from enrolled student teachers since the proposal has been implemented; as administrators of the incentive schemes our ITE Partnerships are required to advise and if necessary, escalate any concerns or complaints received from ITE students to Welsh Government. Since announcement in 2021 and implementation in 2022, two further Fol requests have been received from members of the public, a complaint from a member of the public around the policy submitted to the general Welsh Government complaint mailbox, a general query from a member of the public (based in London) and a Treat Official correspondence again from a member of the public. Officials do not consider this level of concern from the public to indicate that Welsh Government is failing to meet the general duty to foster good relations. We continue to monitor.

For those meeting the eligibility criteria of the proposal there would be a positive impact. These impacts are 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 online forms are device ‘friendly’
- Ensure grant claim guidance and online 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 re-evaluating 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 ‘traditional/regional’ 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, online forms 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 the internet) and equipment provided by their institution. In addition, there is an expectation within all ITE programmes that for Qualified Teacher Status (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 / devices direct to individuals enabling them to access digital spaces.

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 the online forms and guidance can be accessed via different devices displays. All publications on gov.wales must also meet specific accessibility requirements meeting or exceeding the required statutory requirements and a monitored mailbox is provided whereby alternative access arrangements can be requested where appropriate.

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 well-being 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 well-being, 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 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 can achieve their aspirations via education. The broader purpose and goals of education have 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 are 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

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 / devices) 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 and thereafter the teaching workforce. 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 underway due to report in 2026 and will inform the use of ITE incentives in future.

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

Race/ethnicity data is collected by HESA and currently shows that Black, Asian and Minority ethnic students in ITE have a smaller percentage of intake compared with other postgraduate courses in Wales. 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 – this would also be a requirement under the Equality Act. In addition, an evaluation into the use of incentives as a recruitment tool is underway to report in 2026 and will inform the use of all ITE 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

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 activity 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 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 and thereafter the teaching workforce. 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 underway due to report in 2026 and will inform the use of ITE incentives in future. ♦ How will you know if your policy is a success? Race/ethnicity data is collected by HESA and currently shows that Black, Asian and Minority ethnic students in ITE have a smaller percentage of intake compared with other postgraduate courses in Wales. 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 – this would also be a requirement under the Equality Act. In addition, an evaluation into the use of incentives as a recruitment tool is underway to report in 2026 and will inform the use of all ITE 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.

SECTION 8. CONCLUSION

(Please note that this section will be published)

The work conducted by the Education Workforce Council (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.

While research and reports published since the introduction of this proposal such as the Children's Commissioner for Wales Spotlight Report 'Take it Seriously' did engage with children and young people the focus of these reports was around broader issues relating to racism in education and not this proposal specifically.

Except for the Children's Commissioner, the representatives for children were the education professionals consulted during the research work which led to this proposal. Children were not consulted directly on this specific proposal however learners over the age of 14 were included in the 2021 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 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 – 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 is monitored through the number of enrolments of ethnic minority students on to ITE programmes via HESA data as well as forthcoming research from Cardiff Metropolitan University who are undertaking a second study on the recruitment and retention of minority ethnic teachers in Wales. This aims to assess the current situation, identify any progress made, and highlight ongoing challenges since the [original research commissioned by the Welsh Government in 2021](#). Additional research into the impact of ITE incentives more broadly is also underway and expected to report in 2026. This evidence is supplemented by workforce data collected on the teaching workforce through the School Workforce Annual Census and the EWC annual workforce census.

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: Christopher Warner

Department: School Practitioner Division

Date: 07/08/2025

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; this impact assessment re-evaluates the proposal, to record and mitigate any identified negative impacts since the previous IIA.

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* (2022 and 2024) 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 leading up to the inception of the proposal and reports that underpin this policy but were not asked directly about this proposal specifically.

There are no plans at present to engage children and young people (under 18s) regarding this proposal as it pertains / impacts directly adults able to access programmes of ITE.

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?

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. A diverse workforce often brings broader perspectives to children and into the classroom with influence on stories, history and

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.

cultures thought enriching understanding of diversity. This in turn help children and their families to feel their backgrounds are valued and respected.

The lack of understanding about the value of workforce diversity can sometimes create tension or barriers to integration for teachers and children, however professional learning around equity, inclusion, and anti-racism will help to fostering a more inclusive school culture and rais awareness of how sensitive situations should be handled supporting both student teachers and children.

- 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.

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

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	x		cultural and racial diversity in Welsh society to all learners.
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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 CRIAs 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 annually against HESA 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 Diversity and Anti-Racism Professional Learning (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 scheduled to report in 2026 on the use of incentivisation as a recruitment tool.

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

No

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 (when compared to their peers participating in postgraduate study in Wales that is not ITE 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 used to determine those eligible have been taken from the HESA data fields. These are already used 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.

Should a person be eligible for any of the ITE Incentive schemes it does not impact on:

- the statutory ITE entry requirements in Wales that all ITE applicants must meet,
- assessment decisions made by universities regarding their achievement of an ITE qualification including the award of Qualified Teacher Status (QTS), and
- employment decisions made by local authorities and school governors when determining the needs of the children and young people in their schools and thereby their specific requirements for their teaching workforce.

The eligibility of individuals to any of Welsh Government's incentive schemes does not impact on ITE partnerships' (HEIs') admissions judgements. It remains the case that individual ITE admission decisions remain a matter for HEIs' own professional judgement. 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. 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 nationwide indicative level of ITE students to be recruited each year through the Teacher Planning and Supply Model (TPSM) 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 **the national level allocations have not been met** since 2015/16 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 10% tolerance for allocations for student teachers recruited onto Primary ITE Programmes. There are no plans for this to be amended.
- There is no limit to how many Secondary subject specialists that can be recruited to programmes except for PGCE PE which also has a tolerance for over over-recruitment of 10%.
- 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 use to stop over-recruitment by ITE Partnerships is theoretically the removal of accredited status of programmes via the EWC’s 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. However, given the current recruitment trends over the last decade this is also unlikely to occur.
- 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 this is currently a very unlikely possibility. More information on the ITE annual recruitment process can be found here - <https://www.gov.wales/initial-teacher-education-recruitment-process>

Since the inception of the minority ethnic ITE incentive scheme, the recruitment trends and therefore the above potential impact has been monitored. It remains the case in 2025 that this scenario is highly likely to occur, and sufficient levers remain in place to appropriately address any issues, should they even occur.

As with the other existing incentive schemes eligibility for this incentive has no bearing on whether an individual is awarded their teaching qualification and 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)	Children and young People: As per the CRIA there may be a minimal indirect impact on under 18s that identify as an ethnic minority. UNCRC articles which apply - 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.	The proposal is for a continuation of current policy. There is no direct evidence regarding the impact of the proposal, and this protected characteristic. An evaluation into the use of incentives as a recruitment tool – the aims of the proposal to secure a sufficient teaching workforce for children and young people – is due to report in 2026. The Welsh Ministers have not under the criteria for eligibility of this proposal made any explicit requirements pertaining to age of the applicants. There is an implicit expectation however that only those over the age of 18 would be able to access the scheme as they would be more likely to enter higher education. The requirements under the School Teachers Qualifications (Wales) 2012 are that a person	Ensure that the online application and guidance can be accessed via different devices displays. 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. There have been no changes since implementation that would impact. Maintaining the alternative ITE routes, which

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?
	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. No direct impact on those under the age of 18 as they are unable / unlikely to be accessing programmes of ITE and therefore the proposal. 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	must have a degree to be awarded QTS. The proposal as currently run is for postgraduate ITE programmes only and therefore it is unlikely that anyone in the age range of 18 to 21 would be able to access the scheme; however, the proposal does not make these persons ineligible as the scheme does not require applicants to be a certain age. The proposal 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. The age range accessing ITE tends to be the 18-49 age group.	includes the Part-time PGCE, and continue the Part-time PGCE as eligible for this incentive, will continue to widen access (career changers/carers/ those with pre-existing financial obligations etc.) who tend to fall across older age groups, to access this incentive. Presently the Alternative ITE routes are available until AY26/27.

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 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.	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 addresses and their schools digital infrastructure. The most recently available HESA Data (which covers the entire ITE student cohort which includes those receiving an incentive and those not) on the age of entrants onto ITE courses in Wales (full-time) by degree type for 2021/22 can be found here. Government Statisticians are working on the data covering 2022 to 2024 however at the time of drafting this IIA this more current data is not available.	

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?
		In AY2021/22 64.9% of first year PGCE students (full-time) in Wales were aged between 21 and 24. 31% were aged between 25 – 39 and 3% between 40 – 59. (Data for the 16-18 and 19-20 age ranges is not applicable) The Part-time PGCE (both full-time and part-time students are eligible for all three ITE incentive schemes) recruits an older age demographic and Stats Wales data shows the following change in the age distribution data when the OU is included in the data set: 21 – 24 58.9%, 25 -39 36% and 40-59 4.5%. (Data for the 16-18 and 19-20 age ranges is not applicable)	
Disability (consider the social model of disability ³ and the way in which your proposal	None / Negligible. The proposal is available to all ITE Student subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements	The Welsh Ministers have not under the eligibility criteria for this proposal made any explicit requirements pertaining to disability and does not collect any data on the disability status of eligible claimants. It should be noted that to enter programmes of ITE applicants must meet the	Online applications, guidance, etc. meet Welsh Government's online access requirements. The Education Health Standards

³ 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 inadvertently cause, or could be used to proactively remove, the barriers that disable people with different types of impairments)	and regulations which are placed on ITE providers and ITE students. Consideration for the administrative ‘paperwork’ including guidance, online applications and monitoring tools must ensure it meets industry best practise for eligible students accessing the proposal and ITE providers and Welsh Government staff who administrate the scheme.	Education Health Standards regulations. ITE Providers need to be confident that trainees can meet legislative requirements to have the health or physical capacity to undertake a teacher’s responsibilities. There is no evidence that this proposal impacts on this protected characteristic. We have not received any feedback from our ITE providers, ITE students including those in receipt of this incentive, that the scheme has had any impact due to their disability. The team has considered disabled persons and has worked with disabled WG officials to test the application system and discuss accommodations – as some disabled persons may be unable to access the online application forms due to accessibility tools (braille readers for example) being incompatible. Alternative arrangements are available on request and tailored to the needs of individuals. Timescales for applying may also be adjusted where appropriate by officials where persons have been delayed in applying due to incompatibility of accessibility	are established legislation; should they be reviewed for amendments this EQIA and the scheme should be reviewed. Officials will continue to monitor the operation of the scheme and act promptly on feedback from applicants and our ITE Partnerships. Updated desk instructions with a new section on accommodating disabled applicants will be included to ensure arrangements in the future.

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?
		tools with the online application process. To date no reports of issues nor requests for alternative arrangements have been made by applicants nor our ITE Partnership. Our incentive mailbox email address and directions to contact us are available on our website which is compatible with most accessibility technologies as far as we are aware. Updated desk instructions are also being prepared and a new section on accommodating disabled applicants will be included to ensure these arrangements in the future. HESA data on the entire cohort shows that in AY2021/22 13% of new ITE students had some known disability. 38% of ITE first years with a known disability were in the 'Specific Learning Difficulty' category – dyslexia is a condition in this category. Further information can be found here https://statswales.gov.wales/Catalogue/Education-and-Skills/Post-16-Education-and-Training/Higher-Education/Initial-Teacher-Training-ITT/students-in-Wales/firstyearsonitecoursesinwales-by-disability-year .	

Protected characteris tic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
		Government Statisticians are working on the data covering 2022 to 2024 however at the time of drafting this IIA this more current data is not available. 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 undertaking an ITE qualification 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. HEI's (ITE Providers) need to be confident that trainees can meet legislative requirements (Education Health Standards) to have the health or physical capacity to undertake a teacher's responsibilities. HEIs have a responsibility to ensure that this requirement is met having due regard to the relevant regulations, and to their statutory obligations under the Equality Act 2010.	

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?
		Information on the guidance and standards applicable to all government publications can be found here - https://www.gov.wales/accessibility-standards-govwales	
Gender Reassignment (the act of transitioning and Transgender people)	None The incentive scheme is available to all ITE student teachers subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations which are placed on ITE providers (HEIs) and ITE students.	The Welsh Ministers have not under the eligibility criteria for this proposal made any requirements pertaining to Gender reassignment therefore this data is not collected. Therefore, there is no evidence that this proposal impacts on this protected characteristic. We have not received any feedback from our ITE providers, ITE students including those in receipt of this incentive, that the proposal has had any impact. 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	

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?
		equality of opportunity and does not discriminate against any group of potential applicants. Under the requirements of the <i>Criteria for accreditation of ITE programmes in Wales</i> (which sit under the <i>School Teachers Qualification (Wales) Regulations 2012</i>) the ITE partnerships (HEI's) should provide advice, support, and guidance, including counselling, as well as medical and careers services for those that may require them.	
Pregnancy and maternity	None. The proposal is available to all student teachers 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. There is employment legislation relating to pregnancy and maternity which employers (schools,	The Welsh Ministers have not under the criteria for eligibility of this proposal made any requirements pertaining to pregnancy and maternity as such no data is collected. Some aspects related to administration of the scheme - deferral due to personal circumstances – would ensure no negative impact on student teachers / teachers who are pregnant and/or on maternity leave not receiving the incentive due to this protected characteristic. We have not received any feedback from our ITE providers, ITE students, including those in receipt of this incentive, that the scheme nor its delivery has had	Keep in place the processes that enable those in receipt of the incentive to defer from their studies / induction and return within a reasonable period to complete and therefore claim their subsequent incentive payments. Keep in place comms and online guidance detailing deadlines for claiming.

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?
	local authorities, and supply agencies) must have due regard.	any impact. There is no evidence that this proposal impacts on this protected characteristic. 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 for those that may require and/or request it. In the operation of the proposal, processes have been put in place so that those that leave their programme of ITE but intend to return (either within the same academic year or a subsequent academic year) are able to claim the remaining grant monies they are due as they become eligible. For example – should someone defer and return the following year and complete their programme of ITE they are eligible to receive the payment	

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?
		(on award of QTS) and the subsequent induction payment - should they remain eligible under the terms of the scheme. Induction typically takes one year to complete, and the Scheme allows for three years after the award of QTS to complete induction – and a further year to claim the incentive (in the run up - deadlines are advertised via Dysg, on Welsh Government social media channels, and a dedicated web page detailing deadlines by cohort here https://www.gov.wales/initial-teacher-education-ite-priority-subject-incentive-scheme-claim-deadlines, in addition applicants are contacted via their email (provided by the applicant) to check-in and remind them to claim their induction payment when appropriate alongside guidance on how to claim). Recent changes made to induction in Wales mean that it is the standard and not the time spent in classrooms that determines completion of induction and as such induction can now be completed in a minimum of one school term up to five years after award of QTS.	

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?
		It is the purpose of the proposal to ensure that individuals that are needed within the teaching workforce are recruited and retained within the workforce in Wales during their statutory training period (ITE and Induction). As such; the proposal's timeframe for claiming, recent changes made to induction, the average time to complete induction (1 year / three school terms), the statutory maternity leave allowance of 52 weeks (no Government data on the actual average time spent on Maternity leave for those in the UK labour force is available at this time, however the ONS and independent 2024 research suggests the take-up of full statutory leave is less common) allow for both the intended aims of the proposal and flexibility for those that fall within this protected category, to be balanced.	
Race (include different ethnic minorities, Gypsies and Travellers)	Positive impact for ethnic minorities. The proposal is available to all ITE Students subject to the eligibility criteria and must operate within, and	The proposal continues to 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 (HEIs) and ITE students.	n/a

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?
and Migrants, Asylum seekers and Refugees)	be subject to, existing ITE requirements and regulations which are placed on ITE	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. They need to ensure that their admission policy promotes equality of opportunity and does not discriminate against any group of potential applicants. 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. 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. Current HESA Data shows 6% of enrolments onto a Welsh 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?
		Programme are from an ethnic minority. The data shows that 16% of enrolments for non ITE postgraduate courses were from BAME students compared to this 6% of enrolments for ITE postgraduate courses from BAME students. The proportion of enrolments that are from BAME students is lower for ITE postgraduate courses compared to non ITE postgraduate courses in Wales. Ethnic minority persons on average tend to come from lower socio-economic backgrounds^{4, 5, 6} and therefore may benefit more than their peers from higher socio-economic households/background however we have no evidence that there is any actual impact due to this proposal in this regard. Welsh Government does not collect the socioeconomic backgrounds of eligible student teachers claiming this incentive, so this is an inference. An evaluation into the use of incentivisation as a	

⁴ Income distribution - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)

⁵ Persistent low income - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)

⁶ [first-ministers-bame-covid-19-advisory-group-report-of-the-socioeconomic-subgroup.pdf](https://gov.wales/first-ministers-bame-covid-19-advisory-group-report-of-the-socioeconomic-subgroup.pdf) (gov.wales)

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?
		recruitment tool expected to report 2026 may provide evidence of impact (in terms of its aims to recruit more BAME student teachers rather than impact of receipt) of this proposal however this is still in the scoping stage. Those from lower socioeconomic households may have limited access to ICT equipment / digital spaces and risk digital exclusion however as noted under the age section of the IIA there are mitigations in place to reduce this potential impact.	
Religion, belief and non-belief	No impact. The inclusion of the category White: Jewish in the legal scheme for AY2023/34 was not intended to cause a positive or negative impact with regards to the religious belief or non-belief of eligible or non-eligible student teachers. This inclusion is continued in the AY2026/27 scheme. White: Jewish for the	The Welsh Ministers have not under the criteria for eligibility of this proposal made any requirements pertaining to religion, belief and non-belief. We therefore do not collect and have no data pertaining to the policy intervention specifically with regards to the religion, belief and non-belief of student teachers eligible. The inclusion of White: Jewish as a category is not intended to refer religious belief but to include those identifying as ethnically Jewish. We have not received any feedback from our ITE providers or ITE students including those in receipt of the proposal that it has had any impact on this protective 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?
	purposes of the incentive scheme is intended to reflect the Jewish ethnic minority community. The Office for National Statistics notes that there is no consensus on what constitutes an ethnic group, and membership is something that is self-defined and subjectively meaningful to the person concerned. Since ethnicity is a multifaceted and changing phenomenon, various possible ways of measuring ethnic groups are available and have been used over time. These include common ancestry and elements of culture, identity, religion, language and physical appearance. What seems to be generally	The proposal continues to 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. 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	

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?
	accepted, however, is that ethnicity includes all these aspects, and others, in combination.” As such and for the purposes of the proposal belief and practice under the Jewish religion is not considered to be a requirement for eligibility for the incentive. The Jewish community is a multifaceted combination of the aspects noted in the quote above and this would include atheist / secular Jews. We therefore consider that there continues to be no impact with regards to the proposal against this protected characteristic. While the incentive scheme is available to all ITE Students subject to the	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?
	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, could therefore be more likely to access the incentive however we have no evidence to support this inference.		
Sex / Gender	Negligible impact. The proposal is available to all ITE Students subject to the eligibility criteria and must operate within, and be subject to, existing ITE requirements and regulations	The Welsh Ministers have not under the criteria for eligibility of this proposal made any requirements pertaining to Sex/Gender. Therefore, we do not collect and have no data pertaining to the proposal specifically with regards to the sex/gender of student teachers eligible for the proposal. We	

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?
	which are placed on ITE providers and ITE students.	have not received any feedback from our ITE providers or ITE students including those in receipt of this incentive, that the proposal has had any impact due to their sex or gender. There is no evidence that this proposal directly impacts on this protected characteristic. The proposal is available to those meeting the criteria who are studying either a Primary PGCE or Secondary PGCE. The proposal 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. Government Statisticians are working on the data covering 2022 to 2024 however at the	

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?
		time of drafting this IIA this more current data is not available. Stats can be found here: https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/teachers-and-support-staff/initial-teacher-education/students-in-Wales/firstyearsonitecoursesinwales-by-gender-schoollevel-year and https://www.gov.wales/sites/default/files/statistics-and-research/2023-05/initial-teacher-education-september-2021-august-2022-080.pdf The HESA data shows that of all first years on ITE courses in Wales (AY2021/22) the majority were female. The Open Data sets do not allow further analysis by Ethnicity and Gender due to the small numbers of minority ethnic student teachers. As such, with the available data, there may be a positive impact for female students entering ITE as they are statistically the majority of ITE students. Evidence of any direct impact of this proposal on sex/gender is not held and our deduced impact is hard to parse and unintentional	

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?
		to the purposes of the proposal. There are longstanding cultural expectations related to sex / gender and professions (such as teaching/nursing) however this is a complex area and not within the remit of the proposal. 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.	
Sexual orientation (Lesbian, Gay and Bisexual)	None. The proposal 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 Welsh Ministers have not under the criteria for eligibility of this proposal made any requirements pertaining to Sexual orientation. We therefore do not collect and have no data pertaining to the proposal specifically with regards to the sexual orientation of student teachers eligible for the proposal. We have not received any feedback from our ITE providers or ITE students including those in receipt of this incentive, that the proposal has had any impact due to their sexual orientation. There	

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?
		is no evidence that this proposal directly impacts on this protected characteristic. The proposal 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.	
Marriage and civil partnership	No impact. The proposal 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 Welsh Ministers have not under the criteria for eligibility of this proposal made any requirements pertaining to Marriage and civil partnership. We do not collect and therefore have no data pertaining to the policy intervention specifically with regards to the marriage or civil partnership status of eligible student teachers. We have not received any feedback from our ITE providers or ITE students	

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?
		including those in receipt of this incentive, that the proposal has had any impact due to their married/civil partnership status. There is no evidence that this proposal directly impacts on this protected characteristic. The proposal 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. 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	

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?
		legislation, eliminating discrimination and positively promoting equality.	
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, and across the IIA, an indirect impact due to improving the diversity of ITE recruitment and therefore the teaching workforce has been shown to have a positive impact on children and young people via their education.	ITE Programmes are University 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 proposal 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.	
Low-income households	Indirect positive and negative impact. As noted in the Anti-racist Wales action plan (2022) and within the Race section of this	See information under Age Impact assessment section relating to digital exclusion. The Welsh Ministers have not under the criteria for eligibility of this proposal made any requirements pertaining to low-	See information under Age Impact assessment section relating to digital exclusion

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?
	EQIA, minority ethnic communities tend to be from lower-income groups and as such this financial incentive may indirectly benefit low-income households where the student teacher is eligible. The proposal 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.	income households. We do not collect and therefore have no data pertaining to this proposal specifically with regards to low-income households. The proposal is a financial incentive which may directly benefit low-income households where an eligible student teacher resides / is supported (as appropriate).	

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 criterion for access. However, this is required to meet the aims of the proposal to diversify the workforce in terms of ethnicity. The proposal 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 proposal is demand led and as such accessing the scheme and administration requirements is voluntary and does not impact on person's access to ITE	The proposal 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 proposal is part of the implementation of an Anti-racist Wales; 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 met. These indicators include enrolments of BAME student teachers, teaching workforce demographics and where appropriate children and young people's demographics.

	Programmes (entry decisions are made by HEIs), the awarding of Qualified Teacher Status, nor access to employment as a teacher in a school.		
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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.

Key to this section of the IIA is the eligibility requirement that applicants be in receipt of student finance. The regulations which apply the provision of support to students commencing courses on or after 1 August 2018 are the Education (Student Support) (Wales) Regulations 2018 (SI No.191 (W. 42)). These regulations will remain extant for academic year 2026/27. This requirement reflects the evidence (HESA – destination of students – annual survey) that graduates tend to return to their domicile or in this case their home country outside of the UK. As the proposal is intended to ensure a sufficient workforce for the maintained sector in Wales this criterion therefore remains as is. The 2018 regulations will have their own IIA and be required to assess their impact on the persons to which this section refers.

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

The proposal does not relate nor impact on this right.

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

The School Teachers Qualification (Wales) 2012 regulations remain in force and have been amended due to EU Exit to ensure that teaching qualifications obtained outside of Wales / the UK can continue to be recognised in Wales.

The proposal does not relate to MRPQ as it pertains to students studying to gain their professional qualification. The 2012 regulations make a requirement for the award of QTS which includes (Schedule 2: 1.(a)) *“hold a first degree or equivalent qualification awarded by a United Kingdom institution **or an equivalent degree or other qualification awarded by a foreign institution**”*

ITE providers as HEIs are autonomous bodies however are encouraged by Welsh Government to use UK ENIC (formerly UK NARIC), the UK National Information Centre for the recognition and comparison of international qualifications and skills, to ascertain equivalency. 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.

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

The proposal does not relate nor impact on this right.

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

The proposal does not relate nor impact on this right.

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

(Frontier workers (those citizens who reside in one state and regularly work in another) can continue working in the UK if they did so by the 31 December 2020).

The proposal does not relate nor impact on this right.

C. DATA PROTECTION IMPACT ASSESSMENT SCREENING

Title of proposal: Implementation of the Minority Ethnic Incentive Scheme
Name of Information Asset Owner: Christopher Warner
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 should it be taken forward.

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 via an online application

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

2.1 – ITE providers confirm with Welsh Government (WG) the eligibility of applicants.

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 via an online application

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 only at this stage**) – 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 review 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 HEI specific student 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; 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. No data pertaining to their asylum status nor patient status would be collected nor is required for the purposes of this proposal. 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. AY2023-24 showed that 61 students were eligible for the scheme in its an increase from the 41 in the first year. Current data for AY24/25 is that 46 persons are eligible and that we have reached a 6% BAME student teacher population 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 – should this be taken forward:

	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 should this be taken forward</u>: From WG to EWC (for which both are controllers) 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:

- [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.
- [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 should this work be taken forward (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 should it be taken forward. At present (July 2025) 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 – may not be taken forward. 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 2025) there are insufficient cohorts that have received the incentive to undertake this work currently.

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 three 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.

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 agreed by the then Education Minister following a recommendation 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 commitments/ plans to an Anti-Racist Wales. 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 practice 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, such as the Welsh medium ITE incentive scheme (Iaith Athrawon Yfory). 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. Data on the Welsh speaker status of student teachers is available at [Initial teacher education | GOV.WALES](#).

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

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

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 and thereafter the teaching workforce. 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.

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.

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

An evaluation into the use of incentives as a recruitment tool is underway due to report in 2026 and will inform the use of ITE incentives in future.

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

Race/ethnicity data is collected by HESA and currently shows that Black, Asian and Minority ethnic students in ITE have a smaller percentage of intake compared with other postgraduate courses in Wales. 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 – this would also be a requirement under the Equality Act. In addition, an evaluation into the use of incentives as a recruitment tool is underway to report in 2026 and will inform the use of all ITE 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 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 re-evaluating 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 / devices) and spaces (the internet / email) to submit an application 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 re-evaluates 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 to 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 to 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