



# Anti-racist Wales Action Plan

## Contents

	Page	
Ministerial Foreword		Section B
Co-Chairs' Foreword	25	1. Background on detailed actions for policy areas
Section A	27	Leadership within Welsh Government and across public services     Education and Welsh Language
<ol> <li>The need for this Plan</li> <li>Key stages in preparing the Plan         Commissioning         Pre-consultation – how the work was done         Early messages     </li> <li>What is 'anti-racist action'?</li> <li>What you told us, and how we've responded</li> </ol>	55 63 73 81 94 98	<ol> <li>Culture, Heritage and Sport</li> <li>Health</li> <li>Social Care</li> <li>Homes and Places</li> <li>Local Government</li> <li>Employability and Skills, including Social Partnership and Fair Work</li> </ol>
<ul> <li>A. Terminology</li> <li>B. Vision, purpose and values</li> <li>C. Goals and Actions</li> <li>D. Multiple discrimination/'intersectionality'</li> <li>E. Measuring and monitoring change</li> <li>F. Compliance with the Equalities Act</li> <li>G. Resources</li> <li>H. The leadership challenge</li> </ul>	107 112 124	and Entrepreneurship  10. Nation of Sanctuary – Support for refugees and asylum seekers  11. Crime and Justice  12. Childcare and Play
	<ul> <li>Co-Chairs' Foreword</li> <li>Section A</li> <li>1. The need for this Plan</li> <li>2. Key stages in preparing the Plan</li></ul>	Ministerial Foreword  Co-Chairs' Foreword  Section A  1. The need for this Plan 2. Key stages in preparing the Plan 2. Key stages in preparing the Plan 3. Commissioning 3. Pre-consultation – how the work was done 4. Early messages 3. What is 'anti-racist action'? 4. What you told us, and how we've responded 4. Terminology 5. C. Goals and Actions 7. D. Multiple discrimination/'intersectionality' 6. Measuring and monitoring change 7. Compliance with the Equalities Act 6. Resources 7. H. The leadership challenge

18

19

19 22

22

23

B. External Independent Accountability Group

A. Clear measures of success, including indicators for success

J. Resistance to the Action Plan

5. How we will deliver this Plan

C. Resources

6. Acknowledgements

## Section A

## Ministerial Foreword

## Black, Asian and Minority Ethnic people make an immeasurable contribution to a prosperous, healthier, more equal Wales with vibrant cultures and thriving languages.

We profoundly regret those experiences in everyday life in which ethnic minority people have experienced racism as citizens, as service users, as employees and as applicants for jobs and opportunities. Not being valued or respected is heightened by seeing too few Black, Asian and Minority Ethnic people as managers or leaders in the organisations they work for, or in public life. This must change, and the work on making that change has begun.

The Plan has been developed in collaboration with a wide range of communities and organisations across all parts of Wales. The goals and actions have been shaped jointly with ethnic minority people and we made 'valuing lived experience' one of the values underpinning the Plan so that it continues to underpin our approach.

We want to thank everyone for their contribution to this work – and the willingness of ethnic minority people to extend their trust in securing the possibility of change – and in providing their leadership and sharing their lived experiences to help making this plan what it is.

During the formal consultation on this Plan, (then referred to as the draft Race Equality Action Plan), we formed a new Government. Then, in our new Programme for Government we reaffirmed that delivery of this Plan remains one of our most important commitments.

So this is one of our key priorities. It is a real opportunity to make a difference as a catalyst to improving life chances and tackling poverty across all protected groups. We commit our leadership and our resources, and our influence on others to implementing this Plan. But we also call on everyone working in our public services, at whatever level, to do the same. Leadership can be shown by everyone, at all levels of any organisation. We all have a part to play in tackling racism and being actively anti-racist.

We do this work acknowledging the immense leadership within the ethnic minority communities and leadership at all levels – as individuals, as political leaders, as community activists, as academics and as leaders of organisations. Without a wide range of lived experiences informing our work we limit our creative capabilities. We have therefore, purposely involved with these leaders to inform and inspire us collectively to do better.

We have shown that Welsh Government can make changes to what we do and how we work. The pioneering work led by Professor Charlotte Williams means that learning about the cultural heritage and ethnic diversity of Wales and the wider world is now a mandatory element of our national Curriculum. This has made history; no other nation is doing this.

Given our commitments to working in a more sustainable way for current and future generations, we prepared this plan, and the draft plan in 2021 through co-design and coproduction with people and communities. The process was collaborative, innovative and inspiring, and was commented on positively by those working alongside us and those we consulted.

We know we need to ensure the voices and lived experiences of Black, Asian and Ethnic Minority people need to be not just heard, but acted upon. The way in which we developed this Plan made sure that these stories and experiences were written in to this work. People gave generously of their time and many, at some personal cost, shared their experiences of discrimination and hostility as citizens of Wales; they also shared their achievements as entrepreneurs, workers and leaders; as researchers, experts and professionals and as communities.

This Plan is a culmination of an effort to sustain open and dynamic dialogues within and between the Welsh Government, local government, academics, activists, the trade union movement, community group leaders, religious leaders and individuals from the breadth of the racial and ethnic minority groups in Wales. We are indebted to our community mentors and other 'experts through lived experience', who have supported both officials and the Steering Group. That dialogue and process of co-design will continue and we will assess progress and identify where further action is needed together.

By involving people differently we changed our Plan. We have given more focus on the articulation of the problems faced by people drawing on real life experiences. We have also been more confident and pointed in the actions that we propose to take – we are more ambitious as a result of the involvement of Black, Asian and Ethnic Minority people. This is how involvement should work. The actions in this Plan are aimed at preventing problems from arising and are focused on the core of our systems, processes and behaviour, so as to tackle institutionalised racism

#### 5 Anti-racist Wales Action Plan

We have also strengthened the ways in which we will deliver the Plan and be held accountable for it. We will be driven by the need to close the implementation gap. These will help ensure greater compliance with the Equality Act 2010, and will also make use of better data, and so enable better analysis. Our aim is to close 'the gap' between publishing a Plan, and seeing it implemented – to closing what has been called; the "implementation gap".

Another key difference is the stronger commitment to anti-racism. Indeed we have renamed the Plan to the "Anti-racist Wales Action Plan". This is to emphasise our focus on proactively surfacing and tackling institutional and systemic racism.

We ask you now to work with us in delivering the Anti-racist Wales Action Plan and in building an anti-racist Wales: a Wales in which we can all be proud to belong and in which each of us can thrive. Taken forward in that way, we firmly believe that the successful implementation of this Plan will benefit all citizens, now and in the future.



Rt Hon Mark Drakeford MS First Minister of Wales

**Personal Data** 



**Jane Hutt MS**Minister for Social Justice

**Personal Data** 

## Co-Chairs' Foreword

As a society, we are collectively perturbed by racism. However, for too long, we have believed that racial inequality will disappear without sustained efforts to challenge and eradicate it. In many respects, we have become conditioned to living with racial inequality in a way that has made it a self perpetuating aspect of reality that has blighted the lives of Black, Asian and Minority Ethnic (herewith ethnic minorities) members of our society.

The An Anti-racist Wales Action Plan (the Plan) builds on previous Welsh Government initiatives on race equality. The urgency of the Plan was laid bare and intensified by the COVID-19 pandemic, and perhaps more acutely by the unparalleled visibility and reaction of the world to the killing of George Floyd in the USA. These two events brought the pernicious consequences of racism to the world's consciousness and heightened the need for sustained action to eradicate racial discrimination.

The Plan builds on the findings of the Welsh Government Socio economic Subgroup report on coronavirus (COVID-19) and people from the ethnic minority backgrounds in Wales, and is distinguished by three inter related features. Firstly, the Plan is built on the values of anti racism. This means that a common theme that runs across all the chapters is the desire to strive for a nation in which there is zero tolerance for racism in all its guises. In this regard, the Plan is comprehensive and touches every institution over which the Welsh Government has influence.

The second factor that distinguishes the Plan is that we followed the principles of co-creation in that the Plan is a culmination of open and dynamic dialogues within and between groups, including Welsh Government officials, academics, race/ethnicity activists and workers,

Trade Unions and Wales TUC, officials from local government and non governmental organisations, community group leaders, religious leaders and, importantly, individual members of the multiple communities that comprise the breadth of the racial and ethnic minority groups in Wales. The outcome of this is a Plan which represents what we have heard from our stakeholders.

The final feature that distinguishes this Plan is the emphasis on closing the implementation gap. In developing the Plan, members of the Steering Group were guided by the knowledge that previous Race Equality Plans with positive intentions have not resulted in meaningful improvements in the lives of ethnic minority groups. We were also mindful that the problem of implementation has marred the efficacy of the legislative framework (the 2010 Equality Act) which was designed to eliminate racial discrimination in society. We believe that the successful implementation of this Plan will benefit all citizens, now and in the future.

The guiding principle of this Plan is that the rhetoric on racial equality should be translated into meaningful action, with organisations and institutions made accountable for turning this into reality as is common with other important policy areas. It is for this reason that the Plan identifies 'goals', 'actions' 'timelines', 'outcomes' and the role of the Accountability Group that will oversee the governance as critical to successful implementation.

However, the success of this Plan does not depend on the actions of the Welsh Government and institutions alone, it also depends on the combined behaviours and actions of ordinary people in society. Individuals who believe that they are not racist but who are not actively engaged in eradicating racism may inadvertently be supporting the existing racialised system we are trying to change. This is why everyone has a role to play

in eradicating racism. At the very least, we should all consider how the stereotypes we hold of people from ethnic minority backgrounds influence our behaviour towards them and we should do all we can to build fairness into our everyday lives.

We believe that the successful implementation of this Plan will benefit all citizens. An equitable employment market that increases the participation of racial and ethnic minorities will improve the overall productivity and growth of the Welsh economy, which will benefit all. A fairer education and training system will harness the potential of all people in Wales. Finally, equalising racial opportunities and outcomes in healthcare and other social services will help to reduce the overall burden on the state and individuals and help to promote active citizenship.

In these regards, the imperatives for fully implementing this Plan are derived not just from the moral and legal requirements, but also from the mutually beneficial nature of the outcomes: we all stand to benefit from racial equality.



Professor Emmanuel Ogbonna Cardiff University



Dr Andrew Goodall
Permanent Secretary,
Welsh Government

## 1. The need for this Plan

In early 2020, the Welsh Government started work on an action plan for race equality, following calls by the Wales Race Forum, and other grassroots organisations. Almost immediately however, the work was halted by the COVID-19 pandemic. Then, in May 2020, the killing of George Floyd sent shock waves throughout the world. Both events shone a light on the systemic racism faced by Black, Asian and Minority Ethnic people, both in Wales and elsewhere. Both events reinforced the urgent need for action.

The COVID-19 pandemic has had a disproportionate impact on people from ethnic minority communities. Over the past two years, a host of reports, inquiries and research have demonstrated this. This is underscored by social and structural differences, leading to health disparities and a range of other inequalities. A report in 2020 by the Chief Medical Officer summarised the challenges very starkly (see Appendix 7: References: Chief Medical Officers Report). The Runnymede Trust also highlighted this problem, stating that "racial inequalities persist in almost every arena of British society, from birth to death" (See Appendix 7: References: Runnymede, 2017).

Welsh Government and others in the public and third sectors have previously pursued approaches such as 'equality of opportunity', 'managing diversity'," integration and assimilation", "multiculturalism" and race equality to tackle institutional racism. These approaches had good intentions, but were often neutral in their execution. They failed to take enough account of unequal power structures, especially in relation to racialised power in our society.

They put too much emphasis for change on 'fixing' ethnic minority people or communities, not on fixing broken systems. In work settings, it is often implied that ethnic minority people do not have enough qualifications, or didn't network enough, or need more training.

We know that highly qualified ethnic minority people work in our health services, and in other public and private organisations. But it is the nature of recruitment and progression that works against them; it is the systems for selecting those who achieve progression, those who get mentored, coached and sponsored, that fail them. In the provision of services, it is often the 'colour-blind' approach that ignores pre-existing racial imbalances that affect outcomes, that fails them. Such systems are, in effect, 'rigged' against certain groups. Consequently, they struggle to enter and progress, or to obtain services appropriate to their needs.

Through the development of the Plan we heard a clear message about the lack of trust felt by many people from ethnic minority backgrounds, over whether public bodies will enforce their rights rights enshrined in law – but which often have little real impact on their lives. In this new Plan we outline how we have developed more focused actions, to help us make the necessary changes, and to fix broken systems.

We acknowledge the actions set out in the Plan represent the key steps to be taken during the next two years or so. We are committed to be developing and publishing further actions, as implementation progresses on an on-going way.

## 2. Key stages in preparing the Plan

#### Commissioning

In the summer of 2020 Jane Hutt MS, the Deputy Minister responsible for equalities, asked officials to resume work on a new Race Equality Action Plan. She invited Professor Emmanuel Ogbonna from Cardiff University and Dame Shan Morgan, then Permanent Secretary at the Welsh Government, to co-chair a Steering Group to oversee the work. The Group included people from organisations, academia, and others with in-depth knowledge and experience of race and racism. Throughout the process, the Group played a central role in shaping the Plan.

#### Pre-consultation – how the work was done

During this initial period, a host of pre-consultation events, meetings and discussions took place, in order to identify priorities and to co-design the draft Plan. This work included:

- Evidence Review: we commissioned the Wales Centre for Public Policy at Cardiff University to carry out a rapid evidence review of reports and research in relation to race equality. (See Appendix 7: Reference: WCPP report).
- We commissioned an internal review of 'What the evidence tell us', as outlined in the draft Plan. gov.wales/race-equality-action-plan-anti-racistwales.
- Face to face meetings: we held a series of meetings with grassroots organisations and individuals.
- · Work by the First Minister's Black Asian and Minority Ethnic COVID-19 Advisory Group: and its sub group and incorporated them into this work. (See Appendix 7: References: Black, Asian and minority ethnic advisory group report).
- Discussions with the Wales Race Forum.
- Work by Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group and The Slave Trade and the British Empire: an audit of commemoration in Wales; (See Appendix 7: References: Cynefin report).
- Setting up and working with the Anti-racist Wales Action Plan Steering Group. (See Appendix 1).

- Community Mentors, and experts on anti-racism policy: We asked seventeen 'Community Mentors' to support and advise policy officials on ethnic minority people's lived experiences (list at Appendix 2). We also invited a number of experts with particular understanding of racism in policy work to help us; this helped us to clarify and strengthen many of the actions.
- A series of 'Community-led dialogues: We held a series of engagement sessions with ethnic minorities, including women, young people, Welsh speakers and others. (list at Appendix 3: organisations supporting the dialogue and later consultations).
- Commissioned an analysis of community lead dialogue reports. (See Appendix 7: References: Community engagement analysis).
- Policy themed events: We held several events to bring together different partners working on the evidence base, involving academics, activists and individuals with expertise and lived experience. These had a profound impact on how the actions were shaped.
- Assessing Impact: The Plan has been specifically designed to tackle institutionalised and systemic racism experienced by Black, Asian and Minority Ethnic people. This is designed to have positive impacts on Black, Asian and Minority Ethnic people in Wales. The intersectional nature of institutional and systemic racism is recognised in the Goals and Actions. The most significant positive impact of the Plan is that in making the commitments outlined within it, the Welsh Government is taking the first step towards the radical cultural shift required to achieve an anti-racist nation by 2030. By involving

#### 9 Anti-racist Wales Action Plan

people differently, we better understood the impact our draft Goals and Actions would have on the lives of Black, Asian and Ethnic Minority people (see chapter 5 'What you told us, and how we've responded'). This helped us look at impacts in an integrated way and support our continued assessment of impact through our Integrated Impact Assessment approach.

The impact of the proposed Goals and Action was developed and recorded in the Integrated Impact Assessment (IIA) tool which includes a Children's Rights Impact Assessment, Equality Impact Assessment and consideration of the Well-being of Future Generations obligations. The first version of the IIA was published alongside the draft Race Equality Action Plan consultation (March 2021) and we will publish an updated conclusion, and continue to use this as a live resource to inform the implementation of the Plan and how we measure and monitor change.

#### Early messages

During this period, some clear themes emerged, which informed the consultation document. These are summarised below:

- a strong feeling that people wanted a practical document focused on anti-racism. They did not want "yet another strategy" aimed at equal opportunities, integration or multi-culturalism. However what an anti-racist action plan looked like needed further collective agreement;
- a clear belief that public, private and third sector organisations were not meeting their obligations to dismantle systemic and institutional racism.
   In particular, that many public bodies were not compliant with the Equality Act 2010, and not meeting the public sector equality duty;

- acknowledgment that without proper messaging, the Plan could alienate some in the White community. There was a strong belief that promoting fairness and equity for ethnic minority people and communities does not conflict with supporting other disadvantaged groups and we should highlight the separate work being done on those issues;
- doubt as to whether the Welsh Government could incentivise action or apply sanctions when progress was not being made;
- a view that regulatory bodies, inspectorates and ombudsmen do not have a good understanding of racism, how it is embedded in their policies and practices, or of what to do when they encounter it;
- a feeling that generic Diversity and Inclusion plans within the public sector were often insufficient.
   Many felt they resulted in a lack focus on race issues;
- a call for Welsh Government to address the differing and intersecting needs of ethnic minority women, children, disabled people and those of all other protected groups.

Irrelevant & Sensitive

Image courtesy of Ethnic Minorities Youth Support Team Wales

## 3. What is an 'anti-racist action'?

Our approach to understanding and implementing anti-racism, has been informed by academic experts and experts by lived experiences working in the field of anti-racism. Welsh Government is doing this in a new way, because we want to avoid 'doing what we always do', and repeating mistakes made in the past. The old approach resulted, unsurprisingly, in a belief by ethnic minority people that real change was not possible. In this Plan, we are making a genuine effort to do things differently.

"We cannot solve our problems with the same thinking we used when we created them."

Albert Einstein

In adopting the vision of a Wales that is anti-racist, and in naming this Plan the "Anti-racist Wales Action" Plan", we are taking an anti-racist stance. We are acknowledging that institutional and structural racism exists and needs to be tackled actively and assertively.

During the consultation, people asked us to be clearer about what we meant by this. They wanted to know what an anti-racist approach would mean in practice. They wanted us to be bolder in tackling systems that negatively impact on ethnic minority people.

#### Professor Ogbonna has highlighted that:

"Racism is constantly mutating. If we fail to eradicate it, it will continue through generations. It becomes a perverse inheritance that expresses itself in different mutations, and that blights the lives of future generations in different ways. Many years ago, racism was overt, with many ethnic minority people told directly that they were not wanted. Today, racism has morphed into subtle everyday behaviours but is no less pernicious in its impacts. We want to eradicate racism and we believe that adopting an anti-racist approach is the key to this".

We adhere to the formal definition of institution racism defined in the Macpherson report (1999):

"The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. The report argues that institutional racism can be seen or detected in processes, attitudes, and behaviours that amount to discrimination through prejudice, ignorance, thoughtlessness, and racist stereotyping which disadvantages minority ethnic groups."

#### For us, we have defined anti-racism as:

"Actively identifying and eradicating the systems, structures and processes that produce radically differential outcomes for ethnic minority groups. It involves acknowledging that even when we do not regard ourselves as 'racist' we can, by doing nothing, be complicit in allowing racism to continue. It is not about "fixing" ethnic minority people or communities, but rather about fixing systems that have not benefited and at times even damaged ethnic minority people. It is about working with the considerable strengths and leadership of ethnic minority people and using their lived experiences in how we, collectively, shape and deliver. It is about making a positive and lasting difference."

#### 11 Anti-racist Wales Action Plan

Developing negative stereotypes about ethnic minority people can start as early as age four; so even those who think they are non-racist can have ingrained stereotypes which may, if combined with a position of power, result in negative behaviour towards ethnic minority people. The pervasive nature of racism can affect all ethnic minority people, irrespective of rank and seniority, and can be multiplied when combined with another source of oppression e.g. due to gender or disability.

Failing to adopt an anti-racist approach means that behaviours deemed benign may still impact negatively on people from ethnic minority communities. We should start to scrutinise our individual biases, and reflect on how they may impact on members of minority ethnic communities. We should also acknowledge the power we hold, both individually and collectively, to tackle broken systems. This will help us to understand why there is racism in society, how it is embedded in our ways of working and delivering services, and what we can actively do about it.

We also wish to emphasis the role of White people in being active allies for this work. Being an ally means that we take responsibility for actively making the necessary changes.

In developing our goals and actions, we decided to take radical rather than incremental steps. We want action that is different from before. The solutions will vary between policy areas, and this is reflected in the plan.



"If you are neutral in situations of injustice, you have chosen the side of the oppressor. If an elephant has its foot on the tail of a mouse and you say that you are neutral, the mouse will not appreciate your neutrality."

Desmond Tutu

## 4. What you told us and how we've responded

After considerable efforts to co-design an action plan, we formally consulted on a draft Action Plan between March and June 2021. We received over 300 responses. We want to thank and honour all these individuals, groups and organisational contributions, in particular the many people who took the difficult step of sharing their own painful experiences of deep racism, and of the impact this has had.

We also want to thank those individuals and organisations who led the dialogue and debate on our behalf. We are also very grateful to Race Equality First, who went beyond the call of duty and who analysed every response for us. We present as much of the full report as we can in order to do it full justice and as a record of the strength of the concerns and contributions made

We summarise below the key messages from the consultation, and how these have been taken into account in this final version of the Plan.

#### A. Terminology

The term Black, Asian and Minority Ethnic used in the consultation draft, and the short version 'ethnic minority people or communities', attracted many differing comments. Feedback from Gypsies and Traveller people was stronger – they felt the term simply didn't apply to them or include them. Identity is extremely personal and people who experience racism are not a homogenous group. Rather, they consist of a wide variety of different cultural and ethnic groups often with very different positions within British society. It was clear from the response that the preferred position was to be as specific as possible and to refer to people the way they would prefer themselves to be referred

There will be occasions where it is necessary to refer to the collective experience of racism. As expected, the consultation did not result in any one term firmly standing out from others as the preferred option. Following a further discussion with the Anti-racist Wales Action Plan Steering Group, we agreed to keep the term 'Black, Asian and Minority Ethnic' along with 'ethnic minorities' as a short version. A key point raised was to ensure that we used 'people' over 'communities' wherever possible. This is to emphasise the humanity of those who have experienced racism and have been minoritised. Often they are a global majority.

It is also important to point out that whilst collectively discussing racism against a group of people, these terms can be helpful. However, when in workplaces or services - allowing people to express their identity in the way they choose is important.

We were also, rightly, challenged about a lack of clarity and visibility of the experience of Jewish people and people of Islamic faith as included in groups experiencing racism. We want to emphasise that in addressing racism we include these groups and the racism they experience.

The Welsh Government has adopted the International Holocaust Remembrance Alliance's working definition of antisemitism which is:

"Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities."

We add that we prefer to say "Jewish people".

The All Party Parliamentary Group on British Muslims and the Runneymede Trust both define Islamophobia in terms of racism directed at Muslims, highlighting the way in which Muslims have become collectively racialised through their religious identities. It is important thus vital that prejudice, discrimination, bigotry, and inequality facing Muslims is considered in addressing racial equality here in Wales. This is not to undermine the importance of religious identity to Muslims, but rather to recognise the way in which racism impacts different communities in different ways.

There were also comments on the term 'lived experience'. Some pointed out that their lived experiences were not solely what individuals brought - they also brought their professional expertise; for example, as health workers, social care workers, teachers or academics. The preferred term proposed was 'experts by lived experience.'

#### B. Vision, purpose and values

We have worked within the good practice and momentum offered by the Well Being of Future Generations' Act and the five ways of working as core to this work. The Act is about improving the social, economic, environmental and cultural well-being of Wales now and in the future.

It makes public bodies listed in the Act think more about the long-term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach.

The intentions of the Act can only be realised if we are working actively towards equity in wellbeing for everyone in Wales now, and in the future. Addressing racism and the disparities it has created and continues to sustain are fundamental to the purpose of the Act. Anti-racism has to be central to the implementation of the Act – otherwise it risks perpetuating existing injustice.

This purpose is reflected in the specific wellbeing Goal which is: "A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances)". However, the goals must be seen together and none can be achieved without transforming the wellbeing of ethnic minority people living today and of future generations to come.

In developing the vision, values and purpose of this work in a way that was led by and endorsed by ethnic minority communities, we have embedded the sustainable development principles of long term, prevention, integration and collaboration at the heart of this work

The Vision, Purpose, Values and Goals of this Plan, as stated in the draft consultation were:

#### Vision

Wales as an anti-racist nation.

#### Purpose

To collectively, make a measurable difference to the lives of Black, Asian and Minority Ethnic people.

#### **Values**

Openness and transparency, putting people's lived experiences at the heart of the work we do, and adopting a rights-based approach.

The vision, purpose and values were widely welcomed in the responses. Regarding timescales, some felt it was too ambitious to achieve the Plan's purpose within ten years, due to the extent of the cultural and behavioural changes needed. Many also questioned where the actions in the consultation paper would achieve this vision.

We agreed. Racism has been systematised and institutionalised over generations, so it will take a significant time to change. The vision may take longer than 10 years to realise, but we need a picture of what it may look like in order to move forward, and we want to make progress as quickly as we can. Our purpose is to collectively make a measurable difference to the lives of Black, Asian and Minority Ethnic people. This has to happen through the collective efforts of Government, public, third and private sectors. We have therefore amended the purpose to include the word "collectively".

For the purpose of monitoring change we have responded to comments about the large number of statements in the draft plan about what good looks like by 2030 if we move towards becoming an anti-racist nation and revised and condensed them. We list them in the section entitled "How we will deliver this Plan", and explain how we will use this material to measure change over time.



In our draft consultation we laid out of the Vision, Purpose, Values and Goals as below and this remains the same.

In this, the final Plan, we have amended the Goals, as below.

The cross-cutting element and the Environment actions have gone. The cross-cutting elements are now reflected in our section on Leadership within the Welsh Government and in relation to public services section, and the Environment section is awaiting further work. We are committed to including action on Climate Change and Environment in the coming months.

We give some explanations on each of the areas of the Goals we have actions in Section B.

#### C. Goals and Actions

Some respondents were concerned that we were trying to achieve too much, and/or not prioritising the right things for tackling systemic and institutional racism. Others felt the sheer size and extent of the draft plan (64 Goals and 340 Actions) meant that impact, and overall understanding, were at risk of being lost. We have reflected on this and have focused the final actions on tackling institutionalised racism.

Others felt that the draft Goals and Actions were not sufficiently 'SMART' i.e. specific, measurable, achievable, reliable and time bound. In the consultation paper the goals and actions were listed as 'short term', 'medium term' and 'long term'. This was partly done to test the appetite for particular actions. However, respondents felt these terms were too imprecise. Since the consultation period we have worked with policy leads to sharpen the actions with clearer outcomes and timescales. We have also attached responsibility for every action to a named part of the organisation.

## This revised Plan only covers actions to be undertaken between June 2022 to June 2024. We will learn from the work we do in this period and will develop revised goals and actions for the subsequent period.

Others felt the document had too much jargon and 'policy speak'. They felt we were not explaining the changes we were looking to make in simple enough terms. So, we have tried to simplify things, by focusing on changes we wish to collectively make to people's experiences of racism in six different aspects of their lives:

- · Their experience of racism in every-day life;
- Their experience of racism when experiencing service delivery;
- · Their experience in being part of the workplace;
- Their experience in gaining jobs and opportunities.
- Their experience when they lack visible role models in positions of power.
- Your experience of racism as a refugee or asylum seeker.

Policy officials have used these headings to guide their action plans. In our published Introduction to anti-racist Wales – <u>gov.wales/anti-racist-wales-action-plan</u> we share some examples of how we are addressing people's different experiences in different policy areas.



#### D. Multiple discrimination/'intersectionality'

Some concerns were expressed that we were only focusing on one protected group, and that this took a simplistic approach to the different ways racism works to impact on ethnic minority women, children, older people, disabled people, and other protected groups. Many commented that an awareness of how these differing characteristics interplay, to create greater disparities, was not sufficiently visible in the draft Plan.

Kimberlé Crenshaw, a Black feminist, coined the term 'intersectionality' to describe the combined effect of multiple forms of oppression, and how they interplay and are interconnected (Crenshaw K. 1989.)

We recognise that ethnic minority women, for example, carry a heavier burden in their experience of racism, for example through their direct experience with maternity services, or in leading engagement with schools or social services on behalf of their elders and families. We also recognise that young ethnic minority men, for example, are more likely than other groups to be stopped and searched by the police. Similarly, the systems and processes that impact on refugees and migrant workers are very different to those affecting ethnic minority people with the permanent right to live in Britain.

Socio-economic circumstances or 'class' plays an additional role in keeping ethnic minority people oppressed. Ethnic minority people in Wales are more than twice as likely as White people to live in the 10 per cent most deprived parts of Wales (20.6 per cent of ethnic minority people compared to 8.3 per cent of White people). Black people are most likely to live in the 10 per cent most deprived parts of Wales, with 35 per cent of all Black people living in these areas. More than 1 in 10 people living in the 10 per cent most deprived areas are from ethnic minority groups, despite only making up 5 per cent of the total population in Wales (Welsh Government, 2020).

In recent years, we have sought to improve the experience of people with specific protected characteristics through a series of action plans. These include the *Gender Equality Action Plan*, the Nation of Sanctuary Refugee and Asylum Seeker Plan, the Enabling Gypsies, Roma and Travellers Plan and the Right to Independent Living Plan. Other plans are also in development, including the LGBTQI+ Plan, and work by the Disability Rights Taskforce in response to the 'Locked out: liberating disabled people's lives and rights in Wales beyond COVID-19' report. Please see Appendix 7 for links to these plans.

These plans consider complex and challenging experiences and set out a series of actions to mitigate the potential negative impacts associated with them. It is important that these characteristics are not considered in isolation. Consideration must be given to how a protected characteristic interacts with other factors, such as gender, sexuality, disability, age, faith, socio-economic status or class. One single form of discrimination cannot and should not be understood in isolation from another.

Many of the themes in this Plan are repeated within other plans because they apply to the experience of combined protected characteristics. We recognise that actions and goals within this Plan which aim to address the experience of ethnic minority people in Wales do not always address race or ethnicity in isolation. Often, they address the experience of intersecting characteristics.

The power of this Plan (and others) will depend on our approach to implementation. An intersectional approach will be crucial. So the Accountability Group will consider and draw-in expertise from across a range of protected characteristics, to ensure that combined impacts are considered, as the Plan is put into action. Governance frameworks for all other equality plans will also be adjusted for the same purpose, and reporting mechanisms identified and put in place.

#### E. Measuring and monitoring change

Measures and indicators: The consultation paper did not include specific performance indicators as we were testing the appetite for the particular actions before confirming details. So respondents were concerned that we were not being transparent about how we would monitor change, either quantitatively (with numbers and statistics) or qualitatively (e.g. through interviews, or people's accounts of lived experience).

#### F. Compliance with the Equalities Act

The consultation responses suggested that the failure to reduce racism was due, in part, to government, public, private and third sector organisations not fully meeting their duties under the Equalities Act 2010. It was suggested that the Public Service Equality Duty under the Equality Act 2010 needed to be fully met, and that the powers under the Act should become central to the implementation of this Plan. We agree. We will ensure that we hold ourselves, and those we fund, to account in meeting this Duty.

To help with this, we have identified a set of five core actions for all public bodies to progress, linked directly to the provisions of the Equality Act 2010. Our newly established Race Disparity Evidence Unit will track progress with this. These five core actions are explained more fully in the Leadership in Welsh Government and across public sector section. (Section B2, page 27.)

#### 17 Anti-racist Wales Action Plan



Image courtesy of Women Connect First



Image courtesy of Gaynor Legall

#### G. Resources

A key concern for many consultees was whether this Plan would be supported by proper resources. As a result, the Welsh Government has reviewed the resources it makes available to (a) the teams that will coordinate and monitor the Plan, (b) to the relevant policy leads, and (c) for the work with external stakeholders and communities.

Different Ministers, across all portfolios, have committed to make an appropriate level of resources available across Welsh Government, to deliver the goals and actions in this Plan. Funding has been made available, within the Welsh Government's budget, to support this.

In developing detailed actions in different policy areas, the level of resources required to implement them have been identified and agreed. For example, the Welsh Government has committed funds to support a central Implementation team to oversee the implementation plan, to establish the Race Disparity Evidence Unit, and to support the work of the External Accountability Group. In addition, we are being very clear about how we will use our wider budgets and spending and programme budgets to drive anti-racist action.

The 'Anti-racist Wales Implementation team' will lead on the development, implementation and monitoring of the goals and actions. We will also review the criteria and priorities for our Equality and Inclusion grants, with a view to establishing a better dialogue with ethnic minority communities across Wales.

#### H. The leadership challenge

A concern was raised that giving responsibility for promoting anti-racism to a 'champion' within an organisation may backfire, by encouraging other leaders to avoid action or accountability. Many suggested that all leaders should champion anti-racism.

We believe that the leadership challenge that permeates all the goals and actions is to reveal the systems and processes that have a negative impact on ethnic minority people, and to do something active, bold and different to tackle these. It requires leaders to reflect, and to tackle the "cause behind the cause." This is the challenge we will be asking leaders at all levels of our organisation to understand, and which we will support them to act upon.

This requires leaders to prioritise anti-racism, and to give a clear message about the importance of being brave and radical, and to live these behaviours themselves. As 'Allies' they will be need to engage in difficult conversations that take on board people's lived experiences – and to initiate and sustain change. It also requires leaders to identify those systems and processes that result in different, negative outcomes for ethnic minority people, and to ensure that changes occur. Calling out racism wherever they see it and committing to making unbiased decisions is also critical.

We will enable leaders to understand that anti-racism requires them to listen, however discomforting, and to be creative about possible solutions. They should co-design solutions with ethnic minority people, as they have the real knowledge of the changes that are needed. For their part, policy officials and other public servants have knowledge about the tools that exist to make change. We need everyone to have this knowledge as we see leadership to be a part of everyone's role, not just those who occupy senior positions.so they can be equal partners in implementing new and effective solutions.

We will also work with leaders in the public services, third sector and those we fund in the private sector to gain rapid ownership of this Plan. We will hold dialogue sessions but also contract via our policy work with those enable or regulate on our behalf to use the levers they have to their full effect.

Finally and most importantly, we wish to ensure that this Plan recognises the strengths of the leadership within the ethnic minority communities. Leaders at all levels in society have fought racism for many generations and for many years, and left unrecognised and often excluded from decision making that effects ethnic minority communities and wider. Their resilience and tenacity in continuing the fight against racism needs acknowledging, and their considerable strengths and insights in how systems work to elude and discriminate is critical to this work and indeed to good practice for all.

These include strengths reflected in the consultation and at every level of society – of individuals who have suffered the trauma of racism and shared their lived experiences in open forums, of groups who lobby and/or act on behalf of others, often without payment and organisations who stand up against racism and call out racism. This leadership carries a particular burden – one of enduring scars of racist experiences. As Welsh Government we respect and value the work they do, support their efforts and acknowledge that without them this Plan would not be possible.

Our leadership commitment is to support and develop the capacity and capabilities of leaders from the ethnic minority communities. We have identified actions within our Leadership within Welsh Government and across public services section.

#### I. The role of the private sector

There was a concern that the Plan did not focus enough on the private sector, or on actions that can influence the private sector. This presents challenges because we do not hold as many direct levers with the private sector as we do with the wider Welsh public service. We will aim to use our funding more effectively with the private sector through our grants and procurement processes to ensure organisations in receipt of our funding demonstrate a commitment to anti-racism.

To deliver the ambitions of the Plan, we will need to use our influence and persuasion as an exemplar employer. By encouraging both the public and private sectors to work together with recognised trade unions in social partnership, we will encourage more robust and effective decision-making processes, and the creation of an anti-racist culture.

The Wales TUC represents Trade Unionists in all sectors in Wales and play a significant role in tackling racism in the workplace. The Social Partnership Act and the way in which Trade Unions use collective bargaining to implement Fair Work outcomes so that workers receive:

- · Higher pay
- Flexible work policies
- Job security
- · A fairer workplace

#### J. Resistance to the Action Plan

Although there were many constructive responses from public services, there was also some evidence of resistance to the Plan and its ambition. This was reflected in responses which questioned the need for a Plan, given existing legislation and other relevant action plans and strategies. There were also questions about the relevance for different parts of Wales, funding and resources and discomfort with proposals around accountability for change.

We recognise that adopting an anti-racist approach represents a significant shift in our approach to addressing racial disparity and racism in Wales. There is limited expertise in Welsh public bodies, including Welsh Government, in embedding anti-racist practice on a sustained basis. We need to work together across public services to provide leadership on this issue and build capacity.

However, we make no apology for having a very clear and direct focus on race and ethnicity and the imperative to address structural and systemic racism. The case for change is overwhelming. If change was going to come as a consequence of existing legislation, plans and strategies, and different approaches e.g. multi-culturalism race equality, inclusion and diversity etc., we would have already have seen it. This Plan – and its accountability arrangements – is about having a sustained focus on these issues and ensuring that as a minimum, existing legislation is complied with.

## 5. How we will deliver this Plan

When embarking on this work to develop this Plan there was a clear call by ethnic minority leaders working with us that they did not want another strategy, and further, another Plan that did not deliver on its promises. How we ensure that the implementation takes place effectively and does not falter along its journey has been central to the discussion with the Steering Group and people within the ethnic minority groups. We have put in place three key elements to reassure on these concerns - clear measures of success. including indicators, independent governance arrangements and commitment to resources.

#### A. Clear measures of success, including indicators for success

When we developed our Vision, values and purpose statements with the ethnic minority communities. we also identified a series of statements about what "good" would look like if we moved significantly towards being an anti-racist nation by 2030. (See pages 27 and 28 of the Draft Race Equality Action Plan). Based on feedback, we have revised and drafted these to include the below. They cover six areas of concerns:

#### In relation to ethnic minority people's resilience and success despite racism experienced.



#### Statement of desired changes:

- 1. Welsh Government will have funded and supported community-led organisations in an open and fair way.
- 2. Policy development and the design of service provision includes a diverse range of voices from Black, Asian and Minority Ethnic communities at regional and national level, using their lived experiences to find creative solutions to policy and service development and delivery.

#### In relation to ethnic minority people's experience of racism in every-day life:



Image courtesy of Race Council Cymru

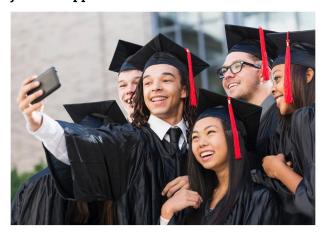
#### Statement of desired changes:

- 1. Black, Asian and Minority Ethnic people are aware of the complaints procedures when accessing public services and are able to access those in the language which they require when needed without any fear, barriers or retribution.
- 2. The police service in Wales proactively tackles racism and works with Black, Asian and Minority Ethnic people and the wider community to improve community cohesion in the delivery of police services.
- 3. The justice process in dealing with racism is reviewed in collaboration with Black, Asian and Minority Ethnic communities.
- 4. Physical and online Hate crime is eliminated.

#### In relation to ethnic minority people's experience of racism in service delivery.



#### In relation to ethnic minority people's experience of racism in the workplace/racism in gaining jobs and opportunities.



#### In relation to ethnic minority people's experience when there is a lack of visible role models in positions of power.



Image courtesy of Wales TUC

#### Statement of desired changes:

- 1. Black, Asian and Minority Ethnic students and their carers have confidence that education settings have effective policies to prevent racist bullying/micro aggressions and that these are dealt with effectively when they do occur.
- 2. Black, Asian and Minority Ethnic people experience improved access to public services which are equitable and culturally appropriate to their needs.
- 3. Public sector providers are culturally aware and competent in delivering services to Black, Asian and Minority Ethnic people which recognises the differences amongst ethnic minority groups.
- 4. There is zero tolerance to racial discrimination or inequality in public sector service delivery.

#### Statement of desired changes:

- 1. The public sector workforce in Wales represents the population it serves at all levels of the organisation.
- 2. Improved identification and promotion of practice that works in reducing employment inequalities, discrimination and barriers for Black, Asian and Minority Ethnic people in all aspects of recruitment, selection and career progression.
- 3. Leaders and senior management in public and third sector demonstrate how they are working to embed anti-racism within the organisation as a mandatory aspect of their performance management.
- 4. All staff in public sector and funded bodies receive mandatory training on anti-racism.

#### Statement of desired changes:

- 1. Public, private and third sector organisations have senior leadership that is representative and inclusive, as are all Boards of public bodies.
- 2. A diverse Welsh Senedd that is representative of its communities
- 3. Public, private and third sector organisations develop Black, Asian and Minority Ethnic people to take up 'positions of power'.

In relation to ethnic minority people's experience of racism in areas beyond the control of Welsh Government (non-devolved areas): for example in your experience as refugees or asylum seekers.



#### Statement of desired changes:

- 1. Those seeking asylum and refuge in Wales are aware of their rights and entitlements, and are able to access them.
- 2. Wales is seen as a safe place to live by new arrivals and also existing communities.
- 3. Welsh Government uses its levers to ensure it influences non-devolved areas.

These are in draft and are being further developed and refined by a mixed group of community leaders, civil servants and public servants from outside the Welsh Government

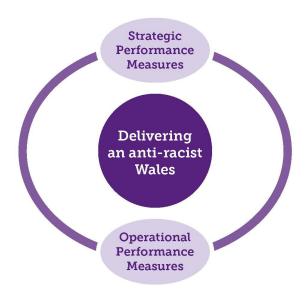
We have started to design a draft Strategic Progress Measurement Framework to become the main reporting tool for the Plan. Once developed, the framework will be further discuss with the newly set up Accountability Group (see below). It will show the progress the Welsh Government, public sector and funded organisations are making towards the purpose and the vision, against a set of strategic indicators. Work on it is ongoing and will be developed in autumn 2022 when we have the right resources and expertise to do this work.

The draft proposes that the measures will be measured at two levels:

(i) the Strategic Performance Measures (SPMs), will measure change across the Welsh Government, public and funded sectors. The SPMs are, on the whole, intended to be generic, and so applicable to any policy area, across all sectors.

(ii) the Operational Performance Measures (OPMs), will measure progress against the goals and actions set out in the Action Plan. Each respective policy area will have to consider how it will ensure effective measurement of the changes and outcomes arising from its actions. Each will need to develop its own OPMs and include appropriate actions.

Some of the ways we will measure change will take some time to implement. For example implementing new surveys, making changes to questions in major surveys, or changing sampling to ensure adequate ethnic minority people's representation to enable data to be presented in an appropriate more detailed/granular way.



#### B. External Independent Accountability Group

To offer additional and continuing confidence that this Plan is being implemented, in agreement with the Steering Group we have agreed the Terms of Reference an external, independent 'Accountability Group' to oversee this work. (See full Terms of References at Appendix 5). It will mainly consist of ethnic minority people, and will be further strengthened by including experts by lived experience of racism. They will have expertise in racial disparities, and in ways to tackle institutional racism in different areas, for example, health, social care, education, employment, and refugees. All will be recruited in an open and transparent way. We will look for a spread of expertise, lived experience, and views.

This independent Accountability Group will be led by Professor Emmanuel Ogbonna, from Cardiff University and Dr Andrew Goodall, Permanent Secretary at the Welsh Government. It will have regular access to the Minister for Social Justice, and the First Minister and other Ministers.

The Accountability Group's core focus will be ensuring delivery of the Plan, monitoring progress on actions and commitments and ensuring momentum is maintained. The Plan includes pan-public service actions and priorities, which require collective commitment across Welsh Government and public service leadership but will also require specific actions from particular sectors, including health, housing and local government. The Welsh Government will ensure commitments are monitored and progressed through many public service and third sector organisations through mechanisms such as remit letters or funding commitments and through political engagement between Ministers and councils.

We will also have an internal Welsh Government group, called the *Internal Challenge and Support Group*, which will guide the different departments' work. Its role will be to ensure that we are 'joined-up' across different policy areas. (See full Terms of References for this group at Appendix 6.)

We value the conversations we have started with ethnic minority people, and so we also intend to develop local forums, across Wales, to help us continue this conversation.

The consultation also revealed concerns over whether the Welsh Government would have the right tools and structures to hold other bodies to account over this Plan. Its existing levers include legislation and guidance, contracts and grant agreements, and its powers to inspect, regulate and investigate. Our revised actions aim to spell out more clearly how we will use these levers to accelerate action.

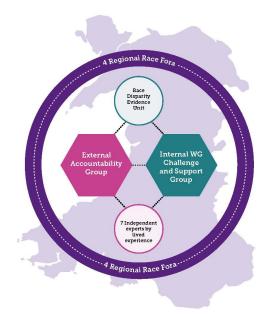
#### C. Resources

The Minister for Social Justice has agreed to invest in and set up a *Race Disparity Evidence Unit* alongside an *Equality Data Unit* to improve quantitative and qualitative data on seldom-heard groups in Wales. Race Disparity Evidence Unit will offer targeted resource to support improvements to evidence on ethnicity. In 2022 the development of the Race Evidence Programme will begin, which will include identification of the top priorities in this area.

In the short-term, needs will be met through the Race Disparity Evidence Unit delivering ad-hoc evidence reviews and analysis using currently available evidence sources. In the longer-term the Race Disparity Evidence Unit will have a vital role in influencing and improving a range of longer-term solutions to evidence (as exampled in the Strategic Performance indicators section). Improvements across these areas could feed into longer-term measurable performance indicators for this Plan.

The Welsh Government are demonstrating their priority and commitment to this work by funding a central Anti-racist Plan team of officials who will lead the implementation. The team will work with both different policy officials leading on the actions outlined in Section B and also with the leaders at different levels in the ethnic minority and other communities. Resources to support the Accountability Group will also be made available.

The Minister for Social Justice has agreed to implement a Race Disparity Evidence Unit alongside an Equality Data Unit to improve quantitative, qualitative, and lived experience data on seldom-heard groups in Wales. The Race Disparity Evidence Unit will offer targeted resource to support improvements to evidence on ethnicity. In 2022 the development of the Race Evidence Programme will begin, which will include identification of the top priorities in this area.



## 6. Acknowledgements

We would like to thank the following for helping us to produce this Plan. Every individual and group has provided evidence and insight that has made this Plan what it is.

- The members of the Steering Group.
- The members of the Wales Race Forum, and also the many Black, Asian and Minority Ethnic individuals and organisations who helped to collect and collate the contributions from the wider community. Their efforts helped to bring us new voices, which greatly informed our work.
- The COVID-19 Group Health Advisory Group and its Socio-economic and Risk Assessment Sub-groups. These produced a series of recommendations, many of which have been incorporated into the Plan.
- · The Cynefin and Monuments Advisory groups, The Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group, published two reports highlighting the need for more high-quality learning resources. involving more positive representations, and detailing the contributions, of Black, Asian, and Minority Ethnic groups in schools in Wales. The Welsh Government accepted the findings in their entirety.
- The 'community mentors' who brought to our attention their individual and their communities' lived experiences in specific policy areas and as feedback on the Plan from their communities.
- · The leaders and participants in our 'community-led dialogues' with ethnic minority community groups and forums

- The Trade Unions and the Wales TUC for working with us in social partnership, adhering to the important principles of co-operation, respect and trust.
- The participants in our policy events, where we brought together partners from specific policy fields. to share evidence and develop potential actions.
- The Wales Centre for Public Policy and those who contributed to the rapid reviews of existing evidence conducted by the Centre.
- Those from the Ethnic Minorities and Support Youth Team Wales who provided invaluable help and facilitation at our 'vision-setting' events.
- Those who gifted their time to participate in the various vision-setting events and evidencegathering phases of this work.
- Those experts, from across the UK, working in the field of anti-racism who gave generously of their advice at short notice.
- Race Equality First for their collation and analysis for the consultation responses.
- We would also like to thank the team of officials and the policy leads who have been exceptional in managing the entire process leading to the development of this Plan.

Rt. Hon. Mark Drakeford MS. First Minister of Wales

Jane Hutt MS. Minister for Social Justice

Professor Emmanuel Ogbonna, Cardiff University

Dr Andrew Goodall. Permanent Secretary, Welsh Government

## 1. Background on detailed actions for policy areas

#### Background and rationale for actions in different areas of leadership and policies

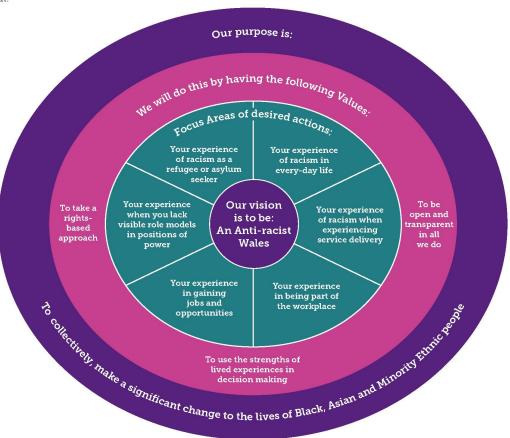
In developing this action plan, we have focused on 6 ways in which racism impacts on the lives of ethnic minority people, for instance in:

- · experience of racism in everyday life
- · experience of racism when experiencing service
- · experience of racism in being part of the workforce
- · experience of racism in gaining jobs and opportunities
- experience when they lack visible role models in position of power
- experience of racism as a refugee or asylum seeker.



Image courtesy of Ethnic Minorities Youth Support Team Wales

The below diagram (repeated from page 14) illustrates how the six areas interface with the vision, values and purpose of this work.



As a Government our work is largely planned and delivered according to policy areas such as Health and Social Care or Education, so we have separated the actions according to policy areas. This makes accountability for progress clearer but we acknowledge that people's lives do not experience these policy areas separately. We used the above lens of the different experiences of racism in different areas of people's lives to guide the development of the actions and it will remain a key reference point.

We have divided out actions into eleven broad areas. Some have sub sections and other policy areas will be added in time. For each, we present some evidence, explain the background and rationale for our focus and our how it informs the detailed actions as outlined, under different policy areas, in this section.

The cross-cutting element and the Environment and Climate change actions have been put on hold. During June to December 2022 we will be developing a more comprehensive action plan to include our work on climate change, rural affairs and environment, based on evidence both from data we collect and from lived experiences of Black Asian Minority Ethnic people across Wales.

We recognise that locally and globally ethnic minority people are disproportionately affected by climate change and practices that are environmentally damaging. Their heritage, cultures and religions however, offer them strong connections with, and respect for their environment.

We have developed a Local Place for Nature Programme (LNfN), intended to get local people involved in nature at their doorsteps. We have purposely targeted the greater involvement of ethnic minority communities and will share learning on this. Policy leads in the respective Climate Change, Rural Affairs, and Environment parts of the Welsh Government are already thinking about what the challenges and opportunities are in greater involvement and actions for ethnic minority groups in such work as our review of the Wales Coastal Path, in delivering grants and funds to communities, in developing a new approach to Sustainable Farming and of course the impact of climate change on ethnic minority communities here in Wales and globally. We will present our evidence for change and the actions to the Accountability Group in December 2022.

Supporting children and families is an ongoing commitment for Welsh Government. The childcare and play goals and actions set out in the Childcare and Play section (Section B12, page 124) are a key focus, and this section has been included in response to issues raised during consultation on the draft plan.

However, our commitment to children and families goes wider, with a strong focus on upholding children's rights. Our work includes tackling the potential impact of adverse childhood experiences, supporting families through our Flying Start and Families First programmes, and wider support for parents and development of children's speech, language and communication skills. The parent-child relationship and home environment are key, alongside access to high quality childcare, play, education and health services.

Children and Families division will continue discussions with Black, Asian and Minority Ethnic communities to understand the issues for their communities in relation to support for children and families, and will set out the further actions we will take by the end of 2022.

Finally, we recognise that in the Draft Consultation Plan, the section on Communities was focused mainly on the needs of Refugees and asylum seekers – our work on being a Nation of Sanctuary. We have amended the title to better reflect this work.

We give some explanations on each of the areas of the Goals we have outlined and state the detailed actions for Leadership within Welsh government and across the Welsh public services and then for each policy area in this section.

## 2. Leadership within the Welsh Government and across the Welsh public sector



#### Some evidence

- In 2020 to 2021, no new public appointments and less than 5% of public re-appointments made by the Welsh Government were to individuals from a Black, Asian and Minority Ethnic background (where the appointee's ethnicity is known) (Commissioner for Public Appointments, 2021), down from 5.9% and 18.2% respectively in the previous year (Commissioner for Public Appointments, 2020). However, due to pandemic disruption, many competitions were suspended; as such any conclusions drawn from the 2020 to 2021 data need to be treated with caution. In 2018 to 2019, 2.7% of new public appointments and 3.8% of public reappointments made by the Welsh Government were to individuals from a Black, Asian and Minority Ethnic background (where the ethnicity of the appointee is known) (Commissioner for Public Appointments, 2019).
- In the 2021 Senedd Cymru elections, three members from an ethnic minority background were elected (5% of all Members elected). Since 2015, ethnic minority police staff representation in England and Wales, as a proportion of staff whose ethnicity was known, grew from 6.7% to 7.4% on 31 March 2021 (response rates over 95%). This compares with 13.2% of the economically active population in England and Wales (House of Commons Library, 2021).

#### Introduction

Our vision is one in which the Welsh Government and the public services it funds are anti-racist, and there is a culture of zero-tolerance of racism throughout the public sector. This section covers both the Welsh Government's aspiration to be anti-racist, and its leadership responsibility for anti-racism across the wider public sector to enable, facilitate and hold to account our collective responsibility to become an anti-racist Wales

For the Welsh Government, as an employer of over 5,000 people, we must be an exemplar to other organisations in Wales. We must also create a sizable momentum for the changes needed across the public sector. Organisations will need to review and continuously improve their approach to operations, policy development, service delivery and co-design with ethnic minority communities. We will need to weave anti-racism through all our policies and practices. We must be able to demonstrate that we are making a significant difference to the lives of ethnic minority people.

Within the Welsh Government, our departments will work with their delivery partners. For example, health boards, local authorities and cultural and heritage bodies to use the most appropriate mechanisms to embed these changes within their policy-making and service delivery. It will be through these unique relationships with those we fund, and the different tools and levers we use, that we will be able to make the culture change we need for anti-racism to take hold across the public and third sector.

#### What we know

We know that as an organisation we are currently a long way from being representative and appropriately serving the communities of Wales in our organisation. We need to do more, so we have set a number of targets in our Workforce Equality, Diversity and Inclusion Strategy 2021 to 2026 that by 2026, 20% of the people we recruit will be from ethnic minority backgrounds (the Welsh Government, 2021e).

We have also committed to promote ethnic minority staff at a level which exceeds their population share, to address under-representation at all levels of the organisation. We will seek not just to increase numbers at all levels of the organisation, but more; we will look at people's experiences of working in the Welsh Government, and seek to review and develop robust policies to facilitate progression, and processes for calling out racism.

#### What we will do

We will work with leaders at all levels because we believe that leadership is distributed, and leadership skills and wisdoms are held at every level of every organisation. To ensure that we are truly delivering the actions set out across this plan, our senior leaders will set an example, by being accountable under our performance management system for being anti-racist. The way the public sector operates, for example, in its use of data, policy-making and funding arrangements – will need to reflect our commitment to anti-racism. And how we deliver our services and engage with ethnic minorities must take into account cultural and language considerations.

We will make explicit our expectations of those we fund to address racism by:

- using the levers we have through remit letters, financial arrangements and our new Accountability Group.
- expecting organisations to demonstrate how they will ensure at least minimum compliance with the Equality Act 2010 and take actions to tackle racism and monitor actions annually.

To achieve an Anti-racist public sector in Wales we have identified a clear set of goals and actions that the Welsh Government will undertake to achieve anti-racism and so our expectation is for all public sector organisations to do the same. The different areas will aim to:

- Demonstrate visible commitment to anti-racism:
  - behaviour change and values
  - use of positive action
  - recruitment
  - progression
  - senior leadership
  - board representation.
- Embed ways of working to tackle racism:
  - use of all levers to tackle racism
- use of data and evidence
- policy-making
- use of funding and grants.

- Engage and deliver anti-racist services:
  - cultural awareness and competency in our communications
- language and interpretation services
- advocacy services.
- · Embed accountability and demonstrate progress:
  - governance and accountability arrangements.

### Wider public, third sector and Government funded private sector

In relation to the leadership responsibility we hold for public, third and those private sector organisations we fund, we have identified 5 core actions we will expect and will hold them to account, via our Accountability Group:

- 1. A strong commitment to lead from the front and demonstrate it in terms of anti-racist values, behaviours, representation at all levels of your organisations and accountability measures.
- Participation in all decision making and senior leadership groups in a way that enables lived experiences of ethnic minority people to be heard and acted upon.
- 3. Achieve, at the very least, minimum requirements of the Equality Act 2010 and publish your results in an open and accessible forum/platform.
- 4. Ensure minimum standards and provision of culturally sensitive and appropriate services, including provision of translation and interpretation.
- 5. Ensure robust complaints policies and processes for racial harassment that are validated to the satisfaction of ethnic minority groups.

Actions	Outputs	Impact	By when	Lead and partners		
Demonstrate visible commitment to a	Demonstrate visible commitment to anti-racism					
Goal: To create a sizeable shift in culture, include	ding behaviour change, within the orgar	nisation, towards values and behaviours	for anti-racism.			
Every senior leader (Senior Civil Servant) within the Welsh Government will be required to have one performance objective related to anti-racism in 2022 to 2023.  The Board of the Welsh Government will have regular reports on the Plan and be invited to look at their own diversity, learning needs and performance objectives in relation to anti-racism.	Permanent Secretary will announce and explain the requirement to both senior leaders and the Board of Welsh Government, as well as point to resources to support this action.	The Welsh Government Board and all senior leaders will have committed to embedding anti-racism in every aspect of Welsh Government policy and practice.  Senior leaders will make an informed and educated decision about the performance /behaviours/actions they choose to demonstrate their objectives and so demonstrate a greater understanding and commitment to anti-racism.	April 2023.	Permanent Secretary for the Welsh Government supported by Welsh Government Human Resources.		
Provide key support, including induction, training, coaching/mentoring, reverse mentoring, seminars and events to keep an understanding of anti-racism constantly on the agenda	Programme of events, reverse mentoring and anti-racist coaching will be available for all leaders.  Anti-racism embedded into the new Senior Civil Service Strategy by June 2022.	Every senior leader will be aware of what anti-racist behaviours look like within the leadership framework for public services.	April 2023.	Welsh Government Human Resources in consultation with the Anti-racist Wales Implementation Team.		
Academi Wales will develop leadership behaviours that will be part of the Leadership Behaviours Framework to support this action.  A collective review of the performance indicators adopted by senior leaders, will be carried out annually, to ensure they do not become tick boxes and learning is shared with Accountability Group and Welsh Government Board members.	Academi Wales to review and co-design the public service leadership behaviours with ethnic minority leaders.		April 2023.	<ul> <li>Academi Wales.</li> <li>The Welsh Government's Chief Operating officer to commission.</li> </ul>		

Actions	Outputs	Impact	By when	Lead and partners
Goal: Continue to embed Positive Action in our recruitment, retention and progression policies and procedures (Positive action is a range of measures allowed under the Equality Act 2010.)				
Implement positive action into progression, recruitments and interviews.  Increase understanding on Positive Action as defined in the Equality Act 2010 and understand how to embed it in their work.		Officials are well informed and confident to implement Positive Action in recruitment, retention and progression. Rates of retention and progression for ethnic minority staff will be the same as those for non-ethnic minority staff.  By 2026 we will have reached our recruitment target of 20% at all levels of the organisation and in Board membership that are from ethnic minority groups. As a result, at least 6% of all staff at all levels of the Welsh Government will be from an ethnic minority.	2023.	Welsh Government Human Resources.
Deliver training and development (mentoring etc) opportunities for ethnic minority staff within the organisation.		Staff from ethnic minority groups will experience outcomes no worse than those of non-ethnic minority staff in progression and promotion.  Minority Ethnic Staff Network staff who attend specific Learning & Development opportunities report high levels of satisfaction.	2023.	Welsh Government Human Resources.
Co-design an apprenticeship and new middle management talent schemes to attract applicants from ethnic minority communities to meet our targets for recruitment.		New apprentice and middle management talent scheme outcomes reflect the population of ethnic minorities in Wales.		Welsh Government Human Resources.

Actions	Outputs	Impact	By when	Lead and partners	
Goal: To use data, quantitative and qualitative of Welsh Government.	Goal: To use data, quantitative and qualitative data (including lived experience) to monitor and so improve our recruitment, retention and exit and experience of working in the Welsh Government.				
Collect data on progress against flow targets above, applicants to recruitment programmes and individual job adverts, where applicants saw adverts for jobs, inward secondments and outward secondments.  After the review of HR systems and policies proposed above, recommendations for data	Ethnic minority people inside and outside the organisation will have data to measure the Welsh Government's progress about recruitment and all other HR related processes.	Quantitative data and qualitative data including lived experience will be collected to share the Welsh Governments efforts to tackle racism in recruitment to exit.	Start of 2024.	Welsh Government Human Resources.	
will be reviewed and implemented.  Goal: To ensure that public sector senior leader	rchin is rangeantative and inclusive, as a	are all Boards of public services and third	sector organisation was	fund	
<ul> <li>Implementation of the 2020 Diversity and Inclusion Strategy for Public Appointments, including:</li> <li>Chairs of all regulated bodies to ensure that every Board member (including themselves) has a diversity and inclusion objective, to include anti-racism as part of their performance management system.</li> <li>Chairs objectives to be discussed by relevant stakeholder groups and agreed by Ministers or Welsh Government Senior officials.</li> <li>A suite of training for Regulated Boards to be commissioned and delivered. Good practice form this transferred to other Boards we fund.</li> </ul>	A near ready public appointment leadership programme for ethnic minority groups, interested in assuming public appointment roles.  A public leaders of the future development programme targeted at ethnic minority groups aimed at showcasing and supporting individuals interested in public appointment opportunities in the medium to long term.	Chairs of regulated bodies will have identified one objective in their performance management system related to anti-racism.  Chairs will have had a discussion with their respective Ministers about their performance related to tackling institutional racism.  Regulated Boards will have committed to training in anti-racism.	By summer 2023. By summer 2023.	Public Bodies Unit.  Public Bodies Unit.	
Leadership: Race Disparity Evidence Unit to scope and pilot a data collection of the equality characteristics of regulated Public Sector Bodies (including race) in 2022-23 in order to run a baseline survey for 2023-24. Initial assessment of the pilot will be published in Summer 2023.	Clear picture of the position on Boards in Welsh Government public bodies	Following the initial baseline survey of the PSB equality data collection in Summer 2024 we will set quantifiable targets on an increase in ethnic minority representation on regulated bodies. Targets will also be set for other protected groups.  Ability to measure and report on progress.	Baseline survey 2022 to 2023.	Race Disparity Evidence Unit.	

Actions	Outputs	Impact	By when	Lead and partners
Facilitate bespoke opportunities including mentoring, coaching, community mentorship, reverse mentoring for community leaders with public service leaders, providing mutual benefit for them and for public services.	A suite of opportunities available from across public and third sector opened and well published to community leaders is in place.	More women and people from ethnic minority groups in leadership roles.  Career entry and progression through all levels through to senior leadership and Boards.	In place by end of 2023.	Public Bodies Unit.
Expand the availability of opportunities for community leaders to be involved in policy development and decision-making (including making public appointments), with remuneration where possible and appropriate.	Outreach programme developed, community leaders engaged and budget identified to remunerate people's time.	Expert lived experience built into policy-making and delivery decision.  Better services for all.	By Summer 2023.	Anti-racist Wales Implementation Team.
Develop a cadre of highly committed allies across public services to embed anti-racism.  Departments and sponsor teams to work with delivery bodies to develop the capacity and capability of a greater understanding and actions required of allies for anti-racism.  Public Bodies Unit to lead corporate communications with key internal and external stakeholders to share best practice and facilitate improved practice.	Expectation that public bodies create a programme of events and guidance on what it means to be an ally and how to call out racism and support ethnic minority people will be in place.  Training in managing a multi-racial, intersectional team will be commissioned.  Mentors and coaches who are active allies within and outside Welsh Government will be made available to ethnic minority staff.  Public Bodies Unit to engage senior public leaders through the Public Leaders Forum.  Public Bodies Unit to establish and manage an internal network with Partnership Teams to share and drive best practice and to establish and facilitate an external network with relevant stakeholders from protected characteristics with a similar goal."	All leaders at all levels of the organisation will have exposure to and better understand what is racism, anti-racism, the dynamics of intersectional discrimination and act to call out racism including micro aggression and support ethnic minority staff.	By end 2022. By summer 2023.	Public Bodies Unit reporting progress of sponsor teams.

Actions	Outputs	Impact	By when	Lead and partners	
Join up work to support community leadership with development of the pipeline for public appointments and entry to the public service workforce for ethnic minority people, with particular focus on ethnic minority women who are exceptionally under-represented in leadership roles.	Develop a collaborative programme of support for community leaders from ethnic minority groups to enter the public services workforce.	More women and people from ethnic minority groups in leadership roles.  Career entry and progression through all levels through to senior leadership and Boards.	By end March 2023.	<ul> <li>Anti-Racist Wales Implementation Team.</li> <li>Third Sector Team.</li> <li>Public Bodies Unit.</li> </ul>	
Goal: To ensure that public and third sector org	anisations we fund work towards zero-t	olerance to racism.			
Academi Wales will review and co-design its Public Service Leadership Behaviours Framework, embedding an anti-racist approach into that review.	Revised behaviours framework.	Behaviours expected of leaders at all levels for an anti-racist Wales will be explicit to all.	April 2023.	Academi Wales.	
Academi Wales will share the draft of the behaviours with the Accountability Group and in particular the experts by expertise appointed to agree the new framework before adopting and publishing it.					
Embed ways of working to tackle racism					
Goal: To ensure all organisations we sponsor as	nd fund commit to at least meet the min	imum requirements of the duties in the	Equality Act 2010.		
Use all levers available to embed anti-racist approaches throughout the public sector including:  • remit letters	Published anti-racist statements and action plans for all funded organisations and their delivery partners.  All levers and enablers has to tackle	A Welsh Public Service that better reflects the communities it serves with services that meet the needs of all.		The Welsh Government.	
• funding					
performance reviews	institutional racism identified.				
• guidance					
legislation					
Ensure grants and procurement process are anti-racist.					
Use conditions of grants and procurement to incentivise other organisations to improve leadership and representation and anti-racism more generally.					

Actions	Outputs	Impact	By when	Lead and partners
Goal: Boost our use and understanding of data	and evidence to underpin anti-racist po	licies and measure progress.		
Establish the Equality, Race and Disability Evidence Units made up of:  • Equality Evidence Unit  • Disability Disparity Evidence Unit  • Race Disparity Evidence Unit.  Evidence Units to:  • undertake a mapping exercise of existing equality data/evidence sources to assess consistency, completeness and granularity, and identify gaps  • identify and address barriers to improving existing equality data collection, reporting and use  • provide guidance and training to colleagues and stakeholders on equality data collection and sources of evidence  • make changes to existing data collections and introduce new data collections, where required, to fill the evidence gaps identified.	Strategic Equality Evidence Plan identifying scope, priorities, clear timescales and approaches to work, including a:  Race Disparity Evidence Unit Plan  Equality Evidence Plan  Ethnicity data map including gaps  Key demographic and performance measures that reflect ethnic minority groups  Training and guidance materials on the use of evidence on ethnicity in policy making.	Data readily available to be used in all policy areas, to better reflect decision-making for ethnic minority communities.  Lived experience, in the form of coproduction and qualitative evidence is valued equally to other sources of evidence.  Data on ethnicity includes disaggregation by gender, disability and all other protected characteristics where possible.  An increased understanding of the availability, consistency, completeness and granularity of existing ethnicity data/evidence sources in Wales.  Improvements in collection, reporting and use of ethnicity data/evidence.	Evidence Units in place by April 2022. Planning and mapping completed by January 2023.  Available demographic and performance data will be staged and planed in detail following the data mapping exercise.	The Welsh Government Equality, Race and Disability Evidence Units, in partnership with public sector and third sector organisations.
Engage and deliver anti-racist service	S			
Goal: To ensure we engage with Black Asian Ethnic Minority communities and our services are delivered in a culturally competent and appropriate way.				
Provide expert support to Black, Asian and Minority Ethnic communities in accessing services, advice and benefits.	Establish separate advice and advocacy services to Gypsy, Roma and Traveller and Black Asian and Minority Ethnic communities.	Appoint procured service provider to deliver the service against defined indicator targets.  The scheme will improve access to a range of services including health, utilities, and benefits.	By December 2022.	Communities Division.

# 3. Education and Welsh language





Images courtesy of Ethnic Minorities Youth Support Team Wales

# Some evidence

- In the year ending July 2021, A2 outcomes (final year of A-levels) fell steeply for learners with Black, African, Caribbean, Black British ethnic backgrounds, undoing much of the rise in grades in 2019 to 2020, leading to a large gap in outcomes (the Welsh Government, 2022b).
- For the year September 2019 to August 2020, pupils with a Gypsy ethnic background had the highest rate of fixed term exclusions (5 days or less), and pupils with a White ethnic background had the highest rate of fixed term exclusions (over 5 days) and permanent exclusions. Note: We do not have data for the ethnic background of all pupils. Some pupils prefer not to provide the information, and for some the information wasn't obtained (the Welsh Government, 2021b)
- Statistics on the diversity of the education workforce in Wales published by the Education Workforce Council (EWC) show that the proportion of school teachers who were Black, Asian and Minority Ethnic was 1.3% in 2021 (Education Workforce Council, 2021). In contrast, the latest school census (as at April 2021) indicates that 12.1% of pupils aged 5 or over in Wales are Black, Asian and Minority Ethnic (the Welsh Government, 2021d).
- According to research undertaken by Show Racism the Red Card, a quarter of teacher/teaching assistant respondents in Wales had observed, responded to or had a pupil report racial discrimination in the last vear, with 3 in 10 pupil respondents to the survey admitting to being racist or using racist language towards another pupil (Show Racism the Red Card. 2020).

• The Equality and Human Rights Commission's (EHRC) inquiry into racial harassment in higher education found it is a common experience in publicly funded universities in Britain, and is widespread, consisting of racial harassment, physical attacks, name calling and micro aggression. It drew attention to issues relating to a lack of understanding and confidence amongst university staff in dealing with racial issues, leading to under-reporting and recording (Equality Human Rights Commission, 2019).

#### Introduction

Education is vital to enable individuals to achieve their full potential and not just survive but thrive throughout their lives.

The situation in relation to race and ethnicity, and the impact of experiences of children, young people and adults from Black, Asian and Minority Ethnic communities in education is complex.

Racism is still a reality for many of our learners and educators. Many will experience overt and direct racism, through racial bullying and harassment within our education settings, often from their peers. All will experience more subtle forms of racism through the everyday reality of our society; the systems, structures and processes that produce radically differential outcomes for ethnic minority groups.

The Welsh Government currently lacks data on racist bullying and harassment, and the everyday experiences of Black, Asian and Minority Ethnic children and young people in education settings. This gap in data presents a challenge as it means that we do not have an accurate picture of the scale and/or barriers faced by children and young people who experience racism. The Welsh Government is currently considering a Wales-wide system of reporting and data collection which will specifically collect data in relation to bullying and harassment, including on the basis of protected characteristics. This new system will help us bridge this data gap and gain a deeper understanding of the lived experiences of Black, Asian and Minority Ethnic learners

The experiences and inequality in outcomes for learners from ethnic minority communities also has an impact on their aspirations to continue in education after the end of compulsory schooling. Studying in further and higher education can strengthen individuals' life chances by widening their experiences and providing them with vital skills and knowledge that can support their future career development. The education experience should be positive for all students and staff.

The experience of teachers, lecturers and other educators from ethnic minority communities also has an impact, not just on those in post but also those aspiring to join the profession.

#### What we know

The data we have in terms of qualifications and academic attainment shows that children and young people within some ethnic minority groups in Wales are amongst our highest achievers. Others are at the opposite end of the attainment scale. However, the data only gives a small snapshot of the experience of education for these learners. It does not give any indication of the barriers faced and overcome by these groups, in order to become high achievers in terms of their qualifications. The data also gives no indication as to why groups at the opposite end of the scale do not qain qualifications.

Learners and staff of every ethnicity should have opportunity to achieve their full potential and be part of an anti-racist culture. The culture should respect and nurture difference, make learners and staff feel safe, recognise different histories and experiences, and calls out and acts upon behaviours that are racist. It should support victims of racism, in a way that makes them feel supported and empowered. If we can make this transformation it will benefit all learners and staff in our education system, not only those from minority ethnic backgrounds.

# In developing this work we heard that

Early on in developing this work we heard about some appalling lived experiences of learners of all different ages, and of staff across the education spectrum. It left a strong imprint on us. We were told about the racism that learners experience, of parents finding it hard to get their complaints heard, and both ethnic minority and white staff finding it difficult to negotiate and call out racism, the added burden this placed on ethnic minority staff.

Above all, we heard very clearly that those with lived experience across the education system did not, and still do not, feel heard. They had become, to a large extent, voiceless and this had led to a lack of reporting and recording of racist incidents within our schools and colleges. It became clear that the reporting systems in place are inconsistent, are not used in a way which provides confidence to victims of harassment and are not fit for purpose.

#### What we will do

All education institutions will be required to tackle institutional racism as a whole-institution approach. They will need to seek out systems and policies that no longer serve ethnic minority groups and redesign and embed them in their structures and policies. In time we also want to see educational institutions collaborating to share good practice and to develop shared approaches and resources.

At an institutional level we will review and act on our Curriculum for Wales, our complaints polices, our approach to teacher and student recruitment and more. Recognising the different contexts in which our schools, colleges and universities operate, we have set out some specific priorities and actions for each sector (see below).

One key priority is to expect every education institution to record effectively all incidents of racist abuse, discrimination and/or bullying; and to work with learners and staff to co-design more effective ways to respond to the issues raised. We also expect every institution to publish information on the progress made in developing such approaches, and the impact this is having on learners and staff, whether that be learner outcomes and/or levels of staff pay. The results should be made available in languages and ways that are meaningful to ethnic minority people.

To measure change over time we have an urgency to improve both the completeness and the use of data on ethnicity in education. We need to use data currently available more systematically. We also need to explore opportunities to link to other datasets, such as those on health and employment, to develop a fuller understanding of inequalities. We will also create more robust systems of data collection and reporting.

We are also committed to improving the levels of recruitment, retention and progression into leadership of teachers, lecturers and managers and leaders from ethnic minority communities. 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.

#### We will work with

We will work with the BAMEed (Wales) Network, our institutions and other partners to ensure that appropriate support and resources are in place to help all staff feel confident in modelling anti-racist values.

For refugee communities, the lack of transferability of refugees' qualifications to those we recognise in Wales is a particular challenge. This means we are wasting talent, so we will continue to work with the Credit and Qualifications Framework for Wales (CQFW) Advisory Group, to provide guidance and resources to aid the comparability and transferability of international qualifications.

We will work closely with partners including Estyn, the Higher Education Funding Council for Wales (HEFCW), and the EHRC to ensure that progress is monitored. We recognise that not everything is measurable in terms of data; so we will look to gather information on the lived experiences of those living and experiencing our policies and processes. Their voices are vital if we are truly to understand the differences that our actions can make.

It is important to recognise the good work that is already being done in all areas of education. However, much more still needs to be done. We expect zero tolerance of racism in all of our education settings, and an active commitment to increasing the diversity of institutions at every level. This responsibility falls on leaders in the Welsh Government, but also on those it funds to deliver in the education sector

### Schools

#### What we will do

In relation to schools, Wales is leading the way by becoming the first part of the UK to make it mandatory to teach Black, Asian and Minority Ethnic histories and experiences in the new Curriculum for Wales. This is being rolled out to primary schools from September 2022. Ensuring that this work is implemented and doesn't suffer from the "implementation gap" is critical.

Our new teaching award: The Betty Campbell MBE award, for promoting the contributions and perspectives of Black, Asian and Minority Ethnic communities, was launched in 2021. This will be awarded annually.

We will deliver a strategy to recruit more teachers from Black, Asian and Minority Ethnic communities into the school workforce. As an initial step, we published on 22 October 2021 the <u>Initial Teacher Education Black, Asian and Minority Ethnic Recruitment Plan.</u> We will take this forward through work such as a new mentorship scheme to help support Black, Asian and Minority Ethnic staff to reach their goals, as well as developing other actions.

We are also reviewing current policies designed to reduce educational inequalities. In particular, we will develop a strategy for tackling the impact of poverty on educational attainment in Wales. Key elements of this strategy will include supporting the wellbeing of pupils, ensuring that the new school curriculum enables all learners to succeed to high levels, developing high-quality teaching and leadership and developing Community-focussed Schools. While this work is for the benefit of all children, there is an intersectionality with the experiences and outcomes of children and young people from ethnic minority backgrounds.

Updated guidance for schools to support children and young people from Gypsy, Roma and Traveller communities is due to be published in July 2022, along with an updated version of our anti-bullying guidance, 'Rights, Respect, Equity'.

#### Further Education (FE)

Around seven per cent of learners in FE colleges are from ethnic minority groups and we will prioritise the development of our analysis of data to better understand the participation and outcomes from learners from these backgrounds. We also need to improve the coverage and use of data on the ethnicity of staff and leaders in the sector. We will also look at ways to improve recruitment of ethnic minority people into the teaching staff within the Post-Compulsory Education Training (PCET) sector.

The FE sector in Wales has stated its commitment to anti-racist goals, reinforced through ColegauCymru's partnership with the Black Leadership Group. Over the next year we will work with both organisations and with the sector as a whole, to review colleges' race equality policies and procedures. The aim will be to ensure colleges take a comprehensive, rigorous approach to anti-racist practice. ColegauCymru is already undertaking a review of the Code of Good Governance for Colleges in Wales. Amongst other aims, the revised Code will support colleges to ensure that their boards reflect and represent their diverse communities

As part of our review, we will work with the sector to consider how race equality could be further integrated into the FE curriculum. There is unlikely to be a "one size fits all" answer, given the diversity and range of the qualifications studies by learners in post-compulsory settings. We will consider opportunities for the collaborative development of modules, resources and enrichment activities that explore ethnic and cultural

diversity. We will also continue our work to ensure that international qualifications held by refugees and asylum seekers are recognised and transferable.

English for Speakers of Other Languages (ESOL) is a funded priority area directed to all providers of adult learning in the community in Wales through our ESOL Policy. We are committed to helping those who migrate to Wales to participate fully in the communities which become their homes. Being able to communicate with confidence is essential if they are to utilise the skillset which they bring with them. As part of our plan, we will review the effectiveness of our ESOL policy in meeting the needs of the communities it serves and put in place an action plan to address the outcomes.

# Higher Education (HE)

We want to be clear about our expectations that the HE sector will make rapid and sustained progress in tackling racism and in improving the experience of ethnic minority staff and students in HE. To make this happen, we have set out goals and actions that build on work already underway with the Higher Education Funding Council for Wales (HEFCW) and Welsh HE institutions to address racial inequality, as it affects staff and students. These actions include actively sharing and building on good practice, working with schools and local community groups, and developing links with employers.

We will also expect all HE institutions to achieve a race equality charter mark within three years, as a condition of funding. This will help to embed anti-racism policies at all levels within the sector.

This is not simply about meeting the minimum requirements set out in law. Increased racial diversity within institutions brings benefits to all who work and study in them, including enriching the higher education experience and ensuring that positive role models are visible

# Welsh Language

#### Some evidence

- Estimates from the National Survey for Wales 2019-20 noted that 98% of ethnic minority adults aged 16 or over did not use the Welsh language in their everyday life. This was similar for adults from a 'White other' ethnic background, where 97% noted that they did not use Welsh in their everyday life. For 'White Welsh, English, British etc.' adults, 89% noted that they did not use the Welsh language in their everyday life (the Welsh Government, 2022a).
- The Welsh Government analysis of the Pupil Level Annual School Census (PLASC) shows that only 4 per cent of pupils aged 5+ in Welsh-medium schools were Black, Asian and Minority Ethnic (not White British) at April 2021, compared to 15% in English Medium schools.

#### Introduction

We have an expansionist and inclusive vision for the Welsh language. Welsh is a language that belongs to us all, and is a way of uniting people from different backgrounds. Learning new languages can make us as individuals more open to other cultures. We celebrate the linguistic diversity of Wales and recognise that learning and using a second or third language can enrich people's lives.

#### What we know

As a nation, we have begun a journey towards reaching a million Welsh speakers by 2050 and doubling the daily use of Welsh. At the last Census in 2011, around 10,000 of the 562,000 people who said they could speak Welsh were from ethnic minority communities. We want to see this number increasing, and we will work with our partners to promote access to Welsh-medium education and opportunities to use Welsh among ethnic minority communities. But we want to go further. We want to celebrate what connects us as well as what makes us different in our cultures and our languages.

#### What we will do

In doing so we will listen to, learn from, and respond to the lived experiences of Welsh speakers and non-Welsh speakers from ethnic minority communities. We will use this intelligence to guide the way we engage with communities to promote the benefits of a Welsh language education and the use of the language every day. We will ensure our marketing and communications reflects the communities we serve and the Welsh terminology we use is appropriate and culturally sensitive to discuss anti-racism.

# Education and Welsh language

Actions	Outputs	Impact	By when	Lead and partners	
Culture change towards anti-racism. To use existing and new tools to create organisation wide change towards anti-racism.					
Further Education (FE)					
Goal: Anti-racist culture and practices are emb	edded in every FE institution and adult l	earning provider in Wales.			
Commission an independent review of policies and procedures in the FE and adult learning sector through an anti-racist lens and expect representation of ethnic minority groups within forums or groups established to design the audit/review and oversee and support their effective implementation and application.	Review completed and published.	Evidence base for strengthening anti-racist policies and improving the experiences of learners and staff of all ethnicities.	By March 2023.	Colegau Cymru.     Black Leadership Group (BLG).	
Work with the FE sector to embed the principles of the Black Leadership Group 10 point plan to ensure an anti-racist FE system.  Survey learners and staff to understand their experiences of racism and to gather views on what effective anti-racist practice looks like in FE.	Confirmed commitment by individual institutions.  Survey undertaken and responses analysed.	Anti-racist practice is embedded in FE institutions.  Basis for strengthening anti-racist policies and improving the experiences of learners and staff of all ethnicities.	By July 2023.	ColegauCymru.     BLG.	
Higher Education (HE)					
Goal: Staff and students can expect their exper	ience of HE to be positive irrespective of	their racial and ethnic background.			
Establish an anti-racism network across the HE sector.  Publish an annual race equality report and performance measures for the sector, including outcomes for students and staff.	Sharing of good practice across HE institutions in addressing racial harassment and promoting anti-racist culture. Report and measures are published.	More rapid, sustainable progress towards improving the experience for staff and students.  Increased accountability for HE institutions with regard to anti-racism. More focused response to issues affecting Black, Asian and Minority Ethnic staff and students, including attainment gaps for students from different ethnic backgrounds.	By March 2023.  Annual report from 2023.	<ul><li>HEFCW.</li><li>Universities Wales.</li><li>Welsh HE institutions.</li><li>Unions.</li></ul>	

Actions	Outputs	Impact	By when	Lead and partners	
Goal: Better use of levers available to promote anti-racist culture in higher education.					
Require HEFCW to expect all HE institutions to review existing recruitment policies and procedures through an anti-racist lens.  Require HEFCW to expect HE institutions to monitor and address inequalities, including pay disparities.  Expect all HE institutions to achieve a race equality charter mark as a condition of funding within three years to embed anti-racism policies at all levels within the sector.	Senior leaders adopt a whole-institution anti-racist approach.  Publication of data on HE staff pay for different ethnic groups.  All HE institutions to achieve a Charter Mark.	Increased ethnic minority representation in senior positions within higher education.  Greater transparency in pay data to support increased pay equality for staff regardless of racial background.  Whole-institution, open, commitment to anti-racist approach which will benefit all students and staff.	By September 2023.  By September 2023.  Commitment to Charter Mark by September 2023.	<ul><li>HEFCW.</li><li>Universities Wales.</li><li>Welsh HE institutions.</li><li>Unions.</li></ul>	
Curriculum: To ensure that the curric	culum is anti-racist				
Schools					
Goal: To ensure that Black Asian and Minority	Ethnic stories, contributions and histori	es are taught throughout the revised Cur	riculum for Wales.		
Make it mandatory to include the teaching of Black, Asian and Minority Ethnic communities and contributions across the revised Curriculum for Wales.  Update the Curriculum for Wales framework and guidance and teaching resources to reflect the recommendations of the Williams Review.	Inclusion in the refined Curriculum for Wales framework and guidance, including the mandatory What Matters Code.	Reported increased knowledge amongst the general population of ethnic minority people experiences and contributions to the history of Wales.  Ethnic minority learners report greater relevance and representation in the	By September 2022.	<ul> <li>Regional Education Consortia.</li> <li>The Welsh Government.</li> <li>Local authorities Schools.</li> </ul>	

curriculum they experience.

Actions	Outputs	Impact	By when	Lead and partners		
Further Education (FE)						
Goal: To ensure that we have in place a modern FE curriculum that reflects an anti-racist Wales.						
Review and revise the current FE curriculum to embed anti-racist principles and develop a revised curriculum in co-construction.	Working group established and initial scoping exercise completed.	More diverse and enriched curriculum for post-16 learners.  Black, Asian and Minority Ethnic learners report greater relevance and representation in the curriculum they experience.	By September 2023.	<ul><li>FE institutions.</li><li>ColegauCymru.</li><li>Black Leadership Group.</li><li>Qualifications Wales.</li></ul>		
Goal: To ensure that the Credit and Qualification comparison of international qualifications.	Goal: To ensure that the Credit and Qualifications Framework for Wales (CQFW) continues to support the recognition of prior learning and facilitates the understanding and comparison of international qualifications.					
Maintain alignment between the CQFW and the other UK qualification frameworks and the European Qualifications Framework to support ongoing qualification comparability and learner mobility.  Raise awareness and promote the CQFW as a vehicle to aid understanding and recognition of qualifications as appropriate, and refer queries from international learners relating to the equivalency and comparison of international qualifications  Collate information together with examples of the types of qualifications currently not being recognised or accepted by institutions or employers across Wales, to help our understanding of barriers to employment.	Qualifications and learning are understood and recognised, facilitating learner/citizen progression, transferability and mobility.  Increased consistency of approach with regards to assessing prior learning.	Barriers to recognition of prior learning are removed.	By April 2023.	The Welsh Government.     ColegauCymru.     The CQFW Advisory Group.		

Actions	Outputs	Impact	By when	Lead and partners
Workforce: To take positive action to i	ncrease the number of employe	es, at all levels, from ethnic mind	ority people.	
Schools				
Goal: To create an anti-racist teaching workfor	ce through embedding anti-racist profe	ssional learning.		
Develop anti-racist professional learning resources to support the teaching of the new curriculum hosted on a co-designed "virtual campus" to collate and curate all anti-racist materials and resources.	Published central online resource to provide support for practitioners and leaders to develop curriculum materials and resources to address the requirements of the new curriculum.	Increased confidence in practitioners' ability to address racism and install a culture of anti-racism via teaching of the curriculum.	Ongoing.	<ul><li>BAMEed (Wales) Network.</li><li>The regions and HEI partners.</li><li>Other expert groups.</li></ul>
Support a new PhD doctorate placement to evaluate the programme of Diversity and Anti-Racist Professional Learning (DARPL).	Published evidence to underpin a revised programme.	Contribution to research in this area from a uniquely Welsh perspective.	Ongoing.	BAMEed (Wales) Network.
Goal: To increase recruitment of teachers from programmes.	ethnic minority communities into the I	Education sector with a clear focus on red	cruitment onto Initial To	eacher Education (ITE)
Review Initial Teacher Education (ITE) and professional learning to ensure that it reflects an anti-racist approach to teacher recruitment and training.	<ul> <li>An updated and published:</li> <li>criteria for the Accreditation of ITE programmes;</li> <li>inspection frameworks for ITE;</li> <li>professional learning resources;</li> <li>new recruitment, retention and progression pathways prior to ITE published;</li> <li>activities to take place in all schools to highlight teaching as a profession.</li> </ul>	All student teachers receive professionally appropriate, high quality ITE that includes anti-racist issues and prepares them to be a beginner teacher.  More diversity from ethnic minority communities in the teaching profession that better reflects communities.	By December 2022.	<ul> <li>ITE Partnerships. EWC Teacher Education Accreditation Board.</li> <li>Estyn.</li> <li>USCET.</li> <li>The Welsh Government.</li> </ul>
Expand the range of subjects available on the employment-based Initial Teacher Education (ITE) scheme to attract support staff from ethnic minority backgrounds, including Welsh-medium.	Expanding the subjects offered via Open University programmes where economically and educationally viable.	Increased recruitment from ethnic minority communities into the teaching profession.	By September 2025.	OU ITE Partnerships.

Actions	Outputs	Impact	By when	Lead and partners
Set up a diverse anti-racism working group with stakeholders to review progress against the actions and identify emerging requirement.	Working group established to oversee delivery of actions in recruitment plan.	Ethnic minority people involved as stakeholders and partners report that their lived experiences, voice and recommendations have been heard and acted on.	By March 2022.	The Welsh Government.
Develop and publish recruitment plans specifically to increase the numbers of ethnic minority applicants to ITE courses including Welsh-medium.	Each ITE Partnership will publish a recruitment plan with baseline data specifically identifying the actions they will take to increase ethnic minority representation in their intake.	Increased recruitment from ethnic minority communities onto the teaching profession.	By July 2022.	ITE Partnerships.
Co-design appropriate and sensitive support arrangements for students from ethnic minority backgrounds at all stages of the application and study process.	All ITE partnerships to undertake a review of existing practice.  Identify any shortcomings in existing processes and use these findings to ensure that appropriate levels of support are in place to assist ethnic minority applicants.	Satisfaction with level and appropriateness of support provided increased.	By March 2022.	<ul><li>The Welsh Government.</li><li>ITE Partnerships.</li><li>EWC.</li></ul>
Require all ITE providers to review, strengthen and develop the application of criteria for accreditation requirements in existing programmes.	All ITE partnerships to undertake a review of existing practice.  Identify any shortcomings in existing processes and use these findings to ensure that issues around anti-racism are strengthened in the accreditation requirements for programmes.	Greater satisfaction and increased numbers of applicants from ethnic minority people reported.	By March 2022.	ITE Partnerships.
Collaborate and co-design with ethnic minority stakeholder groups to develop next phases of the ITE Black Asian and Minority Ethnic Recruitment Plan.	Publish an updated and second phase of the ITE Black, Asian and Minority Ethnic Recruitment Plan.	Increased recruitment of teachers from ethnic minority communities onto ITE programmes whilst increasing representation within the workplace.	Ongoing.	<ul><li>The Welsh Government.</li><li>ITE Partnerships.</li><li>EWC.</li><li>Estyn.</li><li>Community stakeholders.</li></ul>
Evaluate and build on the race access and success enhancement programme.	Strengthen opportunities for ethnic minority ITE students to gain work experience to support future career progression.	Reduction in educational inequalities, leading to more equal opportunities for Black, Asian and Minority Ethnic students reported.	By September 2023.	<ul><li>HEFCW.</li><li>Universities Wales.</li><li>Welsh HE institutions.</li><li>NUS.</li><li>Students unions.</li></ul>

Actions	Outputs	Impact	By when	Lead and partners	
Further Education and Work Based Learning					
Goal: To ensure that clear information is availa	ble about the ethnicity of staff at all level	s in FE and WBL, and that staff are suppo	orted to progress in their	careers regardless of ethnicity.	
Support the Education Workforce Council (EWC) to gather improved data on the ethnicity of post-16 practitioners and learning support workers by building trust so that more staff disclose their ethnicity (current levels of Not known and Prefer not to say are very high).  Ensure this improved data is used to support workforce policy and recruitment practices.	Coverage of ethnicity category for practitioners and learning support workers improved from 80% to at least 95%.  Stronger baseline to improve representation where needed.	Better understanding of the ethnic profile of staff.	By July 2022.	• EWC.	
Survey staff from ethnic minority backgrounds on their experiences of working in FE, and co-produce proposals on improving their experiences and career prospects.	Publish an action plan to support FE staff from ethnic minority backgrounds.			<ul> <li>ColegauCymru.</li> <li>BLG.</li> <li>National Academy for Education Leadership.</li> <li>Joint Trade Unions.</li> </ul>	
Work with ColegauCymru and BLG to explore improved methods of collecting data on protected characteristics of non-Education Workforce Council registered staff, including leaders.	Initial data collection completed and evaluated.  Stronger baseline to improve representation where needed.	Better understanding of the ethnic profile of staff.	By September 2022.	ColegauCymru.     BLG.	
Goal: To increase the numbers of representativ	es from Black, Asian and Minority Ethni	c communities training to become FE ar	nd WBL practitioners.		
Undertake a review of the PGCE for FE Incentives programme, including improved data collection on the ethnicity of current practitioners.  Take positive action to encourage more learners from ethnic minority communities to undertake ITE qualifications in the FE sector, via the PGCE FE Incentives programme.	Improved data collection processes for the Incentives Scheme.  Amendments to the priority guidance for the distribution of the PGCE FE Incentive.  Work with HEIs to ensure the Incentive is having the impact intended.	An increase in the numbers of individuals from ethnic minority communities in the FE Sector which will aim to strengthen representation, understanding and acceptance of different cultural backgrounds and communities within the sector.	The Incentive Review will take place by March 2023.	Lead and Partners for this are WG and USCET.	

Actions	Outputs	Impact	By when	Lead and partners
Identify any recruitment and retention issues of teachers from ethnic minority communities in the PCET Sector, put appropriate positive actions in place where required and impact assess them.	Review undertaken and improved data established on which to base policy decisions.  Action plan in place once issues are understood.  Work closely with the sector to deliver action plan.	An increase in the numbers of individuals from ethnic minority communities in the FE Sector which will aim to strengthen representation, understanding and acceptance of different cultural backgrounds and communities within the sector.		<ul><li>FE sector.</li><li>Work-based learning sector.</li></ul>
Goal: To increase levels of self-identification fr	om ethnic minority people and increase	confidence in sharing data.		
Continue to collect hard and lived experience data on existing workforce and increase levels of self-identification from individuals.	Statistical evidence on the ethnic makeup of the workforce.	Identified negative impacts and remedied shortfalls in the recruitment plan.	Annually.	• EWC.
Ethnicity identification is voluntary so further work with communities to get greater ownership and compliance will be sought.				
Addressing the experience of racism				
Schools				
Goal: To improve the experiences of Black, Asia	an and Minority Ethnic learners and teac	chers in schools.		
Require reporting of racist incidents and harassment in schools and colleges through strengthened data collection, how they were dealt with, action taken in response and whether the incident was resolved successfully for the victim.	Improved and consistent reporting system for schools.  Improved collection of data from schools and colleges in Wales; including good practice and lived experience evidence.	Higher levels of satisfaction from ethnic minority learners and their families with the way racist incidents are dealt with and resolved in schools and colleges.  Increased knowledge of the numbers of racist incidents experienced by learners and staff across schools and colleges in Wales.  Ability to use this data to identify trends and measure success of policies.	By September 2023.	<ul> <li>Anti-racism stakeholders: Show Racism the Red Card.</li> <li>BAMEed Wales Network.</li> <li>Anti-bullying Steering Group for Wales.</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners	
Goal: To reduce the negative experience of racism by Gypsies, Roma and Traveller' negative experience of schooling.					
Co-design and publish statutory Gypsies, Roma and Travellers' guidance for schools.	Statutory guidance published for all schools.  Resource trusted intermediaries	Support and improve educational outcomes for learners from Gypsy, Roma and Traveller backgrounds.	By July 2022.		
	e.g. community activists and leaders engaged in enabling this change on the ground.	Increased awareness in schools of the specific needs of Gypsy, Roma and Traveller learners, leading to a reduction in educational inequalities.	By July 2023.		
		Reported increase in confidence in schools by the respective communities.			
Goal: Ensure the well-being of Black Asian Mir	ority Ethnic learners.				
Strengthen the Welsh Government's statutory guidance for schools in respect of wellbeing to recognise the particular needs of learners from an ethnic minority backgrounds.	Updated statutory guidance.	Teachers and other school staff are aware of the particular needs of learners from ethnic minority backgrounds and are able to offer appropriate support in a timely fashion.	2022-2023.	<ul> <li>Anti-racism stakeholders –         Show Racism the Red Card.</li> <li>BAMEed Wales Network.</li> <li>Anti-bullying Steering Group for Wales.</li> </ul>	
Strengthen the Welsh Government's 'Rights, respect, equality' anti-bullying guidance for schools.	Updated statutory guidance; support for schools to develop anti-bullying strategies; advice for practitioners on how to engage effectively with parents and carers around this agenda.	Increased confidence in practitioners' ability to address racial harassment and bullying. Increased confidence in learners that racist behaviour will be tackled effectively.	By July 2022.	<ul> <li>Anti-bullying Steering Group for Wales.</li> <li>Estyn.</li> <li>KAS.</li> <li>Equalities Division.</li> </ul>	
Ensure a range of appropriate interventions (both universal and targeted) are available to schools to meet the wellbeing needs of learners from ethnic minority backgrounds.	Suite of appropriate evidence based resources are available.	Learners have access to evidence based resources which are appropriate to their needs to support their wellbeing.	2022-2023.	<ul><li>PHW.</li><li>Local authorities.</li><li>Schools.</li><li>Third sector.</li></ul>	

Actions	Outputs	Impact	By when	Lead and partners
Welsh language				
Goal: That the voices of Black, Asian and Mino communities in the areas of education, langua			mote access to the Wels	h language by ethnic minority
Gain a better understanding of the lived experience of the c.10000 Welsh speakers from ethnic minority communities to inform future actions and interventions to eliminate racism in Wales.	Integrate findings into current and future policies and look for ways to improve access to information on access to Welsh-medium education, language learning, workplace activities and community activities.	A better understanding of the experiences of Welsh speakers from ethnic minority communities across Wales.	By March 2023.	The Welsh Government and the Welsh Language Partnership Council's Equality Inclusion and Diversity Sub-group.
Set targets and expectations of anti-racist approaches for grant funded organisations. Develop an action plan to improve representation from ethnic minority backgrounds within the workforce of our grant funded organisations.	Updated grant funding arrangements and action plan in place.  Updated terms and conditions to grant recipients in 2022-23 award letters.	More Welsh language projects delivered for people from ethnic minority communities across Wales.  More individuals from ethnic minority communities across Wales enjoying activities and events through the medium of Welsh.	By April 2023.	The Welsh Government grant funded organisations.
Commission the National Centre for Learning Welsh to review current take up of provision amongst Black, Asian and Minority Ethnic backgrounds, and current strategies to promote access.	Published review with findings used to better inform communication and marketing strategies in order to attract more learners from Black, Asian and Minority Ethnic communities.	More adults from ethnic minority communities across Wales accessing National Centre for Learning Welsh provision.	By March 2023.	National Centre for Learning Welsh.
Analyse data on Black, Asian and Minority Ethnic people that attend Welsh-medium education to develop local and national strategies to increase this number and tackle the barriers to accessing Welsh-medium education.	Analysis complete and strategies developed.	More children from ethnic minority communities accessing Welsh-medium education.	By March 2023.	<ul> <li>Welsh Language Partnership Council's Equality, Inclusion and Diversity Sub-group.</li> <li>WLGA.</li> <li>Local authorities, Grant funded organisations (RhaG, Mudiad Meithrin, Mentrau Iaith, Urdd).</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners
Commission the development of multilingual anti-racist resources and case studies to support an increase of take up in Welsh-medium education within ethnic minority community.	Resources published and promoted.	More parents/carers from ethnic minority communities understand the benefits of Welsh-medium education and access it for their children.	By December 2022.	<ul> <li>The Welsh Government.</li> <li>RhAG.</li> <li>Welsh Language Partnership Council's Equality, Inclusion and Diversity Sub-group.</li> </ul>
Ensure the Welsh terminology used to discuss and debate anti-racism is current, appropriate, consistent and based upon input provided by Welsh speakers from ethnic minority communities.	Revise and implement standardised terminology, and in doing so ensure engagement with language specialists and representation of Welsh speakers from Black, Asian and Minority Ethnic communities.	Standardised terminology that is easily understood by all developed to discuss issues in relation to anti-racism that reflects Wales' culturally ethnic community.	Ongoing.	The Welsh Government.     Relevant stakeholders.
Goal: To ensure all Welsh-medium educational resources and supporting materials funded are anti-racist and reflect the true depth of our diverse cultural heritage while avoiding stereotyping and cultural appropriation.				
Review and develop a specific set of requirements as part of contracts and grant funding.	Specific requirements included in contracting and funding arrangements to ensure all materials are anti-racist.	Learners have better understanding of our cultural heritage.	By March 2023.	The Welsh Government grant funded organisations and contractors.

# 4. Culture, Heritage and Sport

#### Some evidence

- According to the 2018 to 2019 National Survey for Wales, 76% of respondents with an ethnic minority background did not participate in arts, culture, or heritage activities in the last year.
- In a 2018 survey of 120,000 pupils in Wales, it was found that 40% of Asian/Asian British pupils participate in at least 3 occasions of sport weekly compared to 48% of all pupils. Similarly 36% of Asian/Asian British pupils do not frequently participate in sports compared to 28% of all pupils (Sport Wales, 2018).



Image courtesy of Ethnic Minorities Youth Support Team Wales

#### Introduction

Culture, heritage and sport are fundamental to people's identities. They reflect the values, beliefs and attitudes that define us as people and inform how we relate to each other.

Culture, heritage and sport can be powerful vehicles for expressing our unity and cohesion. For example, in elite sport, Wales is frequently a high achiever on the global stage, but as we collectively share in the success of our rugby, football or athletics teams, their diverse racial and ethnic foundations are frequently overshadowed by the spectre of racism, both in person or through social media.

The goals and actions in this plan are intended to acknowledge and combat past and present disadvantages experienced by Black, Asian and Minority Ethnic groups. They aim to eliminate discrimination and barriers to the full enjoyment of all aspects of culture, heritage and sport, and to recognise and celebrate past and present racial and ethnic diversity in Wales.

#### What we know

Differences in our culture and heritage can often be used to define those who are considered to be 'insiders' and 'outsiders'. An attitude can form that only those with a so called 'indigenous' ancestral heritage, can truly aspire to a Welsh or British identity. Anyone else can be excluded from the privilege of 'belonging' and from the benefits of 'insider' status.

The make up of Welsh society is far more complex than these simple stereotypes might imply. We all benefit from a rich cultural mix; people from many different cultural backgrounds have lived alongside each other for generations. However, a negative perception can still prevail, often unconsciously, that if you are not White, or do not conform to certain cultural 'norms', then you are not part of 'us'. If such personal attitudes and institutional ways of working that can keep ethnic minority people as "others" are not challenged, we will not achieve the desired change towards anti-racism.

A celebration of our diverse and shared culture and heritage, valuing the global influences and perspectives that have helped shape our society, and encouraging active and equal access to participation in all forms of culture, heritage and sport, can be a powerful challenge to this narrative.

# In developing this work we heard that:

In the consultation phase, during a 'deep dive' policy session where evidence of lived experiences was shared, a view was expressed that public bodies have been cautious, and sometimes resistant to supporting and representing diverse ethnic minority groups, due to actual or perceived restrictions on use of public funds for 'political' or religious programmes. It was suggested that this has inhibited freedom of expression and consequently may even have caused a failure to meet legal commitments.

Every individual has the right to participation and enjoyment of the culture and traditions with which they identify. However, through the lived experiences shared, we also heard that Black, Asian and Minority Ethnic people, especially women often feel that they have been left to fend for themselves and have had little choice but to develop cultural and sporting activities in isolation, unfunded and unsupported. While enabling a degree of freedom and autonomy, the barriers faced in accessing funding and facilities inhibited continuity, expansion and improvement. To counter this, financial support and designated resources, to support the development of initiatives led by diverse community groups and individuals are vital to encourage and engage creativity and talent.

In a subsequent round table session, there were discussions about the challenges faced in relation to the freedom to express identity through language, and the right of successive generations to have opportunities to learn about their unique and valued cultural inheritance, origins and ancestry. The importance of this theme to other aspects of the plan was emphasised, as contributing to a much wider sense of societal health and well-being.

At this session, there was general support for the emerging goals and actions but several challenges were highlighted regarding their implementation. For example, it was stressed that ownership of the cultural narrative was critical. The concept of 'them' as beneficiaries and 'us' as benefactors, had to be challenged, keeping the principles of rights as paramount and avoiding the trap of telling ethnic minority people's cultural or heritage stories through the filter of a different 'lens' or perspective.

One of the key themes emerging from consultation feedback on the draft chapter of the Race Equality Action Plan and further engagement through expert roundtable events was the importance of workforce and representation, with access and opportunities to progress at all levels within the workforce needed across all culture, creative and sport sectors. We have adapted our actions to capture this feedback. We have strengthened the emphasis on the workforce, to ensure that our goals and actions reflect the areas that will make the most difference to Black, Asian and Minority Ethnic people across Wales.

#### What we will do

The goals and actions for Culture, Heritage and Sport set out in this plan, focus on the following themes: Leadership, Funding, Celebrating Cultural Diversity, the Historical Narrative and Learning about our Cultural Diversity.

The intention is that the goals and actions are not simply transactional in their ambition but transformational, delivering demonstrable changes leading to equal outcomes for Black, Asian and Minority Ethnic people, (including women, girls, disabled people, elders, people who identify as LGBTQ+, and people whose first language is not English or Welsh). Equitable access to and involvement in cultural, heritage and sporting activities, including in leadership roles, will improve outcomes for all protected groups, support best practice and better reflect and promote a multi-cultural and diverse Wales. We look forward to working closely, collaboratively and in co-production with stakeholders to take this work forward.

#### Who we work with

The Welsh Government works with a wide range of culture, heritage and sports bodies to deliver policies and services for the people of Wales at both a local and national level. These include a number of sponsored bodies (the Arts Council of Wales, Sport Wales, Amqueddfa Cymru (National Museum Wales), the National Library of Wales and the Royal Commission on the Ancient and Historic Monuments of Wales). It also includes other publically funded organisations including local museums, libraries and archives as well as several Welsh Government divisions, who are either responsible for the direct delivery of services (such as Cadw), or for supporting the wider sector (Culture Division, Tourism and Sport Division and 'Creative Wales'). Together, all of these bodies work to promote and encourage active participation in the rich and diverse cultural, heritage and sporting life of our country and will be integral to the delivery of the action plan.

In the table that follows, where we refer to 'Publicly funded Culture, Heritage and Sport organisations', this includes relevant Welsh Government Sponsored Bodies, partner organisations in the Culture, Heritage and Sport sectors, and community organisations, where they receive Welsh Government funding towards the delivery of this action plan. We anticipate that the 'output and 'impacts' of this plan will be applied proportionately to our partners. For example, while relevant partners at every level will be expected to participate in delivery of the actions in this plan, we would not necessarily expect small grass-roots or local organisations to meet all the requirements that we might expect from our Sponsored bodies.

Actions	Outputs	Impact	By when	Lead and partners
Leadership				
Goal: To hold publicly funded organisations ac	countable for the delivery of anti-racist	measures and actions, as set out in this a	ction plan.	
Require the governing bodies and senior leaders of all funded organisations to adhere to performance requirements for anti-racism. These requirements may be set out through remit letters, award letters and other conditions of grant as appropriate.	Funded organisations to submit sufficient evidence as appropriate, to demonstrate adherence to performance requirements. For example, Welsh Government Sponsored Bodies' diversity and inclusivity goals reviewed in quarterly monitoring meetings, revised as needed and updated regularly.	Senior leadership and governing bodies are held to account.  Anti-racist principles at structural level determine and lead changes in policy implementation and practice on the ground.	March 2023 and ongoing.	Publicly funded Culture, Heritage and Sport organisations.
Require public bodies to establish working environments which are highly inclusive and anti-racist, including anti-racism training as a core component of professional learning and development.	All members of the workforce including board members to complete training. New employees should complete as part of their induction training.	All members of the workforce including board members demonstrate anti-racism in practise and decision-making and take responsibility for creating an inclusive working environment.  Black, Asian and Minority Ethnic members of the workforce feel safe, supported and respected in the workplace.	March 2024: workforce and boards undertake training.	Publicly funded Culture, Heritage and Sport organisations.
Publicly funded organisations to capture/ review baseline data of ethnic diversity across the organisation and, as appropriate, implement steps to increase ethnic diversity at all levels, specifically in leadership teams and on boards, by providing quality job opportunities in planning, design, curation and decision-making roles and measure progress.	Data on the diversity of boards, senior management and workforce collected, measuring both recruitment and retention of staff to assess success.  More applications from and employment of Black, Asian and Minority Ethnic people into organisations, especially in senior management leadership roles.  More applications to and appointment of Black, Asian and Minority Ethnic people into boards or governing bodies of organisations.	A diverse board, senior management and workforce, providing visible role models and opportunities to Black, Asian and Minority Ethnic people.	March 2023 and annually.	Publicly funded Culture, Heritage and Sport bodies.

quantitative and qualitative data and lived

experience.

Actions	Outputs	Impact	By when	Lead and partners
Encourage all publicly funded organisations to adopt 'positive' recruitment policies that will support and enable applications from and career pathways of under-represented groups; for example by reviewing and amending the design of application forms and methods of advertising posts, and providing training for both applicants and selection panels.	More applications from and employment of Black, Asian and Minority Ethnic people into organisations, especially in senior management leadership roles.  More applications to and appointment of Black, Asian and Minority Ethnic people into boards or governing bodies of organisations.  Monitoring and equality impact assessment of recruitment procedures in place. Ongoing consultation on design and implementation of measures to eliminate inequalities.	A diverse board, senior management and workforce, providing visible role models and opportunities to Black, Asian and Minority Ethnic people.	March 2023 Review of processes and implementation of any changes. October 2024: impact and monitoring of changes.	Publicly funded Culture, Heritage and Sport bodies.
Review existing systems for reporting, and dealing with complaints of discrimination; including the identification and elimination of all forms of racial discrimination.	Improved processes for reporting and dealing with discrimination.	Process for reporting discrimination is transparent, accessible and effective. Procedures help to change the prevailing culture is one of open and assertive rejection of racist language and behaviour.  Improved confidence in processes for reporting discrimination amongst Black, Asian and Minority Ethnic workforce, job applicants and service users.	March 2023 Review.  March 2024  Implementation of required changes.	Publicly funded Culture, Heritage and Sport organisations.
Funding				
Goal: To work with our sponsored bodies to er participation for Black, Asian and Minority Etl		embed anti-racist practice, facilitate equa	llity of access and outco	mes, and maximise
Undertake detailed financial assessments (including workforce expenditure) and make a specific reporting requirement for how grassroots organisations are supported) and on how funding resources are currently being used. This is to be underpinned by both quantitative and gualitative data and lived	Report on these assessments within 12 months, including recommendations for concrete, quantifiable action.  Existing schemes reviewed within 12 months and outcomes published,	Improved transparency in terms of funding resources, including on how grassroots organisations are supported. Fairer and more equitable distribution of financial support.	March 2023 for reviews/assessments. March 2024 for implementation of required changes.	The Welsh Government and relevant Culture Heritage ar Sport Welsh Government Sponsored Bodies.

including recommendations for

change.

Actions	Outputs	Impact	By when	Lead and partners	
The Historical Narrative	The Historical Narrative				
Goal: To work with public bodies to fully recog authentic and decolonised account of the past					
Review and decolonise our public spaces and collections by appropriately addressing the way in which people and events with known historical associations to slavery and colonialism are commemorated, acknowledging the harm done by their actions and reframing the presentation of their legacy to fully recognise this.	Publish guidance for public and local authorities which references the findings from <i>The Slave Trade and the British Empire: An Audit of Commemoration in Wales</i> to provide clarity on how they review and address examples of historic commemorations. This guidance is promoted to assist with implementation.	People and events with known historical associations to slavery and colonialism are portrayed in an anti-racist way – one that recognises historical injustices.	March 2023: new guidance. March 2025: implementation.	Publicly funded Culture, Heritage and Sport organisations and local authorities, as appropriate.	
Work with Black, Asian and Minority Ethnic communities to identify and lift barriers to accessing heritage sites and cultural collections.  Tell stories through the lens of Black, Asian and Minority Ethnic people's experiences (past and present) in our galleries and museums, including through permanent displays, celebrating their contribution and recognising their presence in the history of Wales.	New and existing schemes or exhibitions are co-created at both a local and a national level that can be used as exemplars for setting the historic narrative.	Black, Asian and Minority Ethnic people are truly represented in the rich and diverse nature of our shared heritage.  Black Asian and Minority Ethnic communities report that the voices of those neglected in the historical narratives of the past and present are amplified and celebrated.	March 2025.	Publicly funded Culture, Heritage and Sport organisations.	
Relevant bodies to report on how they have reviewed and redesigned the historical narrative informed by lived experiences, ensuring that the Black, Asian and Minority Ethnic individuals and groups who participate and share lived experience are paid appropriately for their time and experience.	Reviews by relevant public bodies completed, with action plans put in place.	The historic narrative of Wales truly represents the rich and diverse nature of our shared heritage.	March 2023: review of historical narrative completed by organisations.  October 2023 Action plans put in place.	Publicly funded Culture, Heritage and Sport organisations, as appropriate.	

Actions	Outputs	Impact	By when	Lead and partners		
Learning about our cultural diversity						
	Goal: Identify and meet targets to deliver anti-racist education and learning; including interpretation, marketing and educational materials that recognise and celebrate the rich and diverse cultural mix of our society, encourage widespread physical and intellectual engagement and so promote anti-racist practice and principles throughout.					
Review online and social media content to improve visibility and encourage accessibility – seeking out and working with Black, Asian and Minority Ethnic groups and individuals, to uncover untold stories and celebrate success.	All relevant online and social media content, recognises and celebrates diversity and encourages anti-racist engagement.	Content is disseminated through a wider range of networks and channels, using a wider range of materials and methods to support engagement  Online culture, heritage and sport content is reported by Black, Asian and Minority Ethnic communities to be more sensitive, accessible, equitable and anti-racist, with materials available in different languages.	October 2023 and ongoing.	Publicly funded Culture, Heritage and Sport organisations as appropriate.		
Build on and further link the stories of Black, Asian and Minority Ethnic people within existing educational and cultural programmes, including the Curriculum for Wales, Fusion, Hwb, Cynefin and the People's Collection Wales.	Delivery of education and learning, and associated materials, celebrate diversity and encourage anti-racist engagement.  Relevant collections, which are promoted as part of the delivery of the curriculum through greater digital access and engagement with schools.  People's Collection Wales provides a digital repository of stories better reflecting Black, Asian and Minority Ethnic people's experiences (past and present).  Increased engagement with Fusion coordinators, promoting equality via Culture.	Reported increased awareness amongst all the population, especially young people, of the valuable contributions of Black, Asian and Minority Ethnic people to life in Wales.  Reported greater engagement with our cultural organisations from an early age in a truly anti-racist way for all children and young people, which continues throughout their education and lifelong learning.	March 2024.	<ul> <li>Publicly funded Culture, Heritage and Sport organisations.</li> <li>Welsh Government Curriculum division.</li> </ul>		

# 5. Health



## Some evidence

- Analysis published by the Office for National Statistics (ONS) shows that the risk of deaths involving COVID-19 among some ethnic groups in England and Wales has been significantly higher than that of those of White ethnicity. This difference is partly explained by socio-economic factors, geographical location and other circumstances, but to an extent the difference remains unexplained (the Welsh Government, 2020b).
- The Welsh Government analysis of the Annual Population Survey shows that in 2019 in Wales 11.2 per cent of healthcare workers were Black, Asian and Minority Ethnic (the Welsh Government, 2020b).
- In 2017 the Traveller Movement produced a report based on an online survey of 214 community members aged 18+ from across the UK, exploring Gypsy, Roma, and Traveller people's experience of prejudice and discrimination. The report found 30% of respondents experienced discrimination in relation to accessing health care (The Traveller Movement, 2017).
- Evidence suggests there remains a more than four-fold difference in maternal mortality rates amongst women from Black ethnic backgrounds and an almost two-fold difference amongst women from Asian ethnic backgrounds compared to white women (Knight M, et al., 2021). In addition, mortality rates remain exceptionally high for babies of Black/and Black British ethnicity: stillbirth rates are over twice those for babies of White ethnicity and neonatal mortality rates are 43% higher. Similarly, mortality rates remain high for babies of Asian and Asian British ethnicity: stillbirth and neonatal mortality rates are both around 60% higher than for babies of White ethnicity (Draper ES, et al., 2021).

#### Introduction

Our vision for an 'equitable whole system approach to health and social care', is focused on the health and wellbeing, both of our workforce and communities, and on preventing illness. While Health and Social Care are presented separately within this plan there is necessary and intended overlap ensuring collective success.

As the two largest and most diverse employers in Wales, our Health and Social care sectors are key providers of essential services. Black, Asian and Minority Ethnic people make a highly valued contribution to both the success of the NHS at all levels, and to our wider society in Wales. Our staff must be able to work in safe, inclusive environments. confident of support to meet their potential and of visible ally-ship. This in turn, will provide Black, Asian and Minority Ethnic citizens with access to services appropriate to their needs, without fear of racism and will help address historic health inequalities.

#### What we know

While developing this work we realise that we must continue to sharpen the focus on reducing health inequities while variation remains in how health services provide access to and engage with Black, Asian and Minority Ethnic people, and in how services are delivered and individuals' experiences of care. We know there are significant specific challenges for women from ethnic minority backgrounds, and measurable adverse differences in health outcomes, in particular for maternity services. Ensuring services are delivered in an accessible, culturally sensitive way for all, including women, is a priority for us. We must also continue to focus on reducing health inequalities which come about as a result of the wider determinants of health and expand and develop our use of Health Impact Assessments.

We know there is much to do to ensure our NHS in Wales is anti-racist, and commit to the following actions within the next 12 to 18 months to create cornerstones on which we will build and accelerate progress across this plan:

### **Priority Action 1: Leadership**

Require anti-racist leadership at all levels by direction.

All NHS Boards, Trusts and Special Authorities to report demonstrable progress in driving anti-racism at all levels by:

- appointing 'Executive Equality Champions' and 'Cultural Ambassadors:
- implementing a leadership and progression pipeline plan for Black, Asian and Minority Ethnic staff;
- providing Ethnic Minority Networks appropriate levels of resource and access to the Board.

# **Priority Action 2: Workforce**

Commission an independent audit of all existing workforce policies and procedures through an anti-racist lens, and expect representation of ethnic minority groups within forums or groups established to design the audit/and oversee and support their effective implementation and application.

# Priority action 3: Data

Improve workforce data quality and introduce a Workforce Race Equality Standard (WRES) to provide an evidence base to make and measure targeted structural change. Underpinned by cultural change, through targeted interventions at both local and national level, developed through social partnership.

# **Priority Action 4: Access to services**

The Maternity and Neonatal Safety Support Programme, co-designed and developed with Black, Asian and Minority Ethnic people and stakeholders, will detail and implement specific changes to maternity services that will improve outcomes and experiences of Black, Asian and Minority Ethnic women and families who experience health inequalities.

# Priority action 5: Health Inequalities

The Welsh Government and NHS Wales will establish a dedicated working group on health inequalities. The working group will work alongside and co-produce with with Black, Asian and Minority Ethnic people to identify to identify to identify barriers faced by these communities in accessing services. By 2023, the working group will make recommendations on how barriers can be removed to ensure equality of access to services. Alongside addressing barriers to accessing services, the working group will also develop programmes of work to maximise the contribution of NHS Wales to tackling health inequalities experienced by ethnic minority people.

Through these priority actions we commit to delivering fundamental cultural change at pace for our ethnic minority workforce within the NHS and for Black Asian and Minority Ethnic people accessing our services across Wales.

We committed to ensuring progress at pace against the 5 enabling Health goals.

# Goal 1: Leadership and accountability

Ethnic Minority Staff Networks have been established in nearly all health boards. We will widen this as a requirement for all Health boards to convene and resource.

#### Goal 2: Workforce

Through partnership working, we have introduced a Respect and Resolution in the Workplace Policy replacing the previous Dignity at Work and Grievance policies. We will monitor the outcomes with Black, Asian and Minority Ethnic staff and readdress disparities.

Cardiff University Medical School and Students are coproducing anti-racist curricular and culture changes informed by lived experiences.

HEIW have created a Differential Attainment Board, to address unequal treatment of doctors in NHS Wales and enable targeted support.

Training for Educational and Clinical Supervisors has been provided on active bystander issues and work has commenced with the GMC providing supporting data to develop indicators to capture progress around Differential Attainment.

#### Goal 3: Data

A Workforce Race Equality Standard (WRES) Wales scoping group has been established and will build on learning from NHS England's implementation and development of the WRES to develop recommendations for Wales.

We are supporting several initiatives including the All-Wales National Data Resource (NDR), SAIL Databank and the Value in Health programme to understand variations in health outcomes and make services safer and more effective.

#### Goal 4: Access to Services

We have met with community groups and leaders to better understand the maternity outcomes, access and attitudes of Black, Asian and Minority Ethnic people in order to directly inform the Maternity and Neonatal Safety support programme. We have set targets in our Maternity and Neonatal safety support strategy for Black, Asian and Minority Ethnic women and children.

# Goal 5: Tackling Health Inequalities

We established a joint Task and Finish Group with the Wales Alliance for Mental Health which is looking at ways to improve access to and the quality of mental health support and services for Black, Asian and Minority Ethnic people. Recognising the unique needs of asylum seekers, refugees and migrants, we have also separately established a Task and Finish Group (chaired by the Wales Strategic Migration Partnership and Traumatic Stress Wales) to develop proposals to address the unmet mental health needs of these people.

We provided additional funding to Diverse Cymru to support the delivery of their cultural competency scheme across Wales.

Time to Change Wales (TtCW), our programme to help people to talk about mental health and to end discrimination, have appointed Ethnic Minorities Youth Support Team Wales (EYST) as a delivery partner to focus on issues facing Black, Asian and Minority Ethnic people.

We established a COVID-19 Vaccine Equity Committee (VEC) and published a COVID-19 Vaccine Equity Strategy. Together with key partners we will be continuing to encourage vaccine take-up by offering a flexible service according to local circumstances. This will include extended hours openings, outreach, pop up clinics, and provision in local places with support from trusted intermediaries and improving access to reliable and trusted information.

In developing this work, we found that we have made considerable progress, but more changes are needed.

We know certain groups of the population, both service users and health staff, were disproportionality affected by COVID-19. We have worked with community groups and leaders, to try to mitigate the ongoing impact of the pandemic.

Actions	Outputs	Impact	By when	Lead and partners
Senior Leaders in Welsh Government Health and Social Services Group will establish an internal Challenge Board to include external representation to monitor and ensure collective progress against Health and Social Care Goals and Actions.	Internal Challenge Board convened with Terms of Reference and meeting schedule agreed.	Visible leadership and allyship demonstrated accountability at the highest level and commitment to ensure Health Goals and Actions are scrutinised and progress challenged.	July 2022.	Welsh Government Health and Social Services senior leaders.
Goal: Staff will work in safe, inclusive environment both be empowered to identify and address race		p and allyship, supported to reach their f	ull potential, and ethnic	minority staff and allies;
Priority action 2: Commission an independent audit of all existing workforce policies and procedures through an anti-racist lens, and expect Black, Asian and Minority Ethnic representation within forums or groups established to design the audit/and oversee and support their effective implementation and application.	Completed Independent Audit of current workforce policies with recommendations to strengthen anti-racist principles. This will specifically include policies around grievances, complaints and use of Non-Disclosure Agreements.	Independent assurance, workforce policies address systemic and instructional racism.  Confidence in workforce that anti-racist principles are threaded through policies and scrutinised independently.  Black, Asian and Minority Ethnic staff have increased confidence that they will work in a safe and inclusive workplace that recognises and promotes their performance and progression. This will also address ethnic diversity at all levels of the NHS workforce across Wales.	December 2022.	<ul> <li>Welsh Government.</li> <li>NHS Wales Employers.</li> <li>NHS Wales organisations.</li> <li>Trade unions.</li> <li>Partner organisations.</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners
Higher Education Institutions (HEIs) and NHS Organisations will co-design anti-racist education programmes with Black, Asian and Minority Ethnic people.  Set a requirement for all NHS Staff, NHS Volunteers and students to complete redesigned anti-racist education programmes.	Audit of current anti-racist educational/training interventions.  Appropriate anti-racist education intervention developed.  Report detailing completion of staff, student and volunteer numbers completing the education programme.  Appraisals will capture completion and participation in anti-racist education and will require EDI objectives to be set and met.	Consistent, fit for purpose educational intervention offered to all staff, students and volunteers.  Visible mandated education providing confidence to workforce that organisation is serious about anti-racist principles.  Visible evidence of development and change in the exhibited behaviours of those who have participated in education programme.  Staff more confident in providing allyship and calling out racism.  Staff more confident in complaining about racist incidence by colleagues and public.	December 2023.	<ul> <li>HEIW.</li> <li>NHS Wales Employers.</li> <li>Trade unions.</li> <li>NHS Wales organisations</li> <li>HEIs.</li> <li>Partner Organisations.</li> </ul>
Each NHS organisation will commit to their involvement in the Aspiring Board Members Programme, ensuring education, mentoring and support to participants who will be from a Black, Asian and minority ethnic background. Academi Wales, to work in partnership with NHS Wales and other appropriate organisations to develop and run an Aspiring Board Members Programme.	All NHS organisations will provide at least one aspiring board member with experience, education and mentoring from a senior non-executive director, including the opportunity to attend board and committee meetings.  In return the senior non-executive member will also receive reverse mentoring from the aspiring board member.	Increase the number of people from a Black, Asian and minority ethnic background who are able to evidence more effectively their ability to undertake the role of a non-executive member.  Increased ethnic diversity on Boards, "building a robust pipeline" of future Black, Asian and Minority Ethnic Board Members.	December 2022.	<ul> <li>Welsh Government.</li> <li>NHS Boards.</li> <li>HEIW.</li> <li>NHS Wales organisations.</li> <li>Trade unions.</li> <li>Academi Wales.</li> </ul>
HEIW will ensure all commissioned programmes provide evidence of anti-racist principles and reflect HEIWs Strategic Equality Plan in order to meet objectives regarding differential attainment, widening access and under-representation of Black, Asian and Minority Ethnic people in NHS Wales.	Report from HEIW (in their Strategic Equality Plan) detailing how they are holding organisations to account through the commissioning process.  Issues of differential attainment are identified and addressed by the General Medical Council.	Anti-racist principles embedded in commissioning process.	September 2023.	<ul><li>HEIW.</li><li>NHS Wales organisations.</li><li>Trade unions.</li></ul>

Actions	Outputs	Impact	By when	Lead and partners	
	Goal: Data in relation to race, ethnicity and intersectional disadvantage will be routinely collated, shared and used transparently, to level inequalities in health and access to health services, and provide assurance that the NHS Wales is an anti-racist and safe environment for staff and patients.				
Priority action 3: Improve workforce data quality and introduce a Workforce Race Equality Standard (WRES) to provide an evidence base to make and measure targeted structural change. Underpinned by cultural change, through targeted interventions at both local and national level, developed through social partnership.	Scoped and implemented WRES to include data about NHS and Social Care Black, Asian and Minority Ethnic workforce career. progression, leadership representation, discrimination and bullying.	High quality workforce data, underpinned by a culture where staff can be safe, and confident to provide ethnicity data and speak up against racist discrimination and practice.	September 2023.	<ul><li>Welsh Government.</li><li>NHS Wales organsiations.</li><li>Trade Unions.</li><li>Partner Organisations.</li></ul>	
Implement systemic monitoring of concerns of workforce discrimination and bullying raised by staff through the Joint Executive Team process. Sources of workforce data and intelligence will be refined including the WRES and HEIW Centre of Excellence.	Scoped and implemented WRES.	High quality workforce data, underpinned by a culture where staff can be safe, and confident to provide ethnicity data and speak up against racist discrimination and practice.	Ву 2023.	<ul> <li>Welsh Government, Health and Social Services Planing and Performance.</li> <li>HEIW.</li> </ul>	
Co-design and revise population health data collection, creating an evidence base to develop policies and provide equitable health and social care services.	Report detailing how population health data collection, monitoring has been revised and the impact.	Refined and cohesive population health data collation.  Transparency and accountability levels raised increasing confidence by population, and providing organisations with data they can be confident to act against.	Ву 2023.	Welsh Government Health and Social Services Public Health Improvements.	
Goal: We will identify and break down barriers	which prevent equitable access to health	ncare services for Black, Asian and Minor	ity Ethnic people.		
Priority action 4: The Maternity and Neonatal Safety Support Programme, co-designed and developed with Black, Asian and Minority Ethnic people and stakeholders, will detail and implement specific changes to maternity services that will improve outcomes and experiences of Black, Asian and Minority Ethnic women and families who experience health inequalities who experience health inequalities.	Publication and reporting against programme's progress.	A reduction in perinatal mortality in minority ethnic women and babies.  Improved experiences of care in pregnancy and birth including pain management in labour.	January 2023.	Office of the Chief Nursing Officer.	

Actions	Outputs	Impact	By when	Lead and partners
Priority action 5: Establish a dedicated working group on health inequalities to address barriers in accessing services and make recommendations to improve. The group will hear from experts by lived experience and draw on evidence that has already been submitted.	Working Group established, experts and community partners identified and Terms of Reference and meetings scheduled.	Greater awareness of barriers and recommendations based on lived experience on how to remove them.  Consultation with Black, Asian and Minority Ethnic people will raise confidence that their voices are being heard, and that systemic differences are being implemented to improve access to services.	December 2023.	Welsh Government Health and Social Services Public Health Improvements.     Public Health Improvement.
Ensure our COVID-19 recovery plans are fully inclusive and targeted to address known health inequalities in access to care and service provision.	National recovery frameworks and detailed recovery plans of local NHS organisations include specific actions to address inequalities.	Delivery of more culturally competent care, with improved access.	September 2023.	<ul><li>Welsh Government.</li><li>NHS Wales Organisations.</li></ul>
"Time to Change Wales" will develop and deliver an anti-racist mental health anti-stigma programme which is co-designed with people with lived experiences and from Black, Asian and Minority Ethnic people.	Published programme on mental health anti-stigma.	Programme based on lived experience will be more authentic and impactful and raise confidence within communities that their voices are being heard.	March 2023.	<ul> <li>Welsh Government Health and Social Services Public Health Improvement.</li> <li>Welsh Government Health and Social Services Mental Health and Vulnerable Groups Division.</li> <li>Public Health.</li> <li>Improvement.</li> <li>Mental Health.</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners
Goal: Black, Asian and minority ethnic people will have confidence that action is being taken to address health inequalities and their voice is heard in shaping decisions which affect them.				
<ul> <li>Work with community organisations, the third sector and the NHS to ensure the needs of Black, Asian and Minority Ethnic people are considered when developing:</li> <li>new strategies and legislation for Mental Health;</li> <li>proposals to address the unmet mental health needs of asylum seekers, refugees and migrants;</li> </ul>	An Action Plan on improving access to and the quality of mental health support for Black, Asian and minority ethnic people.	Black, Asian and minority ethnic people will know how to access mental health services and the service they receive is delivered with an understanding of their individual needs.	September 2023.	Welsh Government Health and Social Services Mental Health and Vulnerable Groups Division.
<ul> <li>proposals to reduce health inequalities amongst, Gypsies, Roma and Traveller communities.</li> </ul>				
Secure ethnic minority representation to the new national programme board for end of life care to ensure that the work programme of the Board includes (and delivers on) commitments around improving end of life care for ethnic minority people.			December 2023.	Welsh Government Health and Social Services Population Healthcare.
Work with representatives of ethnic minority communities to promote the Putting Things Right (PTR) concerns and complaints procedure, including the advocacy services available, ensuring accessibility through additional recommended languages.  Revise Putting Things Right guidance to NHS organisations and include information about on how to respond to patients' complaints about racism in the provision of NHS services.  Complaints are monitored to check whether Black, Asian and Minority Ethnic people are using the process.	Black, Asian and Minority Ethnic people engaged in the development of a strategy for joint PTR and Duty of Candour guidance promotion and translation plan.  Revised NHS organisation guidance distributed.	Greater levels of awareness/use of the PTR complaints procedure by by Black, Asian and Minority Ethnic people.  Empowered citizens feeling safe and supported in making complaints about NHS services confident that they will be taken seriously.  Empowered NHS organisations putting steps in place to better manage complaints about racism in service delivery.	December 2023.	Welsh Government Health and Social Services Population Healthcare.

Actions	Outputs	Impact	By when	Lead and partners
Introduce the new Duty of Candour and, by involving Black, Asian and Minority Ethnic people in the development of the guidance and promotion, ensure high levels of awareness of the duty and the benefits it affords all recipients of NHS care.	Bespoke engagement with ethnic minority communities at a formative stage of the development of the duty of candour guidance.  Plan drawn up for how to ensure duty of candour is effectively promoted to Black, Asian and Minority Ethnic people. Evaluated for impact.	Greater levels of awareness of the Duty.	April 2023.	Welsh Government.
Welsh Government will take an anti-racist approach to the establishment of the new Citizen Voice Body (CVB) for Health and Social Care to ensure that its recruitment processes, governance and policies are anti-racist and fully representative of our communities.  Ensure this approach enables the new body to engage meaningfully with the public about matters relating to racism in health and social services in Wales from the outset.  The CVB establishes relationships with ethnic minority-led organisations, local authorities, NHS bodies and those from ethnic minority backgrounds to ensure their views are heard and reflected.  Annual Remit Letter and Framework Documents to re-enforce above requirements, together with the need to evaluate the effectiveness of their approach.	An anti-racist organisation is established.  Documents set out requirements for engagement and the arrangements for assessing the effectiveness of this engagement.  Improvement action plans are developed where required and progress reporting arrangements are in place.	The voices and lived experience of Black Asian and Minority Ethnic people and communities are effectively heard and their concerns acted upon. With improvements made to service delivery for those communities.	April 2023.	Welsh Government.
Engage with Black, Asian and Minority Ethnic people to identify how the voice and lived experiences of people in these communities can be captured as part of the Health Impact Assessment process which will be mandated in the forthcoming Health Impact Assessment Regulations to be made under the Public Health (Wales) Act 2017 and will assist in tackling health inequities including those which arise as a result of the wider determinants of health.	Black, Asian and Minority Ethnic people engaged in the development of Regulations which will be a key tool to tackling health inequities.	The voices of Black, Asian and Minority Ethnic people will be involved in the development of the Regulations and in shaping the duty to carry out Health Impact Assessments by the public bodies who will be required to comply with the Regulations.	December 2023.	Welsh Government Health and Social Services Public Health Improvement.

## 6. Social Care

#### Some evidence

- In Wales, on 31 March 2021 Black, Asian and Minority Ethnic children made up 8.3% of looked after children (Stats Wales, 2021.)
- The Welsh Government analysis of the Annual Population Survey shows that in 2019 in Wales 7.2% of social care workers were Black, Asian and Minority Ethnic (note that the figure reported here is based on a small sample size and should be treated with caution) (the Welsh Government, 2020b).

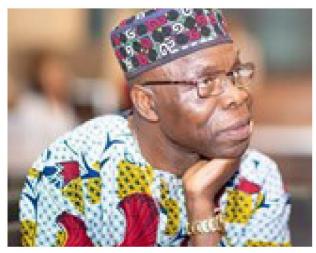


Image courtesy of Race Council Cymru

#### Introduction

The Welsh Social Care sector has many different types of employers delivering a broad range of services that provide social care for individuals of all ages. Some ethnic minority people have told us their experience of social care services lacked compassion and empathy, and those assumptions were made about them because of their ethnicity. They have reported feeling as if they were not listened to and that their needs were not met. This has to change.

The social care sector has a responsibility to ensure that people's characteristics, culture and beliefs (including, for example, language) are considered and used to inform culturally competent service provision. We must ensure that ethnic minority staff, volunteers, managers and leaders working within the sector have a good experience that includes policies and processes to tackle any racism they face.

We are committed to designing, commissioning and providing anti-racist social care services. Our approach will ensure all partners within the sector are striving to achieve the same goal: providing the best service to all people who need care and support and unpaid carers who need support. We aim to embed active anti-racist practice throughout the workforce and delivery of services.

We recognise that many minority ethnic people have had challenging lived experiences when using social care services, or as part of the workforce. In order to further engage with, and understand, these experiences, the Chief Social Care Officer for Wales has met organisations working to support Black, Asian and Minority Ethnic users of social care services. These discussions have also informed this Plan. enabling further development of existing workforce strategies and service delivery plans.

Across our services, we heard that there is an implementation gap between policy and practice on the ground. We are also aware of the longstanding data gap in relation to ethnic minority people and Welsh Social Care; we don't always have sufficient data to make the best decisions and policy changes. We need this data to inform the way in which improvement activities should be targeted including developing the cultural competencies of our staff and addressing the recruitment and progression of ethnic minority staff.

#### What we will do

More progress is required to ensure that experiences of using social care services are actively anti-racist. Our approach will ensure all partners within the sector are striving to achieve the same goals, providing the best service to all people who need care and support and unpaid carers who need support, and embedding actively anti-racist practices.

This commitment addresses two areas. Firstly, what the Welsh Government and our statutory, private and third sector partners can do for adults and children who use social care services and their families: improving access to and experience of services, through an anti-racist lens. Secondly, what the Welsh Government can do for, and what our expectations are of, the social care workforce, to improve both practice and their experience, again through an anti-racist lens.

These actions will deliver and improve our approach to meeting the needs of ethnic minority people using social care services and their carers. Addressing the goals and actions will significantly increase the range and the quality of the data, research and evidence which can be used to address the implementation gap between policy and practice. A new intersectional approach will ensure greater consideration of lived experience to help us and our partners co-design future services, and build the cultural competence and assets-based practice of the wider workforce. This will deliver our commitment to anti-racist care for people using services, and respect for the workforce.

Actions	Outputs	Impact	By when	Lead and partners
Leadership				
Goal: To ensure that leaders at all levels in the s people who are receiving care and support and				
Work with Social Care Wales (SCW) and Health Education and Improvement Wales (HEIW) to review implementation of the Workforce Strategy for Health and Social Care so that it delivers actively anti-racist leaders.  Leaders to be exposed to the revised leadership behaviours for anti-racism, as part the Leadership Behaviours Framework developed by Academi Wales.	The joint SCW and HEIW Workforce Strategy incorporates the Workforce and Leadership Actions within the social care element of the Action Plan.	Leaders at all levels of social care are clear on the role they play, behaviours they need to observe, actions they must take and will be measured against and the education and training that will support them to deliver an anti-racist social care sector in Wales.	March 2024.	<ul> <li>Social Care Wales.</li> <li>Health Education and Improvement Wales.</li> <li>Care Inspectorate Wales.</li> </ul>
Take positive action and support a range of leadership development opportunities for minority ethnic members of the social care workforce to develop into middle and senior management roles.  Development opportunities such as enhanced access to shadowing, secondments, coaching, mentoring (including reverse mentoring), sponsorship, and bespoke training will be included.	A range of leadership development opportunities to promote the development and progression of minority ethnic people in the social care workforce.	The opportunities will demonstrate a more skilled and able cohort of minority ethnic individuals in leadership positions in the social care sector.	September 2023.	<ul> <li>Social Care Wales.</li> <li>Health Education and Improvement Wales.</li> <li>Black, Asian and Minority Ethnic Partner Organisations.</li> </ul>
Develop the social care content of a Health and Social Care Workforce Race Equality Standard as part of the Social Care Health and Wellbeing Framework. This will be used to consider any revisions to the Codes for Employers and Social Care Workers.  This will inform revisions to the Codes for Employers and Social Care Workers.	A Health and Social Care Workforce Race Equality Standard has been scoped and implemented. Revised Codes for Employers and Social Care Workers to include explicit reference to expectations of anti-racist practice.	That anti-racist thinking and practice starts to become the norm in all activity related to the workforce.  That anti-racist practice is specified as an outcome measure by Care Inspectorate Wales.	March 2024.	<ul> <li>Social Care Wales.</li> <li>Health Education and Improvement Wales.</li> <li>Care Inspectorate Wales.</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners
Anti-racist service delivery				
Goal: To continue to identify and work to brea social care services and that the services provide			nic people, to ensure pe	eople feel confident accessing
Establish a working group of statutory, independent and Third sector service partners to co-produce anti-racist, culturally competent social care services for users of all ages. The group will provide advice and support to social care officials. The Group will represent minority ethnic people in its membership and some experts in social care to bring their lived experiences and expertise.	Identify good/best practice elsewhere.  Co-produced working group report setting out specific, time-limited, and measurable actions to be taken forward by each local authority and regulators.  The report will contain a new repository of evidence of positive practice in social care services design and delivery with minority ethnic people.	Social care services will be anti-racist in their design and delivery; services will be more accessible and culturally appropriate for minority ethnic people.  Positive practice in respect of Black, Asian and Minority Ethnic people is implemented and embedded within social care services.  Increase in minority ethnic people recording that they feel fully supported by statutory social care services.	2023.	<ul> <li>Social Care Wales.</li> <li>ADSS Cymru.</li> <li>CAFCASS Cymru.</li> <li>Care Inspectorate Wales.</li> <li>Social Care Fair Work Forum.</li> <li>Third sector providers and advocates.</li> <li>Independent sector providers.</li> </ul>
Care Inspectorate Wales to undertake anti-racism training for all inspectors.		This impact will have been assessed via Care Inspectorate Wales inspections.	March 2024.	Care Inspectorate Wales.
Map out the existing cultural, language, and interpretation/translation needs of minority ethnic people using social care services to aid current and future service planning and the provision of spoken and written translations.  Secure baseline of numbers and nature of complaints in relation to lack of provision to compare with changes sought.  When action plan is delivered build in evaluation of the services – using hard data and lived experiences information.	An Action Plan which sets out existing cultural, language and interpretation needs and recommendations, and identifies resources needed to fill gaps and build capacity.	An increased confidence that services will meet cultural, language and interpretation/translation needs.	March 2023.	<ul> <li>Social Care Wales.</li> <li>ADSS Cymru.</li> <li>Independent sector providers.</li> <li>Black, Asian and Minority Ethnic partner organisations.</li> </ul>

de-biasing the relevant processes and policies and arrangements for ongoing evaluation.

Actions	Outputo	Impact	Previon	I and and partners
Actions	Outputs	Impact	By when	Lead and partners
An anti-racist workforce				
Goal: To ensure that minority ethnic people se	eking a career or role within social care i	n Wales will experience no barriers to en	nployment.	
They will have access to high quality training t of racism and any other form of discrimination		heir workplace, and have full confidence	e in their leadership to c	perate a zero tolerance policy
In addition, high quality training will ensure al and cultural backgrounds.	l members of the social care workforce in	n Wales have the cultural competence to	work effectively with p	eople from diverse ethnic
Undertake a review of complaints from the social care workforce to identify racist behaviours in the workplace and any associated patterns.	An Action Plan on social care selection and progression processes and policies and reasons for the exit of minority ethnic social care professionals from the workforce.	A reduction in the number of complaints made by Black, Asian and Minority Ethnic people in respect of racism encountered in the delivery of social care services.	March 2023.	<ul><li>Social Care Wales.</li><li>Trade Unions.</li><li>Social Care Fair Forum Wales.</li></ul>
Review of selection and progression processes commencing with Local Authority middle management and leadership roles) and identify reasons for the exit of Black, Asian and Minority Ethnic social care professionals from the workforce.  The review will include recommendations for	Published Action Plan with recommendations on social care selection and progression processes and policies and reasons for the exit of Black, Asian and Minority Ethnic social care professionals from the workforce.	Improved processes and policies developed in line with anti-racist principles and practices which result in increased numbers of Black, Asian and Minority Ethnic people in senior positions and the improved retention of Black, Asian and Minority Ethnic people across the workforce as	December 2023.	<ul> <li>Social Care Wales.</li> <li>Health Education and Improvement Wales.</li> <li>Black Asian and Minority Ethnic organisations.</li> </ul>

a whole.

people across the workforce as

Actions	Outputs	Impact	By when	Lead and partners
Ensure that all education and training for the social care workforce, including all initial, pre-entry training and continuous professional development has been reviewed in respect of anti-racist content; including cultural awareness and anti-racism training.  All leaders in Social Care will have training in anti-racism as part of their induction and on-going learning.  This will include the development and delivery of cultural competency training as a recommended element of social care Continuous Professional Development.  Annual evaluation of the Toolkit's effectiveness in supporting anti-racist delivery.  Map out the Welsh language training needs of minority ethnic social care workforce and how these communities of professionals can be more effectively reached to encourage take up of Welsh and other needed/identified language learning.	An Action Plan for improvements to anti-racist education and training content, both at initial, pre-entry level and in relation to continuous professional development.  Development, implementation and evaluation of cultural competency training in social care.	The social care workforce is equipped with the skills and confidence to provide anti-racist, culturally appropriate social care services.	March 2023.	<ul> <li>Social Care Wales.</li> <li>ADSS Cymru.</li> <li>CAFCASS Cymru.</li> <li>Social Care Partnership/Fair Work Forum. BASW Cymru.</li> <li>Universities and colleges providing social care education and training.</li> <li>Third sector providers and advocates.</li> </ul>
In line with the publication date for the Equality and Human Rights Commission (EHRC) Inquiry report into the treatment and experiences of the lower paid Black, Asian and Minority Ethnic social care and health workforce, we will respond positively to the Inquiry's findings and look to include its recommendations within the Actions set out here.	Inclusion of EHRC's recommendations within the social care element of the Anti-racist Wales Action Plan (and elsewhere as required).	Recommendations of EHRC incorporated into Anti-racist Wales Action Plan and responses implemented.		EHRC.     Social Care Wales.

# 7. Homes and Places



#### Some evidence

- Non-white ethnicity is linked with a greater likelihood of relative income poverty. For the period between 2015-2016 and 2019-2020 (an average of 5 financial years) there was a 29% likelihood of people whose head of household comes from a non-white ethnic group living in relative income poverty. This compares to a 24% likelihood for those whose head of household comes from a white ethnic group. However, because the vast majority of households in Wales have a head who is from a white ethnic group, most people (97%) who were living in relative income poverty were from such households (the Welsh Government, 2021c).
- In 2011 in Wales, 28.7% of Gypsy or Irish Travellers and 27% of Bangladeshis lived in overcrowded housing (that is, they had fewer bedrooms than they needed to avoid undesirable sharing), whilst 19.4% of Black people and 18.5% of Arabs did so compared to 4.9% of White British people (the Welsh Government, 2020b).

#### Introduction

Secure homes of all types, are fundamental to people's well-being and to every aspect of their lives, including their mental and physical health and well-being, their educational opportunity and achievement, their employment outcomes and their social and cultural well-being. Our overall aim is that ethnic minority people are able to live in decent, secure and affordable homes which meet the diversity of their needs.

COVID-19 has brought into sharp focus the importance of appropriate and affordable home for everyone's mental and physical well-being. It has also highlighted the deep inequalities that exist for some people in accessing such homes.

#### What we know

We know there are issues with overcrowding in housing, which disproportionately affects some Black, Asian and Minority Ethnic people. A disproportionate number of ethnic minority people may also face inequalities in relation to poor housing and air quality as well as affordability and availability of social housing which meets the diversity of people's needs.

### In developing this work

We have heard very clearly, including from many ethnic minority people and organisations, that:

- active anti-racism needs to underpin all the actions we take, through cultural change and strong and focused leadership, to make race equality a reality;
- accountability and transparency have to be central to what we do;
- there needs to be much better engagement with ethnic minority people in developing our policy;
- there is a strong link between poverty and socio-economic disadvantage and inequalities faced in accessing decent homes by some ethnic minority people;
- we must take into account how different aspects of a person's identity combine to create different experiences and multiple barriers which compound race inequality. This includes women, disabled people, young people, older people, LGBTQ+ people, religious and non-religious groups and those from lower socio-economic groups.

We know that in relation to homes, there is a need for much better data and evidence, as well as meaningful engagement with the full diversity of ethnic minority people. These will be 'givens' that underpin our approach going forward as will the accountability provided by equalities and human rights legislation and the Well-being of Future Generations Act.

It is important to talk not just about 'housing' but about 'homes', including Gypsy and Traveller mobile homes and sites. We heard very powerful evidence of the particular discrimination, racism and inequality that Gypsies and Travellers face and it is really important that this is reflected in our plan. Consultation responses were supportive of our proposals and have helped refine our actions to increase the number and quality of local authority permanent and transit pitches, as well as explore options for rental of trailers. In addition, responses suggesting that advice and advocacy services should be provided in the specific area of private planning applications will be taken forward.

Asylum seekers, refugees and migrants face particular inequalities and whilst the Welsh Government is not responsible for providing housing for asylum seekers (this rests with the Home Office), we have a responsibility to support them from 'day one' of their arrival in Wales in line with our vision of being a nation of sanctuary.

#### What we will do

We will significantly increase representation of ethnic minority people in senior leadership and at all levels to create a workforce within the homes sector to reflect the diversity of the population in which they operate.

We will ensure that standards provision and services around the provision of homes advance race equality, embed anti-racism, equality and human rights, and meet the diverse needs of ethnic minority people.

We will ensure that Private Rented Sector (PRS) housing and accommodation, and service provision advances equality, embeds anti-racism and meets the diverse needs of ethnic minority people.

We will ensure ethnic minority people across the country have a voice and influence in ensuring the Welsh Government policies around the provision of homes reflect the diversity of ethnic minority people's needs and priorities.

In recognition that safe, culturally appropriate accommodation is necessary in order for individuals to flourish in other parts of their lives, we will address the lack of site provision and poor quality of Gypsy and Traveller accommodation in Wales.

#### Who we work with

We will work with Housing Associations, local authorities, third sector support organisations, ethnic minority led organisations, community organisations and other partners, to embed anti-racism, including:

- Rent Smart Wales (RSW)
- · Tai Pawb
- TPAS Cymru
- Chartered Institute of Housing (CIH)
- Community Housing Cymru (CHC)
- · Cymorth Cymru Cymru
- Welsh Local Government Association (WLGA)
- · Shelter Cymru
- Citizens Advice Cymru.

We will also work collaboratively with other key Welsh Government policy areas to achieve those actions that are cross-cutting.

Actions	Outputs	Impact	By when	Lead and partners
Representation				
Goal: To significantly increase representation of population in which they operate.	of ethnic minority people in senior leade	rship and at all levels to create a workfor	ce within the homes sec	ctor to reflect the diversity of the
Ensure organisations' boards, advisory groups, senior leadership and workforce reflect the diversity of ethnic minority people by working with Black, Asian and Minority Ethnic organisations, and partners such as Tai Pawb, Chartered Institute of Housing (CIH), Community Housing Cymru (CHC), Welsh Local Government Association (WLGA) and Cymorth Cymru to:  • implement Reflecting Wales in Running Wales: the diversity and inclusion strategy for Public Appointments, in collaboration with the Public Bodies Unit, specifically in relation to the following goals:  - demonstrate open and transparent recruitment practices  - demonstrate diversity within Boards  - demonstrate that they are building a community of individuals (in particular ethnic minority women) who are interested, aware and nearly ready for Board membership (i.e. to build a robust pipeline).	Increased numbers of Black, Asian and Minority Ethnic, (ethnic minority) people with a place on organisational boards, advisory groups, in senior leadership roles and across the workforces associated with Homes and Places.  Open and transparent recruitment practices which are published.	Increased diversity across the workforce.  Improved access to better job roles, and development opportunities for ethnic minority people.	December 2023 and ongoing/ longer-term.	<ul> <li>Tai Pawb.</li> <li>CIH.</li> <li>CHC.</li> <li>WLGA.</li> <li>Cymorth Cymru and ethnic minority-led organisations.</li> </ul>
Housing Associations, local authority housing departments and third sector support organisations to demonstrate how they will ensure anti-racism and race equality are to be embedded within their organisations both as employers and service providers, including initiatives such as the Tai Pawb's Deeds not Words pledge; this work should be informed by involvement of third sector organisations and community groups.	Delivery Plans with clear and achievable timelines and actions.	Anti-racist thinking and practice becomes the norm in all activity related to the workforce.  An inclusive culture in the workplace is created and nurtured.	December 2023 and ongoing/ longer-term.	<ul> <li>Housing Associations.</li> <li>Local authorities.</li> <li>Third sector support organisations.</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners
Partner organisations to provide anti-racism and zero tolerance training for Boards and all staff groups on understanding and challenging racism on an ongoing basis.	Senior members of the workforce including board members to complete training within 18 months, as part of any Continuing Professional Development programme.  New employees should complete as part of their induction training.	Anti-racist thinking and practice becomes the norm in all activity related to the workforce.  Creating self-awareness amongst work force, encouraging learning about equality, diversity and inclusion.	December 2023 and ongoing/ longer-term.	<ul><li> Housing Associations.</li><li> Local authorities.</li><li> Third sector support organisations.</li></ul>
Revise the current regulatory standards to ensure the expectations placed on Housing Associations with regards to representation on Equality, Diversity and Inclusion, including anti-racism, are clear.	The regulatory standards for housing associations have been revised. Under Regulatory Standard 1: The organisation has effective strategic leadership and governance arrangements which enable it to achieve its purpose and objectives, the expectations are the social landlord: c) Sets and delivers measurable, evidence-based commitments across all areas of its business in relation to equality, diversity and inclusion (including anti-racism and tackling hate crime) reflecting the diversity of the communities it works in and with d) Has a diverse Board, reflecting the communities the Registered Social Landlord before (RSL) works in and with, and has the skills and knowledge required to be effective Compliance with standard will be monitored.	Equality, Diversity and Inclusion, including anti-racism, becomes the norm in all activity related to the workforce.	Complete and implementation will be monitored.	<ul> <li>The Welsh Government Regulation team.</li> <li>CHC.</li> <li>Housing Associations.</li> </ul>
Ensure The Welsh Government housing Boards and advisory groups, including the National Housing Support Advisory Group, reflect ethnic minority people's voice and representation in the transformation of homelessness services.	Increased numbers of ethnic minority people represented on the Welsh Government Boards.	Increased engagement with ethnic minority communities and ensure policy is informed by people's lived experience.	Already ongoing/ longer-term.	The Welsh Government partner organisations, including ethnic minority-led organisations.

Actions	Outputs	Impact	By when	Lead and partners
Ensure that the LHMAs, and their assessment of needs for ethnic minority people and other key groups inform the prospectus as part of the Social Housing Grant programme monitoring.	Funding is awarded based on meeting the needs of ethnic minority people and others within local authority communities.	Access to appropriate and affordable housing is increased.	December 2023 and ongoing/ longer-term.	<ul> <li>The Welsh Government.</li> <li>Local authorities.</li> <li>WLGA.</li> <li>Housing Associations.</li> <li>Tai Pawb.</li> <li>Ethnic minority-led organisations.</li> </ul>
Ensure the barriers faced by the full diversity of ethnic minority people are specifically addressed to ensure they have equal access to homelessness services and homes.  This will include:  • making race equality an integral and focused part of the transformation of homelessness services (including future consideration of priority need and allocations) and ensuring success in addressing the needs of ethnic minority people is built into the evaluation of the transformation;  • ensure the policy and legislative framework supports the commissioning of culturally sensitive housing and accommodation-related support services to meet the needs of diverse ethnic minority people;  • ensure that all Welsh Government homes related guidance to local authorities, such as the "Rapid Rehousing guidance or Code of Guidance on Allocations", includes consideration of the full diversity of ethnic minority people.	Action plan, guidance, and communications make race equality and anti-racism an integral part of ending homelessness services; appropriate housing is provided.	Anti-racism is embedded within approach to ending homelessness at strategic and operational level so that barriers to ethnic minority people and others are removed.	December 2023 and ongoing/ longer-term.	The Welsh Government partner organisations, including ethnic minority-led organisations, Tai Pawb, Cymorth Cymru.

Senedd term, including on homelessness

and allocations

within ethnic minority people and

others in prevention work and/or

accessing services.

INQ000227788	0088

WLGA.

CHC.Tai Pawb.

Local authorities

· Third Sector organisations.

doing so.

Actions	Outputs	Impact	By when	Lead and partners
Private rented sector				
Goal: To ensure that Private Rented Sector (PRS minority people.	s) housing and accommodation, and ser	vice provision advances equality, embed	s anti-racism and meet	s the diverse needs of ethnic
Develop a Private Rented Sector (PRS) Action Plan improving the equality of the sector, which has anti-racism at its core. To include:  • further research into the prevalence of racism and discrimination taking account of intersectionality and socio-economic disadvantage in the PRS and determine options to address this  • research and review the evidence base of the support provided to ethnic minority tenants to access and sustain tenancies in the PRS  • further research the scale of overcrowding in the PRS, and how the ability of local authorities to enforce standards in the PRS could be strengthened  • strengthen the support to those on lower incomes to access affordable and longer term tenancies  • work with Rent Smart Wales to develop anti-racism and hate crime training for landlords and agents. Provide information to tenants to encourage them to report racism and hate crime in the PRS  • Improve communication and engagement with private sector ethnic minority tenants so that they are aware of their rights and how	Research and options appraisal.  Research to establish what tenancy support is available, and produce options to strengthen it.  Research and options appraisal.  Review and strengthen policies to support access to the PRS.  Rent Smart Wales (RSW) to develop anti-racism and anti-hate crime training for landlords and agents (Programme for Government commitment). Information to signpost to help and support will also be shared with tenants and placed on the RSW website.  Develop and deliver communications and engagement strategy.	Better understanding of the scale of the issues and barriers within the PRS in order to prioritise actions to address Improvement in the support provided for tenants.  Better understanding of the scale of overcrowding in the PRS and gaps in enforcement; to prioritise key remedial actions.  Increased support to enable tenants to access the PRS and sustain tenancies.  Greater understanding of impact of racism and hate, and confidence for landlords and agents in tackling racism.  Greater advice and support for tenants experiencing racism and hate crime so racism reduces.  Engagement of ethnic minority tenants and communities to inform private sector policy.	December 2023 and ongoing/ longer-term.	<ul> <li>The Welsh Government.</li> <li>Ethnic minority-led organisations.</li> <li>Tai Pawb.</li> <li>TPAS Cymru.</li> <li>Shelter Cymru.</li> <li>Citizens Advice Cymru.</li> <li>Rent Smart Wales (RSW).</li> <li>Other partner organisations.</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners
During the policy evaluation/development phase, the Welsh Government will work with ethnic minority-led organisations; CHC, CIH, Tai Pawb, TPAS Cymru and WLGA and ethnic minority people, to understand how the potential for Domain Regulation (i.e. regulation of local authorities as well as housing associations in respect of landlord services) may impact on outcomes for ethnic minority people and communities.	Evidenced policy development and options on the potential benefits of domain regulation for landlord services on ethnic minority people and communities.	Decision on whether to pursue domain regulation fully considers impacts on ethnic minority people and communities on an informed basis.	Timescales not yet agreed/ longer-term.	<ul> <li>The Welsh Government.</li> <li>Ethnic minority-led organisations.</li> <li>Local authorities.</li> <li>WLGA.</li> <li>Tai Pawb.</li> <li>CIH.</li> <li>TPAS Cymru.</li> <li>CHC.</li> </ul>
Establish a Group to continue to oversee the implementation of the Anti-racist Wales Action Plan within the Housing and Regeneration Directorate, including structures for sharing information and effective practice.	Establish Group. Establish a community of effective practice.	Achievement of goals and actions relating to Homes and Places.	Within 6 months and ongoing.	<ul> <li>The Welsh Government.</li> <li>Ethnic minority-led organisations.</li> <li>Tai Pawb.</li> <li>CHC.</li> <li>Cymorth Cymru.</li> <li>CIH.</li> <li>TPAS Cymru.</li> <li>WLGA, and other partner organisations.</li> </ul>
Gypsy and Traveller accommodation				
Goal: To recognise that safe, culturally appropriand poor quality of Gypsy and Traveller accom		er for individuals to flourish in other par	ts of their lives and to ac	ldress the lack of site provision
Create a national network of transit provision to facilitate travelling life, with consideration for negotiated stopping, as appropriate.	At least 5 pitches created in both North and South Wales.	Increased number of transit pitches.  Days of pitch use as a proxy measure for reduction in unauthorised encampments.	By 2025.	<ul> <li>The Welsh Government Communities Division.</li> <li>The Welsh Government Planning Division.</li> <li>Gypsy and Traveller groups.</li> <li>Local authorities.</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners
Pilot additional or new ways of funding permanent provision.	10 families with permanent homes delivered using new approaches.	Additional homes provided and new approaches adopted.	Ву 2025.	<ul> <li>The Welsh Government Communities Division.</li> <li>Gypsy and Traveller groups.</li> <li>Local authorities.</li> <li>Housing Associations.</li> </ul>
Explore the potential for a mobile home rental scheme run through social housing in order to improve quality and cost of rental provision in Wales.	Scoping report.	Identify if there is market failure and develop solutions.	Ву 2025.	<ul> <li>The Welsh Government Communities Division.</li> <li>Gypsy and Traveller groups.</li> <li>Local authorities.</li> <li>Housing Associations.</li> </ul>
Capital requirement for mobile home rental pilot.	Pilot rental scheme.	Identify if there is market failure and develop solutions.	By 2025.	<ul> <li>The Welsh Government Communities Division.</li> <li>Gypsy and Traveller groups.</li> <li>Local authorities.</li> <li>Housing Associations.</li> </ul>
Provide learning and development support to Local Authority Elected Members on Gypsy and Traveller communities' culture, needs and strengths. The specification for the service will be drawn up to ensure the support will go beyond awareness-raising and will include anti-racism.	Commission provider and deliver training in a target number of local authorities.	Elected members are informed and sensitive to the needs of Gypsies and Travellers.  Racist language, sentiment and actions towards the Gypsy Traveller communities are not tolerated and widely condemned.	By 2025. By 2024.	<ul> <li>The Welsh Government Communities Division.</li> <li>Gypsy and Traveller groups.</li> <li>Local authorities.</li> <li>Training providers with lived experience.</li> </ul>
Commission a three-year pilot programme to provide independent, trusted advice to those seeking to develop private sites.	Appointment of organisation providing service.	Increased access to appropriate homes. Impact framework will measure number of contacts, the support offered and the results of support.	By 2023.	<ul> <li>The Welsh Government Communities Division.</li> <li>Gypsy and Traveller groups.</li> <li>Local authorities.</li> <li>Planning Aid Wales.</li> </ul>

# 8. Local Government



Image courtesy of Councillor Jasmin Chowdhury

#### Some evidence

• In a survey of candidates for the 2017 local elections in Wales, 2.3% of candidates for county and county borough councils who provided their ethnicity and 1.9% of candidates for town and community councils were black, Asian, minority ethnic people. Of those elected to county and county borough councils 1.8% and 1.2% in town and community councils were from minority ethnic groups (Welsh Government, 2018). In the year ending December 2017, analysis from the Annual Population Survey estimated that 4.7% of the population were Black, Asian or Minority Ethnic people (Stats Wales, 2022). The survey of local government candidates had an overall response rate of 18%, so caution should be applied in treating the results as being representative. Nevertheless, it indicates that our local democracy is not as diverse as our population.

#### Introduction

Local government in Wales consists of the 22 county and county borough councils, town and community councils, 4 national park authorities, 3 fire and rescue authorities and corporate joint committees.

All of these organisations are democratically led by elected councillors, deliver essential public services and have an ethical and governance framework in common. Between them they are also major public service employers. There are 1,234 principal councillors, over 8,000 town and community councillors and over 125,000 local government employees.

The essential public services provided by local government are considered elsewhere in this plan. However, local government is more than a deliverer of services, it provides democratic community leadership through local vision and ambition.

It is vital, therefore, that local government is fully representative of the diversity in our communities and is committed to being anti-racist. This must be demonstrated through the operation of its democratic processes, in its role as a major employer as well as in service delivery. Our local democracy should be representative of the communities it serves, both to engender public trust, and to ensure robust decision making. A local democracy which is comprised of a diverse membership and fully engaged with all its communities is a stronger democracy and will make decisions reflecting that diversity.

The Welsh Government has a long-standing commitment to promoting and supporting diversity in local democracy across Wales. This is a commitment fully shared by the Welsh Local Government Association (WLGA) and One Voice Wales (OVW). Therefore, in delivering the Anti-racist Wales Action Plan we will continue to work closely with the WLGA, OVW, political parties and other partners to strengthen and deepen our commitment to supporting and enabling ethnic minority people to stand for local elected office, including support for appropriate mentoring schemes and delivering our Programme for Government commitment to extend the existing Access to Elected Office Fund for people with disabilities to people from a wider range of backgrounds.

We will also review key aspects of the local government legislative framework to ensure it promotes anti-racism through democratic processes, and in how democratic engagement is undertaken. For example, we want to create an environment where everyone wants and feels able to participate in democracy, including by exercising their right to vote. This means exploring why people who are already enfranchised do not vote. In taking this forward, we will consider how accessible the process of participating in elections is for ethnic minority people, for example, what voter information and support should be available.

The flip side of encouraging and supporting people to participate in democracy is ensuring that democracy is open, transparent, listening, engaging and acts on that involvement and engagement. We are implementing new measures to support local government to engage with communities and promote public involvement. These include statutory public participation strategies, aimed at opening up new ways for people to become involved with democracy, and on-line petition schemes. They also include new approaches to involving people in the scrutiny of local democracy, so they can be actively involved in holding elected representatives to account through the whole of their term of office. We will seek the views and involvement of ethnic minority people, especially of women and young people in co-designing this work, to ensure that as Councils implement these new requirements they are recognising the needs and the benefits of diverse involvement from the community. We will monitor this work closely.

We are also implementing a new performance and governance framework for county and county borough councils. This framework requires councils to keep their performance under review, and to consider the views of citizens and communities as part of this assessment. We will ensure that councils seek the views of ethnic minority people as part of reviewing their performance. Councils will be required to publish their self and panel assessments and respond publically to recommendations.

We also have a long commitment to promoting ethical behaviour amongst our local elected representatives. The current ethical framework has been in place for several years. We have recently passed legislation to strengthen it, by requiring political group leaders to promote high standards of behaviour amongst their members and requiring Standards Committees to make an annual report, including recommendations on how local processes can be improved. So now is the time to review the whole of the arrangements we have in place, and to ensure they promote anti-racist behaviour.

Local government is an essential part of the Welsh public sector, and we expect local government to set itself high standards in all areas, including taking a stance as an anti-racist employer. We expect this to include looking at best practice across the Welsh public sector and the standards that other bodies are adhering to whether these are legislative requirements or not. Our expectation is that local government should be an exemplar of social partnership and take collective action to achieve this and to use levers such as positive action.

Each local government body is a sovereign body in its own right and in terms of their role as an employer it is for each body to ensure an anti-racist culture exists within the organisation and that this underpins its recruitment policies, complaints policies, terms and conditions and all aspects of its employment policies.

To support this, we will work with the Welsh Local Government Association, local authorities, trade unions, professional bodies and One Voice Wales to embed an anti-racist approach in all human resource practices across local government and to expand the level of data about the numbers of ethnic minority people employed by the sector in each grade, the pay gap and whether positive action is in place.

#### 97 Anti-racist Wales Action Plan

Actions	Outputs	Impact	By when	Lead and partners
Review data publishing requirements in relation to pay policy statements.	Clear data publication requirements are in place.	Improved data on representation in local government is available to all to examine.	By March 2023.	Local Government     Directorate in the     Welsh Government.
				Welsh Local Government Association (WLGA).
				Trade Unions.
				One Voice Wales.
				Political parties.

# 9. Employability and Skills, including Social Partnership and Fair Work and Entrepreneurship

## Employability and skills



Image courtesy of Sub-Sahara Advisory Panel

#### Some evidence

- For the year ending 30 September 2021 the employment rate for Black, Asian and Minority Ethnic people aged 16 to 64 in Wales was 68.3%, compared to 73.0% for White people (Stats Wales, 2022c).
- Black, Asian and Minority Ethnic group employees were more likely to work in industries told to close in the early stages of the COVID-19 pandemic (20% of ethnic minority employees compared to 15% of white employees). Black, Asian and Minority Ethnic people were also disproportionately represented in a number of occupations which could be considered to be at higher risk of COVID-19, such as health and social care workers, chefs and taxi drivers (the Welsh Government, 2020b).
- Of all apprenticeship learning programmes started in work-based learning in 2020 to 2021 in Wales 3.9% were started by Black, Asian and Minority Ethnic students (Stats Wales, 2022a).
- According to research undertaken by the UCL Centre for Longitudinal Studies, Carnegie UK Trust, and Operation Black Vote, millennials from Black, Asian and Minority Ethnic backgrounds are 47% more likely to be on a zero-hours contract, compared to their White peers (University College London, 2020).

#### Introduction

The Programme for Government sets clear ambitions to create a Wales where individuals of all ages can receive a high-quality education, with jobs for all, where businesses can thrive in a net zero economy that champions fairness and equality.

In Stronger, Fairer, Greener Wales: A Plan for Employability and Skills, we commit to target our employability programmes to those under-represented in the labour market, building on evidence and the lived experience of those people we seek to support. However, we also acknowledge that some people, including people from Black, Asian and Minority Ethnic groups, women and disabled people, still have poorer labour market outcomes

We offer a number of employability programmes to enable people to gain skills and qualifications to support them to enter, sustain or progress in employment, including the Working Wales advice service, the Community Employability Programmes, and Jobs Growth Wales+ for young people aged 16 to 18.

#### What we know

Despite good programmes being in place, we know that our communications and messaging is not consistently reaching ethnic minority communities. Ethnic minority people are not always aware of the support that is available, for both those seeking work or those who are in work and want to progress. There were also reports that the service providers work in a way that is not anti-racist.

Ensuring we improve outcomes and broaden access are key priorities within our post-16 sector. But we recognise we need to take further action to tackle structural and systemic racism that prevents people from accessing the skills, training and employment prospects that exist in Wales.

#### What we will do

We must continue to find effective and innovative ways of not only communicating our offer to different communities throughout Wales. We must also look at how we tackle institutional racism and seek out how our programmes carry an implicit bias against ethnic minority people and their needs.

We will continue to challenge racism in the way our programmes are developed, communicated and implemented. In so doing, we will have difficult conversations, and develop appropriate anti-racist learning content. We will share best practice, to all staff and contractors that deliver any employability offer on behalf of the Welsh Government and promote best practice beyond the organisations that work directly with us

We will undertake an anti-racist review of our employability programmes to ensure that their operations are inclusive, and not at risk of deepening any existing inequalities and disparities in supporting people into fair and rewarding work. We will support this with a programme of anti-racism training for our front-line employability services.

We will examine the impact of our actions on people from ethnic minority groups, mindful that they are diverse and with different needs, and will include a focus on understanding the impact on women from ethnic minority groups. We will build on our existing engagement with stakeholders from ethnic minority communities to continually improve how we communicate our offers, and to increase awareness and trust in our post-16 learning and skills programmes. We want to identify and remove the barriers that prevent people from accessing and benefiting from employability and skills support, and to regularly monitor this work with ethnic minority people.

### Social Partnership and Fair Work

#### Some evidence

- In 2019, the ethnicity pay gap in Wales was 1.4%. This means that on average, ethnic minority employees in Wales were paid 1.4% less per hour than white British employees (ONS, 2020b).
- Findings from Ethnic Minorities Youth Support Team Wales 2018 All Wales Survey for Ethnic Minority People, an online survey undertaken over a 3 month period (October to December 2018), found a 60% majority of the 143 respondents thought that ethnic minorities are treated unfairly in the workplace (EYST, 2019).

#### Introduction

We are working in social partnership with employers and trade unions to deliver a fairer, more equal and greener Wales. At an individual level, fair work empowers people to meet their needs, provides a sense of fulfilment and enables individuals to contribute, develop and grow. At a societal level, it enables inclusion, participation and social and economic development.

#### What we know

Evidence demonstrates that availability and access to fair work is not universal or equally distributed. We know lived experiences often reflect entrenched and persistent racial inequalities in the experience of work. This includes the under-representation of ethnic minority people in senior roles, lower rates of pay and progression, over-representation in lower paid and more precarious jobs, and organisational policies, processes and cultures that prevent progress and change.

#### What we will do

We are delivering our priorities and ambitions for a 'fair work nation'. This involves using every lever we have to improve working lives, by increasing the availability of, and access to, fair work. We will step up our efforts to ensure that anti-racism is embedded into our approach to social partnership and fair work.

To help ensure this happens, we will incorporate into our fair work outcome measures, data on ethnic minority pay, employment and other data relevant to the world of work. We recognise that evidence comes in many forms, so in addition to quantitative evidence, we will seek out qualitative research and listen and act upon the lived experiences of ethnic minority workers.

Overall, we will embed anti-racism into our social partnership structure and our approach to increasing the prevalence of fair work, improve awareness, understanding and adoption of anti-racist workplace practices, processes and cultures and reduce and eliminate the ethnicity pay gap between ethnic minority and white employees.

#### Who we work with

We will engage social partners to ensure that employers and trade unions act as champions for change, helping us to diffuse awareness, spread anti-racist practice and transform organisational cultures. This includes ensuring that anti-racism and workforce equality, diversity and inclusion feature strongly in the work of the Social Partnership Council and the Workforce Partnership Council.

We will work with our social partners to proactively promote the advantages for all of a diverse workforce and working environments that support ethnic minority workers to participate, progress and thrive.

We will improve employee awareness of workers' rights and employers' awareness and understanding of their legal responsibilities and increase rates of compliance. We will build more effective relationships with the EHRC and others to support this. Working in social partnership with employers and trade unions, we will challenge prejudice in the workplace, tackle workplace discrimination, bullying and harassment and promote anti-racism at work.

Finally, we recognise the world of work is constantly changing and we will be attentive to new and emergent risks and opportunities and any disproportionate impacts according to race.

## Entrepreneurship

#### Some evidence

- Since 2016, of the 5,869 clients supported by Business Wales to start a business 405 (7%) identify as Black, Asian and Minority Ethnic. (Internal Welsh Government data collection).
- Business Wales has directly supported over 13,062 business owners since 2016 to support their business development and growth, 578 (4.4%) identify as Black, Asian and Minority Ethnic. (Internal Welsh Government data collection).
- However, despite these positive strides, only 1.5% of small and medium enterprises (SMEs) with employees in Wales were majority led by ethnic minorities (other than White) in 2019 (although it is worth noting that the ethnicity of 8.6% of the SME leadership teams in the survey were unknown and so the ethnic minority total could be higher) (Ethnicity Facts and Figures, 2020b).
- An analysis of self-employment by ethnicity sourced from the Annual Population Survey shows that only 4.4% of self-employed people in Wales were from an ethnic minority background (the Welsh Government, 2020b).

#### Introduction

The Welsh Government's Business Wales programme proactively supports entrepreneurship through policies and programmes aimed at encouraging the creation, growth and sustainable development of micro businesses and SMEs.

Our vision is clear an anti-racist Business Wales service that is culturally confident and is held accountable throughout delivery.

#### What we know

We know that ethnic minority people need to have full confidence in the Business Wales service. Business Wales recognise that in order to reach out and engage with individuals from the Black, Asian and Minority Ethnic community we need to fine tune our communication with individuals and stakeholders, promoting the service by using role models to ensure that Black, Asian and Minority Ethnic individuals become aware of and have full confidence in using our services

#### What we will do

To make our vision real, we will work with representative bodies and individuals to develop an anti-racist plan for the service. We will continue to strengthen outcomes, linking data analysis with outreach activity on a quarterly basis. Through future contracts, Business Wales will foster an anti-racist provision from the top down, with contractual accountability in delivery. We will do this by co-shaping with ethnic minority business people.

#### Who we work with

The current Business Wales service is designed to offer a service that recognises and aims to meet the needs and aspirations of individuals that seek to start or grow their business, whether this is working on a self-employed basis, starting a high-growth business, or sustaining an existing business. Business Wales works with a breadth of community partners that reach into communities to increase engagement.

These partners include EYST, the Centre for African Entrepreneurship and Assadaqaat Community finance (ACF).

Actions	Outputs	Impact	By when	Lead and partners		
Employability and skills						
Goal: Improved information and performance	Goal: Improved information and performance data on ethnic minority groups participation in the Welsh Government Skills and Employability programmes.					
Review and evaluate the data we collect on ethnic minority participants' in Employability Programmes.  Analyse participation and outcomes for different groups of learners in our statistical reporting, developing disaggregated data by differing ethnic minority groups and gender.	A coherent and disaggregated data set that can be used to understand what support works and where we must improve, and demonstrably improve outcomes for Black Asian and Minority Ethnic people, in particular where there is disparity by gender and certain ethnic minority groups.	Improved data and more transparency, leading to clear understanding of participation levels and increased uptake and better outcomes for people from ethnic minorities.	ding of reased	<ul> <li>The Welsh Government.</li> <li>Contracted providers Careers Wales.</li> <li>Equality and Human. Rights Commission (EHRC).</li> </ul>		
An ongoing review of data using anti-racism as a lens of our employability programmes including Working Wales, ReAct+, and Jobs Growth Wales+.	Updated approaches to engage and increase participation with ethnic minorities.					
Goal: The Welsh Government employability pro	ogrammes will offer a safe, positive, and	inclusive environment for all staff and p	articipants, where racis	m is addressed.		
Co-designed review of our employability programmes using anti-racism as a lens.  Review actions taken on anti-racism within the workforce of our providers of learning and delivery organisations for employability programmes and services.  Review delivery partner engagement to include a specific focus on understanding the experiences of women from ethnic minority communities to increase awareness of support available.  Review community delivery locations to increase accessibility of provision to individuals from ethnic minority communities.  Review the impact of our support on women from Black, Asian and Minority Ethnic backgrounds in order to understand the issues they face and how we can support them through our programmes.	An understanding of where direct and effective improvements in programme delivery can be made.  Positive actions taken to support anti-racism including a programme of training for programme providers and awareness raising for learners.  Increased awareness of anti-racism in the workplace and benefits for businesses. Wider engagement and positive outcomes for people from ethnic minority communities, ensuring inter-sectionality, in skills programmes and better opportunities to progress and upskill.	Increase in participation and improved experiences and outcomes for people from ethnic minorities when participating in Welsh Government employability support.  Increased opportunities for better employment for people from ethnic minority communities.	April 2023.	<ul> <li>The Welsh Government.</li> <li>Contracted providers.</li> <li>Careers Wales.</li> <li>EHRC.</li> <li>Third sector.</li> <li>Local authorities.</li> </ul>		

Actions	Outputs	Impact	By when	Lead and partners
Review and improve Careers Wales/Working Wales services to increase the number of ethnic minority people that access their services.				
Develop co-shaped proposals to raise career aspirations for young people from Black, Asian and Minority Ethnic backgrounds.				
Introduce a programme of anti-racism training and anti-racism awareness sessions for all programme providers and learners that will raise awareness of the experiences of Black, Asian and Minority Ethnic groups, including the specific experience of women and disabled people.				
Ensure providers continue to monitor the increased risks of COVID-19 when considering the needs of participants and staff from ethnic minority communities.				
Roll out awareness and training on anti-racist recruitment practices and anti-racism awareness to businesses.				
Utilise the Wales Union Learning Fund (WULF) Working with trade unions to develop the essential skills and employability of the workforce, with a particular emphasis on removing barriers for traditional non-learners.				
Explore avenues for developing a co-created framework for family learning as a route into skills development and employment opportunities.				

Actions	Outputs	Impact	By when	Lead and partners		
Goal: To increase number of ethnic minority p	Goal: To increase number of ethnic minority people starting and completing Apprenticeships.					
Issue Lifelong Learning Wales Record (LLWR) reports showing trend, breakdown and benchmarking ethnicity data to Lead Contract Holders (LCH.)	Ethnicity target set out in refreshed policy achieved and maintained.	Increased ethnicity starts for apprenticeships.	December 2022.	Lead contract holders.		
Monitor completion data for ethnic minority people and action if drop rate is above thresholds.						
Utilise LCH contract management processes to highlight good practice and areas for improvement.						
Share good practice through Equality Diversity and Inclusion Monitoring Group and include monitoring targets in refreshed apprenticeship policy and monitor LCH against this target.						
Ensure case studies and promotional materials include ethnic minority people.						

Actions	Outputs	Impact	By when	Lead and partners
Social Partnership and Fair Work				
Goal: To embed anti-racism into our social par	tnership structures and our approach to	increasing the prevalence of fair work.		
Include anti-racism in the future operating arrangements of the new statutory Social Partnership Council and the Workforce Partnership Council and ensure anti-racism is embedded into their work and that ethnic minority voices are heard.	A Social Partnership Council and Workforce Partnership Council in which ethnic minority voices are heard.  Work Programmes that make a clear commitment to tackling racism as far as possible within their remit.	Improved satisfaction and engagement will be reported by ethnic minority employers and workers.	December 2022.	<ul> <li>Welsh Government.</li> <li>(Shadow) Social Partnership Council.</li> <li>Social Partnership Council.</li> <li>Workforce Partnership Council.</li> <li>Equality and Human Rights Commission.</li> </ul>
Seek out qualitative research, including a literature review, and listen to the lived experiences of ethnic minority workers. We will use this to inform social partnership and fair work policy development and interventions.	Development and implementation of evidence based policy that meets the needs of ethnic minority workers.	Ethnic minority workers have had improved access to anti-racist and fair working conditions.	December 2023.	<ul><li>Social partners.</li><li>Equality and Human Rights Commission.</li></ul>
Goal: To improve awareness, understanding ar	nd adoption of anti-racist workplace pra	ctices, processes and cultures.		
Engage social partners to ensure that employers and trade unions act as champions for change in promoting awareness and understanding of anti-racist practice and tackling workplace harassment. We will accelerate this activity and establish ways of measuring progress.	Establishment of fair work indicators.	Better informed employers and employees and reduced levels of non-compliance with employment law is evident.	December 2023.	<ul> <li>Welsh Government.</li> <li>Social partners.</li> <li>EHRC.</li> <li>The Welsh Government Equality Branch.</li> </ul>
Improve employee awareness of workers' rights and employer awareness and understanding of their legal responsibilities, to increase levels of compliance. This will include building on our workforce rights and responsibilities campaign to improve access to relevant information, advice and guidance.  We will build a more effective relationship with the Equality and Equality and Human Rights Commission and others to support this work.	Activity to improve awareness of workforce rights and employer responsibilities.	Better informed employers and employees and reduced levels of non-compliance with employment law.	December 2023.	<ul> <li>Welsh Government.</li> <li>Social partners.</li> <li>Equality and Human Rights Commission.</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners		
Goal: To reduce and eliminate the ethnicity pa	Goal: To reduce and eliminate the ethnicity pay gap between ethnic minority and white employees.					
Deliver our National Milestone to eliminate the ethnicity pay gap by 2050. In the short term we will incorporate data on Black, Asian and minority ethnic pay and employment into our fair work outcome measures, and progress plans to review the Public Sector Equality Duty.	A national milestone to eliminate gender, disability and ethnicity pay gap by 2050.	Evidenced that there is an improving trend in the pay gap between ethnic minority and white workers.	December 2023.	<ul> <li>Welsh Government.</li> <li>(Shadow) Social Partnership Council.</li> <li>Workforce Partnership Council.</li> </ul>		
Work with our social partners to proactively promote the advantages for all of a diverse workforce and working environments that support Black, Asian and minority ethnic workers to participate, progress and thrive.	Development and diffusion of relevant information, advice and guidance.	Ethnic minority workforce will have reported greater satisfaction that there are more diverse, cohesive and productive workplaces which enable them to reach their full potential.	December 2023.	<ul><li>Welsh Government.</li><li>Social partners.</li><li>Equality and Human Rights Commission.</li></ul>		
Entrepreneurship						
Goal: To create an anti-racist Business Wales so Black Asian Minority Ethnic people.	Goal: To create an anti-racist Business Wales service that engages with diverse communities in a culturally appropriate way to increase business start-ups and growth amongst Black Asian Minority Ethnic people.					
Work with representative bodies and individuals especially from the ethnic minority business community to develop an anti-racist plan for the Business Wales service.  Deliver anti-racism training for all staff in Business Wales.	Publish a plan with an anti-racism lens over the Business Wales service.	A service provision that is aware of how racism creates disparities is culturally confident and generates increased numbers of ethnic minority people using the service.	March 2023.	Partners will be commissioned to develop the anti-racist plan in collaboration with the Welsh Government and Business Wales.		
Use Business Wales contracts arrangements to secure anti-racist provision through contractual arrangements.	Requirements evaluated.	A service evaluated and underpinned by an anti-racist supply chain to deliver services.	Initial Tender process to commence in July 2022.			

# 10. Nation of Sanctuary -Support for refugees and asylum seekers



Image courtesy of EYST

#### Some evidence

- The UK offered protection, in the form of asylum, humanitarian protection, alternative forms of leave and resettlement, to 14,734 (including dependants) in 2021, the number of people offered protection in 2021 (either following an application for asylum or through a resettlement scheme) was 49% higher than the previous year, and similar to levels seen from 2015 to 2018. This rise (from 9.895 in 2020 to 14,734 in 2021) is accounted for by an increase in the number of grants of asylum at initial decision while the number of refusals has decreased. Over half (55%) of these were grants of asylum, humanitarian protection or alternative forms of leave (such as discretionary leave or Unaccompanied Asylum Seeking Children (UASC) leave).
- There were 1,587 people granted protection through resettlement schemes in 2021. This is 93% higher than in the previous year when resettlement had to be paused due to the COVID-19 pandemic. There are a number of resettlement schemes including the UK Resettlement Scheme, the Vulnerable Persons Resettlement Scheme and Vulnerable Children Resettlement Scheme (which both closed at the end of February 2021), the Afghanistan Citizens Resettlement Scheme and the Afghan Relocations and Assistance Policy.
- The above data relates to information published for the UK, data specifically for Wales is not published in all datasets.

#### Introduction

Our vision is for Wales to be a Nation of Sanctuary where the integration of asylum seekers and refugees begins on day one of their arrival in Wales. Responsibility for asylum and immigration rests with the UK Government rather than the Welsh Government. The Welsh Government is committed to reducing the inequalities experienced by asylum seekers and refugees, increasing access to opportunities and improving relations between these communities and wider society. Actions to achieve this are set out in the Nation of Sanctuary Action Plan 2019. We are also committed to equal and fair treatment for all.

#### What we know

Developing the Nation of Sanctuary Plan and more recent engagement with refugees and asylum seekers has demonstrated that key issues for them are accessing health services including mental health, accessing education and particularly language support, accessing housing, work and avoiding destitution.

#### What we will do

We will ensure that we take an anti-racist approach to our Nation of Sanctuary commitments by ensuring that all forced migrants have the same opportunities, regardless of their country of origin. While we are fully committed to supporting people fleeing the war in Ukraine and helping them to find homes and work in Wales, we will ensure that other refugees are not treated differently because of the colour of their skin.

Actions	Outputs	Impact	By when	Lead and partners	
Goal: Become a Nation of Sanctuary through the	Goal: Become a Nation of Sanctuary through the implementation of the Nation of Sanctuary: Refugee and Asylum Seeker Plan (2019).				
Ensure forced migrants living in Wales can access the advice and advocacy services that they need and are supported to effectively integrate with communities through the procurement and management of the Sanctuary Seeker Support Service.	Provision of expert asylum casework advice, immigration legal advice, bespoke support for young people and other vulnerable groups.	People seeking sanctuary will be supported to achieve better outcomes.  Good relations between sanctuary seekers and wider society will be fostered.  Forced migrants can access advice and this will ensure knowledge of rights and prevent more harmful outcomes.  Forced migrants can integrate with communities and the wider community can thrive.	Sanctuary Seeker Support Service to be funded up to 2025.	The Welsh Government Inclusion and Cohesion Team.	
Implement our Migrant Integration Framework for Wales.	Public bodies and service providers will understand how their services and data contribute to increasing understanding of migrant integration and effective processes.	Fewer migrant community members will experience barriers to integration.	2025.	The Welsh Government Inclusion and Cohesion Team.	
Ensure the sustainability of English for Speakers of Other Languages (ESOL) Hubs to provide consistent high-quality language proficiency assessments and provision of appropriate language courses.	ESOL Hubs will operate in Cardiff, Swansea, Newport and Wrexham (with wider virtual provision). Migrants without adequate English/ Welsh language skills will be supported to access courses.	Language acquisition will be adequately supported to ensure this is only ever a short-term barrier to employment, education or training.	ESOL Hubs funded up to 2023.	<ul> <li>The Welsh Government Inclusion and Cohesion Team.</li> <li>ESOL Team.</li> </ul>	
Ensure refugees are supported to avoid destitution and homelessness through continued funding for a 'Move On' accommodation project.	Ongoing funding will be provided to ensure a trusted refugee support organisation can support newly recognised refugees due to be evicted from asylum accommodation.	The project will ensure refugees can find alternative accommodation, access bank accounts and work/social security, as quickly as possible, avoiding destitution and homelessness.	Funding provided 2022 to 2023.	<ul> <li>The Welsh Government Inclusion and Cohesion Team.</li> <li>Welsh Refugee Council.</li> </ul>	

Actions	Outputs	Impact	By when	Lead and partners
Revise Rent Smart Wales landlords' training to include an explanation of migrant rights to housing (including how this relates to refugees, those with No Recourse to 'Public Funds', EU Citizens, and others), how to easily check the status of migrants to prevent discrimination, and how to deal with racism and hate crime.	Rent Smart Wales landlords training will be revised to incorporate these elements.	Migrants should face fewer barriers to access caused by ignorance and discrimination.  Hate crime and racism should be dealt with more effectively.	Training being rolled out 2022 to 2023.	
Provide advice to Public Bodies and capacity-building support to the Third Sector to ensure those with No Recourse to 'Public Funds' (NRPF) are able to access services to which they are entitled to avoid them becoming more vulnerable to violence and exploitation and treated with compassion and harmful outcomes are avoided.	Guidance for local authorities on how to support those with NRPF is implemented.  Promote understanding of councils' role in delivering services to migrants, providing information on council services in accessible forms (translated information, community connectors).  Regular training is undertaken to support local authorities to understand their duties to support those with NRPF.  Funding is provided to the Third Sector to expand and professionalise 'hosting' arrangements.  Shared housing schemes are explored with housing providers and the Third Sector to find innovative ways to support homeless migrants.  Ongoing funding to ensure last-line immigration legal advice is available.	Local authorities will see the person's needs before their immigration status and maximise the support they can give.  Local authorities will be supported to understand support which can be offered.  Shelter can be provided where individuals have opportunities to regularise their immigration status.  Those refused asylum but with grounds to challenge the decision are supported to do so.	Guidance published 2022. Training funded 2022-23.	<ul> <li>The Welsh Government.</li> <li>Local authorities.</li> <li>Relevant Third sector organisations.</li> </ul>
Seek to minimise data sharing between Welsh Public Bodies and the Home Office to increase migrant confidence to come forward for necessary healthcare or other essential support.	Welsh Public Bodies are advised to limit data sharing with Home Office unless absolutely necessary.  Undertake proactive engagement with migrant communities to increase confidence.	Harmful health outcomes, domestic abuse, or exploitation experienced by migrants including those with insecure immigration status is reduced due to less fear of coming forward for key support.	2025 and ongoing work with migrants to be taken forward as part of Migration Integration Wales.	<ul><li>The Welsh Government.</li><li>Public Bodies.</li></ul>

Actions	Outputs	Impact	By when	Lead and partners
Continue to advocate for improvements to asylum and immigration systems to prevent harmful outcomes for asylum seekers, refugees or other forced migrants.	The impact and operation of UK Government asylum dispersal and refugee resettlement programmes are assessed and recommendations for how these schemes should apply in Wales are made.  Ongoing dialogue between UK Government and the Welsh Government to make improvements and integration of support where possible.	UK Government fully understands the impact of its decisions on Wales and devolved responsibilities.  Assessment enables better provision of support to forced migrants.	Ongoing work with the Home Office.	The Welsh Government.
Continue to support and uphold the rights and best interests of unaccompanied asylum-seeking children and young people.  Programme for Government commitment to be further developed with policy leads.	Councils are enabled to provide appropriate placements and unaccompanied children and young people have access to support and services.		Ongoing.	<ul><li>The Welsh Government.</li><li>Local authorities.</li></ul>

# 11. Crime and Justice, including Hate Crime

The criminal justice system is frequently identified as an area in which there is racial injustice.



### Some evidence

- The independent Lammy Review into the treatment of, and outcomes for, people from ethnic minorities in the justice system (Lammy, 2017) sets out the current disproportionate outcomes in the system.
- Between April 2019 and March 2020 in England and Wales there were 6 stop and searches for every 1,000 White people, compared with 54 for every 1,000 Black people. Over the same period there were 16 stop and searches per 1,000 people with Mixed ethnicity, and 15 per 1,000 Asian people (Ethnicity Facts and Figures, 2021).
- Between April 2018 and March 2019 in England and Wales Black people were over 3 times as likely to be arrested as White people – there were 32 arrests for every 1,000 Black people, and 10 arrests for every 1,000 White people (Ethnicity Facts and Figures, 2020a).
- In 2020 to 2021, there were 3,052 race hate crimes in Wales. This was a 16% increase from 2019 to 2020 (UK Government, 2021).
- Race hate crimes comprise around 66% of all hate crimes recorded in Wales in 2020 to 2021 (UK Government, 2021).
- Research published by the Wales Centre for Public Policy in March 2021 highlights that in Wales, Black, Asian and minority ethnic people are over-represented at every stage of the criminal justice system (Wales Centre for Public Policy, 2021).

- Research undertaken as part of the Lammy Review (2017) finds a majority of Black, Asian and minority ethnic people (51%) believe 'the criminal justice system discriminates against particular groups and individuals', compared with 35% of the British-born white population. In response to this the Centre for Justice Innovation (Bowen, 2017) recommends expanding the existing data on racial disparity in the adult criminal court system.
- In 2017 the Traveller Movement produced a report exploring Gypsy, Roma, Traveller people's experience of prejudice and discrimination (The Traveller Movement, 2017). Based on an online survey of 214 community members from across the UK the Traveller Movement found 77% had not sought legal help after experiencing discrimination.

## Criminal Justice

Much of criminal justice policy (prison, police, probations, courts and related areas) is not devolved to Wales. However, the Welsh Government is responsible for devolved services such as health, substance misuse, accommodation and education. These interface closely with the criminal justice system, and play a crucial role in terms of supporting people in the justice system towards living healthy, crime-free lives.

Because of this we work closely with criminal justice partners including Policing in Wales, the Ministry of Justice, the Home Office, Her Majesty's Prison and Probation Service in Wales (HMPPS in Wales) and Youth Justice Board Cymru. We use forums such as the Criminal Justice Board for Wales and the Policing Partnership Board for Wales to discuss strategic issues and work together to improve outcomes in Wales. Our joint work together, such as the Framework to support positive change for those at risk of offending in Wales and the Criminal Justice Blueprints, set out our vision for a trauma-informed and rehabilitative criminal justice system with prevention at its heart. We are working closely together to realise this vision in practice.

Research published by the Wales Centre for Public Policy (2021) highlights that in Wales, ethnic minority people are over represented at every stage of the criminal justice system – as victims of crime, in stop and searches, within the prison population and within the probation population. This demonstrates the need for the Welsh Government to work with criminal justice partners on this important area. We need to build on the existing commitment in the Framework to prioritise the needs of people from ethnic minorities, gaining greater trust and taking a challenging and radical anti-racist approach to improve outcomes and to tackle systemic racism.

Given this context, our updated Programme for Government includes a commitment to ensure the justice elements of the Anti-racist Wales Action Plan are robust and to address these matters with the police and the courts.

### Hate Crime:

Hate crime is defined as:

"Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity."

A range of agencies including the Equality and Human Rights Commission (2020), Race Alliance Wales (2020), EYST Cymru (Wiegand and Cifuentes, 2019), and Race Equality First (Williams and Tregidga, 2013) have made recommendations designed to tackle the rise in hate crime in Wales. Some focus on improving services and support for victims of hate crime. Others advocate better signposting of legal and institutional responses to address victims' uncertainty over whether their experiences represent hate crimes; a fear that their experiences might be too trivial to warrant reporting; a perception that the police are not able to act; and a lack of formal or meaningful support (Williams and Tregidga, 2013). Other recommendations seek to promote preventative approaches that address the root causes of hate crime.

Recorded hate crime in Wales has roughly doubled in the last 5 years (UK Government, 2021) and debate in the media and online seems increasingly polarised and aggressive. There is room for optimism too as more people than ever in Wales report belonging to their community and that people in their area treat each other with respect (the Welsh Government, 2022). The Welsh Government has operated the Community Cohesion Programme since 2012 and the funding of a hate crime support service since 2014. We know that tackling hate crime also means tackling the hate based attitudes and values which underlies this activity, and emphasising the message that racially motivated intolerance, hatred, divisive actions and behaviours have no place in Wales. We work with our funded partners and third sector organisations to deliver programmes and projects to deliver these messages, and over the years, our programmes have grown in their impact and importance.

## What we will do

# Criminal justice

In his 2017 review, David Lammy recommended an 'explain or reform' principle be used to address racial disparity within the criminal justice system. He recommended that where "agencies cannot provide an evidence based explanation for apparent disparities between ethnic groups then reforms should be introduced to address those disparities." (Lammy, 2017)

We know that we cannot deliver real change in this area without our partners, and we are working closely with criminal justice leads in Wales to put 'explain or reform' into practice. In line with our approach to collaboration more broadly, we are working with partners from the Criminal Justice in Wales Board to develop and fully embed a collective anti-racist approach to criminal justice in Wales.

The Criminal Justice in Wales Board brings together senior representatives from the Welsh Government, HMPPS in Wales, Police Forces, Police and Crime Commissioners, Her Majesty's Courts and Tribunal Service, Youth Justice Board Cymru and other key stakeholders together to discuss strategic criminal justice issues. We work together to support the criminal justice system in Wales and improve outcomes for people in contact with, or at risk of coming into contact with, the justice system.

We are working together with these partners to develop a Criminal Justice Anti-Racism Action Plan for Wales. This plan will set out the concrete and tangible action we will take forward together to tackle inequality and to create an anti-racist criminal justice system. It will outline activity across the system which will embody the goals of the Anti-racist Wales Action Plan in the criminal justice space. In particular, it will seek to address the disparity and injustice demonstrated in the evidence above. We recognise the enormous concerns raised by communities about the disproportionate numbers and negative experience of stop and searches by young ethnic minority men in particular. We will work actively with the Criminal Justice in Wales partners to keep this issue on the agenda and to ensure it is addressed through the Criminal Justice Anti-Racism Action Plan for Wales

The Criminal Justice Anti-Racism Action Plan for Wales will report into the Criminal Justice Board for Wales, ensuring that both the Welsh Government and our criminal justice partners have effective oversight of progress and outcomes. Criminal justice partners have consulted widely on the plan and we believe that it represents a robust and credible approach which will address the endemic prejudice we know is present in the criminal justice system. It will be extensively based on the lived experience of people who have been in contact with the justice system.

This builds on some of the work we are doing through the Criminal Justice Blueprints to understand the experiences of women from ethnic minorities in the justice system. It also complements the activity on Violence Against Women, Domestic Abuse and Sexual Violence which is outlined elsewhere in this document.

Additionally, where we have direct levers or indirect levers e.g. "soft powers" we will continue to use them and this action is captured in the table below. This includes recognising the importance of robust and accurate data, and continuing to pursue the case for the devolution of justice and policing to Wales.

As highlighted by a number of responses to the consultation on this document, it is only when we have full oversight of the justice system in Wales that we will be able to fully align its delivery with the needs and priorities of minority ethnic communities of Wales. We believe that devolution of the police and the justice system is the most sustainable way of creating a justice system that is anti-racist and fully meets the diverse needs of people in Wales.

#### Hate crime

Our vision is for a Wales where everyone is respected and valued and where we can enjoy and celebrate our differences, a country and society where everyone feels a sense of belonging. Where cohesion is not achieved, tensions and hateful attitudes can emerge. In extreme circumstances these attitudes breed hate crimes and even acts of terrorism. However, the consequences of fragmented communities should not define community cohesion. Community cohesion is a driver for positive change and is vital to improving the well-being of people.

The Welsh Government sees community cohesion, hateful attitudes and hate crime as comprising a continuum. In order to effectively tackle hate crime we must also address hate based attitudes and values, and the apparent normalisation of overtly racist language.

Hate crime and hateful attitudes require people and organisations across the whole of Wales to recognise the damage done to victims and the need to address the actions and attitudes of perpetrators. Reporting and tackling hate crime should not be left solely to the victims. We all share the society we live in, we therefore all have a responsibility to call out and eliminate hate crime and hateful attitudes.

As much of this policy work lies in non-devolved areas, it is vital that we develop and maintain strong links with partners such as the four police forces in Wales, the Crown Prosecution Service and Offices of the Police and Crime Commissioners, as well as third sector organisations. We will facilitate these discussions via the Hate and Community Tension Board Cymru.

We will ensure people who experience or witness hateful and racist abuse are aware of how to report it and have increased confidence in doing so. We will continue to work with communities and partners across Wales to make it easier for people to do this and also to ensure they get the support they need.

Our response to hate crime includes our response to Islamophobia and anti-Semitism. Hate crime can dehumanise both victims and perpetrators. For perpetrators, whilst punitive measures can go some way to offering solutions, in the long term there must be opportunities for them to understand the impact of their action and interrogate their belief system. We will work with perpetrators, in a similar way to the successful programmes in place for perpetrators of other forms of abuse such as accredited community based domestic abuse services

The actions in this plan will help us to redouble our efforts to address hateful attitudes before they lead to hate crime but also better support victims where crimes take place.

Group.

Actions	Outputs	Impact	By when	Lead and partners
Goal: To respond to the clear evidence from sta robust, granular, timely and consistent crimina their data will be used to increase their confide	al justice data on ethnicity and race, toge	ther with working closely with ethnic m		
Raise awareness of the Welsh Government's Race Disparity Evidence Unit with criminal justice partners in Wales, and identify how best to help all partners to improve the evidence available on racial disparity within the justice system in Wales and use this to support better policy decisions and monitoring.  Identify the gaps in evidence in relation to all domains including criminal justice data collected and reported on ethnicity and race as one of the first priorities of the Race Disparity Evidence Unit, via an audit of data collections held/outputs produced by the Welsh Government and the wider public/ third sector.	An initial assessment of the gaps in evidence in relation to criminal justice data collected and reported on ethnicity and race in Wales.  An ongoing work programme to improve the evidence base on ethnicity and race within the criminal justice system in Wales, and address any gaps identified from the equalities data audit and from dialogues with ethnic minority people.	A more robust, systematic, consistent approach to collecting and reporting criminal justice data on ethnicity and race in Wales, resulting in a stronger evidence base to inform the decision making process in the criminal justice system in Wales.  A reported increase in confidence to share data by ethnic minority people.	To have in place an agreed monitoring system to capture key data by June 2023.	The Welsh Government Race Disparity Evidence Unit, in collaboration with criminal justice partners.
Building on this initial assessment, take forward a programme of work to improve the evidence base to identify racial disparity within the criminal justice system, including ongoing engagement with ethnic minority people to improve their knowledge/trust in how their data will be used to increase their confidence to share data.				

Actions	Outputs	Impact	By when	Lead and partners		
Goal: To develop our skills and confidence in u UK Government.	Goal: To develop our skills and confidence in understanding what an anti-racist justice system looks like, and to robustly influence and encourage anti-racist policy from the UK Government.					
Ensure development and training opportunities of key officials and those influencing UK Government and Welsh Government policy to understand and argue for an anti-racist justice system.  Take every action possible to highlight the needs and experiences of people from ethnic minorities, and the understanding and importance of an anti-racist approach, through our response to UK Government policy and legislation in the justice space.	Policy officials trained and skilled in arguing what an anti-racist justice system looks and feels like.  Consultation responses, Ministerial correspondence and official-to-official correspondence from us to the UK Government with foregrounds the importance of creating an anti-racist justice system.	Wherever possible, confidence that we have encouraged and supported an anti-racist policy approach from the UK government given that they hold many levers in the criminal justice space.	Ongoing.	The Welsh Government, working closely with UK Government leads.		
Goal: To continue to pursue the case for the de crime reduction policy should be determined a		, which will build on The Thomas Comm	ission report on Justice	e in Wales recommendation that		
Take forward our Programme for Government commitment to pursue the case for devolution of justice and policing to Wales.  Bring forward a publication setting out our work to improve justice and making the case for further reform.  Continue to work to progress the recommendations on criminal justice from the Thomas Commission with the Ministry of Justice.	A publication setting out our work to improve justice and making the case for further reform. This will include an argument for an anti-racist justice system in Wales.  Activity and products which will continue to demonstrate the case for reform.  A joint programme of activity with the UK Government to respond to the Thomas Commission.	In time, a devolved criminal justice system in Wales.	Ongoing. We will provide updates to the Accountability Group to update them on progress.	Justice Policy division.		

Actions	Outputs	Impact	By when	Lead and partners
Hate Crime				
Goal: To ensure that Wales continues to strive thate crime.	o be an anti-racist country and so is a sa	fe place to live, by eliminating hateful at	titudes and supporting v	victims of racially motivated
Raise awareness of the impact of hate crime on victims from ethnic minority communities through our 'Hate Hurts Wales' campaign. This campaign will address victims, perpetrators and bystanders through various materials. Campaign materials will be developed with those who have been affected by racist hate crime.	Campaign monitored to capture 'reach' and 'engagement'.	Bystanders will better understand hate crime and be motivated to act in an anti-racist way in support of victims.  Hateful attitudes will be seen as socially unacceptable.  Perpetrators will fear prosecution and understand the impact of their actions.	'Hate Hurts Wales' launched in March 2021 and will continue for least the next 2 years.	The Welsh Government Equality Team.
Enhance our support and advocacy for those who have experienced racist hate crime through a refreshed Wales Hate Support Centre, including consideration of incidents where intersectional hate has taken place and the specific support which may be required in those circumstances.	Wales Hate Support Centre (WHSC) will record change in number of hate crime referrals during bursts.  Victims offered support will increase (initial aim of 80%). At least 65% of support offers will be taken up by 2025. Victim satisfaction with WHSC services will be at least 90%.	More victims will feel confident taking their abusers to court or finding an alternative suitable outcome.  Increased prosecutions will raise awareness of the problem and will inhibit potential perpetrators.	Ongoing. Contract will run until at least 31 March 2025.	Victim Support Cymru.
Undertake direct work with hate crime perpetrators to better understand how to reduce racial abuse.	Targeted projects undertaken with hate crime perpetrators or those with racist attitudes will be undertaken. Projects will explore good practice in other perpetrator diversion schemes, as well as the scope for increased use of restorative justice practices.	We will better understand effective ways to convert potential and convicted perpetrators to anti-racist members of society.  Converted perpetrators will help us to convince others not to make the same mistakes that they did.	Work will begin in 2022.	The Welsh Government working with key partners.

Actions	Outputs	Impact	By when	Lead and partners
Goal: To tackle anti-Semitism in all its forms.				
Create sustainable funding arrangements to fund Holocaust Memorial Day.  Continue funding Holocaust Education Trust (HET) "Lessons from Auschwitz" programme.  Reinforce our commitment to the International Holocaust Remembrance Association definition of anti-Semitism.  Mainstream tackling anti-Semitism in Welsh Government's anti-racism training and policy-making processes.  Ensure the Hate Hurts Wales campaign highlights the harm caused by religious hate and bigotry.	Funding allocated to schools to undertake activities to promote anti-Semitism through the Holocaust Educational Trust programme.  Commitment to funding and support for educational and awareness raising activities.  Supportive messages promoted in national communications campaign.  Training courses for the Welsh Government staff to include awareness of anti-Semitism.  Understanding of how to report and access support for anti-Semitic hate crime.	The Jewish community in Wales feels supported and valued and feel they can access culturally appropriate and sensitive services across the public sector.  Tackling anti-Semitism is recognised and mainstreamed through our anti-racism activities.	Annually on Holocaust Memorial Day 27 January.  Annually – "Lessons from Auschwitz" is delivered in Wales each February.  Hate Hurts Wales campaign will run for at least 2 years from 2022.	The Welsh Government.
Goal: To tackle Islamophobia in all its forms.				
Work with faith groups, community leaders and equalities partners to explore the adoption of a definition of Islamophobia that fits the Welsh context.  Mainstream tackling Islamophobia in the Welsh Government's anti-racism training and policy-making processes.  Ensure the Hate Hurts Wales campaign highlights the harm caused by religious hate and bigotry.	Initial scoping work undertaken to identify a definition for the Welsh Government and the public sector to adopt.  Training courses for Welsh Government staff to include awareness of Islamophobia.  Understanding of how to report and access support for Islamophobic hate crime.	Muslim communities in Wales feel valued, supported and feel they can access culturally appropriate and sensitive services across the public sector.  Tackling Islamophobia is recognised and mainstreamed through our anti-racism activities.	Ongoing.	The Welsh Government.

Actions	Outputs	Impact	By when	Lead and partners
Community Cohesion				
Goal: To tackle racism through building cohesi	ve and integrated communities.			
Enhance our support in building community cohesion through a review of successes and areas for improvement in our Community Cohesion Programme.	Respond to the findings of the 2021 to 2022 rapid review of the Community Cohesion Programme and reflect in the development of the work plans for our Community Cohesion teams across Wales.  Community Cohesion Principles will be developed as part of this work to ensure a collective understanding of the terms, legislation and effective approaches involved.	Our Community Cohesion Programme will be underpinned by a more consistent, evidence-based approach. This should increase the impact of the Programme. We would expect people to feel more belonging to their area and perceive better community cohesion.	Ongoing.	The Welsh Government, working with Community Cohesion Teams.
Community Cohesion Programme will focus on events and activities which foster good relations between groups through reducing segregation and increasing empathy and understanding.	Build a dataset though the Race Disparity Evidence Unit which it develops a baseline and then measures cohesion and integration.  Cohesion team work plans will include the need to work with grassroots organisations on events and activities which build a shared sense of community.	% of people agreeing that they belong to their local area; % who agree that people from different backgrounds get on together; and % who agree that people in the area treat each other with respect should all increase.	Ongoing.	The Welsh Government, working with Community Cohesion Teams.
Ensure Cohesion teams act as conduits between communities and public bodies to promote participation in policy-making and equality of opportunity for ethnic minority communities.	Cohesion team work plans will include requirements to promote and monitor role in inclusive policy-making.  Case studies of co-production will be captured and shared with other cohesion teams and public bodies across Wales.	Policy-making should be more inclusive of ethnic minority communities.	Ongoing.	The Welsh Government, working with Community Cohesion Teams.

Actions	Outputs	Impact	By when	Lead and partners
Review "Managing Unauthorised Camping" to reflect changes to legislation since last reviewed and changes to be brought in under the forthcoming Police, Crime, Sentencing and Courts Bill.	Commission an external review.  Consult with Gypsies and Travellers and other stakeholders including Local Authorities and Police Services.	Revised guidance to Local Authorities to mitigate adverse impacts on traditional nomadic ways of life, settled people and landowners.	2022 to 2023.	<ul> <li>The Welsh Government Equality Team.</li> <li>Gypsy and Traveller team, and Policing in Wales.</li> </ul>
Work with Policing in Wales on the enforcement of the clauses on unauthorised encampments in the Bill, to ensure that partners in Wales take a progressive and constructive approach to working with Gypsy and Traveller communities.				

# 12. Childcare and Play



# Some evidence

- Despite improvements over time, evidence from an Equality, and Human Rights Commission study in 2018 suggests that attainment in early years in Wales continues to differ for children from different ethnic backgrounds. In particular, black pupils have lower attainment than White British pupils during early vear's education (EHRC, 2018).
- In 2021 Welsh Government published findings from a qualitative study of beliefs, behaviours and barriers affecting parental decisions regarding childcare and early education. The study covered nine areas of Wales and included seven ethnic minority community parent(s) and the researchers found most of the ethnic minority community families accessed some Foundation Phase Nursery (FPN) or childcare provision, even if they were not eligible for the Childcare Offer. Some of the considerations they had in relation to accessing childcare and early education provision included negotiating different educational experiences compared to their own in their country of origin, attempting to replicate some of their own upbringing and maintaining cultural and language practices while managing the different social norms and behaviours expected in childcare and FPN provision in Wales. In addition, parents from ethnic minority communities mentioned how different educational experiences are now compared to their own, and were keen to replicate some of their own upbringing (Welsh Government, 2021a)
- · Data is not currently available on the ethnicity of the childcare workforce in Wales. In the coming months we will secure data to help the action plan.

# Introduction

During the earliest years of a child's life we see a period of rapid growth and brain development which is shaped by experiences and environments. Evidence has shown that early childhood education and care is key at this stage to support a child's development. Such provision lays the foundation for children's lifelong learning, promotes social integration as well as personal development.

Early childhood education and care also has a wider social impact on parents and carers' ability to work and access the labour market.

The Draft Race Equality Action Plan did not contain specific actions under a Childcare and Play sector heading. Many representative bodies and individual childcare and play settings raised concerns about this given the pivotal role of childcare and play in supporting both child development and the wider economy. To address this, we have scoped some initial actions for Welsh Government and its partners. We will be working with the childcare and play sector; Black, Asian and Minority Ethnic groups; and parents to develop and scope our actions further over the next six months. The goals under the Childcare and Play Sector heading are indicative and will be further developed in the coming months.

There is no single strategy setting out our ambitions for childcare, play and early years across Wales. However, the importance of access to high quality early childhood education and care provision, along with the opportunity to play freely, has been recognised in a number of Welsh Government plans, and will be brought together in an early childhood education and care (ECEC) Action Plan shortly to be developed.

Such provision should be culturally sensitive and offer children the opportunity to learn about other cultures and individuals' experiences. Whilst we have limited robust data on the makeup of our Childcare and Play workforce we know that frequently the workforce is not reflective of the wider communities they serve.

To date, we have not had discussions about taking an anti-racist approach within the childcare and play sector and what that may entail. We look forward to working with the sector, community groups and parents on changes we can make to support an anti-racist Wales.

#### What we will do

Under-representation of ethnic minority people in a range of sectors and professions has been a consistent theme of work on this Plan. This picture is likely to be the same in the childcare and play sector.

Welsh Government and the sector are very aware of the impact that under-representation can have on those working or aspiring to work in the sector, but also for those children who experience such under-representation. We have provided funding to the Childcare Wales Learning and Working Mutually Consortium (CWLWM) (CWLWM is made up of the 5 main childcare and play overarching representative bodies) to support our vision of an anti-racist Wales.

We are working with CWLWM to agree plans to develop, by co-designing with ethnic minority people, their anti-racist policy and resources relating to anti-racism to support the sector to respond. These include webinars and training to support childcare practitioners and to promote Welsh-medium childcare in ethnic minority communities.

The 5 CWLWM partners have put in place their initial individual actions to support a more inclusive and diverse Wales. We will continue to work with them to move towards an anti-racist approach to childcare and play.

Actions	Outputs	Impact	By when	Lead and partners	
1. Improving the experience within the workplace.					
Goal: Staff will work in safe, inclusive environm	nents, built on Allyship, supported to rea	ch their full potential, and be empowered	d to identify and address	s racist practise.	
The Welsh Government will work with sector representative bodies and sponsored bodies to develop plans to support the Anti-racist Wales Action Plan in their work and report progress against objectives in relation to anti-racism as part of their organisations work to meet the vision of an Anti-Racist Wales.			December 2022.	In partnership with sector representative bodies and sponsored bodies.	
Focused on lived experience, anti-racism, allyship and cultural competence, the Welsh Government will work in collaboration with sector partners and ethnic minority partners to develop and refresh anti-racist training for the sector and promote its use.			December 2022.	In partnership with sector representative bodies and sponsored bodies.	
The Welsh Government will consider, in partnership with sector partners, whether the childcare and play workforce should be required to complete training programmes in relation to anti-racism, and if so through what mechanisms.			December 2022.	In partnership with sector representative bodies and sponsored bodies.	
The Welsh Government will, in partnership with sector partners, consider how to collate and review concerns of workforce discrimination and bullying raised by staff.			December 2022.	In partnership with sector representative bodies and sponsored bodies.	
Supporting Workforce change, Welsh Government and sector partners will review existing best practice templates for workforce policies and procedures developed to support providers through an anti-racist lens, to ensure that policies reflect change.			December 2022.	In partnership with sector representative bodies and sponsored bodies.	
The Welsh Government will work with Care Inspection Wales and other partners to promote anti-racist working practices in workforce policies and procedures of providers.			December 2022.	In partnership with sector representative bodies and sponsored bodies.	

Actions	Outputs	Impact	By when	Lead and partners
The Welsh Government, working with sector partners will commission a programme of work to survey staff from ethnic minority backgrounds on their experiences of working in the sector and co-produce proposals on improving their experiences and career prospects.			December 2022.	In partnership with sector representative bodies and sponsored bodies.
2. Offering more culturally appropriate	te provision			
Goal: The Welsh Government will work with parto play opportunities.	arents and carers from Black, Asian and E	Ethnic Minority Communities, to improv	re access to childcare an	d play settings as well as access
The Welsh Government will establish a dedicated working group, the working group including sector representative bodies, will work alongside people from Black, Asian and Ethnic Minority Communities, to identify barriers faced by these communities in accessing services. The working group will make recommendations on how barriers can be removed to ensure equality of access to services.			December 2022.  Recommendations 6-12 months.	<ul> <li>In partnership with sector representative bodies and sponsored bodies.</li> <li>People from Black, Asian and Ethnic Minority Communities.</li> </ul>
Local Authority partners, will engage with Black, Asian and Minority Ethnic communities to identify how the voice and lived experiences of people in these communities can be better captured as part of the Childcare Sufficiency Assessment that Local Authorities are required to undertake.			Ongoing.	<ul> <li>Local authorities.</li> <li>People from Black, Asian and Ethnic Minority Communities.</li> </ul>

Actions	Outputs	Impact	By when	Lead and partners
3. Improving the experience of childre	en			
Goal: All children will have the opportunity to e	explore and celebrate racial diversity in a	positive and supportive way.		
The Welsh Government and sector partners will work to improve provider's awareness of anti-racism within the new curriculum.			Over June 2022 to June 2023 as the new curriculum is embedded.	<ul> <li>In partnership with sector representative bodies and sponsored bodies.</li> <li>People from Black, Asian and Ethnic Minority Communities.</li> </ul>
Focused on lived experience, anti-racism, allyship and cultural competence, the Welsh Government will work with sector partners, in collaboration with ethnic minority partners, to design learning materials to support settings to include the teaching of Black, Asian and Minority Ethnic communities within childcare and play settings and to ensure practitioners are supported to do so.			Over June 2022 to June 2023 as the new curriculum is embedded.	<ul> <li>In partnership with sector representative bodies sponsored bodies.</li> <li>People from Black, Asian and Ethnic Minority Communities.</li> </ul>