

Meeting of:	<b>Cabinet</b>
Date of Meeting:	<b>Monday, 07 June 2021</b>
Relevant Scrutiny Committee:	Learning and Culture
Report Title:	<b>Consultation Response: Welsh Government's Race Equality Action Plan for an Anti-Racist Wales</b>
Purpose of Report:	To present Cabinet with the Council's draft consultation response and seek their views and approval to make a final submission to the consultation on Welsh Government's Race Equality Action Plan (REAP) for an Anti-Racist Wales.
Report Owner:	Executive Leader and Cabinet Member for Performance and Resources
Responsible Officer:	Rob Thomas, Managing Director
Elected Member and Officer Consultation:	Strategic Leadership Team Equalities Consultative Forum
Policy Framework:	This is a matter for Executive decision.
<p>Executive Summary:</p> <ul style="list-style-type: none"> <li>• This report summarises key aspects of the Welsh Government's draft Race Equality Action Plan for an Anti-Racist Wales (REAP) and brings to the attention of the Cabinet a draft response to the consultation on this Plan (Appendix A).</li> <li>• The Welsh Government has issued a consultation document outlining draft proposals for a Race Equality Action Plan with many actions relevant to local authorities. This was informed by research, existing evidence, engagement with community leaders and stakeholders, and shaped by people's lived experience.</li> <li>• The Welsh Local Government Association (WLGA) has produced a document (Appendix B) highlighting where there will be work for local authorities.</li> <li>• To inform the Council's draft response to the consultation, comments from officers across Council Services, the Ethnic Minority Staff Network and the Equalities Consultative Forum have been sought. These have been incorporated in the draft response (Appendix A).</li> <li>• The consultation period ends on 17 June 2021.</li> </ul>	

## Recommendations

1. That Cabinet notes the content of this report and appendices.
2. That Cabinet consider and approve the draft consultation response as described and in Appendix A subject to the comments of Scrutiny (Learning and Culture).
3. That Cabinet refers this report to Scrutiny Committee (Learning and Culture) for consideration and also seeks the views of the Council's Equalities Champion on this report.
4. That Cabinet considers any comments from the Scrutiny Committee and Equalities Champion in order to finalise the Council's consultation response for submission to Welsh Government.

## Reasons for Recommendations

1. To give Cabinet the opportunity to consider on the Welsh Government's Draft Plan.
2. To gain approval in principle for the draft consultation response.
3. To enable Scrutiny Committee (Learning and Culture) to consider this report.
4. To enable a response to be submitted to Welsh Government by the deadline of 15<sup>th</sup> July 2021.

## 1. Background

- 1.1 In the summer of 2020, Jane Hutt MS, the Deputy Minister responsible for Equalities, asked officials to develop an "ambitious and radical" [Race Equality Action Plan](#) (the Plan). She invited Professor Emmanuel Ogbonna from Cardiff University to co-chair a Race Equality Action Plan Steering group (Steering Group), with Dame Shan Morgan, the Permanent Secretary, Welsh Government.
- 1.2 In March 2020, the work was impacted by the COVID-19 pandemic. Then, in May 2020, the killing of George Floyd sent shock waves through the global community. Both events shone a light on issues of systemic and institutional racism faced by Black, Asian and Minority Ethnic communities, both in Wales and elsewhere, and served to galvanise and re-energise this work. Since then, the Welsh Government has gathered evidence, views and ideas from a wide range of sources, representing communities, organisations and academia to develop this Plan.
- 1.3 In the Plan, the Welsh Government states its aims to make Wales an anti-racist nation and make the Welsh Government and all public bodies become anti-racist organisations by 2030.
- 1.4 This report provides Cabinet with an overview of Plan.

- 1.5 The report recommends Cabinet considers the content of this report, provides comment, and approves the draft subject to the comments of Scrutiny (Learning and Culture) so that a response can be submitted to Welsh Government on behalf of the Council by the deadline of 15th July 2021.

## 2. Key Issues for Consideration

- 2.1 The Plan defines anti-racism as

'...usually structured around conscious efforts and deliberate actions to provide equitable opportunities for all people, on an individual, organisational and systemic level. It requires individuals to scrutinise the stereotypes they and others hold, and to understand how their actions may impact on people of different races and ethnicities. Anti-racism at organisational and institutional levels requires a careful audit of policies, practices, functions and processes to uncover whether and how practices and behaviours which may seemingly appear benign may inadvertently discriminate against ethnic minority groups.'

- 2.2 The draft Plan has a vision purpose and goals:

**Vision:** "A Wales that is Anti-racist by 2030."

**Purpose:** "To make meaningful and measurable changes to the lives of Black, Asian and Minority Ethnic people by tackling racism."

**Values:** "Open and Transparent, Rights based, and Lived experiences as core to all policy making"

- 2.3 It is a complex Plan that is 147 pages long and covers about 64 goals and 340 actions across 13 policy themes: Leadership and Representation; Housing and accommodation; Income and Employability (I&E); Social partnership and Fair Work (I&E); Entrepreneurship (I&E); Health; Social Care; Education including higher education; Crime and Justice; Culture, Heritage and Sport; Local Government; Welsh Language; and Environment.
- 2.4 There are and 5 cross cutting themes: data; engaging and funding communities; impact assessment for better policy design; services for individuals experiencing racism; and the role of informal volunteering.
- 2.5 There are significant implications for the Council as a local authority. The WLGA have produced a summary of these implications which can be found in Appendix B for Cabinet's information.

- 2.6** The Plan outlines that the Welsh Government expects public services and the third sector to have:
- Provided demonstrable leadership at all levels to meet their existing commitments to challenge systemic and institutional racism.
  - Self-motivated to comply with Equality Act (2010) and Well-being of Future Generations (Wales) Act 2015.
  - Changed the experience of education, job seeking and career progression for ethnic minority people, to bridge the “attainment gap” in education and the “reward gap” in employment.
  - Provided equitable, culturally appropriate services, recognising intersectionality and differences among groups.
  - Provided a safe and nurturing workplace for ethnic minority people to thrive and flourish.
  - Implemented the policies they agreed to deliver.
  - Collected the right data, established baselines from which to measure progress and used evidence to identify where action is needed.
  - Recognised the differential impact of racism in different locations in Wales.
- 2.7** The local government sector is committed to anti-racism and has been responsive to the issues arising from COVID-19 and the Black Lives Matter movement. Along with all other local authorities, this Council signed the #ZeroRacismWales pledge in 2020. Work has also commenced to review street names, statues and monuments in the Vale of Glamorgan. The Council is supporting the development of an Ethnic Minorities Network for staff. The Welsh Government’s Plan will, however, require an even more concerted effort to become anti-racist in a relatively short timescale.
- 2.8** Whilst much of the Plan is about what the Welsh Government will do, there are challenges for all public bodies to improve engagement and involvement, as well as services and employment practices.
- 2.9** There are specific goals for Local Government:
- Legislation and guidance: the framework of local government legislation and guidance will drive local democracy to become fully representative of the population it serves.
  - Community engagement: The framework will also enable people from all communities to feel comfortable engaging with local democracy, support them to become involved and have trust that their views will be considered and taken into account.
  - Employment: Local government is an exemplar employer; all employment and human resources policies are anti-racist to create a safe and inclusive environment for Black Asian and Minority Ethnic people.
- 2.10** The Education section highlights the important role that schools have to play in promoting anti-racism and tackling racism. It notes evidence of growing racist

bullying with mixed success in recording this. It aims to improve the experiences of Black, Asian and Minority Ethnic learners and teachers in schools and the diversity of the teaching workforce.

- 2.11** The Housing section proposes that there should be increased representation of ethnic minority people in senior leadership within the housing sector. It also aims to ensure that housing and accommodation standards, provision and services advance race equality, embed anti-racism, equality and human rights, and meet the needs of different and diverse ethnic minority people. Accessible engagement and communication with ethnic minority communities is seen as critical if they are to have a voice and influence over housing and accommodation. There is also a need for safe, culturally appropriate accommodation for Gypsies and Travellers.
- 2.12** The Social Care goals focus on confidence in accessing dignified and culturally appropriate services delivered by a culturally competent workforce. Black, Asian and minority ethnic members of the workforce should not experience barriers to career progression, should have good access to high quality training and have confidence in leadership to operate a zero-tolerance policy of racist discrimination or inequality. Progress needs to be supported and driven by good quantitative and qualitative data and analysis.
- 2.13** The Leadership and Representation goals require the public sector workforce to be properly representative of the population it serves. This section focuses on senior leadership being representative and inclusive (including all Boards of public bodies), people in public bodies being anti-racist, with zero tolerance of any form of discrimination or inequality, with a safe and inclusive environment for ethnic minority people. There is an expectation that spending power is used to improve leadership and representation across the public, private and third sectors. There is an expectation that ethnic minority community leadership will be supported by enabling the development of Black, Asian and Minority Ethnic community leaders in Wales, with the intention of creating a wider offer for community leaders from ethnic minority groups.
- 2.14** There is a Crime, Justice, Hateful Attitudes and Community Cohesion section. This sets out the aim of Wales being an anti-racist country which feels a safe place to live by eliminating hateful attitudes and supporting victims of racially motivated hate crime, tackling racism through building cohesive and integrated communities.
- 2.15** The goals for Culture, Arts, Heritage and Sport include working with public bodies to recognise their responsibility for setting the historic narrative, promoting and delivering a balanced, authentic and decolonised account of the past – one that recognises both historical injustices and the positive impact of ethnic minority communities.

- 2.16** The Plan proposes that all public service leaders will be held personally accountable for delivering a representative workforce and that Chief Executives must identify one inclusion and diversity objective, with a focus on anti-racism.
- 2.17** Data is an important cross-cutting theme. Whilst we collect, analyse and report on data currently, for example in our Annual Equality Report which contains service and employment information, this may not meet the expectations of this Plan. There are potential implications for our data systems in terms of what we can store, how robust our data is and our ability to analyse the data so that we can use it to produce improved outcomes.
- 2.18** There is an expectation that we will recognise the contribution of community leaders and work with them to develop this further, building on the existing mechanisms the Council has in place (notably through the Equalities Consultative Forum and more recently, the outreach work as part of the response to coronavirus).
- 2.19** The Council is committed to this agenda and welcomes publication of the draft plan. As described above, a comprehensive consultation response has been formulated by colleagues across the organisation.
- 2.20** Appendix A presents the draft consultation response for Members' consideration and approval.

### **3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?**

- 3.1** The Welsh Government's draft Plan and subsequent work for us as a Council will contribute to the achievement of the well-being goals, and in particular, will support progress towards the following:
- A more equal Wales - a society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
  - A Wales of cohesive communities - attractive, viable, safe, and well-connected communities.
- 3.2** The Council's Strategic Equality Plan and its equality objectives align with the corporate well-being objectives so as to demonstrate the interconnectedness and contribution to overall well-being for residents of the Vale of Glamorgan. We will keep under review the actions under these objectives to ensure that they reflect our commitment to being an anti-racist organisation. we meet the matters.

## **4. Resources and Legal Considerations**

### **Financial**

- 4.1** There are no specific financial implications arising from the consultation on the Welsh Government's commencement of the socio-economic duty. Implementation of actions arising from the Plan will be required to be undertaken within existing resources.

### **Employment**

- 4.2** Many of the actions arising from the Plan have employment implications with the aim of achieving fairer employment outcomes for Black, Asian or minority ethnic people.
- 4.3** Training will be required for council officers and members in a number of areas including understanding what it means to be anti-racist.

### **Legal (Including Equalities)**

- 4.4** The Equality Act 2010 created a public sector equality duty, replacing the race, disability and gender equality duties. The duty came into force in April 2011. The duty covers age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. Under the general duty, public sector organisations must have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation;
  - advance equality of opportunity between different groups;
  - foster good relations between different groups.
- 4.5** The duty to have due regard to the need to eliminate discrimination also covers marriage and civil partnership.
- 4.6** Action arising from this Plan falls within the public sector equality duty.

## **5. Background Papers**

### **Welsh Government's Draft Race Equality Action Plan**

- [Draft Plan](#)
- [Summary](#)
- [Easy Read Version](#) ([Easy Read Response Form on this page](#))
- [Consultation Questions](#)



## Consultation Response Form

Your name: Vale of Glamorgan Council

Organisation (if applicable): **Vale of Glamorgan Council**

Email / telephone number: 01446 700111

Address: Civic Offices, Holton Road, Barry, CF63 4RU

## Consultation questions

The Action Plan has three distinct areas we would like you to give us your thoughts on. They include the vision setting pages, the policy themes with their goals and actions and the governance section:

You may want to comment on one or all of these areas.

Below are some questions that may guide your responses:

### **1. Does the vision, purpose, values and the imagined future to 2030 reflect what you would like to see achieved by 2030?**

We support the vision that Wales should be anti-racist.

The vision, purpose and values of the plan feel appropriate and balanced, congruent and articulate, comprehensive and rightly aspirational.

It is important that the Plan is realistic so there is confidence that it can be achieved. It may be unrealistic to expect that there will be no 'in groups' or 'out groups'. People need to have a sense of belonging and naturally form groups. It is likely that some of these will be more mainstream than others. What is important is that within any group, racial equality is assured and people feel of equal worth.

It is positive that the vision recognises that we want to work 'together, as white and ethnic minority people, to make a different and better Wales'.

It is appreciated that whilst progress in the past towards anti-racism has been slower than many would have liked, there is now a commitment to action with dates for short, medium and long term action in place and an end date of 2030 for fulfilling the vision and purpose of this Plan.

### **What may get in the way to realise the vision and values?**

The Council's consultation response has been informed by discussions with colleagues across the organisation who have identified the potential barriers to realising the vision and values:

- Isolated initiatives to challenge racism.
- A lack of acknowledgement of racism and limited understanding of anti-racist practice.
- National and local government must recognise that Black, Asian and Minority Ethnic employees are not responsible for, and should not carry, the emotional burden of racism. The impact of this happening is damaging to these members of staff.
- It may be difficult to access the right data collection and for our systems to generate quality information. This is needed to support the required level of reporting to inform our service delivery.
- It may be a challenge for the Council to engage with people from Black, Asian and ethnic minority groups (particularly during a period where restrictions on 'normal' life are in place). However, it is important that we have input from people from Black, Asian and ethnic minority groups as it is them who will be able to say whether our plans are being achieved successfully. It will be important that the Council is proactive in doing to (rather than expecting them to come to us) to improve the likelihood of developing effective relationships and obtaining feedback.

- The length of time it takes for senior leadership roles to become available for Black, Asian and minority ethnic people to be able to apply for.
- People may see themselves as many things, including Welsh as opposed to only Welsh.

**What may help to realise the vision and values?**

An active and ongoing commitment from all those covered by the Plan to the clearly articulated vision to create a Wales which is anti-racist.

The voice of local people - it will need much engagement and consultation with local communities about what would make a difference to them.

An acceptance of the existence of racism and its effects.

A good understanding of what anti-racism means in practice through examples and mandatory training.

A workplace culture that is ready to learn about and address racism and open to improving and becoming anti-racist.

**2. We would like your views on the goals and actions. To comment on some or all of the goals, actions and outcomes please reflect on the below:**

**(a) Does the explanation (narrative / background) make clear why we have chosen the goals and actions in this policy area?**

**(b) Is it missing any priorities, background or other information?**

**(c) Do you agree with the selected goals and actions? What would you add or take away in relation the actions?**

**(d) Will each goal and associated actions create the desired outcomes we have stated? If not, what would you want to change so that we achieve changes that are truly anti-racist in the time scales stated?**

**(e) How could the positive or negative effect be increased, or mitigated?**

The goals are largely welcomed, particularly the commitment towards the need to increase engagement opportunities and campaigns.

**Education:**

There is a clear explanation on page 66 and this provides extra context on the vision, purpose, and values with an education context.

In terms of what is missing, there could have been more links made between the attainment and the ambition gap. There is an attainment gap based on ethnicity but there is greater ambition gap based on ethnicity.

The Council agrees with the selected goals and actions. We would add in the section 'To improve understanding of diversity and racism in the wider education sector', to include the regional consortia and the WGLA.

The positive effect can be increased by being clear that the future envisaged by 2030 is key to the success of the vision, purpose and values. This sentence is a non-negotiable, therefore senior leaders across the sector must have the right skills to be actively non-racist. 'Ensure that all senior leaders have the right skills and understanding to introduce and support anti-racist work, including asking for compliance to non-discriminatory behaviours.'

**Hateful crime and justice:**

There are limited staff resources (with short term funding) dealing with a large number of priorities. This makes longer term planning challenging - sustainable change needs sustainable funding, otherwise it will be difficult to drive this work forward and ensure its success.

Under the goal to 'ensure specialist support', the Council welcomes the actions to ensure awareness and understanding of honour-based abuse and increase

cultural and religious awareness. An upskilling of the workforce and further workforce development is key to ensuring that workforces can embed into their practices the principles that guarantee that race equality is a totally unconscious norm. Funding will be required to provide the necessary training.

There is a question around the purpose and potential impact of providing specialist services. A more effective solution might be for increased funding to provide general provision that would release pressure on over-burdened staff teams. This would enable a greater focus on ensuring that support services can upskill their workforces to provide the best service to *all* victims (be it black and minority ethnic, street workers, disabled victims or any other groups). This would take into account the issues arising from intersectionality highlighted above.

Within the overarching area of 'crime, justice, hateful attitudes and community cohesion', the Council considers that there is a deficit in detail covering the intersection of race with other protected characteristics. It was felt that what might be lacking is acknowledgement of forms of discrimination other than within the religious or cultural issues experienced by those suffering violence against women, domestic abuse and sexual violence (VAWDASV).

Work to increase awareness across all the protected characteristics and address some of the underlying core issues behind repeated instances of discrimination would be welcome. Certainly, within VAWDASV services, funding towards perpetrator programmes would begin to address the many cases where racism, cultural discrimination or unacceptable cultural practices are the drivers behind a perpetrator's abuse.

### **Housing and accommodation:**

The Council is supportive of the Race Equality Plan in relation to Housing and Accommodation and recognises the potential for making a tangible difference to the lives of Black, Asian, and minority ethnic people. Good quality, suitable, affordable housing is key to people's physical and mental health and needs and therefore plays an integral part in addressing disadvantage across society and delivering the goals set out in the Race Equality Plan.

Previous research has shown that Black, Asian, and minority ethnic people are currently disadvantaged in terms of their housing situations and are more likely to be living in poor quality homes which are expensive, often overcrowded and less secure. Households are overrepresented in the private rented sector and less likely to be able to access social housing.

A great deal of good work has been undertaken within the social housing sector over the years and improvements have been made. However, there remains some way to go in terms of addressing disadvantage and achieving true equality. The overall goal for Housing and Accommodation is captured appropriately and the more specific goals beneath this, appear to address the main areas of concern. There are not any obvious gaps or omissions.

In terms of some of the goals, strong leadership across the social housing sector, which is representative of the communities served, is vital to delivering the range of actions and interventions required but also to create the right culture within organisations - where front line staff are committed to and prepared to embrace the changes required.

As well as leadership, changes which promote the recruitment of Black, Asian and minority ethnic people into the Housing profession and improve representation are welcomed.

Housing organisations have been committed to tenant engagement for many years and have been able to effectively engage individuals and communities in a range of creative, flexible ways. These experiences and skills can be further developed to ensure that engagement is meaningful and representative of the broader tenant population.

Moving to the Housing services delivered, there are clear benefits to simplifying the process for Black, Asian and minority ethnic tenants to report concerns and for appropriate levels of support to be provided. There is also a need to respond quickly and robustly when concerns are raised and adopting a zero-tolerance stance where evidence of discrimination is identified. This will help Black, Asian,

and minority ethnic tenants feel more confident to highlight issues to their landlord.

Strong partnership working is important and social landlords have well developed processes for working with a wide range of agencies. One example is the public protection arrangements in place to tackle domestic abuse. There may be merits to replicating elements of this response to provide a holistic response and prioritise support towards people raising concerns.

The provision of social rented homes and access to social housing by Black, Asian and Minority Ethnic people merits further attention and actions to make sure accommodation of the right size, type and layout is available. Allocations systems for social housing providers need to ensure that disadvantaged people have access to social housing.

There are good examples of new culturally sensitive housing developments designed to meet the needs of specific groups being developed across Wales but the scale and range of these schemes may not be sufficient to meet the needs. It will be difficult to provide all the accommodation required by all groups, against a backdrop of acute housing needs across Wales and increased population and household growth trends. However, more detailed evidence of housing need as part of the Local Housing Strategies would provide greater clarity. There is scope to pick this up as part of the development of the revised Local Housing Market Assessment methodology.

Allocating a scarce resource is extremely difficult and long waiting lists for social housing mean it is very difficult for everyone who needs a social rented property to have access to one. That said, the under representation of Black, Asian, minority ethnic households in social housing needs to be investigated and addressed. This includes detailed impact assessments of existing allocation systems to ensure that households are not being discriminated against. Social housing needs to be promoted, especially where there may be concerns that disadvantaged groups would not tend to apply for Council and Housing Association homes.

Homelessness has been under the spotlight during the Covid-19 pandemic and Councils have worked hard to end rough sleeping. When the focus changes to the 'move on' from temporary accommodation into permanent housing, there is a need to ensure that front line Housing Solutions services are accessible and appropriate for the needs of Black, Asian, and minority ethnic people. Therefore, there continues to be a need for local authorities to prioritise local strategies and approaches which prevent and minimise homelessness and prevent any return to the volumes of people who were rough sleeping.

Lastly, the shortage of suitable accommodation for Gypsies and Travellers continues to be an issue. There are examples of good work, but Welsh Government and local authorities will need to continue to work together to minimise the barriers faced and tackle identified shortages. There is scope for more regional working between Councils, especially around transit sites.

In conclusion, the Housing and Accommodation goals highlighted are the right goals and the actions listed in the Plan are generally deliverable and achievable. There needs to be a discussion about the resources required to support social landlords.

### **Employment and income:**

The Welsh Government Employability Plan will be helpful in making sure that those from Black, Asian and minority ethnic groups who are disadvantaged in employment terms, will have support and opportunity to enter the workplace and progress, including apprenticeships.

Promoting these opportunities will need to be done in a number of ways and there is potentially scope for working with local authorities to assist in doing this within their own communities and schools.

In the context of the current pandemic, it is welcome to see that there is a focus on health risk and risk assessments to learners and staff.

The Council is supportive of the roll out to businesses of anti-racist awareness raising and training.

Employment is a key aspect of the Plan. The Council is committed to the proposals for reviews of HR policy and practice to ensure that they are anti-racist, though we recognise that this has significant resource implications.

There are positive actions that we either already do or can do such as: incorporating objectives for senior leaders into their annual reviews; reviewing whistleblowing policies and procedures; reviewing attraction strategies; explaining anti-racist behaviour expectations in recruitment and induction practices; reviewing learning and development opportunities and how these are promoted; making a wide range of apprenticeship opportunities available and engaging with local groups to understand the barriers and how to increase accessibility; reviewing current data to assess adequacy and ensuring there are robust data sources to track progress; working with trade union groups to ensure their working practices, policies and procedures are diverse and inclusive and representative of their membership; reviewing social care practitioner training and establishing robust data sources to track progress and engagement with groups to support this; consult and engage on recruitment, retention and progression within social care with development of career progression pathways supported by coaching and mentoring and robust data to track; and using data to inform equality impact assessments. It is noted that this work will have a significant impact on resources.

**Health:**

The narrative is clear. It is good that there is recognition of the overlap and requirement to dovetail with social care. In addition, it is beneficial that there are synergies and references to existing policy guidance – A Healthier Wales – and the 10-year workforce strategy that accompanies this.

The goals seem appropriate, but they do focus in more on hospital services, rather than primary and community care when they talk about specific services.

Where there are significant health inequalities, brought clearly to our attention by the impact Coronavirus has on ethnic minorities, the responsibility to respond to the population's health lies with the clusters. These clusters are multi agency and multi-disciplinary. It would be important to see an action against clusters.

With regard to population health and data intelligence, from a citizen perspective, it would be a key enabler if information recorded in one system could be shared with others. This would ensure that the person with lived experience is not having to repeat their story, and that we could collectively use the information to shape our services and responses. It would be especially important given the term 'little heard' is used in this Action Plan.

### **Social Care:**

In addition to the comments outlined in the Health section, which are also applicable to social care, there are some real tangible commitments and links with our Registration body, Social Care Wales. For example, there are links to the Cultural Competency Toolkit, and the development of the Workforce Race Equality Standard as part of the Social Care Staff Governance Framework.

This is immediately relatable to existing practices, and this will make the achievability of these goals more probable.

Another suggestion is a 'compendium of good practice' so that we can learn from each other, especially around effective recruitment, representation within our meetings, and shaping services to inform future service delivery.

There needs to be a reference to digital inclusion. Given our increased reliance on digital platforms to engage, there does not appear to be a reference to whether ethnic minorities are further adversely affected as a result of this or whether this is an enabler.

## **Leadership and representation:**

We welcome the key commitment to strengthen representation and participation in our democracy. Performance indicators that reflect the importance of improving race equality outcomes will be useful in driving progress.

Expecting senior leaders of public bodies to be personally accountable for delivering a representative workforce and an inclusive and psychologically safe workplace puts the responsibility for anti-racism at a high level and potentially drives strong performance throughout the organisation. Similarly, the proposal that Chief Executives must identify one inclusion and diversity objective, with a focus on anti-racism.

There is a proposal to move from a Steering Group to an Accountability Group to hold the Welsh Government, public services and others to account on their commitments and actions in relation to race equality and anti-racism. This may be appropriate for the Welsh Government but not to hold to account or scrutinise democratically accountable organisations and the Council would request that Welsh Government acknowledge the local mechanisms for decision making and holding Councils to account.

It will be useful to have an updated Public Services Leadership Behaviours Framework so that there is a common Wales-wide understanding of what the standards are for anti-racist leadership behaviour in public service.

It would be helpful if the Welsh Government could share its learning and experience of developing an anti-racist culture, including what constitutes 'good' anti-racism training and its ethnicity pay gap calculation.

We welcome the focus in developing community leadership. It is hoped that the Welsh Government will support ethnic minority community leadership in each local authority area.

### **Arts, Culture, Sports and Heritage:**

Work has started on reviewing the way in which people and events with historical associations to slavery and colonialism are commemorated in public spaces. The model we have developed for doing this has the potential to be used for other anti-racism work.

### **Environment:**

More emphasis could be made regarding active travel, public transport and disabilities with some cross feeding to the National Transport Plan. Often Government policies promoting less reliance on the car and more on active travel and transport can have a disproportionately negative impact on some population groups, including ethnic minorities and those with disabilities.

### **Welsh Language:**

There is an opportunity for the Council to work with our partners to better understand the barriers and opportunities for ethnic minority people to access the Welsh language and incorporate actions the Council's Welsh Language Promotion Strategy which is being revised during the year.

### **Local democracy:**

It is appropriate that there is a goal for local government to become an exemplar employer, for local democracy to become fully representative of the population it serves, and for people from all communities to feel comfortable engaging with local democracy.

It is helpful that the Ethical Framework will be changed by May 2022 so that new and returning councillors will be required to sign up to being anti-racist when they take up office. Developing appropriate training to support this is also welcome.

It is positive that 'The Democracy Handbook' and other resources will be developed to help people understand the various ways in which they can become involved in local democracy. This is particularly important to help young people become more politically aware and involved.

If local government is to become an exemplar employer, it will be important that to review recruitment, human resources and internal complaints processes, including coaching, mentoring and employee support schemes, and to share good practice as highlighted above.

**Cross-cutting issues:**

A single all Wales portal or map of Black, Asian and Minority Ethnic groups of people will be useful to improve communication and to use information gathered to inform policy and practice.

It is hoped that the Welsh Government will share its learning on improving the outcomes of equality impact assessments so that other public bodies may benefit from this knowledge.

Securing robust and useable data on ethnicity as well as gathering information from lived experience is a theme that runs through the plan. There are likely to be significant resource implications to achieving this, including implications for the systems on which the information would be stored.

We welcome the commitment to recognise the efforts by volunteers from minority groups.

**3. Are there any goals and actions that you can think of that are missing? Who should deliver on them and what actions would help to deliver them?**

From an education perspective, the role of the regional consortia, third sector and the WLGA is not explicit in the action plan and the Council considers this to be an area which could be made clearer.

Digital inclusion is an important consideration in delivering many aspects of the plan and references could be clearer to this.

Race equality training needs to have the same prominence of annual GDPR training. Excellent training for senior leadership teams and wider teams need to be embedded. Then the local authority would have the leadership and the tools be actively anti-racist. Recent training from Show Racism the Red Card was good as it was both up to date and relevant.

**4. What are the key challenges that could stop the goals and actions achieving anti-racism by 2025?**

The professional confidence of senior managers in national and local government needs to be actively anti-racist.

Dependent on an organisation's readiness and starting point, there may need to be some varied timescales to move towards the goals.

There is a lack of data to establish a baseline to measure progress against. There is an issue around quantitative data and the reliability of the data recorded in social care systems.

There is limited understanding about racism, such as racism in the form of micro-aggressions and the impact it has on people regardless of their background.

Another challenge could be the limited understanding racism has on the wellbeing of the person experiencing racism.

**5. What resources (this could include funding, staff time, training, access to support or advocacy services among other things) do you think will be necessary in achieving the goals and actions outlined?**

This is an ambitious and far reaching plan. It will require significant resources in funding, staff time, training, and access to support or advocacy services. It is important that this is given full consideration so that organisations are in a position to start this work promptly and maintain the momentum to achieving the outcomes identified in the plan by 2030.

Regular training around the Race Equality Action Plan needs to be compulsory. It cannot be seen as an add-on. It must be an integral part of service delivery.

6. **Do you feel the Race Equality Action Plan adequately covers the intersection of race with other protected characteristics, such as religion or belief, disability, age, sexual orientation, gender reassignment, sex, and marriage and civil partnership? If not, how can we improve this?**

More emphasis is needed on intersectionality. Everybody is unique and different. Not everyone is the same because they have the same racial background. People's experience is nuanced and covers a rich variety of experience.

It is well understood that some people experience multi discrimination due to different protected characteristics. The Plan may need a sharper focus on specific groups of people who experience this kind of discrimination. This may vary from one theme to another.

Good quality training at every level is vital to the success of this plan.

7. **Please see the section on Governance. What suggestions can you provide for measuring success in creating an anti-racist Wales and for strengthening the accountability for implementation?**

It is positive that the Welsh Government will continue to draw on people's lived experience to measure success.

An accountability framework needs to have a realistic set of measures of progress taking into account the size of the task and the resources available to achieve the Plan alongside other important work.

It will be important that there is local oversight, ownership and scrutiny of the Council's own progress towards delivering the actions required of it. This reflects the democratic accountability of the Council and should remain distinct, but complementary, to the overall delivery/monitoring by Welsh Government of progress towards achieving the vision and goals of the Plan.

The sharing of good practice detailed in this section of the Plan is welcomed.

8. **We would like to know your views on the effects that the draft regulations or the proposal in respect of the revised trading order would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

We have no suggestions to make.

9. **Please also explain how you believe the proposed draft regulations or the proposal in respect of the revised trading order could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

We have no suggestions to make.

- 10. This plan has been developed in co-construction, and discussions around language and identity have shown that many people do not consider the term 'BAME' to be appropriate. As a result we refer to Black, Asian and Minority Ethnic people or particular ethnic minority people in the Plan. However, we recognise that this term is also problematic and, where possible, being more specific to the particular race or ethnicity an individual or community identifies with is generally preferred. However, there are times where it is necessary to make reference to all those people who share the experience of being subject to racism. We have used the term Black, Asian and Minority Ethnic people for this purpose. What are your views on this term and is there an alternative you would prefer? Welsh speakers may wish to consider suitable terminology in both languages.**

The use of the term Black, Asian and Minority Ethnic is not offensive to most people. There needs to be an understanding these groups are not homogenous and therefore have different lived experiences, even within the same ethnic group.

We agree that the acronym BAME is not positive.

The term BAME and Black, Asian and Minority Ethnic to describe people from different backgrounds could make the entire group homogenous. However, Black, Asian and Minority Ethnic is an acceptable and inoffensive term.

It is unrealistic to think that everybody in the same racial group will agree with one term.

- 11. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

We are committed to this agenda and welcome publication of the draft plan. The Welsh Government needs to drive this and forge the links that will achieve the outcomes the Plan aims for.

Both the full plan and the summary are long documents, whilst the summary makes it more accessible, it may be useful to produce a shorter summary to encourage people to engage with the plan.

Outcomes have been identified. However, there are some areas where it feels like targets would be helpful to monitor progress. For example, there is a lot of reference to training to bring about an outcome. In some organisations, this will take a number of years, therefore milestones could be about % of staff trained to ensure that the resultant outcomes can be achieved.

In some areas, there will be a requirement to collect new data. If that means any developments to our current data collection systems, that should be reflected in any implementation programme as change to large IT systems is not quick, or cheap. Organisations may need some form of audit to see if there are gaps in what we currently collect and how we record it.

Local authorities will need the capacity and resources to do this work otherwise they may only be able to do it at the expense of other areas of work.

The Local Government section focuses on representation in democracy. The power to achieve this lies with political parties. However, there is a role for local authorities to make anti-racism training mandatory and to have clear processes for complaints against councillors when there are complaints of racism as well as processes to support councillors when this happens.

There is a role for local authorities to ensure funding extends to marginalised groups that don't normally receive funding.

All of the themes apply to local government. Local authorities will need their own in-depth action plans showing how they will go about achieving the purpose, values and aims of the Plan. It will be important that these are co-produced with local communities in the same way that the Welsh Government has produced its plan and that they relate to the local context. It will be important that there are robust monitoring arrangements in place to regularly

assess progress.

Whilst there will need to be alignment with Strategic Equality Plans, consideration will be required as to whether there will need to be separate race equality action plans to ensure prominence, oversight and accountability.

A succinct definition of anti-racism is needed in the same way that a definition has been provided for socio-economic disadvantage so that we are all working towards the same end.

Local authorities need to do things differently and to focus on relationship building. It may take time to do this before these relationships can start working on the issues identified within the plan. We may need to refocus on what is important to our local communities following these conversations.

**Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:**

# Welsh Government Race Equality Action Plan

[41912 An Anti-Racist Wales - Race Equality Action Plan for Wales \(gov.wales\)](#)

## Consultation Deadline – 17<sup>th</sup> June

- This is a summary document and does not include all actions (or actions verbatim) but seeks to highlight which actions will have an expectation of or impact on local government in terms of leadership, as an employer and as a service deliverer.
- The REAP is a large document and some of the themes and actions vary in terms of generality or specificity, similarly some of the timelines vary from specific dates to undefined 'short/medium/long-term).

## Consultation Questions

1. Does the vision, purpose, values and the imagined future to 2030 reflect what you would like to see achieved by 2030? What may get in the way to realise the vision and values? What may help to realise the vision and values?
2. We would like your views on the goals and actions. To comment on some or all of the goals, actions and outcomes please reflect on the below:
  - Does the explanation (narrative / background) make clear why we have chosen the goals and actions in this policy area?
  - Is it missing any priorities, background or other information?
  - Do you agree with the selected goals and actions? What would you add or take away in relation the actions?
  - Will each goal and associated actions create the desired outcomes we have stated? If not, what would you want to change so that we achieve changes that are truly anti-racist in the time scales stated?
  - How could the positive or negative effect be increased, or mitigated?
3. Are there any goals and actions that you can think of that are missing? Who should deliver on them and what actions would help to deliver them?
4. What are the key challenges that could stop the goals and actions achieving anti-racism by 2025?
5. What resources (this could include funding, staff time, training, access to support or advocacy services among other things) do you think will be necessary in achieving the goals and actions outlined?

6. Do you feel the Race Equality Action Plan adequately covers the intersection of race with other protected characteristics, such as religion or belief, disability, age, sexual orientation, gender reassignment, sex, and marriage and civil partnership? If not, how can we improve this?
7. Please see the section on Governance. What suggestions can you provide for measuring success in creating an anti-racist Wales and for strengthening the accountability for implementation?
8. We would like to know your views on the effects that these proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?
9. Please also explain how you believe the proposed policy approach could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.
10. We have used the term Black, Asian and Minority Ethnic people for this purpose. What are your views on this term and is there an alternative you would prefer? Welsh speakers may wish to consider suitable terminology in both languages.
11. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

## 1. Leadership & Representation

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not.
1. The public sector workforce in Wales properly represents the population it serves.	Meet with all public body leads to agree the data needed, how it will be collected, and barriers to collection and agree one system for publishing it.	Short			Engagement
	Communicate timelines and location for publications to public services in good time for them to act	Med			Engagement
	Convene meeting with key heads/ CEOs to ensure they understand positive action, what challenges they think they face in recruiting more ethnic minority staff and jointly agree if one single target is needed for all public bodies or as identified by each public body. Communicate agreement of targets to public services to commence positive action. These targets will be expressed in the form of 'by 202x y% of the people we recruit will be minority ethnic	Med			Engagement  Targets – mandated or statutory? Local targets?
2. Senior leadership is representative and inclusive, as are all Boards of public bodies	All leaders of public bodies are held personally accountable for delivering a representative workforce and inclusive and psychologically safe workplaces, with appropriate incentives to ensure that they take action.	Med			New commitment? How scrutinised?
	CEOs of all public bodies to identify one inclusion and diversity objective, with a focus on anti-racism	Short			New commitment? Some CEs may have such objectives

	All regulated public bodies will be asked to have an equality, diversity and inclusion champion on their Boards – list to be collated by Public Appointments Team (PAT) and regular meeting convened to support them	Short			All LAs have leads/champions already
3. People in public bodies in Wales are anti-racist, with zero tolerance of any form of discrimination or inequality (in the workplace, in the provision of services, etc.) and provide a safe and inclusive environment for ethnic minority people	Review and refresh the Public Services Leadership Behaviours Framework with key ethnic minority academics and Steering Group members and any other ethnic minority people who can offer insights to it. Academi wales to submit proposed changes to REAP Accountability Group before publishing and sending to all public leaders in Wales.	Short			Engagement and then adoption, integration.
	Lower risk from speaking up, voicing concerns and making mistakes at work, including by implementing more effective complaints systems relating to racism, supporting complainants and regularly publishing data on complaints.	Med			LAs may need to review complaints systems
	Empower ethnic minority staff to raise concerns and share experience and ideas, including by sponsoring and supporting staff networks.	Short			Several LAs have staff networks. Some may need to establish them,
	Tackle micro-aggressions, encourage allyship and bystander intervention, with mandatory, ongoing team-based learning and development provision for all middle managers and those they manage to develop knowledge, skills and behaviours for working in an anti-racist way.	Med			Guidance/Training for managers
4. Public bodies use their spending power to improve leadership and representation	Ensure grant and procurement processes are anti-racist.	Long			New guidance requiring revised procurement?

across the public, private and third sectors.	Use conditions of grants and public procurement to incentivise other organisations to improve leadership and representation and anti-racism more generally.	Long			As above
5. Ethnic minority community leadership in Wales is supported by enabling the development of Black, Asian and Minority Ethnic community leaders in Wales, with the intention of creating a wider offer for community leaders from ethnic minority groups.	Enhance learning and development provision for community leaders, including by making available existing provision for ethnic minority staff within organisations to community leaders.	Med			New mentoring programmes need to be developed?
	Co-create 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.	Short			As above

## 2. Local Government

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not.
1. The framework of local government legislation and guidance will drive local democracy to become fully representative of	We will review and make changes to the Ethical Framework which sets out the behaviours expected from councillors by May 2022 ...	May 2022			WG Review already under way. LAs need to implement it as part of new framework and training

the population it serves.	Working with the WLGA and local authorities we will consider what induction, training and support is required for councillors to understand their responsibilities around equalities and comply with the Code of Conduct...	May 2022			Already part of LAs/WLGA planning
	We will ensure that political group leaders understand their role in demonstrating and promoting anti-racist behaviour when exercising their duty and to ensure high standards of behaviour amongst their political group	May 2022			LAs will need to include this in induction training
	We will ensure that Standards Committees' Annual Reports highlight racist behaviour and make recommendations to address it amongst elected members in the councils they are responsible for.	May 2022			Standard Committees/MOs to adopt new reporting
	Working with WLGA and local authorities, we will review local processes for dealing with complaints about elected representatives from members of the public to ensure they are fully considered and the public have confidence their concerns will be given the weight they are due....	May 2022			WG Review already under way.
	We will explore the options in relation to quotas for under-represented groups for local government elections.	September 2021			WLGA supportive of voluntary quotas
	...remove requirements for the publication of candidates and elected members home addresses and also review electoral offences related to the abuse of candidates and their support staff.	May 2022			Already brought in through legislation
	We will work with the Independent Remuneration Panel to promote the need for all councillors to have access to the support and tools they need to undertake their roles, including IT equipment and supporting the costs of care.	May 2022			LAs already undertake and promote this
	We will work with political parties, the WLGA and principal councils to ensure there is good information	January 2022			WLGA already leading a be a

	and support available for prospective candidates in local government elections.				councillor campaign, need for more targeted work with under-represented groups.
2.The framework will also enable people from all communities to feel comfortable engaging with local democracy, support them to become involved and have trust that their views will be considered and taken into account.	The Democracy Handbook' ...will have... anti-racism at its core.	May 2022			Engagement with draft guidance
	We will consult with black, Asian and minority ethnic people of all ages and genders to identify any barriers to participating in the electoral process, for example voter information, and with democracy more widely.	May 2022			LAs to respond to feedback to improvement awareness raising
	We will work with black, Asian and minority ethnic people to ensure our education and awareness raising resources for young people reflect their needs.	May 2022			LAs to respond to feedback to improvement awareness raising
	We will ensure county and county borough councils consider the views and needs of black, Asian and minority ethnic people in the new performance and governance framework.	May 2022			WG guidance already produced. LAs need to proactively engage with black, Asian and minority ethnic people

3. Local government is an exemplar employer, all employment and human resources policies are anti-racist to create a safe and inclusive environment for black, Asian and minority ethnic people.	We will review and make amendments to the workforce data which local government is required to publish in its pay policy statements to ensure it reinforces duties in the Equalities Act 2010 to publish accurate and timely diversity data and to achieve timely and complete compliance with other statutory requirements. We will work with local government to ensure this data is used to inform policies and performance frameworks for improvement which will be subject to both internal and external scrutiny.	May 2022			Significant impact on LAs if different and additional data is required and reported. Regulatory impact likely to be significant.
	We will work with the WLGA, local authorities, professional bodies and One Voice Wales to support local government to review its recruitment, human resources and internal complaints processes including coaching and employee support schemes to ensure they are anti-racist and that good practice examples such as staff support groups are promoted.	May 2022			Potentially significant impact if recruitment and HR processes require changes and investment.
	We will work with the WLGA, One Voice Wales, Academi Wales and local government bodies to ensure all graduate recruitment and mentoring schemes are accessible to minority ethnic people.	May 2022			Some changes may be needed.

### 3. Income and Employability

Goal	Actions	Timeline	WG-led, with implication /	LG-led	Commentary i.e type of work, likely impact, whether part
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			input by LG		of current work or not.
To improve accessibility, relevance and performance data associated with programmes to deliver better outcomes for ethnic minority groups in relation to Welsh Government Skills Employability programmes.	review and evaluate the data we collect on Employability Programmes. We will then undertake a review using anti-racism as a lens of our employability programmes – including Working Wales, ReAct, Traineeships, Jobs Growth Wales, Employability Skills Programme.	Short term By April 2023			Data analysis – LAs to review approaches in line with analysis.
Employability programmes in Wales will offer a safe, positive, and inclusive environment for all staff and students, where racial harassment and discrimination is addressed.	<p>The review will include an assessment of anti-racism within the workforce of our providers of learning and delivery organisations for employability programmes and services.</p> <p>We will introduce a programme of anti-racism training and anti-racism awareness sessions for all programme providers and learners.</p> <p>We will ensure providers continue to monitor the increased risks of Covid-19 when considering the needs of learners and staff from within ethnic minority communities and will complete risk assessments as required.</p>	Short term By April 2023			
Support people from ethnic minority people undertaking Apprenticeships	<p>We will continue to support the Apprenticeships provider network to secure greater interest and relevance of the apprenticeship programme.</p> <p>We will consider the Equality Strategy being developed by apprenticeship providers in Wales that</p>	Short to medium term			Targeted engagement & support by LAs providing apprenticeships

	will set out how the network can create change in relation to equality matters including Race.				
Further Education programmes in Wales will offer a safe, positive and inclusive environment for all staff and students, where racial harassment and discrimination is addressed.	Undertake focused analysis of the statistics of learners who identify as Black, Asian and Minority Ethnic in order to ascertain where direct and effective improvements can be made (2021-22)  Work with Further Education, staff and student stakeholders to strengthen policies and procedures in universities to tackle racial harassment and intimidation.	Short to medium term			
Ensure ESOL provision supports the needs of Ethnic Minority Groups	Conduct a review to consider the operational issues raised around adult community learning, particularly how ESOL training is aligned with vocational training.	Medium term			

#### 4.Social partnership and Fair Work

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not.
We will use our social partnership approach and structures to develop, agree and	Build diversity, inclusion and anti-racism objective into the new work programme of the Workforce Partnership Council and better position the WPC to support the actions in the REAP, including developing	2021			LG part of WPC.  Engagement, good practice

<p>implement changes in organisational process, policies and procedures that improve fair work outcomes for Black, Asian and Minority Ethnic workers.</p>	<p>guidance and best practice across the devolved public sector in support of the REAP.</p> <p>Engage social partners and others to agree mechanisms to identify, diffuse and implement best practice and support the communication of good examples by the end of 2021.</p> <p>Promote ongoing awareness, support and advocacy for the REAP across all levels of the social partnership system, up to and including the Social Partnership Council chaired by Welsh Ministers.</p>				<p>and intelligence sharing.</p>
<p>We will improve workplace compliance with equality law and tackle workplace discrimination, bullying and harassment from recruitment practices and right through the career ladder.</p>	<p>Improve relationships and opportunities for collaboration with the Equality and Human Rights Commission (EHRC) and other relevant enforcement agencies, starting with more effective and meaningful engagement during 2021.</p> <p>Within the next 18 months, develop mechanisms for gathering and sharing intelligence from social partners and others to help detect, deter and remedy non-compliance.</p> <p>Use our levers to improve access to Trade Unions and the support they provide in tackling discrimination, bullying and harassment in workplaces. Engage the Social Partnership Council in overseeing this activity – starting during 2021.</p>	<p>2021</p>			<p>Engagement, good practice and intelligence sharing.</p>
<p>We will support equality, diversity and inclusion and</p>	<p>We will a) develop fair work outcome measures that include metrics on Black, Asian and Minority Ethnic pay, employment and other data relevant to the world</p>	<p>2021</p>			<p>Will these outcome measures</p>

<p>promote anti-racist workplace practices through implementing the fair work agenda.</p>	<p>of work; b) use those measures to inform and shape approaches to fair work over the medium and longer-term and c) continue to listen to peoples lived experiences.</p> <p>Improve the implementation, reach and impact of the Code of Practice on Ethical Employment in Supply Chains by the end of 2021.</p> <p>Ensure equality, diversity, inclusion and anti-racism is embedded in all our interventions to support, facilitate and encourage fairer, more secure and safer workplaces. Engage the Social Partnership Council in providing oversight – starting in 2021.</p>				<p>apply to LG (and all public bodies) or WG?</p>
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## 5. Entrepreneurship

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not.
<p><i>This largely impacts on the work of Business Wales, but some of the work will impact on LA business support and engagement</i></p> <p>To ensure that our services meet the</p>	<p>Work with representative bodies and individuals to develop good practice for the delivery of services to</p>				<p>Adoption of good practice</p>

needs of Black Asian and Minority Ethnic clients.	ensure that delivery is focussed on meeting the needs and supporting the aspirations of Black, Asian and Minority Ethnic clients.	Autumn 2021 – March 2022.			and improvements
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## 6. Housing and accommodation

Goal	Actions	Timeline	WG-led, with implication/ input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not.
<b>Representation</b> To significantly increase representation of ethnic minority people in senior leadership and at all levels of the workforce within the Housing sector so that they reflect the diversity of the population in which they operate	Ensure organisations' boards, advisory groups, senior leadership and workforce reflect the diversity of ethnic minority people by working with Black and minority ethnic-led organisations, and partners such as Tai Pawb, Chartered Institute of Housing (CIH), Community Housing Cymru (CHC), WLGA and Cymorth to:	Short - long term			
	A. implement <i>Reflecting Wales in Running Wales</i> ; the diversity and inclusion strategy for public appointments in collaboration with Public Bodies Unit specifically in relation to the following goals: <ul style="list-style-type: none"> <li>· secure open and transparent recruitment practices</li> </ul>				Implementing <i>Reflecting Wales in Running Wales</i> in the housing sector

	<ul style="list-style-type: none"> <li>· get 'Boards on board'</li> <li>· strengthen leadership</li> <li>· build a community of individuals who are interested, aware and nearly ready for Board membership (i.e. to build a robust pipeline).</li> </ul>				<p>Pipeline for ethnic minority people established, with mentors and shadowing opportunities</p> <p>Guidance</p>
	<p>B. Ensure RSLs, local authorities and third sector support organisations 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</p>				<p>Strategic Equality Plans – both as employers and service providers</p>
<p><b>Standards, provision and services</b> To ensure that housing and accommodation standards, provision and services advance race equality, embed anti-racism, equality and human rights, and meets the needs of different</p>	<p>A. Work with ethnic minority-led organisations, Tai Pawb, Chartered Institute of Housing (CIH), TPAS Cymru, CHC, and Cymorth and WLGA to:</p> <ul style="list-style-type: none"> <li>· Provide anti-racism and cultural competence training for leaders and staff in relation to service provision for tenants and customers</li> <li>· Provide guidance for organisations to support staff and tenants to understand how to report racism and hate crime and provide support to</li> </ul>	<p>Short-long term</p>			<p>Training on cultural competence and anti-racism</p> <p>Guidance to employees and tenants re: reporting and responding to racism and/or hate crime</p>

and diverse ethnic minority people	<p>those reporting (actively involving ethnic minority tenants in its design)</p> <ul style="list-style-type: none"> <li>· Ensure landlords respond quickly to complaints of racism, harassment and hate crime and offer appropriate support</li> </ul>				Housing and accommodation policy that reflects the needs of the diversity of ethnic minority people
	<p>B. Work with ethnic minority-led organisations, local authorities, RSLs, Shelter Cymru and Citizens Advice Cymru to ensure the information, advice and advocacy needs of ethnic minority people are met in relation to housing and accommodation, including Gypsies and Travellers and asylum seekers and refugees</p>	Short-long term			access to information, advice and advocacy for ethnic minority people
	<p>C. Work with local authorities (LAs) to develop new guidance for Local Housing Market Assessments (LHMAs). To include:</p> <ul style="list-style-type: none"> <li>· enabling analysis of the housing needs of key groups (Black, Asian and ethnic minority people, disabled people, homeless people, older people, those with mental health conditions, etc.) within the LA to understand the availability of appropriate housing and the estimated future need and therefore what is the shortfall, if any, for each key group</li> </ul>	Short-long term			New LHMAs and training and ongoing support to all LAs

	<ul style="list-style-type: none"> <li>Welsh Government to give all LAs training and ongoing support</li> <li>Ensure that the LHMA, and their assessment of needs for ethnic minority people and other groups inform the prospectus as part of the Social Housing Grant programme monitoring</li> </ul>				
	<p>D. Ensure equality for ethnic minority people, specifically addressing any barriers particular ethnic minority people/groups face to ensure equality of access, provision and outcome in provision of homelessness services and homes.</p> <p>This will include:</p> <ul style="list-style-type: none"> <li>making race equality an integral and focused aspect 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</li> <li>Ensure the policy and legislative framework supports the commissioning of culturally sensitive housing and accommodation-related</li> </ul>	Part of 3-5 year transformation			<p>Barriers ethnic minority people face in regards to homelessness services and the needs of ethnic minority people built into transformation and the evaluation of this</p> <p>The commissioning of culturally sensitive housing and accommodation-related</p>

	<p>support services to meet the needs of diverse ethnic minority people</p> <ul style="list-style-type: none"> <li>· Ensure that all 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</li> </ul>				<p>support services</p> <p>All statutory and non-statutory guidance, such as the Rapid Rehousing guidance to LAs, reflects consideration of the diverse needs of ethnic minority people / groups</p>
	<p><b>Over next 5 years</b></p> <p>E. Ensure that the reviews of housing and related legislation and policy in the next Senedd term, including on homelessness and allocations, fully consider and embed the needs of the wide diversity of ethnic minority people</p>				<p>All housing reviews embed the needs of the ethnic minority people</p>
<p><b>Private rented sector</b> To ensure that private rented sector (PRS) housing and accommodation and service provision</p>	<p>Develop a Private Rented Sector Action Plan improving the quality of the sector, which has anti-racism at its core. To include:</p> <ul style="list-style-type: none"> <li>· Further research into the prevalence of racism and discrimination in the PRS and determine</li> </ul>	18 months			<p>Research report to provide an understanding of the relevance of tenancy</p>

<p>advances equality, embeds anti-racism and meets the needs of different and diverse ethnic minority people</p>	<p>options to address this (including potential legislation, policy and delivery)</p> <ul style="list-style-type: none"> <li>· Review of the support provided to tenants to access and sustain tenancies in the PRS, including whether it is meeting the needs of ethnic minority people</li> <li>· Determine options for improving property standards (including the scale of overcrowding) in the PRS, and the role and ability of local authorities to enforce standards in the PRS</li> <li>· Consider options and levers for ensuring the affordability of accessing and sustaining tenancies in the PRS for those on lower incomes.</li> <li>· Work with stakeholders to strengthen anti-racism information, advice and training to landlords, agents and tenants in the PRS</li> </ul>				<p>support available, and options to strengthen</p>
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<p><b>Engagement and communication</b> To ensure accessible engagement with ethnic minority people across Wales to ensure that Welsh Government policies reflect the diversity of ethnic minority people's needs and priorities and that ethnic minority people have voice and influence in relation to housing and accommodation</p>	<p>A. Ensure Housing and Regeneration Directorate communications and communications campaigns engage ethnic minority people in their design and roll out, and ensure ethnic minority-led organisations and ethnic minority people are involved in monitoring and evaluation</p>	Short-long term			<p>Ethnic minority people, regardless of experience or language understand their housing options, systems, rights and expectations</p> <p>The need to hear ethnic minority tenants' voices is reflected in regulation framework</p>
	<p>B. Ensure ethnic minority tenants have channels to voice concerns, challenge and influence by:</p> <ul style="list-style-type: none"> <li>· Working with ethnic minority-led organisations and partners including Tai Pawb, Cymorth, CIH, CHC, and TPAS Cymru</li> <li>· Ensuring the expectations of Registered Social Landlords in terms of engagement and communication on Equality, Diversity and Inclusion, which includes anti-racism, are clear</li> </ul>	Short-long term			

	in the revised regulatory standards currently being developed				
	C. Supporting our approach to closer alignment of accountability for tenant services in both local authorities and RSLs (Domain regulation), to work with ethnic minority-led organisations, WLGA, CHC, and TPAS to ensure the collection and publication of ethnic minority tenant involvement data to help understand and remove barriers to tenant involvement	18 months			
	D. Work with ethnic minority-led organisations, Tai Pawb, CIH, CHC, WLGA and ethnic minority people to understand how further steps towards Domain regulation (i.e. regulation of local authorities as well as RSLs) can further benefit ethnic minority people and communities, and act on this.	3- 5 years			

## 7. Health

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not.
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<p><i>This largely impacts on the work of WG and NHS, but some actions may have relevance to LG and some relate to Citizens Voice Boards covering health and social care</i></p>					
<p><b>TACKLING HEALTH INEQUALITIES</b> To ensure disease and condition specific delivery plans and strategies include actions to address the evident health inequalities experienced by some Black, Asian and Minority Ethnic people</p>	<p>The Citizen Voice Body (CVB) CVB be issued with a remit letter from Welsh Government when it is established. In terms of remit, the CVB will be asked to develop actions to ensure it can seek and obtain the views of all people in Wales which will include those from ethnic minority backgrounds and ensure diversity in their workforce and in their decision making structures.</p>	<p>Medium</p>			<p>Data, engagement and complaints policies may impact on social services</p>
	<p>Welsh Government will develop strategies to determine whether the short term and medium term actions have led to improvements in issues such as diversity of the volunteer base for the CVB, and the number of people who feel supported if they consider that they have a race related complaint which they wish to make to the NHS or a Local Authority.</p>	<p>Long</p>			<p>Data, engagement and complaints policies may impact on social services</p>

## 8. Social Care

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not.
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<p>To ensure that all Black, Asian and Minority Ethnic people feel confident in accessing and using social services and social care services whenever they are needed</p>	<p>.. examine the reasons for people's fear and mistrust ... work with statutory, independent/private and Third/grassroots sector services to design and deliver services that are anti-racist, assets based, dignified and culturally competent.</p> <p><b>We will</b> develop mechanisms for better engagement with Black, Asian and Minority Ethnic people to better understand how lived experience determines service access and levels of use.</p>	<p>Short to long-term</p>			<p>Review of engagement and engagement with service users and communities</p>
<p>To ensure that all Black, Asian and Minority Ethnic people who access social care services are provided with the highest quality support that is accessible, dignified and culturally appropriate.</p>	<p>New repository of evidence of positive practice with Black, Asian and Minority Ethnic unpaid carers (as set out in the National Plan for Carers).</p> <p><b>We will</b> collect, review and share evidence of service provision in Wales that successfully reaches and meets the needs of Black, Asian and Minority Ethnic people.</p>	<p>Short to medium term</p>			<p>Good practice exchange</p>
<p>3A WORKFORCE To ensure that all members of the social care workforce have the cultural competence to work effectively with people from diverse racial, ethnic and cultural backgrounds and ensure that this support is delivered with zero tolerance</p>	<p><b>We will</b> work with partners to ensure that all training for social care practitioners, including all initial, pre-entry training, is reviewed in respect of race and ethnicity.</p> <p><b>We will</b> work with partners to develop ways to maintain continuous awareness of race and ethnicity with social care practitioners.</p>	<p>Medium to Long</p>			<p>Changes to social care training and support</p>

of racism and any other form of discrimination or inequality					
<p><b>3B WORKFORCE</b> To ensure that Black, Asian and Minority Ethnic people experience no barriers in seeking a career or role within social care; that all Black, Asian and Minority Ethnic social care practitioners have access to the highest quality training throughout their career; and that all Black, Asian and Minority Ethnic social care practitioners are and feel safe within their workplace and have full confidence in the leadership of their organisation to operate a zero tolerance policy of anti-racism and any other form of discrimination or inequality</p>	<p>...10-year Health and Social Care Workforce Strategy - embed anti-racism, inclusion and quality through active engagement and co-production with representative organisations and people sharing protected characteristics.</p> <p><b>We will</b> actively promote social care as a career to people from Black, Asian and Minority Ethnic backgrounds who are currently under-represented.</p> <p><b>We will</b> ensure that the selection, progression (including through middle management in to leadership roles) and exit of Black, Asian and Minority Ethnic social care practitioners in Wales is reviewed by the Social Care Fair Work Forum and recommendations made in respect of de-biasing the processes and policies governing these activities.</p> <p><b>We will</b> ask Social Care Wales to work with Unions to undertake a review of complaints from social care staff to ensure transparency and restorative approaches are embedded.</p> <p><b>We will</b> consider and respond positively to the findings from the EHRC formal inquiry looking at the treatment and experiences of lower paid Black, Asian and Minority Ethnic staff in the health and social care sectors. Examine the record of lived experiences included, to make improvements as required.</p>	Short to medium			<p>Staff recruitment, retention and progression processes reviewed and improved</p> <p>Complaints (and whistleblowing ?) arrangements reviewed and improved</p>

<p><b>4 LEADERSHIP</b> To ensure that leaders at all levels in social care model and champion anti-racism, diversity and inclusion and deliver an anti-racist social care sector for both people who are receiving care and support and for the social care workforce.</p>	<p><b>We will</b> use the actions that are set out in the Workforce Strategy for Health and Social Care to drive consistent, high level and anti-racist leadership</p> <p><b>We will</b> proactively market fulfilling leadership careers in social care for people from Black, Asian and Minority Ethnic backgrounds.</p> <p><b>We will</b> proactively design leadership development support and opportunities to encourage the Black, Asian and Minority Ethnic social care workforce into middle management and senior positions e.g. shadowing, secondment opportunities, coaching, mentoring (including reverse mentoring), development programmes, sponsorship and bespoke training.</p> <p><b>We will</b> proactively develop a Workforce Race Equality Standard as part of the Social Care Staff Governance Framework setting out a series of actions for employers to achieve together with mechanisms for governance and accountability to monitor progress and act on issues raised. This will link to the Codes for Employers and Social Care Workers.</p>	Short to long			Staff/leadership recruitment, retention and progression processes reviewed and improved
<p><b>ACCOUNTABILITY</b> To embed accountability actions and behaviours across the social care sector, including robust governance structures and clear, measurable metrics, in order to determine</p>	<p><b>We will</b> gather information from across social services and social care services regarding the use of reporting mechanisms such as concerns, complaints, grievance, fitness to practice referrals, safeguarding referrals, trade union intervention, staff surveys, annual reviews/appraisals; exit interviews and whistleblowing. All information will be analysed in the context of confidence to report racist behaviour, that reporting will be taken seriously and proactively acted on. Currently, much of this data is not available or is</p>	Short to medium			Review of data availability about social care – linked to data in other sections  Changes to EIA process.

<p>the impact and effectiveness of the social care sector in delivering the actions set out in this plan</p>	<p>inconsistent and this will be addressed by Goal 6 – Data and Analysis.</p> <p><b>We will</b> document and share safely, the lived experiences of Black, Asian and Minority Ethnic staff to enable a fuller understanding of the impact of racist behaviour in the workplace.</p> <p><b>We will</b> review the present approach to Equality Impact Assessments specific to race and ethnicity and co-produce a new approach with lived experience, intersectionality, transparency and openness at the centre of the process.</p>				
<p><b>DATA AND ANALYSIS</b> To improve qualitative and quantitative data, research, evidence, analysis, intelligence and understanding to support and drive continued progress, including a significant increase in the lived experience data gathered from Black, Asian and Minority Ethnic people.</p>	<p><b><u>Workforce Data</u></b></p> <ul style="list-style-type: none"> <li>- <b>We will</b> identify data requirements and what action can be taken to improve self-reporting of race and ethnicity (alongside other protected characteristics)</li> <li>- <b>We will</b> use workforce data to monitor the diversity of the workforce and take action to increase the number of Black, Asian and Minority Ethnic staff (as set out in the Social Care Wales We Care Wales Campaign)</li> <li>- <b>We will</b> produce an annual statistical statement for the social care workforce in Wales, on race and ethnicity and the other protected characteristics as provided for in the Equality Act 2010.</li> <li>- <b>We will</b> use data and intelligence (qualitative and quantitative) to tackle and address incidences of racism and bullying raised by staff, using information</li> </ul>	<p>Short to long term</p>			<p>Improvements in data collection (staff and users)</p> <p>Service user feedback collated</p> <p>Annual statistical statement on social care workforce.</p>

	<p>from a variety of sources including staff survey results.</p> <p><b><u>Service user data</u></b></p> <p><b>We will</b> ensure the development of the Adults Receiving Care and Support Census includes datapoints on ethnicity so that we have better intelligence on Black, Asian and Minority Ethnic people who receive a social service and the types of services they receive.</p> <p><b>We will</b> collate robust data on Black, Asian and Minority Ethnic service users' experience of social services and social care.</p> <p><b>We will</b> consider and proactively develop a system for mapping race and ethnicity against use of services to identify gaps and take remedying action where necessary.</p> <p><b><u>Research</u></b></p> <p><b>We will</b> collate the existing research evidence relating to the use of and experience of social services in Wales by Black, Asian and Minority Ethnic people; and collate the existing research evidence relating to the experiences of Black, Asian and Minority Ethnic social care workers across Wales.</p> <p><b>We will</b> use research and evidence to explore issues faced by Black, Asian and Minority Ethnic people within social care, both as service users and as social care workers, and use this evidence to guide systemic change within the sector.</p>				
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	<b>We will</b> use the Social Care Research and Development Strategy to improve the development, collation and use of evidence in Wales and link to any gaps in research identified via the work undertaken above.				
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## 9. Education

### Schools

Goal	Actions	Timeline	WG-led, with implication/ input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not.
To improve the experiences of Black, Asian and Minority Ethnic learners and teachers in schools by taking an inclusive and anti-racist approach to teaching and school experience	By July 2022 we will strengthen Rights, respect, equality anti-bullying guidance, with a particular focus on the disciplinary procedures in schools for handling incidence of identity-based bullying. This will support schools to develop anti-bullying strategies, which have effective mechanisms to support the elimination of discrimination, harassment and victimisation in schools, including tackling racist behaviour. The update will include advice on how to engage effectively with parents and carers around this agenda. [as recommended in the Show Racism the Red Card].	July 2022			Strengthened anti-bullying guidance, with a specific focus on tackling anti-racist behaviour  Improved disciplinary procedures in schools

	<p>To support the Rights, respect, equality anti-bullying guidance, we will strengthen data collection and reporting of racist incidents and harassment in schools in Wales. We will, where possible, disaggregate this by ethnic subgroup, as recommended by the WCPP report.</p>	Medium			Enhanced data sets
	<p>Publish statutory Gypsies, Roma and Travellers' guidance to support educational outcomes, ensuring that championing anti-racist practice is at the centre.</p>	July 2022			Improved educational outcomes for Gypsies , Roma and Travellers learners
	<p>We will convene a working group to help us strengthen our guidance on Exclusion from Schools and Pupil Referral Units in relation to learners who we are aware can be disproportionately subject to permanent or temporary exclusions, this will include Black, Asian and Minority Ethnic learners and learners with special educational needs (SEN).</p>	June 2023			Updated and strengthened guidance on exclusions from schools and PRUs.
	<p>Through the Interim Youth work Board, final report recommendations in summer 2021, we will encourage anti-racist practice and identification of the specific needs of Black Asian and Minority Ethnic children and young people both across the workforce and in ensuring all young people are encouraged to access services which are relevant to them. A young person's committee will be working with the board throughout, representing the views of Wales' diverse young people</p>	Short term			

	<p>Make learning about Black, Asian and Minority Ethnic stories mandatory within the Curriculum for Wales. Understanding of anti-racism, and the confidence and ability to challenge harmful norms will be mandatory learning across the curriculum. This will be confirmed as statutory by end 2021 (after the passage of the Bill).</p>	Short term			The mandatory 'What Matters Statements',
	<p>We will take forward the recommendations set out in the interim report submitted by the Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group, chaired by Professor Charlotte Williams OBE, in November 2020, which focused on learning resources:</p>	Medium term			Show Racism the Red card Improved diversity – ethnic minorities, in the teaching workforce, resources for teachers on anti-racism, diversity and Black history
	<p>We will raise awareness and encourage increased take-up of Welsh medium education by Black, Asian and M-minority E-ethnic children to ensure equality of access for all to Welsh medium education and services in line with our Cymraeg 2050 ambitions by incorporating into formal Welsh in Education Strategic Plans (WESP) monitoring, discussions around how local authorities engage with the Black, Asian and Minority Ethnic community as part of their strategy to increase provision and take-up of Welsh-medium education,</p>	Medium term			New WESPs operational from September 2022, Annual monitoring cycle commencing in July 2023
	<p>We will strengthen and enhance training for all teachers in Wales on race equality and anti-racism,</p>	Short term			Audit of anti-racism training

To improve the diversity of the teaching workforce and embed anti-racist professional learning	building on the existing inclusivity and equality Accreditation Criteria.				that is delivered as part of ITE programmes
	We will strengthen the values and dispositions in the Professional Standards for Teaching and Leadership that drive all teachers to be the best they can be, to better reflect teachers' and leaders' role in promoting race equality and being anti-racist	Medium term			We will update the professional standards to take account of this action, and work with the Regions to deliver professional learning. We will also work with EWC to revisit the PLP to develop opportunities for practitioners to evidence their practice in promoting these values.
	We will develop a strategy and action plan by September 2021 to increase the numbers in the teaching workforce from Black, Asian and Minority Ethnic groups and including other under-represented groups.	Short – long term			The strategy will inform an action plan that will set out specific actions that we

					<p>will take to address:</p> <ul style="list-style-type: none"> <li>• Under-representation in the workforce</li> <li>• Wider diversity of the workforce in all areas including those that do not have a high proportion of ethnic minority pupil population</li> <li>• Action plans from ITE Partnerships to increase applications to courses from ethnic minority</li> </ul>
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					communities
	We will ensure the E-sgol programme actively seeks out Welsh-speaking Black, Asian and Ethnic Minority teachers to teach subjects, revision or awareness sessions online in schools across Wales, focusing specifically on rural areas with a less diverse teaching workforce.	Medium term			
	We will ensure school practitioners and school support groups are confident in leading positive discussions around anti-racism, cultural diversity, by working collaboratively with Bangor University and Black, Asian and ethnic minority advisory groups to revise and introduce new standardised terminology in Welsh that best reflects Wales's cultural and racial and ethnic communities and include in <i>Y Termiadur Addysg</i> .	Medium term			
<b>To improve understanding of diversity and racism in the wider education sector</b>	We will work with Estyn to determine how a refreshed inspection framework can be strengthened for anti-racism and so for Black, Asian and Minority Ethnic learners and teachers, and recognise, understand and support them.	By October 2021			A revised, anti-racist inspection framework
	We will make revisions to the school governors' guide to the law to further highlight the importance of the Public Sector Equality Duty and Strategic Equality Plans by November 2021. We will provide training to all Governors on the Public Sector Equality Duty, and in anti-racism, particularly in	Short term			A revised chapter of the governors' guide to the law and anti-racism.

	<p>preparation for the delivery of the new curriculum. Regional consortia are ready to develop and deliver this, in line with the recommendations of the WCPP report.</p>				
	<p>We will provide information and advice to local authority governor support services on the importance of anti-racism training and the vital role that school leadership teams have to play in implementing effective anti-racism policies. Additionally, we will explore how Hwb playlists or other online training materials on anti-racism and wider equality can be made available to governors. We will also seek feedback on the feasibility of introducing an Anti-Racism Champion role to school governing bodies, by the end of October 2021.</p>	Short term			Potentially additional non-statutory guidance.
	<p>As part of our Whole School Approach to Wellbeing we have provided funding in the current year of £600,000 to local authorities to embed universal and targeted interventions in schools. It is a matter for local authorities to decide, in discussion with schools, which interventions are most appropriate in their areas, though interventions can include building resilience among learners and addressing stigma and discrimination. We know that some groups of learners are more affected by emotional and mental health problems and may experience difficulties or be uncomfortable discussing emotional difficulties due to stigma. These learners include those who are part of one or more vulnerable or historically marginalised groups, including those with protected characteristics such as LGBT+ children and young people; refugee and asylum seeker children and</p>	Medium term			Evidence based interventions are available which meet the wellbeing needs of learners

	<p>young people; Gypsy and Traveller children and young people; and children from Black, Asian and Minority Ethnic backgrounds. As we embed our whole school approach we will consider the lessons from implementation and the need to provide more specific and tailored guidance for ethnic and other minority groups to ensure equitable and anti-racist provision as appropriate.</p>				
	<p>We have also invested an additional £1.252m in improving and extending school counselling support in 2020-21. The Service sees around 11,500 children and young people each year, with data showing that around 4.5% of those seen are from a Black, Asian and Minority E-ethnic background. We have commissioned Cardiff University to evaluate the service and will consider the recommendations, including any related to accessibility of the service and the need to provide more specific and tailored guidance for ethnic and other minority groups to ensure equitable provision when the findings are reported later in 2021.</p>	Medium term			Revised guidance for counselling provision tailored to ethnic minority learner needs
	<p>In February/March 2021 we will publish our Whole School Approach to Emotional and Mental wellbeing Framework which will be statutory guidance for all maintained schools and local authorities. The guidance will support schools in meeting the wellbeing needs of all their learners and staff by reviewing their wellbeing needs, putting in place strategies to build on their strengths and addresses</p>	Long term			Needs of diverse communities are reflected in policy and practice, guidance and

	<p>weaknesses and review and evaluate progress as part of continuous improvement. The Framework highlights that some learners are at higher risk of facing poor well-being and experiencing adverse outcomes. School senior leadership teams should be taking an inclusive, anti-racist and non-stigmatising approach to ensuring good well-being for all of their learners, regardless of circumstance. However, it is important to acknowledge that some learners may need additional support at different times and more targeted early intervention to prevent negative experiences. School senior leadership teams should consider their learner and parent/carer population when developing their well-being plan.</p>				<p>other documents</p>
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## 10. Crime, justice, hateful attitudes and community cohesion

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not
Tackle racism through building cohesive and integrated communities	Enhance our support in building community cohesion through a review of successes and areas for improvement in our Community Cohesion Programme	Short - medium			Potential changes to community cohesion prog
	Community Cohesion Programme will focus on events and activities which foster good relations	Short			Good practice exchange

	between groups through reducing segregation and increasing empathy and understanding.				
	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.	Short			Potential impact around improved engagement and facilitation (capacity and support) for community cohesion teams
	Undertake research to capture the views of the Welsh public in relation to community cohesion and hateful attitudes	Short - medium			Review of approaches based on evidence

## 11. Culture, Heritage and Sport

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not
<b>Accountability</b> To hold public bodies we are responsible for accountable for the delivery of anti-racist	Collectively establish clear leadership and performance indicators for anti-racism by governing bodies and nominated senior leaders, to which they are held accountable to as part of their performance reviews.	Short	Published indicators - to be defined by the bodies, in consultation and		Culture, sport and tourism departments within LAs & relevant cabinet members?

measures and actions, as set out in this action plan.			agreement with WG		
	Take action to increase ethnic diversity in the workforce at all levels, and specifically in leadership teams and on boards, as well as in paid and unpaid planning, design, curation and decision-making roles.	Long			Most of the actions within this section are consistent throughout REAP and apply to organisations
	Identify what data is needed and agree across public bodies how they will be collected and trusted	Short			Potential data collection impact
	Review existing systems for reporting, escalating, investigating and dealing with complaints of discrimination	Short			Consistent with other parts of REAP
	Promote anti-racist practice and principles within our organisations	Short			Consistent with other parts of REAP
<b>Funding</b> To work with the public bodies we fund to use their spending powers to embed anti-racist practice, facilitate equality of access and outcomes, and maximise participation for ethnic minority people.	Undertake detailed financial assessments (including of workforce expenditure) and report on how funding resources are currently being used to eliminate racial discrimination, address historical disadvantage and provide support for ethnic minority people in cultural and sporting activities at local, regional and national level (timelines and milestones to be added later).	Short - medium	Published indicators - to be defined by the bodies, in consultation and agreement with WG		Potentially significant depending on nature of assessment expected

<b>Celebrating Cultural diversity</b> To support all parts of the society in Wales to embrace and celebrates its diverse cultural heritage while understanding, and recognising the right to, freedom of cultural expression	Collaborate with and support community-based organisations to provide opportunities for ethnic minority individuals and groups to express their creativity, heritage, language, cultural identity and origins, encouraging and enabling community-led grassroots action.	Short-medium			Engagement with partners
	Identify opportunities to pump-prime support for a cross-community programme of small-scale activities that allow people to come together to celebrate our diverse but shared cultural heritage.	Short - medium			Funding and support for community groups, possibly from WG.
<b>The Historical Narrative</b> To work with public bodies to fully recognise their responsibility for setting the historic narrative, promoting and delivering a balanced, authentic and decolonised account of the past – one that recognises both historical injustices and the positive impact of ethnic minority communities.	Review and appropriately address the way in which people and events with known historical associations to slavery and colonialism are commemorated in our public spaces and collections, acknowledging the harm done by their actions and reframing the presentation of their legacy to fully recognise this.	Short - medium			WG to produce guidance. Likely to require local policies, reviews and engagement depending on local legacy and monuments
	Implement new ways of telling the stories through the lens of Black, Asian and minority ethnic people in our galleries, museums and collections, celebrating their contribution and recognising their presence in the history of Wales.	Short - medium			LAs to review approaches local museums/galleries etc
	Take action to lift the barriers to heritage and cultural collections across Wales, through delivering and promoting innovative and engaging experiences relevant and relatable to ethnic minority communities.	Short-long			LAs to review (where collections are held)
	Require the relevant responsible bodies to report on how they will review and redesign the narrative in a	Short-medium			'require' – suggests part

	way that is informed by the lived experiences of users from ethnic minority communities across Wales.				of funding agreements? Reporting should not be burdensome.
<b>Education and Learning</b> Identify and meet targets for Welsh Government and sponsored bodies to deliver learning, educational, interpretation and marketing materials that recognise and celebrate the rich and diverse cultural mix of our society, encourage widespread physical and intellectual engagement and promote anti-racist practice and principles throughout.	Review web and social media content to improve visibility and encourage accessibility - seeking out and working with ethnic minority groups and individuals, to uncover untold stories and celebrate success.	Short			Part of wider good practice work
	Improve dissemination through a wider range of networks and channels, using a wider range of materials and methods to delivery and support engagement.	Short			Review engagement and information
	Build on and link the stories of ethnic minority people within existing educational and cultural programmes, including the Curriculum for Wales, Hwb, and the People's Collection Wales.	Short-medium			Part of wider good practice work

## 12. Welsh Language

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part
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					<b>of current work or not</b>
To better understand the barriers and opportunities for ethnic minority people, and so remove barriers and increase access to the Welsh language by ethnic minority communities in the areas of education, language learning, the workplace and community activities for both children, young people and adults.	A review to be undertaken by relevant education stakeholders in the first instance to gather detailed information on the current picture and the barriers to accessing Welsh medium education amongst the black and minority ethnic community.	Short			Unclear of scope of this work – assume LAs will lead?
	Through the Welsh in Education Strategic Plan support programme, co-ordinate an online forum event for Local Authorities to share information and current good practice in terms of engagement, marketing strategies and reaching this community.	Medium			Event

### 13. Environment

<b>Goal</b>	<b>Actions</b>	<b>Timeline</b>	<b>WG-led, with implication / input by LG</b>	<b>LG-led</b>	<b>Commentary i.e type of work, likely impact, whether part of current work or not</b>

<p>To continue to create more local places for nature across Wales....support wider participation by those from protected groups.</p>	<p>Work with stakeholder representatives ...and identify any barriers to participation.</p> <p>Work together to identify how those barriers to participation could be lessened.</p>	<p>Short</p>			<p>LAs review policies based on outcome of this work.</p>
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#### 14. Cross-cutting

Goal	Actions	Timeline	WG-led, with implication / input by LG	LG-led	Commentary i.e type of work, likely impact, whether part of current work or not
<p>To significantly improve the process for undertaking impact assessment, so that ethnic minority people and their communities are satisfied that the approach makes a real difference in identifying the impact of any policy on different groups.</p>	<p>Review current approach with stakeholders and policy officials; identify different approaches that could be tested to get better results.</p>	<p>Short</p>		<p>Depending on recommendations, could require changes to local processes</p>	
	<p>Build-in a stronger remit for impact assessment within the public sector procurement and grant funding processes, to ensure that public funding delivers beneficial outcomes for ethnic minority people.</p>	<p>Short</p>		<p>See above</p>	

<p>To secure meaningful, robust and useable data on ethnicity</p>	<p>Identify data gaps, understand why the gaps exist and how else they can be secured.</p>	<p>Short - medium</p>		<p>Common priority throughout REAP – data collection, collation and reporting changes will have implications for LAs</p>	
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