

## Agenda Supplement – Equality and Social Justice Committee

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Meeting Venue:

Committee Room 3 (Senedd)

Meeting date: 2 March 2026

Meeting time: 10.00

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## Supplementary Pack

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Please note the documents below are in addition to those published in the main Agenda and Reports pack for this Meeting

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### 3 General Ministerial scrutiny: session with the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip

(10:35 – 12:05)

(Pages 1 – 251)

Attached Documents:

**Evidence paper from Welsh Government: Anti Racist Wales Plan**



***Our ambition is to make Wales the beacon nation for racial equality.***

We want to eliminate poorer outcomes for Black, Asian and Minority Ethnic people, whether in our capacity as a major employer, in the services we provide, or in people's everyday experiences of life in Wales.

The Ministerial commitment to the Anti-Racist Wales Action Plan remains as strong as when we started on this journey, while the international interest in our approach to embedding anti-racism continues to grow.

A culture of anti-racism benefits everyone. It's a proactive and inclusive way of working, leading to organisational cultures that promote equality and challenge systemic discrimination. Nonetheless, achieving real and sustainable culture change takes time: this chapter builds on the incremental progress we've made over the last two years, supported by measurable actions to track progress and hold us to account.

**The need for strong leadership is central to achieving our ambition. Together, we will drive forward a culture of anti-racism throughout Wales.**

## Our Approach

Our approach to delivering the actions within this chapter will be guided by the following principles:

- We will work together as *One Welsh Public Sector* to share good practice, build understanding and learn from each other
- We will actively co-produce solutions with Black, Asian and Minority Ethnic communities
- We will ensure our work aligns to the statutory responsibilities set out in the Equality Act 2010, the Public Services Equality Duty, the Wellbeing of Future Generations (Wales) Act and the Cymraeg 2050 strategy, as well as other equality commitments.

## Outcomes

The actions in this chapter have been developed to ensure that across the Welsh Government (and the organisations for whom we have direct responsibility):

- ethnic minority staff are represented in all areas of the workforce at a level that matches or exceeds the society we serve
- ethnic minority staff match or exceed the organisational norms or average in all measures (quantitative and qualitative) of wellbeing, engagement and lived experience
- ethnic minority citizens of Wales report sizeable improvements in their experiences of public services

In doing so, we will see:

- Increased competence of all those who work in public services in understanding antiracism and acting in an anti-racist way
- Improvement in staff wellbeing and, in particular, the psychological safety of Black, Asian and Minority Ethnic people across our workforce

- Increased prominence of Black, Asian and Minority Ethnic voices so they are heard and acted upon
- Increased representation of Black, Asian and Minority Ethnic people in decision-making positions

To achieve these outcomes, we will need to deepen our understanding of racism (and antiracism) and the impact of its legacy on our organisation. We will need to address inequalities across key areas of work and draw on the knowledge and expertise of Black, Asian and Minority Ethnic communities in Wales to guide us. **Goals**

The actions within this chapter are structured around **four goals** that will collectively foster a culture of anti-racism across the public sector:

1. **Building robust data and evidence**
2. **Driving forward anti-racist leadership**
3. **Improving representation and development**
4. **Strengthening governance arrangements**

All actions are focused on three key areas: the Welsh Government in its role as an employer, our support for arm's length bodies, and our wider leadership role across the Welsh public sector.

## Goal 1: Building robust data and evidence

**To achieve an anti-racist culture, we must take an evidence-based approach that promotes continuous learning. The first of our goals is focused on capturing the right data so we can understand the lived experience of ethnic minority people and measure our progress in a meaningful way.**

### 1. Welsh Government as an Employer

#### *Developing a Cultural Matrix*

Our actions set out how the Welsh Government will address the challenge of collecting and monitoring staff data. We will establish '*Cultural Maturity Matrix*' to measure our performance in becoming a truly anti-racist organisation. It will help us assess where we are, define where we need to get to, and identify the steps needed to achieve our goals.

#### *Setting clear targets and understanding the data*

We will hold ourselves accountable to the recruitment targets set out in our Workforce Equality and Diversity Strategy 2021 – 2026, which states that 20% of successful candidates recruited externally will be from an ethnic minority background. We haven't yet met that target, but we're committed to retaining the scale of our ambition, despite current financial constraints and limits on recruitment likely making it more difficult to achieve.

We also set a target for ethnic minority staff to be successful in promotion at a level that exceeds their organisational population share, which we have achieved over the three years of the strategy. Nonetheless, we will keep up the momentum and monitor the data to ensure we maintain this positive trajectory.

Better quality data is essential in helping us to build a robust evidence-base, enabling us to review our assessment processes through an anti-racist lens and identify barriers to recruitment and progression for Black, Asian and Minority Ethnic candidates.

## 2. Supporting the Welsh Government's Arm's Length Bodies

More than 250 bodies form part of the Welsh Government's public sector network. From advisory bodies and NHS organisations through to executive agencies and companies wholly owned by the Welsh Government, we have a significant reach that can drive collective cultural change in anti-racism.

### *Greater clarity of public appointments' data*

The Welsh Government has a responsibility to ensure public appointees (committee members who take decisions on public services in Wales) reflect the diversity of society in Wales. Fair representation helps service providers understand people's needs and make better decisions.

Our Action Plan commits us to improving regulated public appointments data so we can establish a comprehensive baseline and gain a better understanding of Board members' experiences. However, we're not starting from a zero-base position and we are already making progress in improving representation. Current data shows the appointment of ethnic minority people to regulated Boards has increased from 5% in 2021-21 to 11% in 2022-23 and 14.9% in 2023/24, demonstrating the positive impact direct and targeted action can make.

## 3. Our Leadership of the Welsh Public Sector

### *Sharing our Cultural Matrix methodology*

We are committed to sharing our approach to establishing cultural maturity with the wider Welsh public sector and third sector. In doing so, we will learn from each other and promote the good practice already underway.

### *Exploring Intersectionality*

Our Action Plan commits the Welsh Government to seek more data on how race interacts with other protected characteristics. We will use this evidence to develop an intersectional approach to our work.

### *Measuring cultural change*

Work is underway to establish a measurement framework that can assess the impact of the Anti-racist Wales Action Plan in driving a significant cultural change across the public sector in Wales.

## Goal 2: Driving forward anti-racist leadership

**This second goal focuses on our leadership priorities as we drive forward an anti-racist culture. These actions require sustained awareness and a clear prioritisation of resources.**

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### 1. Welsh Government as an Employer

We have been working with an external organisation to review our HR policies and processes through an anti-racist lens. Key themes for action include:

### *Clarifying our leadership roles and responsibilities*

Our leadership responsibility is to create a culture change that drives forward anti-racism. We will ensure our Senior Leaders have a clear anti-racism objective and are held accountable on their performance. We will strengthen our approach to developing and reporting on personal objectives to enable this, while also embedding a 360-feedback mechanism for our leaders.

### *Embedding anti-racism training and development*

We will support our staff to have honest conversations, including calling out poor behaviours and practices. We want to enable our staff to listen, build trusted relationships, and give and receive constructive feedback. Underpinned by our organisational values, we will strengthen understanding of anti-racism through bespoke learning and development. This approach will be routinely reviewed and evaluated, ensuring we meet the evolving needs of individual staff and the wider organisation.

### *Supporting our staff*

The role of our Minority Ethnic Staff Network as a critical friend in our anti-racism work has been vital. We will ensure the network remains supported to provide a collective voice and a safe space for staff to raise issues. We know we need to address reluctance in reporting experiences of racism, so will be making our complaints processes simpler and more effective.

## **2. Supporting Welsh Government's Arm's Length Bodies**

### *Leadership objectives*

We expect all senior leaders of funded bodies, Chairs and Board members to have an antiracism performance objective. These objectives must be measurable and aligned to the strategic goals set out in the Action Plan.

By introducing a common leadership objective across the public sector, we will be able to concentrate our efforts on driving collective action and establishing the anti-racist ethos we want to see.

## **3. Our Leadership of the Welsh Public Sector**

### *Sharing good practice and lessons learned*

Our aim is to share examples of good practice and lessons learned along the way with partners across the public sector in a 'One Welsh Public Service' approach. By working together, we will be able to identify opportunities for collaboration, reduce the risk of duplication and focus resources on priority actions.

### *Learning and development support*

Academi Wales provides expert training, learning and development throughout the public sector. Our Action Plan commits us to reviewing L&D provisions so we can ensure we're maximising

opportunities to build knowledge and understanding of anti-racism, codeveloping solutions that can drive cultural change.

## **Goal 3: Improving representation and development**

**This third goal sets out our actions to support career development and progression for ethnic minority staff at the Welsh Government. It also outlines how we will support our Arm's Length Bodies and our role across the wider Welsh public sector.**

### **1. Welsh Government as an Employer**

#### *Improving our approach to recruitment and progression*

We will conduct an end-to-end review of our recruitment and progression processes in collaboration with our Trade Unions and staff diversity networks, examining outcome indicators at each stage of assessment. We will introduce 'Equity Advocates' to ensure our recruitment practices are fair and robust, and we will continue to strengthen our approach to lawful positive action, including strengthening outreach activities to attract a more diverse field of applicants.

We are committed to increasing our support for Black, Asian and Minority Ethnic staff by establishing a Senior Leaders' Sponsorship programme for those who are seeking progression.

### **2. Supporting Welsh Government's Arm's Length Bodies**

#### *Reflecting Wales in Running Wales*

Since publication of 'Reflecting Wales in Running Wales' in 2020, we have made considerable progress in implementing the recommendations. Recruiting a representative cohort of Senior Independent Panel Members to sit on our most senior appointment panels has been fundamental, while providing diversity training for Board members, introducing a job shadow scheme, and supporting aspiring Board members have all contributed to improving the diversity of Board membership.

Nonetheless, we know there is more that needs to be done. Our Action Plan commits us to reviewing the process of Board appointments to ensure we attract a wide field of applicants and have a diverse pipeline of talent to draw from. We also want to provide unsuccessful applicants with good quality feedback to support them applying again in the future.

We will review the recruitment practices of regulated Boards to ensure they are as fair and inclusive as possible, including our approach to outreach and advertising vacancies. We will listen to ethnic minority Board members and applicants to understand their experiences and identify where improvements need to be made.

### **3. Our Leadership of the Welsh Public Sector**

We are concerned about the lack of Gypsy, Roma or Traveller voices represented on decision-making forums. We will work with our community mentors to provide additional training and development, as well as continue to grant fund community initiatives and develop community leaders with potential.

We will support mentoring (including reverse mentoring), coaching and other opportunities across the Welsh Government, public sector and communities to build leadership capability and increase understanding of racial inequality.

## **Goal 4 – Strengthening governance arrangements**

**This fourth section focuses on how we will strengthen our corporate governance on anti-racism. It outlines how this relates to our Arm's Length Bodies and partnership approach with the wider public sector.**

### **1. Welsh Government as an Employer**

Our Action Plan commits us to reviewing the internal governance of equality, diversity and inclusion decision making mechanisms to ensure clarity and transparency, while reducing duplication and addressing gaps. This will include exploring how we can work together with the External Accountability Group and its sub-groups in the best way.

### **2. Supporting Welsh Government's Arm's Length Bodies**

We will review our support for Arm's Length Bodies and examine how current governance arrangements are supporting delivery of ArWAP actions and achieving our anti-racism ambitions.

### **3. Our Leadership of the Welsh Public Sector**

Our governance review will include establishing how we can learn from good practice across the Welsh public sector. We will also continue to provide grant funding to community groups and individuals who are leading initiatives and events to promote anti-racism.

| Theme | Action | Who | How | By when | Desired Outcomes | Owner | Measuring progress | Impact |
|-------|--------|-----|-----|---------|------------------|-------|--------------------|--------|
|-------|--------|-----|-----|---------|------------------|-------|--------------------|--------|

## Goal 1: Building robust data and evidence

### Welsh Government as an employer

|             |   |  |   |   |   |   |                                     |  |   |
|-------------|---|--|---|---|---|---|-------------------------------------|--|---|
| Pack Page 7 | Cultural Maturity Matrix                      | <p><b>Lead 1:</b></p> <p>Develop a Cultural Maturity Matrix to assess the level of culture change required to become an anti-racist organisation.</p>  | <p>HR Equality, Diversity &amp; Inclusion Team with support from MESN, KAS and EAG.</p> | <p>Establish baseline data (inc. all staff survey)</p> <p>Review good practice across Wales and beyond</p> <p>Co-produce with MESN, KAS and EAG</p>   | <p>Final matrix completed by March 2025</p> | <p>A co-produced maturity matrix to measure our cultural maturity over the next 3 years.</p>                                    | <p>Director People &amp; Places</p> | <p>Regular assessment to track understanding of anti-racism within WG, reporting progress to EAG</p> | <p>All people in Wales can be confident that the Welsh Government civil service and its leadership is demonstrably anti-racist.</p> |
|             | Set clear recruitment and progression targets | <p><b>Lead 2:</b></p> <p>Recruitment target: 20% of all successful candidates recruited externally to be from an ethnic minority background</p> <p>Ethnic minority staff are successful in promotion at a level that exceeds</p> | <p>HR</p>   | <p>Diversity data reviewed at each stage of the assessment process</p> <p>Identify barriers to recruitment and progression arrangements for Black, Asian and Minority Ethnic applicants</p> <p>Targeted outreach and positive action measures</p> | <p>Dec 2026</p>                             | <p>More inclusive recruitment and assessment practices</p> <p>Better quality recruitment data to inform inclusive practices</p> | <p>Director People &amp; Places</p> | <p>Monitor progress against targets</p>  | <p>Welsh Government workforce represents the diverse communities it serves</p>  |

| Theme   | Action  | Who  | How   | By when               | Desired Outcomes  | Owner                       | Measuring progress  | Impact  |
|---|---|--|---|-----------------------|---|-----------------------------|---|---|
|   | their organisational population share   |  |   |                       |   |                             |   |   |
| <b>Supporting the Welsh Government's Arm's Length Bodies and key partners</b> |   |  |   |                       |   |                             |   |   |
| Increased evidence and data on regulated public appointments                  | <b>Lead 3:</b><br>Identify data and evidence needed and put measures in place to collect it   | Public Appointments Team and Race Disparity Unit | Establish data requirements at each stage of the public appointment process   | Work to begin 2024-25 | Better quality data will support targeted interventions to improve diversity of public appointments<br><br>Outcomes for ethnic minority people applying to regulated Boards will be transparent | Director, People and Places | Data on Board appointments at each stage of appointment process | Public sector Boards are representative of the population in Wales  |
| <b>Our leadership of the Welsh Public Sector</b>                              |   |  |   |                       |   |                             |   |   |
| Cultural Maturity Matrix and baseline data across public sector organisations | <b>Lead 4:</b><br>Invite public sector partners to take forward the Welsh Government's Maturity Matrix model for use within their own | HR teams within each organisation                | Establish Welsh Government baseline data for organisations to measure progress against<br><br>Review existing Welsh Government maturity | Ongoing               | Key funded bodies and partners will have access to a maturity matrix model they can adapt for own use to drive  | Permanent Secretary         | Number of bodies and partners developing maturity matrix        | All people in Wales can be confident that the Welsh public sector and its leadership is demonstrably anti-racist. |

| Theme       | Action                      | Who  | How  | By when   | Desired Outcomes               | Owner  | Measuring progress                  | Impact |
|-------------|-----------------------------|--|--|---|--------------------------------|--|-------------------------------------|--------|
|             | organisational context      |  | model and lessons learned<br><br>Co-produce with ethnic minority staff and representatives |   | forward an anti-racist culture |  |                                     |        |
| Pack Page 9 | Impact of intersectionality | Lead 5:<br><br>Improve understanding of how race intersects with other protected characteristics, identities and socio-economic conditions to inform our approach and actions. | Race Disparity Unit  | Data and evidence review  | Ongoing                        | Impact of intersectionality better understood and represented in future actions                                  | Deputy Directors for Disparity Unit |        |
|             | Measuring cultural change   | Lead 6:<br><br>Continue to develop key indicators to measure the progress and impact of the Anti-racist Wales Action Plan in its entirety                                      | Race Disparity Unit  | Develop model with a narrative and an impact measurement framework to measure outcomes that support the achievement of key indicators.<br><br>Continue to assess key evidence and make recommendations to improve the quality and | Ongoing                        | Progress made on the implementation of the Anti-racist Wales Action Plan will be measurable at a granular level. | Deputy Directors for Disparity Unit | N/A    |

| Theme | Action | Who | How                            | By when | Desired Outcomes | Owner | Measuring progress | Impact |
|-------|--------|-----|--------------------------------|---------|------------------|-------|--------------------|--------|
|       |        |     | granularity of ethnicity data. |         |                  |       |                    |        |

## Goal 2: Driving forward anti-racist leadership

### Welsh Government as an employer

|              |                                   |   |  |   |  |   |  |  |
|--------------|-----------------------------------|---|--|---|--|---|--|--|
| Pack Page 10 | Embedding anti-racist objectives  | <p><b>Lead 7:</b></p> <p>All senior civil servants will have at least one measurable performance objective related to anti-racism</p> <p>Senior civil servants will undertake 360-degree feedback to measure their progress</p> | <p>All senior civil servants agree objectives with their line managers</p> <p>Directors General report progress to ExCo and Welsh Government Board</p> | <p>HR to produce guidance on developing SMART anti-racism objectives</p> <p>Senior Management Teams contribute to development of objectives</p> | <p>Objectives in place for 2025/26 performance management cycle.</p> | <p>SCS actively demonstrate their commitment to anti-racism, fostering a culture of anti-racism across the organisation</p> | <p>Directors General</p> <p>Directors General to provide assurance to ExCo</p> <p>Director, People and Places to report to EAG</p> | <p>All people in Wales can be confident that the Welsh Government civil service and its leadership is demonstrably anti-racist</p> |
|              | Learning and development to drive | <p><b>Lead 8:</b></p>   | <p>HR (Learning &amp; Developm</p>   | <p>Review feedback and outcomes from existing anti-racism training offer</p>  | <p>Review to be completed</p>  | <p>Staff at all levels offered high quality anti-racism training</p>  | <p>Staff at all levels understand the policy,</p> <p>Attendance rates for learning opportunities</p>                               | <p>All people in Wales can be confident that Welsh Government civil</p>  |

| Theme   | Action  | Who   | How  | By when  | Desired Outcomes  | Owner   | Measuring progress  | Impact  |
|---|---|---|--|--|---|---|---|---|
| culture change                                      | Evaluate current anti-racism training provision   | ent), RDU, MESN, EAG members, Race Implementation team, senior leadership group and L&D experts | Co-develop anti-racism L&D strategy with clear learning objectives and outcomes (aligned to corporate Capability Strategy and skills analysis)<br><br>Consider opportunities for procurement of training providers | by summer 2025<br><br>Procurement of new anti-racism provision to begin in autumn 2025 | and development, leading to enhanced awareness and understanding<br><br>Learning and development opportunities tailored to meet the learning needs of specific groups, enabling more effective behaviour change | organisational and cultural context of anti-racism and how to embed the ethos | Improved post-learning evaluation to track behaviour change and satisfaction rates        | service and its leadership is a demonstrably anti-racist  |
|   | Develop an evidence-based L&D strategy to drive behaviour change, including induction for new recruits and options for mandatory training |   |  |  |   |   |   |   |
| Support the Minority Ethnic Staff Network to thrive | <b>Lead 9:</b><br>Ensure MESN is supported to provide a collective voice and a safe space   | HR, senior leaders  | Ensure line managers and senior leaders support network chairs and committee members to undertake network roles<br><br>Continue to support MESN to represent the   | Ongoing  | Organisational policies and processes are more inclusive<br><br>Black, Asian and Minority Ethnic staff feel confident that  | Director, People and Places   | Staff network membership and feedback from members<br><br>People Survey scores (inclusion | All people in Wales can be confident that Welsh Government civil service and its leadership is a demonstrably anti-racist |

| Theme                              | Action   | Who  | How  | By when   | Desired Outcomes  | Owner                       | Measuring progress   | Impact  |
|------------------------------------|--|--|--|---|---|-----------------------------|--|---|
|                                    | for staff to raise issues  |  | views of their members at key decision-making forums and with senior leaders   |   | their views are heard and acted upon  |                             | and fair treatment)<br>Track impact of network engagement on policy and process development                                  |   |
| Supporting staff to raise concerns | <p><b>Lead 10:</b></p> <p>Improve internal policies and processes to enable incidents of racism to be reported more easily</p> <p>Promote support and resources available for staff</p> <p>Policy and support will be regularly reviewed to respond to lessons learned</p> | HR and Internal Communications, with MESN, Trade Unions, and EAG members | <p>Review current policies and processes for raising concerns, including available data</p> <p>Co-design new approach with MESN and Trade Unions. Formal consultation as required</p> <p>Share learnings with public sector partners</p> | <p>Policy and process review to be completed by spring 2025</p> <p>12-week formal consultation period to follow</p> | Ethnic minority staff and allies feel more confident in reporting incidents of racism and the action that will be taken | Director, People and Places | <p>HR Case Team data</p> <p>People Survey data (scores relating to inclusion and fair treatment, segmented by ethnicity)</p> | All people in Wales can be confident that Welsh Government civil service and its leadership is a demonstrably anti-racist |

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**Supporting the Welsh Government’s Arm’s Length Bodies and key partners**

| Theme        | Action   | Who  | How   | By when  | Desired Outcomes            | Owner   | Measuring progress  | Impact   |   |
|--------------|--|--|---|--|-----------------------------|---|---|--|---|
| Pack Page 13 | Work with senior leaders from Arms' length Bodies to drive anti-racism | <b>Lead11:</b><br>Leadership support for the devolved public sector to enable arms' length bodies (ALBs) to become anti-racist   | PBU Governance Team working with the Chairs, Chief Executives and Partnership Teams as well as senior leadership teams where DGs engage with Chief Executives | Support the Public Leaders Forum, the Chief Executives' meetings and the Chairs' meetings to highlight the need for an anti-racist approach, providing practical advice, guidance and support on training and development<br><br>Learn from good practice across the public sector | Ongoing commitment          | Partnership Teams understand the expectations on ALBs<br><br>ALBs drive forward an anti-racist ethos throughout their organisations | Chief Operating Officer   | Self-reflective survey from ALBs on the support provided.            | All people in Wales can be confident that the Public Sector in Wales and its leadership is a demonstrably anti-racist |
|              | Leadership objectives  | <b>Lead 12:</b><br>All senior leaders of funded bodies (CEO and Director level), Chairs and Board members to have an anti-racism | Public Bodies Unit, working with public sector leaders  | Support leaders to with good practice examples of SMART anti-racism objectives   | To commence from April 2025 | Increased accountability and visible commitment to anti-racism  | Director, People and Places<br><br>Chief Operating Officer<br><br>Public sector leaders | Public sector leaders to provide assurance through respective forums | All people in Wales can be confident that the Welsh public sector and its leadership is demonstrably anti-racist      |

| Theme  | Action   | Who  | How   | By when                     | Desired Outcomes  | Owner  | Measuring progress  | Impact  |
|--|--|--|---|-----------------------------|---|--|---|---|
|  | performance objective  |  |   |                             |   | Sponsor teams  |   |   |
| Funding at public bodies for anti-racism work    | <b>Lead 13:</b><br>Engage CEOs to discuss and identify how anti-racism requirements are resourced within their organisations   | Public Bodies Unit   | Direct engagement with CEOs, individually and via relevant forums.  | To commence from April 2025 | Increased understanding of resource allocated to anti-racism work, with additional resources directed as necessary. | Director, People and Places<br>Chief Operating Officer<br>Public sector leaders<br>Partnership teams | Included as part of self-reflective survey from ALBs on the support provided. | All people in Wales can be confident that the Welsh public sector and its leadership is demonstrably anti-racist  |
| <b>Our leadership of the Welsh public sector</b> |  |  |   |                             |   |  |   |   |
| Share positive progress and good practice        | <b>Lead 14:</b><br>Share progress on ArWAP actions to identify synergies and adopt a 'One Welsh Public Service' approach (inc. the development of the NHS Workforce Race Equality Standard | Senior policy leads and co-chairs of EAG to work with public sector leaders in their respective forums | Presentations and discussions at respective public leaders' forums. | Ongoing                     | Good practice shared across the public sector, supporting a 'One Welsh Public Sector' approach                      | Welsh Government policy leads  | Qualitative feedback from policy leads and public sector leaders              | All people in Wales can be confident that the Welsh public sector and its leadership is demonstrably anti-racist. |

| Theme                               | Action   | Who                          | How  | By when | Desired Outcomes  | Owner  | Measuring progress  | Impact   |
|-------------------------------------|--|------------------------------|--|---------|---|--|---|--|
|                                     | and delivering inclusive grants)   |                              |  |         |   |  |   |  |
| Leadership training and development | <p><b>Lead 15:</b></p> <p>Share learnings from anti-racism resources and training developed</p> <p>Collaborate on a programme of leadership training and development for senior leaders in public services</p> | Academi Wales with Race Team | <p>Convene a forum with partners to understand best practice and establish agreed standards</p> <p>Make recommendations to the Chief Operating Officer</p> | 2025    | Senior leaders offered high quality anti-racism training and development, leading to enhanced awareness and understanding | Chief Operating Officer, Head of Academi Wales | <p>Attendance rates for learning opportunities</p> <p>Post-learning evaluation to track behaviour change and satisfaction rates</p> | All people in Wales can be confident that the Welsh public sector and its leadership is demonstrably anti-racist |

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### Goal 3: Improving representation and development

#### Welsh Government as an employer

|  |  |   |  |   |   |                             |   |  |
|--|--|---|--|---|---|-----------------------------|---|--|
| End to end review of recruitment and progression | <p><b>Lead 16:</b></p> <p>Review all aspects of recruitment and progression processes to ensure they are anti-racist and inclusive.</p> <p>Positive action to be effectively</p> | HR, working with staff networks and Trade Unions. | <p>HR will act on recruitment and progression recommendations from anti-racism independent review</p> <p>Recruitment review will build on recommendations from</p> | Review to be completed by end of March 2025 | <p>Recruitment and progression processes will be anti-racist.</p> <p>Positive action is understood by all involved in recruitment and selection</p> | Director, People and Places | <p>Progress against anti-racism review actions on recruitment and progression</p> <p>% increase in ethnic minority candidates' success at each stage of recruitment and</p> | The Welsh Government workforce represents the population it serves at all levels of the organisation |
|--|--|---|--|---|---|-----------------------------|---|--|

| Theme   | Action   | Who                                | How  | By when   | Desired Outcomes   | Owner                        | Measuring progress   | Impact   |
|---|--|------------------------------------|--|---|--|------------------------------|--|--|
|   | embedded within recruitment processes  |                                    | MESN and EAG, with final decision by ExCo  |   | Ethnic minority people have greater clarity on Welsh Government recruitment processes and feel assured the approach is anti-racist |                              | progression process  |  |
| Public sector                                 | Diverse pool of equity advocates to provide assurance in recruitment processes | HR, working with key stakeholders  | HR to co-produce a specification for advocates, including guidance on their remit and roles. | Equity advocate pilot to be rolled out by summer 2025 | Greater assurance that recruitment and promotion panels are anti-racist and inclusive  | Director, People and Places. | % increase in ethnic minority candidates' success at each stage of recruitment and progression process | The Welsh Government workforce represents the population it serves at all levels of the organisation |
|   | Explore opportunities for equity advocates to support public appointments      |                                    | Secure external provider to deliver training.  |   | Increased awareness and understanding of unconscious bias and cultural differences throughout the assessment process               |                              | Number of trained equity advocates   | Public sector Boards are representative of the population in Wales                                   |
| Improve outreach and support for applications | Lead 18:<br>Work in partnership with key stakeholders                          | HR Equality, Diversity & Inclusion | Learn from outreach activities undertaken previously and review against best practice.       | Outreach improvements ongoing                         | The Welsh Government is viewed as an employer of   | Director, People and Places  | Track outcomes of outreach campaigns at  | The Welsh Government workforce represents the  |

| Theme        | Action   | Who   | How   | By when  | Desired Outcomes   | Owner   | Measuring progress  | Impact  |
|--------------|--|---|---|--|--|---|---|---|
| Pack Page 17 | <p>to refine our outreach approach, maximising opportunities for reaching a diverse field of applicants</p> <p>Implement positive action measures to strengthen support for applicants</p> | <p>Team, EAG, MESN, and regional Race co-ordinators.</p> <p>Communications to promote opportunities via diverse media.</p>  | Develop a Positive Action Group to support candidates through the assessment process. | Positive Action Group to be in place by summer 2025  | <p>choice within ethnic minority communities.</p> <p>Individuals feel supported through the assessment process .</p>                         |   | <p>each assessment stage</p> <p>% of ethnic minority candidates applying and appointed (inc. those accessing positive action support)</p> | population it serves at all levels of the organisation.   |
|              | Embedding inclusion into assessment criteria   | <p><b>Lead 19:</b></p> <p>Develop best practice questions and standardised moderation guidance to assess candidates' understanding and knowledge of inclusion</p> | HR  | <p>HR to co-produce criteria and guidance with diversity staff networks and Trade Unions.</p> <p>Interview panels provided with training and guidance on fairness and inclusion throughout the assessment process.</p> | <p>Initial draft to be developed by spring 2025.</p> <p>Engagement, consultation and final implementation to be in place by summer 2025.</p> | <p>Clearer expectations of evidence and a standardised framework for assessment.</p> <p>Increased standards of inclusivity across the organisation, ensuring that all new employees meet high expectations of anti-racist and</p> | <p>Director, People and Places</p> <p>HR recruitment data</p> <p>Feedback from Panel Chairs and Resourcing Hub</p>                        | All people in Wales can be confident that Welsh Government civil service and its leadership is a demonstrably anti-racist |

| Theme                              | Action  | Who                                      | How  | By when  | Desired Outcomes  | Owner                       | Measuring progress  | Impact  |
|------------------------------------|---|--|--|--|---|-----------------------------|---|---|
|                                    |   |  |  |  | inclusive behaviours  |                             |   |   |
| Senior level sponsorship programme | <b>Lead 20:</b><br>Develop a senior sponsorship programme for ethnic minority staff, based on best practice | HR Equality, Diversity & Inclusion team. | Co-develop a proposal for a sponsorship programme, including views from a range of stakeholders<br><br>Establish programme once agreed by EAG and ExCo | Proposal to be developed by spring 2025<br><br>Pilot programme in place by autumn 2025 | A high-quality senior sponsorship programme for ethnic minority staff | Director, People and Places | Number of programme participants and sponsors<br><br>% increase in ethnic minority candidates' success at each stage of recruitment and progression process<br><br>Qualitative feedback from participants and sponsors on impact of programme | The Welsh Government workforce represents the population it serves at all levels of |

Pack Page 18

**Supporting the Welsh Government's Arm's Length Bodies and key partners**

|   |  |   |   |   |  |                             |   |  |
|---|--|---|---|---|--|-----------------------------|---|--|
| Evaluate impact of 'Reflecting Wales in Running | <b>Lead 21:</b><br>Evaluate the 2020-2023 'Reflecting Wales in Running Wales' strategy for | Public Appointments Team to contract an | Evaluate strategy implementation to assess progress against goals<br><br>Review experiences of former applicants to learn lessons | Commission independent analysis by the end of March 2025. | Clarity on outcomes already achieved<br><br>Agreed next steps and recommendation | Director, People and Places | % increase in ethnic minority applicants' success at each stage of the public | Public sector Boards are representative of the population in Wales |
|---|--|---|---|---|--|-----------------------------|---|--|

| Theme   | Action   | Who   | How  | By when   | Desired Outcomes   | Owner                                | Measuring progress   | Impact   |
|---|--|---|--|---|--|--------------------------------------|--|--|
| Wales' strategy   | <p>public appointments</p> <p>Hold deep dive events to gather feedback from external and internal stakeholders</p>   | <p>independent reviewer</p> <p>Establish a steering group to include representatives from the EAG, Race Disparity Unit, Race team</p> | <p>Examine current data on diversity in public appointments.</p> <p>Findings presented to First Minister and Cabinet Secretary, and shared with EAG and ExCo</p>   |   | <p>s, informing priorities for the next two years</p>  |                                      | <p>appointments process</p> <p>Regular monitoring of Board ethnicity data</p> <p>Qualitative feedback from Board members and stakeholders on implementation and impact</p> |  |
| End to end review of recruitment practices for regulated Boards | <p><b>Lead 22:</b></p> <p>Undertake an end-to-end review of recruitment practices for regulated Boards and seek clarity on legislative levers available e.g. positive action</p> | <p>Public Appointments Team and existing steering group plus additional stakeholders as required</p>                                  | <p>Evaluate best practice for recruitment to inform approach</p> <p>Scope membership of Advisory Assessment Panels, training needs of panel members and Board members, and review outreach approach to advertise vacancies.</p> <p>Hold deep dives with ethnic minority people to learn from their</p> | <p>Review to be completed in 2025</p> <p>Pilot approach to be introduced in 2025.</p> | <p>Recruitment practices are anti-racist</p> <p>Positive action measures are understood and utilised effectively</p> | <p>Director, People &amp; Places</p> | <p>% increase in ethnic minority applicants' success at each stage of the public appointments process</p>  | <p>Public sector Boards are more representative of the population in Wales</p> |

| Theme  | Action   | Who   | How   | By when   | Desired Outcomes   | Owner                                   | Measuring progress   | Impact  |
|--|--|---|---|-----------|--|---|--|---|
|  |  |   | experiences of the public appointments process  |           |  |   |  |   |
| <b>Our leadership of the Welsh public sector</b>             |  |   |   |           |  |   |  |   |
| Improving representation of Gypsy, Roma and Traveller people | <b>Lead 23:</b><br>Build on the actions to support Gypsy, Roma and Traveller people, including leadership training as identified by community mentors (ensuring it is community-led) | Race and Gypsy, Roma and Traveller policy team                                      | Discuss community mentor/liaison roles with stakeholders, including leadership training to support their development. | Dec 2025  | A trained cadre of leaders, informing public sector decision-making forums.  | Director (communities & Social Justice) | At least 10 community activist/liaison roles in place over two years to participate in Gypsy Roma Traveller discussions. | Gypsy, Roma and Traveller people are better represented in public sector decision-making  |
| Community leadership   | <b>Lead 24:</b><br>Develop a bespoke learning and development provision for community leaders with potential to enhance their skills and knowledge.                                  | Race policy, ArWAP Implementation team, local forum leads, with MESN and EAG leads. | Race policy and ArWAP Implementation Team will co-design a bespoke training programme with EAG and MESN members       | June 2025 | Active community leaders from ethnic minority communities will have gained knowledge, skills and capability in working with formal and informal public | Head of ArWAP Implementation Team       | 50% of attendees feel more competent and confident in working with public services, formally and informally.             | Public sector decision-making is informed by representatives of the population they serve |

| Theme | Action | Who | How | By when | Desired Outcomes    | Owner | Measuring progress | Impact |
|-------|--------|-----|-----|---------|---------------------|-------|--------------------|--------|
|       |        |     |     |         | service structures. |       |                    |        |

## Goal 4: Strengthening governance arrangements

### Welsh Government as an employer

|              |   |  |  |   |  |  |  |  |   |
|--------------|---|--|--|---|--|--|--|--|---|
| Pack Page 21 | Review internal anti-racism governance arrangements | <b>Lead 25:</b><br>Review internal governance framework for anti-racism, ensuring clarity, transparency, and integration with other decision-making forums.      | Permanent Secretary, Director of People and Places, and key internal stakeholders. | Review current structure with representatives from internal and external EDI governance groups<br><br>Co-develop new structure following review | Review to be completed by summer 2025<br><br>New structure in place by late 2025                   | Clear and transparent governance arrangements, enabling more effective decision-making and greater accountability                      | Permanent Secretary<br><br>Director, People and Places | Feedback from governance group members on ability to implement decisions and affect change | The Anti-racist Wales Action Plan will be implemented successfully.   |
|              | Welsh Government Board assurance                    | <b>Lead 26:</b><br>The Welsh Government Board will regularly review the ARWAP<br><br>The WG Board will assess their learning needs and performance objectives in | Permanent Secretary and Chief Operating Officer                                    | Permanent Secretary to monitor performance objectives and progress<br><br>HR to support learning and development needs identified               | Induction for new Board members<br><br>Annual reviews and one-to-ones with the Permanent secretary | Board members have measurable objectives related to anti-racism in place<br><br>Members updated regularly on ARWAP progress to provide | Permanent Secretary<br><br>Chief Operating Officer     | Monitor progress against measurable objectives   | All people in Wales can be confident that the Welsh Government civil service and its leadership is demonstrably anti-racist |

| Theme   | Action   | Who  | How  | By when   | Desired Outcomes   | Owner  | Measuring progress   | Impact   |  |
|---|--|--|--|---|--|--|--|--|--|
|   | relation to anti-racism  |  |  |   | assurance and scrutiny   |  |  |  |  |
| <b>Supporting the Welsh Government's Arm's Length Bodies and key partners</b> |  |  |  |   |  |  |  |  |  |
| Pack Page 22  | Improving governance arrangements  | <b>Lead 27:</b><br>Examine how current governance arrangements can be used to deliver ArWAP actions and embed an anti-racist ethos | Public Bodies Unit                                     | Review current governance arrangements<br><br>Review best practice<br><br>Co-develop an improved approach for partnership teams across Welsh Government and ALBs. | Commence from April 2025   | More effective and inclusive governance arrangements | Director, People and Places  | Clear and actionable plan to improve governance arrangements in place. | All people in Wales can be confident that the Welsh public sector and its leadership is demonstrably anti-racist |
|   | <b>Our leadership of the Welsh public sector</b>   |  |  |   |  |  |  |  |  |
| Community support and funding   | <b>Lead 28:</b><br>Implement targeted funding to support micro-organisations, individuals and community groups with initiatives and events etc., enabling them to overcome barriers to mainstream funding. | Race Implementation manager,<br><br>Supported by: E&HR division and Regional Forums Convenors                                      | Co-design a fair, open and inclusive funding mechanism | March 2025  | Frontline anti-racism workers are engaged, recognised for their expertise and lived experience, and have the opportunity to influence public sector policymaking | Director Communities and Social Justice              | No. of community groups funded.<br><br>Demographic diversity of applicants (e.g., ethnicity, regional location).<br><br>No. of awareness events supported by the fund.<br><br>Evaluation reports from funded | Anti-racism supported and championed within communities across Wales   |  |

| Theme | Action | Who | How | By when | Desired Outcomes   | Owner | Measuring progress                              | Impact |
|-------|--------|-----|-----|---------|--|-------|---|--------|
|       |        |     |     |         | Sustainable support to celebrate anti-racism and raise awareness of key dates and events |       | initiatives detailing their impact and outcomes |        |

### Abbreviations

- EAG- External Accountability Group
- HR - Human Resources
- RDU - Race Disparity unit
- ExCo – Executive Committee,
- DISG – Diversity and Inclusion Steering Group
- MESN – Minority Ethnic Staff Network
- KAS - Knowledge and Analytical Services
- WG - Welsh Government

# ARWAP 2024-26. Chapter 3.

## Education and Welsh Language narrative.

### Evidence

Since the publication of the Anti-Racist Wales Action Plan (ARWAP) and the first-year annual report, further research and evidence has been published in relation to provision in education settings. This is summarised by sector, looking at schools, further education (FE) and higher education (HE).

While the availability of new and updated research and evidence is welcomed, there remain concerns about gaps in data and the impact this has on the evidence base and our understanding of progress. There will be an ongoing need for robust and relevant data to support action on anti-racism across the education sector and in relation to the Welsh language. This was recognised in both the Inquiry undertaken by the Equalities and Social Justice Committee which published its report and recommendations in [Actions, Not Words](#), in March 2024, and in the report "[Take it Seriously](#)" on racism in secondary schools published by the Children's Commissioner for Wales in November 2023.

Both reports have been considered in the work to refresh this chapter and the associated actions. Implications for data and research needs has also been recognised as a cross-cutting theme for this work.

### Schools

The academic attainment levels for Gypsy, Roma and Traveller learners remain a clear concern. For the year [September 2022 to August 2023 data from the Pupil Level Annual Census \(PLASC\)](#) statistical bulletin for examination results published 07 December 2023, shows pupils from Gypsy, Roma and Traveller ethnic backgrounds have the highest percentage of GCSE entries which resulted in no grade. From the Welsh Government's [Post 16 Learning statistics by learner's ethnic group August 2017 – July 2021, published July 2022](#), Year 11 pupils from Gypsy, Roma or Traveller backgrounds were also less likely to continue into post 16 learning compared to other ethnic groups.

In the Welsh Government's [Exclusions from Maintained Schools statistical bulletin published 09 November 2023](#), from September 2021 to August 2022 the rate of fixed term exclusions per 1,000 pupils is lower for pupils from Black ethnic groups compared to those from the White British ethnic group. The rate of fixed term exclusions (suspensions) per 1,000 pupils is higher for pupils from Roma ethnic groups compared to those from the White British ethnic group. However, the Welsh Government's statistical bulletin does not have data for the ethnic background of all pupils. Some pupils prefer not to provide the information, and for some the information wasn't obtained. For pupils that we do have information for:

- Pupils with a Roma ethnic background have the highest rate of fixed term exclusions (5 days or less).
- Pupils with an Indian ethnic background have the lowest rate of fixed term exclusions (5 days or less).
- Pupils with a White ethnic background have the highest rate of fixed term exclusions (over 5 days).

- Pupils with a Chinese ethnic background have the lowest rate of fixed term exclusions (over 5 days).
- Pupils with a Black ethnic background have the highest rate of permanent exclusions.

Pupils with a Chinese ethnic background have the lowest rate of permanent exclusions.

The Education Workforce Council's [Annual Education Workforce Statistics 2023](#) bulletin illustrates the diversity of the education workforce in Wales. It shows the percentage of schoolteachers who are Black, Asian and Minority Ethnic was 1.7% in 2023. This is an increase of 0.5% from 1.3% in 2021. This compares with the levels within the general Welsh population, whereby 6.2% of people in Wales identified within the high-level Black, Asian and Minority Ethnic group category from Census 2021.

In the latest [Schools' Census results for January 2023](#) published in September 2023, there were 405,075 pupils aged five and over, and of those 85.7% of pupils aged 5 and over identified as White British. This figure has been falling slightly for each of the past five years with pupils of most other ethnic backgrounds showing increases over the same period. Of pupils from a minority ethnic background the largest groups are from a mixed ethnic background (15,565 pupils), a White background other than White British, Traveller or Gypsy/Roma (14,645), Asian (11,176) and Black (5,354); whilst 6,400 pupils identify as another ethnic group.

The Children's Commissioner for Wales published a research report, [Take it Seriously: Children's experiences of racism in secondary schools](#), in November 2023. The Commissioner's report provides valuable evidence and information about the impact that racism continues to have on children. This report was preceded by the Commissioner's 2022 national consultation of children and young people [Ambitions for Wales](#) which found of the number of children and young people that reported experiencing bullying, 80.5% of Black, Asian and Minority Ethnic children (aged 7-11) reported experiences of bullying in school. Almost a third (30.3%) of 12–18-year-olds reported experiencing bullying or abuse.

## Further Education

Statistical analysis within [Further Education, Work Based Learning and Adult Learning in Wales 22/23](#) published 27 February 2024 shows that the proportion of ethnic minority learners in FE has increased over the past decade, reaching ten per cent in 2022/23.

Learners from Black ethnic backgrounds continue to achieve lower A level outcomes than other ethnic groups, although they achieve better outcomes than their peers with similar GCSE results. Data for the 2022/23 academic year shows that the differences in [post-16 achievement](#) (published and updated 21 March 2024) for different ethnic groups are starting to narrow.

Analysis of [post-16 performance measures and learner destinations \(2020-21\)](#) shows that progression into a sustained positive destination (further learning and/or employment) is generally highest for learners with a white ethnicity (87%), and lowest for learners with a Black, African, Caribbean, Black British, Black Welsh ethnicity (79%), and those from Other ethnic groups (76%). However, there is variation within individual groups in each category. Learners from Asian ethnic groups are more likely to enter sustained further learning after finishing their studies in FE.

The Welsh Government commissioned qualitative research into the extent and impacts of racism on learners and staff in the further education sector. Published in October 2023, the report [Towards Anti-Racist Further Education: Qualitative research on the lived experiences of learners and staff](#) found that overt racism, in general, was no longer a normalised part of the FE experience, but that racial discrimination is still very present. This typically takes the form of covert racism such as microaggressions and othering, rather than more overt incidents such as name-calling. The research identified recommendations and actions to tackle discrimination, improve the experience of ethnic minority learners and staff, and build confidence in understanding and

discussing anti-racism. These recommendations will inform ongoing work with the FE sector and have helped to shape the updated actions within this plan.

## Higher Education

In 2024, Higher Education Funding Council for Wales (HEFCW) published its first annual race equality data monitoring report on [Equality and Diversity Statistics](#). (Race Equality Monitoring Measures) The purpose of this data monitoring is to provide a more detailed understanding of the diversity of the HE population in Wales (staff and students) and to contribute to an anti-racist Wales.

We expect that race equality monitoring will develop and evolve over time, in consultation with providers and other interested parties. The report has been published following [consultation](#) on the use of data and indicators, and HEFCW adjusted its approach based on the [feedback received](#). Further data is available in the data and narrative reports [Race Equality monitoring 2021-22](#) and [Race Equality monitoring 2023](#).

HE in Wales has shown that there has been an increase in the number and proportion of applications from students from minority ethnic backgrounds. However, there remain disparities in retaining students from minority ethnic backgrounds and in attaining the highest undergraduate degree classification.

The annual data report shows that the number and proportion of student applications to HE in Wales, from people from each of the minority ethnic backgrounds surveyed, increased between 2016 and 2022. The proportion of full-time undergraduate students from the UK still studying a year after they started was lower for students from each minority ethnic background than it was for all student entrants.

- Graduates from minority ethnic backgrounds were proportionately less likely to achieve a first class degree than graduates from a White ethnic background. Graduates from a Black ethnic background were the least likely of all minority ethnic groups to achieve a first class degree.
- Between 2016/17 and 2020/21, both the number and the proportion of academic staff from each of the Asian, Black and Mixed minority ethnic backgrounds increased annually and the number of members of universities' governing bodies in universities in Wales from minority ethnic backgrounds was small. However, across the reporting period, the proportion of governors from an Asian, a Black or a Mixed ethnic background increased.

## Introduction

Since the original publication of the Anti-Racist Wales Action Plan, progress has been made in all areas of education and learning within schools, FE and HE. We have taken the opportunity of working with stakeholders to review, assess and revise some of these actions as well as introducing new ones. An important example of this dialogue is the introduction of actions relating to the provision and delivery of youth work services, equipping both the workforce and young people with the skills to understand and address racism wherever they encounter it.

We also have more evidence of progress. For example, we have seen increased recruitment into teaching of people from ethnic minority communities and embedding anti-racist practices via the creation of an initial teacher education (ITE) recruitment plan. This has a targeted financial incentive to attract new entrants into the school teaching professions. In addition, we have introduced and expanded DARPL and its anti-racist professional learning resources for teachers and leaders of schools; and made the teaching of Black, Asian, and Minority Ethnic histories and experiences mandatory in the Curriculum for Wales.

The Welsh Government strengthened the statements of what matters for Humanities in spring 2021 to ensure the study of Welsh history in all its diversity and complexity is both explicit and compulsory for schools and settings. We also updated the Curriculum for Wales framework and guidance in spring 2021, with the Arts Council Cynefin project providing the means to explore multicultural history of Wales and fostering a nurturing environment for all learners and professionals alike. It is essential that we assess progress and a Formative Evaluation of the Curriculum for Wales is underway. This is a large-scale piece of work examining the perspectives and experiences of senior leaders, practitioners, learners, and their parents / carers. It will include surveys with a representative sample of these populations and smaller scale qualitative 'deep dives' to get richer, more detailed insights on specific parts of the curriculum. A dedicated 'deep dive' into curriculum development and implementation in relation to Black, Asian and Minority Ethnic communities and experiences forms part of this work.

Progress has been slower for some ethnic minority communities and learners such as children and young people from Gypsy, Roma and Traveller families. However by working with local authorities, local Traveller Education Services and listening to the voices of learners, [Celebrate and Participate](#), the Welsh Government's new education guidance for schools and settings to support Gypsy, Roma and Traveller children and young people, was published in December 2023. Further work will be progressed to assist schools and local authorities with new and additional resources to help embed understanding of learners' needs. This work will be developed in co-operation with stakeholders including the Local Authority Officers' Minority Ethnic and Gypsy, Roma and Traveller (MEGRT) Group which meets half termly.

In 2024-25 the Welsh Government provided over £160m to local authorities in Wales to support action to address equity in education via the Equity strand of the Local Authority Education Grant (LAEG). This includes the funding previously allocated via the Minority Ethnic, Gypsy, Roma Traveller (MEGRT) grant, which stood at £11m in 2023-24. Funding may be used by local authorities to support the delivery of local Traveller Education Services (TES) and Ethnic Minority Achievement Services (EMAS). The grant also supports activities to promote and ensure inclusion and integration of learners into education, equity of education and opportunity by removing barriers to accessing the curriculum and improving school attendance, plus engaging with learners, their families and communities.

In terms of raising awareness and fostering a deeper understanding of anti-racist practice within education settings, the last year has seen the continuation of the [Diversity and Anti-Racist Professional Learning \(DARPL\) project](#), and its extension across all tiers of education, childcare and play work. Building on early foundations, the project is supporting a growing number of practitioners to undertake anti-racist work within their practice and share their learning, development and successes with the wider DARPL Community of Practice. The second phase of DARPL involves significant investment in consultation work, engaging with regional consortia, local authorities, Qualifications Wales and Estyn, amongst others; refinement of the longitudinal community of practice; and sustained anti-racist step change and impact work.

In ITE we published our [ITE recruitment plan in October 2021](#) that set out a range of actions to be undertaken by the Welsh Government and partners. All ITE Partnerships have developed and published individual action plans that are live documents and are updated as existing actions are completed. ITE Partnerships have reviewed and amended their recruitment and support approaches for applicants from ethnic minorities. They have also strengthened the support provided for these students during their period of study. The Welsh Government has refreshed the Criteria for Accreditation of ITE programmes now include a specific requirement for student teachers to develop an understanding of anti-racist practice and to receive training in developing anti-racist pedagogical approaches.

The Welsh Government continues to provide financial support to ITE Partnerships to enable them to take forward anti-racist work and to engage with community mentors to support them. We have also set up a working group of ITE Partnerships, community mentors and other partners (including community groups) that meet twice a year to share learning and develop future plans. Discussion will focus on the development of a second version of the ITE recruitment plan that is due to be published in autumn 2024.

The Education Workforce Council has employed an official to specifically work on the recruitment of more ITE applicants from ethnic minorities and they undertake an advocacy role for individuals and engagement with community groups.

As part of wider work to identify barriers that may exist for all young people to access youth work, evidence will be gathered on youth work organisations actions to support young people from a wider range of backgrounds. We wish to see services more inclusive and relevant to young people from ethnic minority backgrounds.

A very important change is taking place in 2024 which has led to a restructuring of the Education and Welsh Language chapter for the second iteration. From August 2024, Medr, the Commission for Tertiary Education and Research, will be responsible for funding and overseeing post-16 education and research. Medr is a newly established arms-length body. Their work will include, but is not limited to, HE and research, FE, as well as work-based learning such as apprenticeships.

Medr will have a strategic duty to promote equality of opportunity, and its strategic priorities include setting ambitious targets and actions to reduce the inequity of access to tertiary education, improve the diversity of intake where it is low and reduce attainment gaps. This will build on and consolidate the work in the HE, FE and apprenticeship sectors over the past two years, building a deeper understanding of how inequality affects learners' outcomes and what interventions can have an impact. We have included a new goal to establish Medr as a highly effective, anti-racist tertiary education and research organisation, setting the expectation that Medr will put equality and anti-racism at the heart of its work and provide leadership to the tertiary education sector.

In the FE sector a wide range of work is underway focusing on establishing an anti-racist culture across the sector and building a robust evidence base. An initial [scoping study commissioned from the Black Leadership Group and ColegauCymru in 2022](#) provided the impetus for much of this work and has helped to shape priorities over the past two years. All FE institutions now have anti-racist action plans in place. Progress reviews have highlighted extensive work to review institutional policies and processes, foster a culture of anti-racism, and deliver professional learning to staff, leaders and governors. Many institutions have undertaken their own investigations to understand the lived experiences of their learners, staff and wider communities.

An ambitious programme of work is underway to develop rich, interactive curriculum resources for the further education sector, enabling learners and practitioners across all subject areas to explore anti-racism and diversity. This has resulted in the launch of the FE anti-racist curriculum metaverse, a "virtual world" co-constructed by subject experts with lived experience of racism. Led by Cardiff and Vale College, the [metaverse](#) was launched in 2023. The next stage of work involves ongoing professional learning and support for all colleges in Wales to pilot and implement the anti-racist curriculum.

In the HE sector, all universities have committed to achieve a race equality charter mark by 2025. The charter's purpose is to support universities to identify and address the barriers facing Black, Asian and minority ethnic staff and students, while also providing a clear framework for action and improvement. All universities have reported to HEFCW on their actions to address key recommendations in the Equality and Human Rights Commission's UK report on [Tackling racial harassment: Universities' Challenged report](#).

Universities are reviewing their recruitment policies and procedures through an anti-racist lens and HEFCW has published information on addressing pay disparities. All universities are active members of an anti-racism network to share learning across Wales and understand wider-UK practice. In 2023 Advance HE delivered an anti-racism masterclass for senior staff at universities to support leaders in delivering change.

## Youth Work

In 2021, the Interim Youth Work Board for Wales published its final report [Time to Deliver: Achieving a sustainable delivery model for youth work services in Wales](#). The report contains 14 recommendations including major changes in how the Welsh Government and others should develop youth work services to ensure a strong and resilient sector, which all young people in Wales can access or can be offered. Work is underway, under the advice of the Youth Work Strategy Implementation Board, to develop and take forward these recommendations, one of which recommends that the Welsh Government and the youth work sector should work together “to promote equality, inclusion and diversity, both in terms of access to youth work services in Wales, and in relation to the role that youth work services can play in proactively challenging discriminatory attitudes and behaviours within society”.

## Welsh Language

The Welsh language is a part of all the Welsh Government’s work and policy areas. It is therefore appropriate to note that although this chapter has a strong education focus, with education being a vital component of our [Cymraeg 2050: A million Welsh speakers](#) strategy, some of the Welsh language actions go beyond the area of education. The targets relating to increasing the number of Welsh speakers in Wales are heavily reliant on both increasing the number of learners in Welsh medium education, and improving and reforming how Welsh is taught within all schools in Wales. The Welsh language sub-section below outlines further measures we are taking to expand the provision of Welsh medium education across all school settings. We believe that introducing reforms in this area will have a significant positive effect on the number of ethnic minority people who can speak Welsh in the future.

### **What we will do**

Priorities for the next two years will build on the progress to date achieved across all sectors of education. We will continue to improve and expand our understanding of the challenges faced by learners, students, staff, practitioners, schools, FE institutions, universities and other education organisations, taking account of lived experiences of racism.

In March 2024, the Senedd’s Equality and Social Justice Committee’s inquiry into the Anti-Racist Wales Action Plan led to a series of recommendations within its final report “Action, Not Words”. The report contained two specific recommendations for the education sector. The first of these (Recommendation 8) called for specific training for education practitioners and schools with the creation of a national INSET day. The second (Recommendation 9) focused specifically on addressing racist incidents, including the creation of a new system of data recording and reporting. The Cabinet Secretary for Culture and Social Justice [replied to the Committee’s recommendations in April 2024](#).

Engaging with new research and obtaining more data will inform future policies as we continue to roll-out and embed understanding. Critical to this work is ensuring learners themselves experience positive change, and measuring the impact this is having. It is essential that we achieve true equity in education and ensure the best possible life chances for learners whether entering school or continuing their education journey throughout their lifetime.

Medr will put equality of opportunity and anti-racism at the heart of all it does, including providing leadership on anti-racism, ensuring policy and funding is evidence-based and outcome focused and working with the tertiary education system, stakeholders, partners, learners and students and in social partnership with staff representatives. Medr has a statutory duty to promote equality of opportunity in tertiary education and strategic priorities that expect it to set ambitious targets and actions for providers to reduce the inequality of access to tertiary education, improve the diversity of intake where it is low and reduce attainment gaps. This will provide significant opportunities to make connections across the tertiary sector, promoting good practice and support learner transitions and aspirations.

### 1. Leadership and representation

The ITE recruitment plan is designed to assist ITE Partnerships to recruit more entrants to teacher training from ethnic minorities. Early evidence shows a slight increase in the numbers of applicants but there is continuing work to be undertaken to further increase this.

In FE, we will build on progress over the last two years to embed a culture of anti-racism in all institutions. This will include ongoing implementation of institutional anti-racist action plans and evaluation of the impact, as well as sharing of good practice and outcomes across FE and with the wider tertiary education sector.

Following work to analyse learner participation and outcomes by ethnic group, the focus needs to shift to understanding the underlying reasons for inequalities in outcome, understanding what will make a difference, and developing better evidence to demonstrate progress. Inequalities in learner outcomes can only be tackled by a whole-system approach across education, and we need to explore the use of data to understand learner progression at each stage of education and to better identify “what works” to tackle inequities. We will also continue to develop professional learning support for practitioners and leaders in FE, and to work with the Education Workforce Council to improve data on the FE workforce and to diversify staff recruitment.

Following an action on universities to review recruitment policies and procedures through an anti-racist lens, from August 2024 Medr will expect universities to continue to improve anti-racist human resources policies. Actions will include reviewing staff pay, well-being and mental health policies and to share practice. An annual race equality data report will continue to be published under Medr. This publication will provide transparency in the diversity of staff and students higher education in Wales.

Senior leaders in HE are expected to lead whole-institution anti-racist strategic change to secure safe and inclusive learning, working and living spaces. Universities’ commitments should be clearly evidence in their strategic equality plans and other corporate documents.

Other key partners in the education sector, including local authorities, schools, FE and HE institutions and Estyn, also have key roles to play in this space. Where partners are subject to specific statutory equalities duties, they are required to take action appropriated, such as completing and published Strategic Equality Plans and tackling discrimination. By engaging with existing responsibilities, and applying a lens of anti-racism to their actions, partners can play a significant role in driving out discriminatory and racist behaviour.

### 2. Intersectionality

We will continue to work across the Education Directorate and the Culture and Tertiary Education Directorate to ensure Welsh Government policies are in line with the plan and are intersectional in nature. For example, we will consider the intersectionality seen between gender, poverty, and educational attainment. Existing data sets are often collected over differing time periods, and with differing methodologies which can hamper direct comparisons and data linking. We will work to overcome these challenges and better align data collection going forward.

Medr will build and extend the use of data and evidence, collect and publish findings to identify inequalities, promote fair access and improve the diversity of intake where it is low to improve race inequality in higher education.

### 3. Gypsies, Roma and Travellers

Looking ahead we will be using the new action for schools to support the needs of Gypsy, Roma and Traveller learners including improved awareness amongst education professionals of the different cultures. This will continue to be considered in the context of wider issues such as health, caring responsibilities, accommodation / housing, digital exclusion and access to public services. New relationships and opportunities to work with representatives from Gypsy, Roma and Traveller communities are also being developed.

DARPL continues to grow its offer for the different education sectors through discussions with ethnic minority individuals and experts with lived experience. This has led to seminars addressing the issues facing children and adults from Gypsy, Roma and Traveller communities. Additional opportunities to work with representative organisations, children and young people will continue to be explored and developed.

There is clear and consistent data on students in HE in Wales who identify as being from Gypsy, Roma and Traveller backgrounds. While we recognise that numbers are small, these data provide an evidence base to enable Medr to improve transition from schools and FE providers to higher education, and to start discussions about how to increase participation.

### 4. Data and research

The Welsh Government receives monthly recruitment data from ITE Partnerships and we have included a requirement for data on those individuals who self-declare as being from an ethnic minority. There is still a disparity in the numbers who are willing to declare an ethnic minority at the University and Colleges Admissions Service (UCAS) application stage and the numbers who apply for the ethnic minority incentive at registration stage with an ITE Partnership. This is expected as there is a need to build confidence in communities around the willingness to self-declare as being from an ethnic minority at all stages of the process. Since the introduction of the incentive in 2022/23 there have been 103 applications for the incentive. The Welsh Government has also commissioned DARPL to undertake a follow-up to their previous research of the lived experience of ITE students to assess the impact of the changes that ITE Partnerships and other stakeholders have implemented since 2021.

The Education Workforce Council (EWC) is continuing to improve the completeness of data on the ethnicity of further education and work-based learning staff. From 2024, new categories of staff are required to register with the EWC including FE senior leaders and adult learning tutors, and ethnicity (including an active choice not to disclose ethnicity) will be a mandatory category of data for these groups. This more comprehensive data will help us to understand what actions we need to take to improve the diversity of recruitment and career progression in the tertiary sector, and to measure progress.

From August 2024 Medr will continue to support universities work on wellbeing and health, including mental health by monitoring that universities take proper account and provide tailored support to staff and students from ethnic minority backgrounds. In higher education, HEFCW Welsh language has taken an intersectional approach to wellbeing and health. Evidence suggests that around a quarter of students from an ethnic minority background (24%), and 9% of White students, said they had experienced racial harassment since starting their course. This equates to 13% of all students - 11% in Wales. See [Equality and Human Rights Commission, Tackling Racial Harassment: Universities Challenged](#).

Students and staff from ethnic minority backgrounds are also more likely to face negative impacts on wellbeing and health (research into the student experience in the UK, UKCISCA). As a result of these findings, HEFCW has part funded the Student Space which has provided specific well-being and health support to specific groups of students, including Black students.

#### 5. Strengthening complaints systems

We will be working to strengthen monitoring and reporting systems for schools and exploring how they handle complaints, including racist incidents. This was a key matter highlighted in the Inquiry by the Equalities and Social Justice Committee and the report by the Children's Commissioner for Wales. To take this forward will require work with local authorities and schools to understand what data is currently collected and in what format, as well as what data would be needed to drive change. Consideration can then be given to the requirements for a robust data collection in relation to racist incidents in school, and actions taken in respect of them.

Our Further Education research has shown that learners and staff in FE do not always feel confident reporting racism, and that when they have done so in the past, they do not feel satisfied with the outcomes. Medr will work with the FE and HE sectors to help improve complaints and reporting procedures to ensure that learners and staff feel able to call out racism, and other forms of discrimination, and that their concerns are taken seriously and acted upon.

#### 6. Positive action

We will work with all partners across the education sector in Wales to drive forward the actions set out in this plan and to improve experiences for children and young people. This includes, but is not limited to, schools and other education providers, local authorities, Estyn, the EWC, Workforce Unions and the Youth Work Sector. Medr will work with tertiary education providers to understand how they are taking positive action, and it will share practice.

## Welsh language

### Welsh Language

In alignment with the Welsh Government's [Cymraeg 2050: A million Welsh speakers](#), there is a strong focus on expanding Welsh-medium education and implementing reforms to the teaching of Welsh in all schools. These efforts aim to increase the number of Welsh speakers, including among ethnic minority communities, ensure that every child in Wales has an opportunity to become independent and confident Welsh language users, and ensure the Welsh language is integrated into all policy areas.

### **Evidence: Current and Future Plans**

The Welsh Government's analysis of the Pupil Level Annual School Census (PLASC) shows that, as of January 2024, around 5% of pupils aged five years or in Welsh-medium and bilingual schools identified as Black, Asian, or Minority Ethnic (i.e. not White British), compared with around 17% in English-medium schools. Census 2021 estimated that approximately 21,400 of the 538,300 people who reported being able to speak Welsh were from ethnic minority communities, an increase of around 10,400 compared with Census 2011. However, it is important to note that Census 2011 did not collect data on the 'White: Gypsy or Irish Traveller, Roma, or Other White' ethnic groups, which were included in 2021. Excluding the data collected for this group, the increase in Welsh speakers from ethnic minority communities between 2011 and 2021 is approximately 5,000.

### **Achievements and Future Focus**

The Welsh Government is committed to expanding Welsh-medium education and reforming how Welsh is taught in all schools. This includes progressing with our Welsh Language and Education

Bill, introduced in July 2024, which aims to ensure that, by 2050, all pupils are independent and confident Welsh language users by the time they reach the end of compulsory school age. This will have a substantial positive impact on ethnic minority people and their access to the Welsh language.

Future plans also involve promoting access to Welsh-medium education and ensuring our marketing and communications reflects the communities we serve and that the Welsh terminology we use is appropriate and culturally sensitive. The government will also fund research to capture the experiences of migrants accessing Welsh-medium education, contributing to the Nation of Sanctuary plan. In addition, we aim to diversify the teaching workforce, enhance early years education, and support post-16 learning through tailored programmes, ensuring a comprehensive and sustainable approach to Welsh language learning.

### **Closing Summary**

The Welsh Government believes that Welsh belongs to us all in Wales, however much or little we speak. We're committed to growing the number of Welsh speakers all over Wales particularly among ethnic minority people. We have big ambitions for our language, and our Cymraeg 2050 strategy explains our plans to make those ambitions come true.

## EDUCATION AND WELSH LANGUAGE SUB-GROUP - drafted approx. spring-summer 2024

SCHOOLS – ANTI-RACISM IN SCHOOLS, GYPSY, ROMA AND TRAVELLER LEARNERS, WELL-BEING, SCHOOL EXCLUSIONS, DIVERSITY AND ANTI-RACISM PROFESSIONAL LEARNING (DARPL), INITIAL TEACHER EDUCATION (ITE), FURTHER EDUCATION (FE), HIGHER EDUCATION (HE), YOUTH WORK, WELSH LANGUAGE.

| Existing Actions   | Amended Actions   | Desired Outcomes  | By When   | Lead and Partners   | Key Priority Areas (1-6) |
|--|---|---|-----------|---|--------------------------|
| Require reporting of racist incidents and harassment in schools and colleges through strengthened data collection, how they were dealt with, action taken in response and whether the incident was resolved successfully for the victim. | <b>E&amp;WL 1:</b><br><br>Explore the mechanisms needed to produce a consistent reporting format of racist incidents and harassment in schools and colleges. This will be done through strengthened data collection, including information on how incidents were dealt with, action taken in response and whether the incident was resolved successfully for the victim, showing the percentage number of incidents resolved. | Increased knowledge of the numbers of racist incidents experienced by learners and staff across schools and colleges in Wales.<br><br>Ability to use this data to identify trends and measure success of policies.<br><br>Higher levels of satisfaction from ethnic minority learners and their families with the way racist incidents are dealt with and resolved in schools and colleges.                   | June 2026 | Local authorities (LAs), schools, Welsh Government  | 1-6                      |
|  | <b>E&amp;WL 2:</b><br><br>Undertake scoping work into the implementation and impact of the recently published guidance for schools to support Gypsy, Roma and Traveller learners, and into specific barriers to education facing learners from these communities.   | A better understanding of the challenges Gypsy, Roma, and Traveller learners face in accessing education, as well as an evaluation of the effectiveness of the recently published guidance. This scoping work would identify specific barriers to education for these communities, leading to evidence-based recommendations for improving support, enhancing educational outcomes, and ensuring that schools | June 2026 | Local authorities, schools, Welsh Government, Traveller Education Services, Gypsy, Roma and Traveller stakeholder organisations | 2 and 3                  |

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|   |   | can more effectively address the needs of Gypsy, Roma, and Traveller students.   |                             |  |         |
| Strengthen the Welsh Government's 'Rights, respect, equality' anti-bullying guidance for schools.   | <b>E&amp;WL 3:</b><br><br>Strengthen the Welsh Government's 'Rights, respect, equality' statutory anti-bullying guidance for schools. This will be done by updating the current guidance to advise education settings on effectively addressing prejudice-related bullying and harassment, and how to effectively monitor incidents and use data. | Schools better address prejudice-related bullying, improve monitoring, and use data more effectively. This will create safer, more inclusive environments, particularly for vulnerable students, while fostering a culture of respect and equality across schools. | June 2025                   | LAs, schools   | 2,3,4   |
| Strengthen the Welsh Government's statutory guidance for schools in respect of well-being to recognise the particular needs of learners from an ethnic minority backgrounds   | <b>E&amp;WL 4:</b><br><br>Provide schools with dedicated wellbeing resources centred on the needs of those from ethnic minority backgrounds.  | Higher levels of wellbeing among ethnic minority learners and their families with learners better able to engage with their education.   | March 2025                  | WG, Schools, LAs, third sector                                   | 1 - 6   |
| <b>E&amp;WL 5:</b><br>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 includes, but is not limited to ethnic minority learners and learners with special |   | Reduction in the number of exclusions generally and specifically in the rates of exclusions for those groups of children who are disproportionately excluded.  | Gradual reduction over time | Local authorities, head teachers, and pupil discipline committee | 2 and 3 |

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| <p>educational needs (SEN). Data will be used from the Official Statistics published by the Welsh Government on permanent and fixed-term exclusions from schools, which includes data on exclusions by ethnic background. This data will continue to be published.</p> |  |   |  |  |                |
| <p><b>E&amp;WL 5:</b><br/> Make it mandatory to include the teaching of Black, Asian and Minority Ethnic Communities and Contributions across the revised Curriculum for Wales.</p>  |  | <p>A more inclusive and representative education that will promote cultural understanding, challenge stereotypes, and highlight the diverse histories and achievements of these communities. This approach can foster greater empathy, reduce discrimination, and empower all students to appreciate the richness of Wales's multicultural society, ultimately contributing to a more equitable and socially responsible future generation.</p> | <p>Completed 2021</p> <p>During academic year 2024-25</p>    | <p>Welsh Government</p> <p>Stakeholders: Estyn; Regional Consortia; Diversity and Anti-Racism Professional Learning (DARPL) project.</p> <p>Stakeholders: Contractor for evaluation.</p> | <p>2,3,4,6</p> |
| <p><b>E&amp;WL 6:</b><br/> Update the Curriculum for Wales framework and guidance and teaching resources to reflect the recommendations of the Williams Review</p>   |  | <p>Curriculum better addresses issues of racial equality, social justice and representation.</p> <p>Promotion of a more inclusive education, highlighting the contributions of Black, Asian, and Minority Ethnic communities, and provide students with a deeper</p>  | <p>2024/2025</p> <p>Three resources have been published:</p> |  | <p>2,3,4,6</p> |

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|   |                           | <p>understanding of Wales's diverse history.</p> <p>This would help schools create an environment where all students feel seen, valued, and empowered, while fostering a society based on equality, respect, and inclusion.</p> | <p>(February 2024) Map Cymuned  </p> <p>Repository - Hwb (gov.wales)</p> <p>(Published September 2023) Our Welsh History</p> <p>A bilingual Black, Asian and Minority Ethnic timeline is being published and sent to all schools from W/c 18/03/24 when 200 will be sent each day until all have schools and settings have received them.</p> |  |                |
| <p>Develop anti-racist professional learning resources to support</p> | <p><b>E&amp;WL 7:</b></p> | <p>Building on firm foundations, continuing</p>   | <p>2026</p>   | <p>DARPL (Cardiff Metropolitan University) and</p> | <p>1 and 6</p> |

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| <p>the teaching of the new curriculum hosted on a co-designed “virtual campus” to collate and curate all anti-racist materials and resources.</p>               | <p>Develop anti-racist professional learning resources to support the teaching of the new curriculum hosted on a co-designed “virtual campus” to collate and curate all anti-racist materials and resources. Review, refresh and extend anti-racist provision, moving towards a sustainable, professional learning continuum</p>     | <p>to create an anti-racist education workforce, by developing a sustainable professional learning pathway for all tiers of Education, Childcare and Play work.</p>  |  | <p>associated partners.</p>   |                            |
| <p>Support a new PhD doctorate placement to evaluate the programme of Diversity and Anti-Racist Professional Learning (DARPL).</p>                              | <p><b>E&amp;WL 8:</b><br/>Support a new PhD doctorate placement to evaluate the programme of Diversity and Anti-Racist Professional Learning (DARPL). Extend DARPL impact/evaluation work to fully embed a sustained approach to anti-racist practice.</p>   | <p>Understanding/assessment of DARPL’s effectiveness which helps to further embed sustained anti-racist practices in schools.<br/><br/>Educators are provided with robust, effective professional learning, which enables them challenge to racism and promote equality.</p> | <p>2026</p>  | <p>DARPL (Cardiff Metropolitan University) and associated partners.</p>                   | <p>1 and 6</p>             |
| <p>Review Initial Teacher Education (ITE) and professional learning to ensure that it reflects an anti-racist approach to teacher recruitment and training.</p> | <p><b>E&amp;WL 9:</b><br/>Review and update where appropriate the anti-racist requirements within the Criteria for the Accreditation of ITE programmes, ready for use in the reaccreditation of ITE programmes to be delivered by September 2029.<br/><br/>Estyn to ensure the ITE inspection framework continues to reflect the</p> | <p>An ongoing explicit requirement of anti-racism in ITE programmes that award Qualified Teacher Status (QTS) leading to better teaching and learning in schools in relation to the curriculum and fostering anti-racist, inclusive classrooms/settings.</p>                 | <p>2027 for use in the reaccreditation process for ITE programmes to be delivery from 2029.<br/><br/>To be determined by Estyn</p> | <p>Welsh Government The EWC, Estyn, ITE Partnerships and stakeholders.<br/><br/>Estyn</p> | <p>1 and potentially 6</p> |

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|   | <p>diverse nature of Wales and the wider world.</p> <p>Activities to promote teaching as a career to continue taking place in all schools.</p>  |   | Promoting of careers including within schools - ongoing   | EWC, Careers Wales, Schools   |  |
| <p>Expand the range of subjects available on the employment-based Initial Teacher Education (ITE) scheme to attract support staff from ethnic minority backgrounds, including Welsh-medium.</p> | <p><b>E&amp;WL 10:</b></p> <p>Expansion of subjects or student teacher support grants offered via the Salaried PGCE ITE programme (employment based ITE) where economically and educationally viable, to attract support staff and wider applicants from ethnic minority backgrounds, including Welsh-medium.</p> | <p>More Black, Asian, or Minority Ethnic graduates can access initial teacher education and enter teaching as a career; the Salaried PGCE is intended to support those not able to access 'traditional' full-time PGCEs</p> | <p>Ongoing – annual review. The Welsh Government has committed to the Alternative ITE programmes for a further three academic years up to and including academic year 2026/27's cohort.</p> | <p>Welsh Government and the Open University to maintain a watching brief on demand and opportunities for further development should funding be available in future.</p> | <p>2 and potentially 3: The alternative ITE routes are delivered by the Open University pan-Wales and are intended to support those unable to access full-time 'traditional' (a 'fixed' HEI in a certain location)</p> |

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|  |   |   |  |  | <p>ITE programmes. This includes people in rural communities, those in / from low-income households / backgrounds, those with caring responsibilities, and those unable to access good quality work and careers.</p> |
| <p>Set up a diverse anti-racism working group with stakeholders to review progress against the actions</p> | <p><b>E&amp;WL 11:</b><br/><br/>The diverse anti-racist working group which includes stakeholders</p> | <p>Ensures accountability, fosters continuous progress, and drives systemic change to increase diversity in the teaching profession while promoting anti-</p> | <p>Ongoing – twice a year workshop</p> | <p>Welsh Government, ITE Partnerships, EWC</p> | <p>1, 5 and potentially 6.</p>   |

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| and identify emerging requirement.   | to meet twice a year to oversee delivery and actions in the Black, Asian and Minority Ethnic ITE recruitment plan and wider anti-racist work within ITE.  | racist practices across ITE programs.  |         |   |  |
| Develop and publish recruitment plans specifically to increase the numbers of ethnic minority applicants to ITE courses including Welsh-medium             | <b>E&amp;WL 12:</b><br><br>Continue to develop and publish ongoing recruitment plans, including utilisation of positive action initiatives where appropriate, specifically to increase the numbers of ethnic minority applicants to ITE courses including Welsh-medium  | Increase of individuals from ethnic minority backgrounds onto ITE programmes.  |         | ITE partnerships  | 1 and 6  |
| Co-design appropriate and sensitive support arrangements for students from ethnic minority backgrounds at all stages of the application and study process. | <b>E&amp;WL 13:</b><br><br>ITE partnerships to continue to review existing practices, identifying any shortcomings in existing processes and use these findings for continual self-improvement to ensure co-designed, appropriate, sensitive and positive action based levels of support are in place to assist ethnic minority applicants at all | A more inclusive and supportive Initial Teacher Education (ITE) system, where ethnic minority applicants receive tailored, sensitive support at every stage of the application and study process.<br><br>Increased diversity within the teaching profession, with ethnic minority candidates feeling valued and supported, contributing to a more inclusive, | Ongoing | ITE Partnerships<br><br>Supported by Education Workforce Council (EWC) and Welsh Government | Priority area 5.<br><br>As part of the review of existing practice group to include consideration around this priority area to |

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|              | stages of the application and study process.  | representative, and equitable education system.   |  |   | make our ITE more effective and responsive to applicant / student teacher complaints. Also 1, 6 |         |
| Partnerships | Require all ITE providers to review, strengthen and develop the application of criteria for accreditation requirements in existing programmes | <p><b>E&amp;WL 14:</b></p> <p>ITE Partnerships to continue to review and identify shortcomings in processes and use these findings to ensure that issues around anti-racism are strengthened during the ongoing development of the application of the criteria for accreditation.</p> | <p>Continual strengthening of application processes and support to applicants ensuring that an anti-racist approach is taken.</p> <p>Review of programmes in line with updated accreditation criteria, ensuring programmes meet accreditation requirements (every 5 years)</p> | <p>Ongoing - accreditation takes place every five years (2024 - 2029)</p> | <p>Welsh Government</p> <p>ITE Partnerships</p>   | 1 and 5 |
|              | Collaborate and co-design with ethnic minority stakeholder groups to develop  | <p><b>E&amp;WL 15:</b></p> <p>The partnership would ensure that the recruitment strategy is</p>   | <p>By December 2024</p>  | <p>Welsh Government,</p>  | 1 and 6   |         |

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| <p>next phases of the ITE Black Asian and Minority Ethnic Recruitment Plan</p> | <p>In partnership with the Anti-racist working group consider the current evidence, collaborate, co-design and publish an updated and second phase of the <a href="#">ITE Black, Asian and Minority Ethnic Recruitment Plan</a>.</p> | <p>aligned with current needs, best practices, and lessons learned.</p> <p>This updated plan would drive targeted actions to increase ethnic minority representation in Initial Teacher Education, fostering a more diverse and inclusive teaching workforce and promoting equity within the education system.</p> |  | <p>ITE Partnerships, the EWC and all relevant stakeholders.</p> |  |
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## FURTHER EDUCATION

| Existing Actions  | Amended Actions  | Desired Outcomes   | By When   | Lead and Partners  | Key Priority Areas (1-6) |
|---|--|--|-----------|--|--------------------------|
| <p><b>Action:</b><br/>Commission an independent review of policies and procedures in the FE and adult learning sector through an anti-racist lens and expect representation of ethnic minority groups within forums or groups established to design the audit/review and oversee and support their effective implementation and application</p> | <p><b>E&amp;WL 16:</b><br/>Embed anti-racist action planning across the further education sector, evaluate progress and drive forward anti-racist policies and practices sector-wide.</p>  | <p>All FE institutions have dynamic, robust anti-racist action plans in place and regularly review their progress and impact.</p> <p>Ethnic minority staff and learners are fully represented and engaged in constructing and evaluating anti-racist policies in their institutions.</p> <p>Anti-racism principles are integrated into FE policies and procedures.</p> | June 2026 | Medr, ColegauCymru, Black Leadership Group, FE institutions  | 1 and 6                  |
| <p>Work with the FE sector to embed the principles of the Black Leadership Group 10 point plan to ensure an anti-racist FE system.</p>  | <p><b>E&amp;WL 17:</b><br/>Work with the FE sector, stakeholders and partners to embed the principles of the Black Leadership Group 10 point plan to ensure an anti-racist FE system, including support for diverse leadership and governance.</p> | <p>Anti-racist principles are integrated into planning at the institutional and system levels.</p> <p>Leaders, staff, learners and partners have a clear understanding of what an anti-racist FE sector looks like and what part they need to play to make it a reality.</p>   | June 2026 | Medr, Colegau Cymru, Black Leadership Group, FE institutions | 1 and 6                  |

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| <p>Survey learners and staff to understand their experiences of racism and to gather views on what effective anti-racist practice looks like in FE.</p> | <p><b>E&amp;WL 18:</b></p> <p>Implement actions in response to research on lived experiences of racism in further education, including improvements to reporting and complaints; integrate questions about anti-racism and equality into future surveys of FE learners.</p> | <p>FE learners feel able to report racism and are confident that they will be taken seriously and reach a satisfactory outcome.</p> <p>We have a robust understanding of learners' experiences of racism and the effectiveness of anti-racist practice in addressing complaints at an institutional and system level.</p> | <p>June 2026</p> | <p>Medr</p>  | <p>2, 4</p> |
| <p></p>   | <p><b>E&amp;WL 19:</b></p> <p>Support professional learning for staff across the further education sector, to extend and deepen knowledge of anti-racism and to increase confidence in calling out racism.</p>  | <p>Staff understand what it is to be anti-racist, feel confident to call out racism, and can effectively integrate anti-racism and diversity into their teaching practices.</p>   | <p>June 2026</p> | <p>Medr, FE institutions</p>                           | <p></p>     |
| <p><b>Action:</b> Review and revise the current FE curriculum to embed anti-racist principles and develop a revised curriculum in co-construction.</p>  | <p><b>E&amp;WL 20:</b></p> <p>Continue to co-construct FE curriculum and tutorial content based on anti-racist principles and lived experiences, and roll out delivery across the FE sector.</p>  | <p>Creation of a more inclusive and responsive Further Education (FE) curriculum that is grounded in anti-racist principles and reflects the lived experiences of students.</p> <p>Teaching is relevant, culturally responsive, and sensitive to the needs of diverse student populations.</p>                            | <p>June 2026</p> | <p>Medr, Cardiff and Vale College, FE institutions</p> | <p>6</p>    |

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| <p>To ensure that the Credit and Qualifications Framework for Wales (CQFW) continues to support the recognition of prior learning and facilitates the understanding and comparison of international qualifications.</p>   | <p><b>E&amp;WL 21:</b></p> <p>Maintain alignment between the Credit and Qualifications Framework for Wales (CQFW) and the other UK qualifications frameworks and the European Qualifications Framework (EQF) to support ongoing qualification comparability and learner mobility</p>  | <p>Overseas qualifications are understood and recognised by education institutions, supporting progression into employment or education/training.</p>  | <p>Ongoing</p>   | <p>CQFW Partners and Advisory Group</p> | <p>1 and 6</p> |
| <p>Raise awareness and promote the CQFW as a vehicle to aid understanding and recognition of qualifications as appropriate, and refer queries from international learners relating to the equivalency and comparison of international qualifications.</p>   | <p><b>E&amp;WL 22:</b></p> <p>Raise awareness and promote the CQFW as a vehicle to aid understanding and recognition of qualifications as appropriate, and refer queries from international learners relating to the equivalency and comparison of international qualifications to the UK National Information Centre for the recognition and evaluation of international qualifications and skills (UKENIC).</p> | <p>Overseas qualifications are understood, recognised by education institutions, and can be compared to Welsh/UK qualifications, supporting progression into employment or education/training.</p>   | <p>Ongoing</p>   | <p>CQFW Partners and Advisory Group</p> | <p>1 and 6</p> |
| <p>Support the Education Workforce Council to gather improved data on the ethnicity of post-16 practitioners and learning support workers by building trust so that more staff disclose their ethnicity. Ensure this improved data is used to support workforce policy and recruitment practices.</p> | <p><b>E&amp;WL 23:</b></p> <p>Support the Education Workforce Council to gather improved data on the ethnicity of post-16 practitioners, leaders and learning support workers by building trust so that more staff disclose their ethnicity. Ensure this improved data is used to support workforce policy and recruitment practices.</p>   | <p>Registered staff feel confident to disclose their ethnicity and are confident that this information will be used appropriately.</p> <p>Improved understanding of the ethnicity of the FE workforce and of issues around representation.</p> | <p>June 2025</p> | <p>Education Workforce Council Medr</p> | <p>1, 4, 6</p> |

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| <p>Survey staff from ethnic minority backgrounds on their experiences of working in FE, and co-produce proposals on improving their experiences and career prospects.</p>  | <p><b>E&amp;WL 24:</b></p> <p>Co-produce and implement actions in response to research on the lived experiences of ethnic minority staff, ensuring integration with institutions' anti-racist action plans; establish arrangements for further surveys and research in order to monitor progress.</p> | <p>Staff with lived experience of racism are fully involved in constructing and delivering actions to improve experiences in the FE sector.</p> <p>Improved confidence by staff of all ethnicities that their employers are committed to anti-racism, and that their concerns and views will be listened to and taken seriously.</p> | <p>June 2026</p> | <p>Medr,<br/>Further education institutions,<br/>Joint Trade Unions</p> | <p>1, 4, 5</p>    |
| <p><b>Goal: To increase the numbers of representatives from Black, Asian and Minority Ethnic communities training to become FE and WBL practitioners</b></p> <p>Take positive action to encourage more learners from ethnic minority communities to undertake ITE qualifications in the FE sector, via the PGCE FE Incentives programme.</p> | <p><b>E&amp;WL 25:</b></p> <p>Take positive action to encourage more learners from ethnic minority communities to undertake ITE qualifications in the FE sector, via the PGCE FE Incentives programme, and improve data collection and evidence of impact.</p>  | <p>An increase in the number of learners from ethnic minority communities pursuing ITE qualifications in the Further Education (FE) sector, supported by targeted incentives through the PGCE FE Incentives programme.</p> <p>More diverse candidates encouraged to enter the teaching profession.</p>                               | <p>June 2026</p> | <p>Medr<br/>HE institutions</p>   | <p>1, 4, 6</p>    |
| <p>Identify any recruitment and retention issues of teachers from ethnic minority communities in the PCET Sector, put appropriate positive actions in place where required and impact assess them.</p>   | <p><b>E&amp;WL 26:</b></p> <p>Identify any recruitment and retention issues of FE teachers from ethnic minority communities, put appropriate positive actions in place where required and impact assess them.</p>   | <p>Improved understanding of the barriers to ethnic minority individuals to entering the FE workforce, staff retention and career progression.</p> <p>Improved diversity of recruitment and improved retention of ethnic minority staff.</p>   | <p>June 2026</p> | <p>Education Workforce Council<br/>Medr<br/>HE institutions</p>         | <p>1, 2, 4, 6</p> |

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| <p>Identify equality gaps in learner participation and attainment, and set targets and appropriate actions for improvement.</p> | <p><b>E&amp;WL 27:</b><br/>Take action to understand and address equality gaps in FE learner participation and attainment, with specific attention to ethnicity and intersectionality, and establish initiatives and targets for improvement.</p>   | <p>A clearer understanding of the equality gaps in Further Education (FE) learner participation and attainment, particularly related to ethnicity and intersectionality.</p> <p>Learners from all backgrounds have the support they need to succeed, and contribute to reducing achievement disparities in the FE sector.</p> | <p>June 2026</p> | <p>Welsh Government and Medr</p> | <p>2 and 4</p> |
| <p>Commission a review of the English for Speakers of Other Languages (ESOL) policy and address its recommendations.</p>        | <p><b>E&amp;WL 28:</b><br/>Put in place an Implementation Plan that prioritises key recommendations in the Review of English for Speakers of Other Languages (ESOL) policy to improve the availability of high quality ESOL provision across Wales and support economic and social integration.</p> | <p>Speakers of other languages have the confidence and ability in English language skills to integrate into the Welsh economy and society.</p>  | <p>June 2026</p> | <p>Medr, Welsh Government</p>    | <p>2 and 6</p> |

## HIGHER EDUCATION

| Existing Actions   | Amended Actions  | Desired Outcomes  | By When               | Lead and Partners   | Key Priority Areas (1-6) |
|--|--|---|-----------------------|---|--------------------------|
| Pack Page 49   | <p><b>E&amp;WL 29:</b></p> <p>Work with universities, stakeholders and partners to embed and share the learning from race equality charter mark action planning and developments to contribute to securing an anti-racist HE system.</p>   | <p>Anti-racist actions are integrated into strategic planning at the institutional and system levels.</p>   | June 2026             | <p>Medr, Universities Wales, universities, Joint Trade Unions</p>                                 | 1-6                      |
|  | <p><b>E&amp;WL 30:</b></p> <p>Work with higher education providers to promote anti-racism and equality of opportunity and ensure a more equitable higher education system for Black, Asian and minority ethnic staff, applicants and students in higher education, including as this relates to well-being, health and mental health and tackling violence, harassment and abuse in all its forms.</p> | <p>Senior HE managers, staff, applicants, students and partners have a clear understanding of universities' commitment to becoming anti-racist organisations and the actions taken to achieve this.</p> |                       | <p>Medr, Universities Wales, Universities, Further Education Institutions, Joint Trade Unions</p> | 1,2,3,4,6                |
| <p>Publish an annual race equality report and performance measures for the sector.</p> | <p><b>E&amp;WL 31:</b></p> <p>Build and extend data and evidence, collect and publish findings to identify inequalities, promote fair access to higher education and improve the diversity of intake where it is low, and reduce unexplained degree differential</p>   | <p>Improved understanding of diversity in higher education, including intersectionality, which informs more inclusive higher education policy.</p>  | June 2025 - June 2026 | Medr  | 2,3,4,6                  |

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|  | gaps for Black, Asian and ethnic minority students.  |   |             |  |         |
| Require Medr to expect all HE institutions to review existing recruitment policies and procedures through an anti-racist lens  | <b>E&amp;WL 32:</b><br>Raise awareness, promote learning and share practice in improving anti-racist human resources policies, including pay and staff well-being, health and mental health policies in higher education | A more inclusive and supportive work environment in higher education, where anti-racist human resources policies are actively promoted and improved.<br><br>Staff from all racial backgrounds feel valued, supported, and empowered improving retention, job satisfaction, and overall institutional culture, fostering a more diverse, equitable, and inclusive higher education sector. | June 2026   | Medr, Universities, Joint Trade Unions | 1,2,5,6 |
| Expect all HE institutions to achieve a race equality charter mark as a condition of funding within three years to embed anti-racism policies at all levels within the sector. | <b>E&amp;WL 33:</b><br>All universities to embed anti-racist actions, planning and evaluate progress against their charter mark commitments annually to secure their ambitions to be anti-racist organisations.          | All universities have dynamic, robust anti-racist action plans in place informed and updated by regular review.   | Summer 2025 | Medr, Universities                     | 1 - 6   |
| <b>Shared Medr action</b>  | <b>E&amp;WL 34:</b>  | Collaborating will ensure that these efforts are inclusive, collaborative, and reflective of diverse needs. This  | June 2026   | Medr, tertiary education providers,    | 1 - 6   |

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|  | <p>Medr will put equality of opportunity and anti-racism at the heart of all it does, including providing leadership on anti-racism, ensuring policy and funding is evidence-based and outcome focused and working with the tertiary system, stakeholders, partners, learners and students and in social partnership with staff representatives.</p> | <p>will create a more equitable, supportive educational environment that benefits all learners and staff, reducing racial disparities and promoting long-term change.</p> |  | <p>Universities<br/>Wales,<br/>Colegau Cymru,<br/>Joint Trade<br/>Unions</p> |  |
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## YOUTH WORK

| Existing Actions   | Amended Actions | Desired Outcomes  | By When         | Lead and Partners   | Key Priority Areas (1-6) |
|--|-----------------|---|-----------------|---|--------------------------|
| <p><b>E&amp;WL 35:</b></p> <p>Hold a series of discussions with young people to better understand how racist behaviour has acted as a barrier for them and their peers to access youth work, with the aim of using this testimony to seek ways of removing these barriers.</p>   | n/a             | An improved understanding by the youth work sector of how young people may not feel able to access youth work services, and how this evidence can be used to improve how these services are designed and delivered. | By October 2025 | Welsh Government, working with local authorities and voluntary youth work organisations and the Youth Work Strategy Implementation Board. | 1- 6                     |
| <p><b>E&amp;WL 36:</b></p> <p>Hold a series of discussions with young people to better understand how youth work provision has helped them and their peers to address racism in wider society, and for this testimony to be shared with the youth work, and wider statutory education sector, to help inform the design of future provision.</p> | n/a             | Build the evidence base of the positive contribution of youth work to building an anti-racist Wales.  | By October 2025 | Welsh Government, working with local authorities and voluntary youth work organisations and the Youth Work Strategy Implementation Board. | 1-6                      |
| <p><b>E&amp;WL 37:</b></p>   | n/a             | The youth work workforce will have a better understanding of the impact of  | Ongoing work as | Welsh Government,   | 1 - 6                    |

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| <p>As part of wider work to develop a youth work workforce that delivers for young people from all backgrounds, providing support and professional learning opportunities for youth work practitioners on: the impact of racism and the barriers this may create for young people to engage with youth work services, developing tools and skills to enable youth work practitioners to develop their confidence to challenge racism in youth work settings and to help the young people they work with to challenge racism across society and build an anti-racist youth work workforce.</p> |  | <p>racism and are empowered to help young people to challenge racism in society.</p>  | <p>part of Workforce Development Opportunities in 2023-2025</p> | <p>local authorities, youth work organisations, training providers.</p> <p>National Academy for Education Leadership (NAEL) and DARPL</p> |  |
| <p><b>E&amp;WL 38:</b></p> <p>Deliver workshops to provide an opportunity for Welsh Government and its grant recipients to share information on how funding decisions are made, including funding to support anti-racism in the youth work sector, in order to</p>  |  | <p>Improve transparency and a greater understanding of how funding decisions are made, and how organisations may access future opportunities. It will also provide opportunities for organisations to raise questions, comments and concerns.</p> | <p>By March 2025</p>  | <p>Welsh Government, local authorities and the wider youth work sector</p>  |  |

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| build greater transparency on how funding is provided and allocated. |  |  |  |  |  |
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## WELSH LANGUAGE

| Existing Actions  | Amended Actions   | Desired Outcomes   | By When              | Lead and Partners  | Key Priority Areas (1-6) |
|---|---|--|----------------------|--|--------------------------|
| Gain a better understanding of the lived experience of the 11000 Welsh speakers from ethnic minority communities to inform future actions and interventions to eliminate racism in Wales.                                       | <b>E&amp;WL 39:</b><br>Amplify and listen to the lived experiences of the c21,000 Welsh speakers from ethnic minority communities in order to gain a better understanding of their lived experiences. Learnings and engagement should inform future actions and interventions to eliminate racism in Wales  | A better understanding of the experiences of Welsh speakers from ethnic minority communities across Wales.   | June 2026 and beyond | Cymraeg 2050 and Knowledge and Analytical Services (KAS) in Welsh Government | 1 - 6                    |
| Set targets and expectations of anti-racist approaches for grant funded organisations. Develop an action plan to improve representation from ethnic minority backgrounds within the workforce of our grant funded organisations | <b>E&amp;WL 40:</b><br>Set targets and expectations of anti-racist approaches for grant funded organisations. Ensure that the targets set are tangible and relatable to each of the partners' context. Activity should also include working with partners to devise and implement actions, especially within the framework of positive action, to improve representation within the workforce of their respective organisations | More Welsh language projects delivered for people from ethnic minority communities across Wales.<br><br>More individuals from ethnic minority communities across Wales enjoying activities and events through the medium of Welsh. | April 2025           | Cymraeg 2050 and grant funded organisations                                  | 1 - 6                    |

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| Commission the National Centre for Learning Welsh to review current take up of provision amongst Black, Asian and Minority Ethnic backgrounds, and current strategies to promote access                                 | <b>E&amp;WL 41:</b><br><br>Work with the National Centre for Learning Welsh to implement their anti-racism action plan and continue to monitor progress through existing grant monitoring mechanisms.  | More adults from ethnic minority communities across Wales accessing National Centre for Learning Welsh provision.  | April 2025 | National Centre for Learning Welsh  | 1 - 6      |
| Commission the development of multilingual anti-racist resources and case studies to support an increase of take up in Welsh-medium education within ethnic minority community.   | <b>E&amp;WL 42:</b><br><br>Commission the development of multilingual anti-racist resources and case studies to support an increase of take up in Welsh-medium education within ethnic minority communities.   | The increased sense of belonging and representation will lead to more ethnic minority families considering Welsh-medium education as an option for their children's education. | April 2025 | Cymraeg 2050 and Welsh Government comms   | 1, 2, 3, 4 |
| Analyse data on Black, Asian and Minority Ethnic people that attend Welsh-medium education to develop local and national strategies to increase this number and tackle the barriers to accessing Welsh-medium education | <b>E&amp;WL 43:</b><br><br>Analyse annual PLASC data on Black, Asian and Minority Ethnic people that attend Welsh-medium education and continue to develop and build on local and national strategies to increase this number and tackle the barriers to accessing Welsh-medium education. | National and strategic focus on increasing the number of ethnic minority pupils attending Welsh-medium education.  | June 2026  | Welsh Government - Cymraeg 2050 and Knowledge and Analytical Services divisions | 2,3,4      |
| Expand programmes to increase the use of Welsh by learners in English medium schools  | <b>E&amp;WL 44:</b><br><br>Through annual grant funding, increase the number of English medium schools engaging in the Cymraeg Campus programme. It aims to provide a clear framework for schools which can be used to promote and increase the use of Welsh by                            | More learners from ethnic minority backgrounds learning and using the Welsh language.  | June 2026  | Cymraeg 2050  | 1 – 6      |

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|  | children in a whole school context, promote a strong Welsh ethos in schools and provide a range of enriching activities that encourage learners to enjoy learning Welsh.   |  |           |   |       |
| Ensure the Welsh terminology used to discuss and debate anti-racism is current, appropriate, consistent and based upon input provided by Welsh speakers from ethnic minority communities | <b>E&amp;WL 45:</b><br><br>Continue to promote the terminology guidance amongst partners and internally within the Welsh Government in order to encourage the use of appropriate anti-racist Welsh terminology; based upon input provided by Welsh speakers from ethnic minority communities.  | More organisations integrating anti-racist practises.  | June 2026 | The Welsh Government and grant recipients |       |
| Review and develop a specific set of requirements as part of contracts and grant funding   | <b>E&amp;WL 46:</b><br><br>Adnodd (established in April 2023 to oversee the commissioning and development of Welsh and bilingual teaching and learning materials) to progress with work to identify resource gaps which includes stakeholder engagement as well as continued work with WG in its review of all existing resources on Hwb to support the implementation of the Curriculum for Wales.<br><br>Working in partnership with Hwb, develop a content strategy to ensure future commissioning arrangements (including quality assurance frameworks for commissioning developing and producing resources) are aligned with the Curriculum for Wales and | Ethnic minority communities feeling represented and included in resources created to support the Curriculum for Wales. | June 2026 | Adnodd                                    | 1,3,6 |

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|  | wider Welsh Government policies including the Anti-racist Wales action plan |  |  |  |  |
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## Welsh Government Policy Advice for Anti-racist Wales Action Plan (ArWAP) Refresh June 2024 – June 2026

### For Internal Use Only

#### Chapter: Culture, Heritage and Sport

The goals and actions in the Culture, Heritage, and Sport section remain unchanged, reflecting our commitment to the multi-year grant schemes via which funding has been awarded to our arm's length bodies (ALBs) and local, regional and grassroots organisations, for financial years 2022-2025, to deliver against our existing, agreed goals and actions. We will be undertaking an independent theory of change evaluation of the grant schemes during 2024-25 to assess their impact and effectiveness. The findings from the evaluation will be instrumental in determining future goals and actions.

In the meantime, Culture, Heritage, and Sport officials have relied on data from surveys and reports, including those mentioned below, and have instigated robust monitoring via quarterly meeting and bi-annual detailed reporting to gather evidence.

#### Evidence

The collection of data on participation, disaggregated by ethnicity, remains a key issue in understanding how Black, Asian and Minority Ethnic people access and experience culture, heritage and sport offers in Wales. Though we know from the [Museum Spotlight Survey](#) 23% of local and national museums in Wales offered programming specifically for Black, Asian and Minority Ethnic people and 3% specifically for Gypsy, Roma and Traveller communities.

The recent [Well-being of Wales 2023: Ethnicity and Well-being](#) report offers some insight into ethnicity and participation with culture, arts and heritage. According to the report, participation rates of Black, Asian, and Minority Ethnic adults in culture, arts, and heritage activities remains lower than that of white adults, with only 37% engaging three or more times a year compared to their white counterparts. However, there is a notable exception in library visits, where Black, Asian, and Minority Ethnic adults have a higher rate of engagement at 37% compared to 24% among white adults. It is important to note that the Ethnicity and Well-being data does not provide disaggregated information for specific ethnic groups, such as Gypsy, Roma, and Traveller communities. Consequently, the experiences and participation rates of these groups are not fully represented in the report.

In sports participation, the 2022 [Sport Wales School Sport Survey](#) highlights a persistent disparity in sports participation outside the school curriculum, with young people from Black, Asian, and other ethnic backgrounds engaging less frequently compared to their white counterparts.

While the data indicates that access to cultural, arts, and heritage offerings in Wales is lower among Black, Asian, and Minority Ethnic adults, there has been a notable shift towards increased engagement and participation within these groups. Evidence gathered from our programme of

grant funding shows an increase in the engagement and participation of people from ethnic minority backgrounds in various forms including co-production and participating in culture, heritage and sport. This increase is a direct result of the targeted Culture, Heritage and Sport funding, which has enabled the ongoing process of decolonising museum collections and the establishment of inclusive spaces, facilitating a wider interpretation of culture, heritage and the arts. As a result, we are witnessing a gradual infusion of diverse cultural perspectives into our cultural and artistic offerings, fostering a more inclusive environment for the people of Wales. For example, through our Culture Grant Scheme for Grassroots Organisation, we have funded more than 50 groups and organisations, over 90% of which are Black, Asian and Minority Ethnic led. Collectively, these organisations will have engaged with a significant number of stakeholders from ethnic minority communities participating in cultural activities across Wales. Further examples of participation and engagement are provided under goal 2.

Welsh Government remit letters issued to our arm's length bodies outline the specific need and expectation to deliver against our goals and actions in the ArWAP. We hold quarterly monitoring meetings with these bodies to review their progress against the Culture, Heritage and Sport goals and actions. Over the next 10 months we plan to prioritise discussions with our ALBs on leadership and representation, as we recognise that area requires strengthening and a better understanding of progress made by the respective bodies.

## **Introduction**

The Culture, Heritage and Sport section of the Anti-racist Wales Action Plan focuses on 5 key areas: leadership, funding, celebrating diversity, the historical narrative and learning about our cultural diversity. These were identified as priority areas through consultation and direct engagement with Black, Asian and Minority Ethnic people during the development of the Action Plan.

Recognising the importance of addressing both tangible racial disparities and the perceptions of inequality within the culture, heritage, and sports sectors, we initiated pilot work to progress anti-racism prior to the publication of the Anti-Racist Wales Action Plan in 2022, laying the foundation for our efforts in decolonising museum collections and exhibits, conducting an audit of commemorations in Wales, and investing in cultural programs designed to foster anti-racist practice within the culture, heritage, and sports sectors.

Since the publication of the Action Plan we have committed more than £5 million to deliver against our goals and actions, across the three financial years from April 2022 to March 2025, funding our arm's length bodies (Amgueddfa Cymru, the Arts Council of Wales, the National Library of Wales, Sport Wales and the Royal Commission on the Ancient and Historical Monuments of Wales) and 22 national, regional and local culture, heritage and sports organisations across Wales. Funding to organisations has largely been on a multi-year basis, recognising that the desired change and impact cannot be achieved through short-term funding.

In response to the call to ringfence funding to improve grassroots cultural and creative activities and enhance opportunities for Black, Asian, and Minority Ethnic organisations, we commissioned Diverse Cymru to administer a Culture Grant Scheme for Grassroots Organisations. The Culture Grant Scheme not only seeks to increase inclusivity and diversity within the cultural sector but also to address disparities in funding accessibility for Black, Asian and Minority Ethnic groups and organisations.

While we are proud of the progress made towards achieving our objectives, we recognise the ongoing need for further action and improvement. During 2024-25, the final year of our current funded activities, we will be commissioning an independent theory of change evaluation of the current grants programme to understand how effective it has been in delivering against our commitments in the Action Plan and how sustainable any outcomes and impacts are. We will use the key findings and recommendations from the evaluation to further develop and refine our goals and actions for 2025-26, and to determine key performance indicators to assess the longer term impact of the grants programme. Therefore, in this current refresh of the Action Plan our goals and actions remain unchanged, except for those relating to Creative Wales, where descriptions of relevant actions have been updated to provide additional clarity.

*Goal 1: To hold publicly funded organisations accountable for the delivery of anti-racist measures and actions, as set out in this action plan.*

- We have established an External Accountability Subgroup for Culture, Heritage and Sport. The group is a partnership of external experts with lived experience, diversity representatives, community mentors and Welsh Government officials. The group provides support and challenge to the Welsh Government and partners to deliver the goals and actions relating to Culture, Heritage and Sport.
- Sport Wales has utilised funding to date to undertake specific training activities for its national centre staff, to enable it to adjust its practices to meet the needs of communities. The organisation will build on this experience and has employed a community investment adviser to link with local community groups, to promote funding opportunities not previously accessed by these communities.
- Amgueddfa Cymru's Human Resource team has been collaborating on improving recruitment processes. As part of implementing a positive recruitment policy to support and enable applications from under-represented groups, Amgueddfa Cymru is currently revamping candidate recruitment information to include:
  - an explicit offer of 1-1 support with job applications and on reasonable adjustments.
  - a recruitment guide including videos on how to apply and what to expect at an interview. The value of life experience is emphasised.
  - I-recruit, in its final stage of development, will offer anonymized recruitment as standard for all roles and a flexible application process.

*Goal 2: To work with our sponsored bodies to ensure they use their spending powers to embed anti-racist practice, facilitate equality of access and outcomes, and maximise participation for Black, Asian and Minority Ethnic people.*

- We have provided £1.8m to our arm's length bodies for financial years 2022-25 to strengthen their spending powers to embed anti-racist practice, facilitate equity of access and outcomes and maximise participation for Black, Asian and Minority Ethnic people. We have awarded more than £2.8 million to 22 local, regional, national or independently run culture, heritage and sport organisations across Wales. All projects receiving funding have a focus on co-production, demonstrating a commitment to placing lived experience at the centre of policy, service development and delivery.

- We have established monitoring processes to measure the effectiveness of the above funding. We have set in place robust monitoring including quarterly meetings and bi-annual detailed reporting's to gather evidence on how organisations are spending their funding and the outcomes and impacts which the funding has resulted in. In addition, across our grant funded programmes we have made it a condition of the grant that projects are co-produced with Black, Asian and Minority Ethnic people.
- Through our Culture Grant Scheme, administered by Diverse Cymru, we have awarded grant funding to more than 50 grassroots groups and organisations for the financial year 2023-25. More than 90% of the organisations are Black, Asian and Minority Ethnic led. We have adopted novel approaches in the Grant Scheme to enable a wider pool of Black Asian and Minority Ethnic groups and organisations to apply for grant funding. We enabled applications to be submitted in video format. Diverse Cymru held information sessions, specifically targeting underserved communities, including, Gypsy, Roma and Traveller communities and worked with regional County Voluntary Councils to enable applicants to have access to skilled individuals and support with writing their applications. We also made available a small grant to facilitate access to funding for newly established groups and organisations. Applicants who do not have a business bank account had the opportunity to seek funding of up to £1,000 which will be made available through pre-payment cards. This approach has not previously been used by the Welsh Government. We will use our grant evaluation to assess the impact of the Grant Scheme in widening access and participation at grassroots level.
- The Arts Council of Wales and Amgueddfa Cymru have published a joint [Widening Engagement Action Plan for 2022-25](#), setting out a number of measures to address the current inequalities experienced by people, groups and communities, particularly those currently under-represented, in access to and participation in the arts.
- Sport Wales has utilised funding to provide training activities catering to the needs of the community during Ramadan and is reviewing how the offer could be extended to other communities. Last financial year, the programme attracted over 400 participants who enjoyed badminton, squash, basketball, and squash. Transportation across Cardiff was provided by Foundation for Sports Coaching, ensuring accessibility for all. Positive feedback poured in on social media, highlighting the program's impact.
- The Sport4All project delivered by Women Connect First has enabled more than 200 women and young girls from diverse ethnic minority backgrounds to participate in physical fitness, sport and other related activities, to improve their health, well-being and confidence. It actively promotes participation in activities which ethnic minority women typically engage in less frequently than other groups (for reasons of cultural inappropriateness, direct racism, financial restrictions, or other barriers particularly relevant to ethnic minority women and girls in Wales).

*Goal 3: Support all parts of the society in Wales to embrace and celebrate its diverse cultural heritage while understanding, and recognising the right to, freedom of cultural expression.*

- Museum Spotlight Survey indicated that 23% of local and national museums in Wales offered programming specifically related to ethnic communities in 2022.
- Amgueddfa Cymru has taken proactive steps to ensure its exhibitions and events are inclusive and enjoyed by communities spanning every local authority area in Wales. Collaborative efforts with Black, Asian, and Minority Ethnic communities have led to successful community events such as Diwali, Dandiya, and Ramadan celebrations held at St Fagans and the National Museum Cardiff (NMC). Partnerships have facilitated further events at NMC marking World AIDS Day, Trans Awareness Week and Somali Heritage Day.
- Amgueddfa Cymru has pioneered new event programs such as the New Heights series, which spotlights the talents of local Black artists and musicians. Partnerships with The Honey Session, The BOMB Directory, and Radio Cardiff have enriched these initiatives, notably bringing live music platforms to the museum, a space often not associated with music. Moreover, Amgueddfa Cymru has integrated celebrations of cultural diversity into existing public programmes, including the live music platforms incorporated into the Amgueddfa Cymru Food Festival, curated by New Heights, BBC Horizons, Amgueddfa Cymru Producers and Tafwyl.

*Goal 4: To work with public bodies to fully recognise their responsibility (individual and collectively) for setting the right historical narrative, promoting and delivering a balanced, authentic and decolonised account of the past – one that recognises both historical injustices and the positive impact of Black Asian and Minority Ethnic communities.*

- Amgueddfa Cymru has co-produced with Black, Asian and Minority Ethnic people [a charter for decolonising its collection](#) that sets out the Museum's approach. It highlights six key areas where it will work with communities across Wales, and beyond, to decolonise the collection and work towards decolonising the museum itself. A number of task and finish groups have been established, with individuals and community organisations working together on the decolonisation of objects. This will inform new displays and exhibitions as part of the *Safbwyntiau /Perspectives* programme. In addition, the Museum's new Collections Development Strategy will focus on greater diversity of collecting, with a new focus on commissioning and rapid response collecting.
- Through the Museums, Collections and Cynefin project 21 local and independent museums have undergone training based around collection reviews, to support staff as they decolonise their museums. All participating organisations will receive a supporting training package to further strengthen their ability to decolonise their collections. As a result of the training and collection review, museums have actively engaged with ethnic minority people on the implementation of permanent change in museum displays. This collaboration has enabled ethnic minority people to contribute openly to the project, fostering inclusive dialogue about museum collections and new ways of interpreting them. Museums have stated that they will continue the relationship beyond the funded project.

- Cadw has produced [Public Commemoration in Wales: Guidance for Public Bodies](#). This was a key follow-up action following 'The Slave Trade and the British Empire: An Audit of Commemoration in Wales', published in March 2024. The guidance will help local authorities, town and community councils, and other public bodies, reach well-informed decisions about existing and future public commemorations. This will help them to play their part in making Wales an anti-racist nation and to celebrate individuals from all parts of our society who have made an outstanding contribution to Welsh life.
- The Royal Commission on the Ancient and Historical Monuments of Wales is running a project to record Welsh Asian heritage. '*Places we remember - recording the heritage of Welsh Asian communities*' is working with Welsh Asian communities to define and record heritage that is significant to them and to showcase the major contribution people of Asian heritage have made to the culture, economy and well-being of Wales. [RCAHMW | Launch of the Royal Commission's Welsh Asian Heritage Project: Celebrating and Archiving the Experiences of Ugandan Asians](#).
- Race Council Cymru was awarded funding to develop a Codi Cymru Black Live Matter Exhibition, which was launched on 21 March 2024. The exhibition captures the stories of 27 Black Lives Matter activists from across Wales and is set to tour across Wales over the next two years. The exhibition aims to raise awareness of racial injustices, promote dialogue and encourage positive change.

Goal 5: Goal: Identify and meet targets to deliver anti-racist education and learning; including interpretation, marketing and educational materials that recognise and celebrate the rich and diverse cultural mix of our society, encourage widespread physical and intellectual engagement and so promote anti-racist practice and principles throughout.

- As a partner of DARPL (Diversity and Anti-Racist Professional Learning) Amgueddfa Cymru has developed new resources to support the delivery of the Curriculum for Wales. *Windrush Cymru* is a learning resource to explore the history and voices of the Windrush generation in Wales. The resources support in delivering against the goal within the Education section of this Plan '*To ensure that Black Asian and Minority Ethnic stories, contributions and histories are taught throughout the revised Curriculum for Wales*'.
- GEM Cymru has created [The new curriculum for Wales – a toolkit for museums](#) which provides guidance for museums to support them to deliver the new Welsh curriculum, work with diverse communities and identify and share Black, Asian and Minority Ethnic histories in galleries, collections and learning visits/resources.
- The National Library of Wales has begun work to diversify the Dictionary of Welsh Biography (DWB). The commissioning and publication of new articles about Black, Asian and Minority Ethnic people is ongoing, along with modification and revision of entries already included in the Biography due to unencyclopedic vocabulary or interpretive problems. Recent entries into the DWB include Abdullah Ali Al-Hakimi.
- Cadw has prepared a dedicated area of its website to celebrate Wales's rich and diverse heritage. This includes sections on key black figures associated with Welsh history, Gypsy, Roma and Traveller communities in Wales and other minority groups.

- The National library for Wales 'Communities of Wales' project is working with children and young people across Wales to embrace and celebrate our diverse cultural heritage. NLW is currently working with a youth organisation and five schools across Wales to tell stories through the lens of various people who have moved to Wales and helped to shape their communities, and to co-develop and deliver education and learning materials and opportunities that celebrate diversity and encourage anti-racist engagement.

### **What we will do**

Our goals for 2024/25 remain unchanged as they have not yet reached their agreed timescales. Our delivery partners, supported via our grant funding programmes and term of government remit letters, have committed to delivering on our current goals and actions to the end of the financial year. At the same time, we will focus our efforts on understanding emerging needs and developments within our sectors through an evidence-based approach. Our priorities for 2024-2025 are:

- To work with our sectors to capture practice and evidence of impact and to ensure funded organisations build legacy by embedding anti-racist practices in their wider work.
- To commission an evaluation of our current grant funded programmes and projects, to understand how effective they have been in delivering against our commitments in the Action Plan and how sustainable the outcomes are. The evaluation will provide an independent assessment of the grant programme implementation and impact of the schemes in delivering against our Culture, Heritage and Sport goals and actions. This will inform our approach to addressing anti-racism even more effectively, via refreshed goals and actions from 2025/26.
- To develop a digital learning platform to enable the Culture, Heritage and Sport sectors to continue to strengthen their professional learning and development on anti-racism.

## Key priority areas for consideration set out by the EAG:

**Implications for leadership and representation (for example, policy areas to improve their workforce, senior leadership and the arm's length bodies that we work with to be more diverse and representative of the local demographics.)** A key priority for our arm's length bodies is to diversify their workforce and boards. We are committed to working with our ALBs to encourage increased efforts in this area to diversify their workforce and increase representation in ways that extend beyond grant funding.

1. **Implications for intersectionality (cumulative impact of disadvantage i.e. disability, gender, sexual orientation, etc.).** Our grant funding takes an intersectional approach to maximise our impact on those facing multiple intersectional barriers, for example, funding has focused on race and disability.
2. **Implications for the needs of Gypsy, Roma, and Traveller people.** Our Culture Grant Scheme has a specific focus on Gypsy, Roma and Traveller people and Diverse Cymru has taken a proactive approach to promote the Scheme to the Gypsy, Roma and Traveller communities.
3. **Implications for any data/research needs.** We know that data collection is critical if we are to realise the improvements in participation, and engagement of Black, Asian and Minority Ethnic people in culture, heritage and sport and measure the impact of our commitments. We recognise that our evidence base is currently limited, and we will aim to work with delivery partners to capture quantitative and qualitative evidence. In addition, we are working with the Race Disparity Evidence Unit to better understand the gaps in evidence and data that exist, what we need to measure to understand the outcomes and impacts of our goals and actions, and how we can improve data collection.
4. **Strengthening complaints systems: Enhance current systems/mechanisms to make them more effective and responsive.** We will continue to work with and support our arm's length bodies to understand the complaint systems they currently have in place and identify any relevant issues to improve the current processes.
5. **Positive action as per the Equality Act 2010 – Fully implement this in team/board recruitments, as well as more broadly e.g., service delivery, engagement etc.** We will continue to encourage our arm's length bodies to implement positive action within their recruitment processes. As part of our grant schemes, we have made co-production with Black, Asian and Minority Ethnic people a prerequisite for all funded projects to ensure lived experience is at the centre of service design and delivery.

| Existing Actions   | Amended Actions  | Desired Outcomes  | By When           | Lead and Partners  | Key Priority Areas (1-6) |
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| <p><b>Action:</b></p> <p>Require the governing bodies and senior leaders of all funded organisations to adhere to performance requirements for anti-racism. These requirements may be set out through remit letters, award letters and other conditions of grant as appropriate.</p> | <p><b>CH&amp;S 1:</b></p> <p>Require the governing bodies and senior leaders of all funded organisations to adhere to performance requirements for anti-racism. These requirements may be set out through remit letters, award letters and other conditions of grant as appropriate.</p> | <p>Senior leadership and governing bodies are held to account for the Anti-racist principles that have been specified as a requirement for their funding.</p> | <p>March 2025</p> | <p>Amgueddfa Cymru</p> <p>Arts Council of Wales</p> <p>National Library of Wales</p> <p>Sport Wales</p> <p>Royal Commission on the Ancient and Historical Monuments of Wales</p> | <p>Priority area 1</p>   |
| <p><b>Action:</b> Require public bodies to establish working environments which are highly inclusive and anti-racist, including</p>  | <p><b>CH&amp;S 2:</b></p> <p>Require public bodies to establish working environments which are highly inclusive and anti-</p>  | <p>All members of the workforce including board members demonstrate measurable anti-racism in practice and decision-making and take responsibility for</p>    | <p>March 2025</p> | <p>Amgueddfa Cymru</p> <p>Arts Council of Wales</p>  | <p>Priority area 1</p>   |

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| <p>anti-racism training as a core component of professional learning and development.</p>  | <p>racist, including anti-racism training as a core component of professional learning and development.</p>   | <p>creating an inclusive working environment.</p>  |                   | <p>National Library of Wales<br/><br/>Sport Wales<br/><br/>Royal Commission on the Ancient and Historical Monuments of Wales</p>   |                               |
| <p><b>Action:</b> Publicly funded organisations to capture/ review baseline data of ethnic diversity across the organisation and, as appropriate, implement steps to increase ethnic diversity at all levels, specifically in leadership teams and on boards, by providing quality job opportunities in planning, design, curation and decision-making roles and measure progress.</p> | <p><b>CH&amp;S 3:</b><br/><br/>Publicly funded organisations to capture/ review baseline data of ethnic diversity across the organisation and, as appropriate, implement steps to increase ethnic diversity at all levels, specifically in leadership teams and on boards, by providing quality job opportunities in planning, design, curation and decision-making roles and measure progress.</p> | <p>A diverse board, senior management and workforce, providing visible role models and opportunities to Black, Asian and Minority Ethnic people.</p> | <p>March 2025</p> | <p>Amgueddfa Cymru<br/><br/>Arts Council of Wales<br/><br/>National Library of Wales<br/><br/>Sport Wales<br/><br/>Royal Commission on the Ancient and Historical Monuments of Wales</p> | <p>Priority areas 1 and 6</p> |

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| <p><b>Action:</b><br/>Encourage all publicly funded organisations to adopt 'positive' recruitment policies that will support and enable applications from and career pathways of under-represented groups; for example by reviewing and amending the design of application forms and methods of advertising posts, and providing training for both applicants and selection panels.</p> | <p><b>CH&amp;S 4:</b><br/>Encourage all publicly funded organisations to adopt 'positive' recruitment policies that will support and enable applications from and career pathways of under-represented groups; for example by reviewing and amending the design of application forms and methods of advertising posts, and providing training for both applicants and selection panels.</p> | <p>Increased diversity and inclusion within the workforce.</p>             | <p>March 2025</p> | <p>Amgueddfa Cymru<br/>Arts Council of Wales<br/><br/>National Library of Wales<br/><br/>Sport Wales<br/><br/>Royal Commission on the Ancient and Historical Monuments of Wales.</p> | <p>Priority area 1 and 6</p> |
| <p><b>Action:</b><br/>Review existing systems for reporting, and dealing with complaints of discrimination; including the identification and elimination of all</p>   | <p><b>CH&amp;S 5:</b><br/>Review existing systems for reporting, and dealing with complaints of discrimination; including the identification and elimination of all</p>   | <p>People are more confident in reporting incidents of discrimination.</p> | <p>March 2025</p> | <p>Amgueddfa Cymru<br/><br/>Arts Council of Wales<br/>National Library of Wales<br/><br/>Sport Wales</p>   | <p>Priority area 5</p>       |

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| forms of racial discrimination.  | forms of racial discrimination.  |  |                   | Royal Commission on the Ancient and Historical Monuments of Wales.   |                               |
| <p><b>Action:</b></p> <p>Undertake detailed financial assessments (including workforce expenditure) and make a specific reporting requirement for how grassroots organisations are supported) and on how funding resources are currently being used. This is to be underpinned by both quantitative and qualitative data and lived experience.</p> | <p><b>CH&amp;S 6:</b></p> <p>Undertake detailed financial assessments (including workforce expenditure) and make a specific reporting requirement for how grassroots organisations are supported) and on how funding resources are currently being used. This is to be underpinned by both quantitative and qualitative data and lived experience.</p> | <p>Improved transparency in terms of funding resources, including on how grassroots organisations are supported, leading to fairer and more equitable distribution of financial support.</p> | <p>March 2025</p> | <p>Welsh Government</p> <p>Amgueddfa Cymru</p> <p>Arts Council of Wales</p> <p>National Library of Wales</p> <p>Sport Wales</p> <p>Royal Commission on the Ancient and Historical Monuments of Wales</p> | <p>Priority area 4</p>        |
| <p><b>Action:</b></p> <p>Review the funding application process to improve outcomes for Black Asian and Minority</p>   | <p><b>CH&amp;S 7:</b></p> <p>Review the funding application process to improve outcomes for Black Asian and Minority</p>   | <p>Equitable availability and accessibility of funding.</p> <p>Measurably increased number of Black, Asian and Minority</p>  | <p>March 2025</p> | <p>Welsh Government</p> <p>Amgueddfa Cymru</p>   | <p>Priority areas 2 and 3</p> |

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| <p>Ethnic-led organisations or people, including where necessary by supporting applicants and potential applicants to make applications.</p>  | <p>Ethnic-led organisations or people, including where necessary by supporting applicants and potential applicants to make applications.</p>   | <p>Ethnic people or organisations applying for and accessing funding.</p>  |                   | <p>Arts Council of Wales<br/>National Library of Wales<br/><br/>Sport Wales<br/>Royal Commission on the Ancient and Historical Monuments of Wales</p>  |                                  |
| <p><b>Action:</b><br/>Work with funding bodies to co-produce bids from small or Black, Asian and Minority Ethnic-led organisations to improve outcomes for Black, Asian and Minority Ethnic groups.</p> | <p><b>CH&amp;S 8:</b><br/><br/>Work with funding bodies to co-produce bids from small or Black, Asian and Minority Ethnic-led organisations to improve outcomes for Black, Asian and Minority Ethnic groups.</p> | <p>Increase in targeted support and resources for ethnic minority communities.<br/><br/>Organisations can access funding more effectively, enhancing their ability to deliver tailored programs that address the specific needs of ethnic minority groups.</p> | <p>March 2025</p> | <p>Welsh Government<br/><br/>Amgueddfa Cymru<br/><br/>Arts Council of Wales<br/><br/>National Library of Wales<br/><br/>Royal Commission on the Ancient and Historical Monuments of Wales<br/><br/>Sport Wales (especially the Arts Council of Wales and Sport Wales).</p> | <p>Priority areas 1, 2 and 3</p> |

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| <p><b>Action:</b><br/>Identify a specific ring-fenced resource to support grassroots cultural, creative and sporting activities among Black, Asian and Minority Ethnic groups and promote this to encourage applications, taking account of intersectional disadvantages and specific issues relating to community languages.</p> | <p><b>CH&amp;S 9:</b><br/>Identify a specific ring-fenced resource to support grassroots cultural, creative and sporting activities among Black, Asian and Minority Ethnic groups and promote this to encourage applications, taking account of intersectional disadvantages and specific issues relating to community languages.</p> | <p>Increased opportunities to participate and initiate culture, heritage and sport initiatives that meet the needs and aspirations of Black, Asian and Minority Ethnic groups at a grassroots level.</p> | <p>March 2025</p>  | <p>Welsh Government,<br/><br/>Arts Council of Wales,<br/><br/>Sport Wales</p> | <p>Priority areas 1, 2 and 3.</p> |
| <p><b>Action:</b><br/>Support the participation in active lifestyles of women and girls from Black, Asian and Minority Ethnic groups, taking account of intersectional disadvantages, languages and the most disadvantaged groups.</p>  | <p><b>CH&amp;S 10:</b><br/>Support the participation in active lifestyles of women and girls from Black, Asian and Minority Ethnic groups, taking account of intersectional disadvantages, languages and the most disadvantaged groups.</p>   | <p>Increased opportunities for Black, Asian and Minority Ethnic women and girls to participate at a grassroots level in sport relevant to their needs and aspirations.</p>                               | <p>March 2024.</p> | <p>Sport Wales</p>  |                                   |

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| <p><b>Action:</b><br/>Co-design opportunities with grassroots community-based organisations to engage Black Asian and Minority Ethnic individuals (including women, girls, disabled people, elders, people who identify as LGBTQ+, and people whose first language is not English or Welsh) to express their creativity, heritage, language, cultural identity and origins. These activities will allow people to come together to celebrate our diverse but shared cultural heritage including through visual and performing arts, including contemporary street art, fashion, poetry, dance, sport and music.</p> | <p><b>CH&amp;S 11:</b><br/>Co-design opportunities with grassroots community-based organisations to engage Black Asian and Minority Ethnic individuals (including women, girls, disabled people, elders, people who identify as LGBTQ+, and people whose first language is not English or Welsh) to express their creativity, heritage, language, cultural identity and origins. These activities will allow people to come together to celebrate our diverse but shared cultural heritage including through visual and performing arts, including contemporary street art, fashion, poetry, dance, sport and music.</p> | <p>Greater diversity and inclusion in cultural heritage and increased understanding of different cultures.</p> <p>Mutual understanding and spaces for cross-cultural collaboration enriching the broader community's cultural fabric.</p> | <p>March 2025: initiatives delivered.</p> | <p>Welsh Government<br/>Amgueddfa Cymru<br/>Arts Council of Wales<br/>National Library of Wales<br/><br/>Sport Wales<br/><br/>Royal Commission on the Ancient and Historical Monuments of Wales</p> |  |
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| <p><b>Action:</b><br/>Marketing and advertising materials are anti-racist and reflect the true depth of our diverse cultural heritage while avoiding stereotyping and cultural appropriation.</p>   | <p><b>CH&amp;S 12:</b><br/>Marketing and advertising materials are anti-racist and reflect the true depth of our diverse cultural heritage while avoiding stereotyping and cultural appropriation.</p>  | <p>Communication in public spaces is overtly anti-racist and is inclusive of the diverse groups and communities of Wales.</p>         | <p>Ongoing</p> | <p>Amgueddfa Cymru<br/><br/>Arts Council of Wales<br/><br/>National Library of Wales<br/><br/>Sport Wales<br/><br/>Royal Commission on the Ancient and Historical Monuments of Wales</p> | <p>Priority areas 1,2 &amp; 3</p>  |
| <p><b>Action:</b> Use Creative Wales' funding mechanisms and its relationship with public service broadcasters through the development of Memorandums of Understanding, to encourage and support a more anti-racist sector that produces content that reflects the reality of our diverse cultural heritage and</p> | <p><b>CH&amp;S 13:</b><br/>Use Creative Wales' funding mechanisms and its relationship with public service broadcasters, including through our Memorandums of Understanding with the BBC and S4C, to encourage and support a more anti-racist sector that produces content that reflects the reality of our diverse</p> | <p>Black, Asian and Minority Ethnic candidates successfully apply for trainee opportunities provided in WG supported productions.</p> | <p>Ongoing</p> | <p>Creative Wales<br/><br/>Public service broadcasters</p>   | <p>Priority areas 1, 2 &amp; 3</p> |

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| provides opportunities for Black, Asian and Minority Ethnic people in front of and behind the camera   | cultural heritage and provides opportunities for Black, Asian and Minority Ethnic people in front of and behind the camera.   |  |  |  |                         |
| <b>Action:</b> Work with partners in the development of Creative Wales' action plans for priority sectors to ensure a specific anti-racist focus on actions that addresses under-representation in the creative industries and supports inclusive pathways into the sector | <b>CH&amp;S 14:</b><br>Work with partners through Creative Wales stakeholder groups for priority sectors and through the Creative Skills Advisory Panel to promote the importance of an anti-racist focus and actions that addresses under-representation in the creative industries and supports inclusive pathways into the sector. | More trainee opportunities provided in WG supported productions.   | Ongoing  | Creative Wales<br><br>Creative Wales priority sector stakeholder groups<br><br>Creative Skills Advisory Panel<br><br>Creative Wales Non-Exec Board | Priority areas 1, 2 & 3 |
| <b>Action:</b><br>Review and decolonise our public spaces and collections by appropriately addressing the way in which people  | <b>CH&amp;S 15:</b><br>Review and decolonise our public spaces and collections by appropriately addressing the way  | People and events with known historical associations to slavery and colonialism are portrayed in an anti-racist way – one that recognises historical injustices and presents | March 2024: new guidance.<br>March 2025: implementation. | Welsh Government<br><br>Amgueddfa Cymru  | Priority area 1         |

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| <p>and events with known historical associations to slavery and colonialism are commemorated, acknowledging the harm done by their actions and reframing the presentation of their legacy to fully recognise this.</p>  | <p>in which people and events with known historical associations to slavery and colonialism are commemorated, acknowledging the harm done by their actions and reframing the presentation of their legacy to fully recognise this.</p>   | <p>a balanced narrative that includes all perspectives.</p>   |                    | <p>Arts Council of Wales</p> <p>National Library of Wales</p> <p>Sport Wales</p> <p>Royal Commission on the Ancient and Historical Monuments of Wales</p> <p>Local Authorities</p> |                               |
| <p><b>Action:</b><br/>Work with Black, Asian and Minority Ethnic communities to identify and lift barriers to accessing heritage sites and cultural collections.</p> <p>Tell stories through the lens of Black, Asian and Minority Ethnic people's experiences (past and present) in our galleries and museums, including through permanent</p> | <p><b>CH&amp;S 16:</b><br/>Work with Black, Asian and Minority Ethnic communities to identify and lift barriers to accessing heritage sites and cultural collections.</p> <p>Tell stories through the lens of Black, Asian and Minority Ethnic people's experiences (past and present) in our galleries and museums, including through</p> | <p>Black, Asian and Minority Ethnic people are truly represented in the rich and diverse nature of our shared heritage.</p> <p>Black Asian and Minority Ethnic communities report that the voices of those neglected in the historical narratives of the past and present are amplified and celebrated.</p> | <p>March 2025.</p> | <p>Amgueddfa Cymru</p> <p>Arts Council of Wales</p> <p>National Library of Wales</p> <p>Sport Wales</p> <p>Royal Commission on the Ancient and Historical Monuments of Wales</p>   | <p>Priority areas 2 and 3</p> |

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| displays, celebrating their contribution and recognising their presence in the history of Wales.  | permanent displays, celebrating their contribution and recognising their presence in the history of Wales.   |  |                     |   |                           |
| <b>Action:</b><br>Relevant bodies to report on how they have reviewed and redesigned the historical narrative informed by lived experiences, ensuring that the Black, Asian and Minority Ethnic individuals and groups who participate and share lived experience are paid appropriately for their time and experience. | <b>CH&amp;S 17:</b><br>Relevant bodies to report on how they have reviewed and redesigned the historical narrative informed by lived experiences, ensuring that the Black, Asian and Minority Ethnic individuals and groups who participate and share lived experience are paid appropriately for their time and experience. | The historical narrative of Wales truly represents the rich and diverse nature of our shared heritage.   | March 2025          | Amgueddfa Cymru<br><br>Arts Council of Wales<br><br>National Library of Wales<br><br>Sport Wales<br><br>Royal Commission on the Ancient and Historical Monuments of Wales |                           |
| <b>Action:</b><br>Review online and social media content to improve visibility and encourage accessibility – seeking out and working with Black,  | <b>CH&amp;S 18:</b><br>Review online and social media content to improve visibility and encourage accessibility – seeking out and working with Black,  | Content is disseminated through a wider range of networks and channels, using a wider range of materials and methods that meet the needs of Black, Asian and | March 2025, ongoing | Amgueddfa Cymru<br><br>Arts Council of Wales<br><br>National Library of Wales   | Priority areas 1, 2 and 3 |

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| <p>Asian and Minority Ethnic groups and individuals, to uncover untold stories and celebrate success.</p>  | <p>Asian and Minority Ethnic groups and individuals, to uncover untold stories and celebrate success.</p>   | <p>Minority Ethnic groups and individuals to support engagement</p> <p>Online culture, heritage and sport content is reported by Black, Asian and Minority Ethnic communities to be more sensitive, accessible, equitable and anti-racist, with materials available in different languages.</p>  |                   | <p>Sport Wales</p> <p>Royal Commission on the Ancient and Historical Monuments of Wales</p> <p>(as appropriate)</p>  |                          |
| <p><b>Action:</b></p> <p>Build on and further link the stories of Black, Asian and Minority Ethnic people within existing educational and cultural programmes, including the Curriculum for Wales, Fusion, Hwb, Cynefin and the People's Collection Wales.</p> | <p><b>CH&amp;S 19:</b></p> <p>Build on and further link the stories of Black, Asian and Minority Ethnic people within existing educational and cultural programmes, including the Curriculum for Wales, Fusion, Hwb, Cynefin and the People's Collection Wales.</p> | <p>Reported increased awareness amongst all the population, especially young people, of the valuable contributions of Black, Asian and Minority Ethnic people to life in Wales.</p> <p>Reported greater engagement with our cultural organisations from an early age in a truly anti-racist way for all children and young people, which continues throughout their education and lifelong learning.</p> | <p>March 2025</p> | <p>Amgueddfa Cymru</p> <p>Arts Council of Wales</p> <p>National Library of Wales</p> <p>Sport Wales</p> <p>Royal Commission on the Ancient and Historical Monuments of Wales</p> <p>(as appropriate)</p> | <p>Priority 2 &amp;3</p> |

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## **Crime and Justice – Refreshed chapter**

This chapter brings together our work on criminal justice, where we are working with a range of partners to tackle racism across the justice system. The first section of the chapter gives an overview of our activity in the justice space as a whole, and then the second provides a detailed view of our work on hate crime. This is an area where we are taking forward a number of initiatives with partners to support people and communities.

### **Introduction – Criminal Justice**

Criminal justice (prison, police, probations, courts and related areas) is not devolved in Wales, however Welsh Government is responsible for areas that are often drivers of crime such as health, substance misuse, accommodation and education. What this means is that whilst we have responsibility for many of the reasons why people commit crime, we do not alone have the levers to address the disproportionality throughout the criminal justice system. To achieve change we need to work with our partners to do all that we can to address the very real concerns of ethnic minority groups.

Whilst we recognise what the Welsh Government can influence in the criminal justice space is limited, we do have a role in displaying leadership and representation, working with partners to ensure there is robust data and real change.

We are also progressing the case for devolution of parts of the justice system to Wales, which will give us more levers to directly tackle racism in the justice system. In May 2022, *Delivering Justice for Wales* was published, setting out what we have done, and are planning to do, to deliver social justice, reduce crime and reduce levels of demand on the justice system. We published an update on progress against *Delivering Justice for Wales* in February 2024.

Since the publication of ArWAP, the Welsh Government has continued to work with criminal justice partners including Policing in Wales, the Ministry of Justice, the Home Office, His Majesty's Prison and Probation Service in Wales (HMPPS in Wales) and Youth Justice Board Cymru to deliver on the shared goals outlined in the Crime and Justice chapter.

The [Criminal Justice Anti-Racism Action Plan for Wales](#) (CJARAP) launched in September 2022. It was developed jointly by Criminal Justice in Wales partners including Policing in Wales, HM Courts and tribunals Service, His Majesty's Prison and Probation Service in Wales and Welsh Government. It sets out seven commitments to help realise an anti-racist justice system in Wales in practice. The CJARAP complements ARWAP and we have agreed an approach to ensure consistency between the two plans.

CJARAP is the key mechanism for driving change in the criminal justice space and we play an important support and scrutiny role in making this happen. The actions below capture our role in supporting CJARAP, as well as highlighting some of the action we are taking in the limited areas of the justice system where we hold the key levers for change.

## What we will do

The External Accountability Subgroup for this chapter provided a clear steer that original actions are still appropriate, however this refresh provides opportunity to streamline and provide further focus to the actions and the intended outcomes of delivering against them.

As a result our priorities for the next two years are not considerably different from those in the first iteration of the plan. However, the refreshed chapter sets out how we are using the specific levers at Welsh Government's disposal to embed anti-racism. The actions in this chapter focus on the key areas where we can drive change using our responsibilities and powers as Welsh Government, ensuring we maximise the change we can deliver in practice.

| Existing Actions   | Amended Actions  | Desired Outcomes   | By When   | Lead and Partners   | Key Priority Areas (1-6) |  |
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| <b>Goal: To work with the police and other criminal justice partners (e.g. Criminal Justice in Wales and members within it) to create an anti-racist criminal justice system in Wales, taking a challenging and radical approach to improve outcomes and to tackle systemic racism.</b>  |  |  |   |   |                          |  |
| <b>Action:</b> Working with criminal justice partners, publish the Criminal Justice Anti-Racism Action Plan for Wales, setting out the concrete and tangible action we will take forward together to tackle inequality and to create an anti-racist criminal justice system<br><br><b>Action:</b> Deliver relevant actions agreed under the above Criminal Justice | <b>C&amp;SJ 1:</b> Through the Criminal Justice Board for Wales, provide oversight of the delivery of the Criminal Justice Anti-Racism Action Plan for Wales, ensuring that progress is made and outcomes improve. | Reduced levels of discrimination and diverse outcomes for people from ethnic minorities across the system.<br><br>Ethnic minority people will have increased confidence and trust in, and where relevant improved experiences of, the criminal justice system. | Ongoing. The Criminal Justice Anti-Racism Action Plan was published in September 2022. Change will take time and determination, with work likely to last beyond 2030. | Welsh Government<br>Community Safety Division,<br>scrutinising the work of justice partners | 1 and 6                  |  |

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| <p>Anti-Racism Action Plan for Wales.</p> <p><b>Action:</b> Through the Criminal Justice Board for Wales, provide oversight of the delivery of the Criminal Justice Anti-Racism Action Plan for Wales, ensuring that progress is made and outcomes improve.</p> |  |  |  |  |  |  |
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**Goal: To use the levers within the Welsh Government PCSO commitment to tackle discrimination and support an anti-racist approach.**

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| <p>Explore broader positive action to recruit more ethnic minority personnel across the police forces in Wales and at all different levels.</p> <p>Use the Wales Police Community Support Officer Steering Group to monitor the ethnicity of PCSOs in Wales, providing constructive challenge if numbers do not reflect the population of each force area.</p> | <p><b>C&amp;SJ 2:</b> Explore broader positive action to recruit more ethnic minority personnel across the police forces in Wales and at all different levels.</p> <p>Use the grant administration process and Wales Police Community Support Officer Steering Group to monitor the ethnicity of PCSOs in Wales, providing constructive challenge when needed to understand why numbers do not reflect the population of each force area.</p> | <p>A more robust, systematic, consistent approach to collecting police workforce data on ethnicity and race in Wales, resulting in a stronger evidence base to inform the decision making process in the recruitment of ethnic minority personnel.</p> <p>The Welsh Government funded PCSOs represent the communities they serve.</p> | <p>Ongoing: An agreed monitoring system is in place to capture key data.</p> | <p>Welsh Government Community Safety Division</p> | <p>1 and 6</p> |  |
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| <p><b>Goal: To strengthen the evidence base to identify racial disparity in the justice system by providing advice and guidance to stakeholders, and by increasing confidence and trust of Minority Ethnic people in the use of their data.</b></p>  |  |  |   |   |  |  |
| <p>Raise awareness of the Welsh Government's Race Disparity Evidence Unit with criminal justice partners in Wales, and identify how best to help all partners to improve the evidence available on racial disparity within the justice system in Wales and use this to support better policy decisions and monitoring.</p> | <p><b>C&amp;SJ 3:</b> The Race Disparity Evidence Unit will continue to work with criminal justice partners to advise on how best to improve the evidence available on racial disparity within the justice system in Wales and support better policy decisions and monitoring.</p> | <p>The availability of data to measure progress of the actions are improved.</p>   |   |   |  |  |
| <p>Identify the gaps in evidence in relation to all domains including criminal justice data collected and reported on ethnicity and race as one of the first priorities of the Race Disparity Evidence Unit, via an audit of data collections held/outputs produced by the Welsh Government and the</p>                    | <p><b>C&amp;SJ 4:</b> Identify the gaps in evidence in relation to all domains including criminal justice data collected and reported on ethnicity and race.</p>   | <p>Gaps in the evidence available to measure progress of the plan are identified and actions can be taken to rectify those gaps.</p> | <p>To continuously monitor the granularity and availability of ethnicity data in the crime and justice sector</p> | <p>Criminal Justice partners in collaboration with the Race Disparity Evidence Unit</p> |  |  |

|  |  |  |         |  |         |  |
|--|--|--|---------|--|---------|--|
| wider public/ third sector.  |  |  |         |  |         |  |
| <p><b>C&amp;SJ 5:</b> Building on this initial assessment, take forward a programme of work to improve the evidence base to identify racial disparity within the criminal justice system, including ongoing engagement with ethnic minority people to improve their knowledge/trust in how their data will be used to increase their confidence to share data.</p> | No change  | A more robust, systematic, consistent approach to collecting and reporting criminal justice data on ethnicity and race in Wales, resulting in a stronger evidence base to inform the decision making process in the criminal justice system in Wales. A reported increase in confidence to share data by ethnic minority people. |         | Criminal Justice partners in collaboration with the Race Disparity Evidence Unit |         |  |
| <p><b>Goal: To develop our skills and confidence in understanding what an anti-racist justice system looks like, and to robustly influence and encourage anti-racist policy from the UK Government.</b></p>  |  |  |         |  |         |  |
| <p>Ensure development and training opportunities of key officials and those influencing UK Government and Welsh Government policy to understand and argue for an anti-racist justice system.</p> <p>Take every action possible to highlight</p>  | <p><b>C&amp;SJ 6:</b> Ensure development and training opportunities on anti-racism are in place for the Welsh Government's Crime and Justice team and other relevant officials, so they can fully embed this approach in their work.</p> | <p>Welsh Government's Crime and Justice team have a strong understanding of Anti-racism embedded in their approach to work.</p>  | Ongoing | <p>The Welsh Government, working closely with UK Government leads</p>            | 1 and 2 |  |

|  |                                    |  |  |  |          |  |
|--|------------------------------------|--|--|--|----------|--|
| <p>the needs and experiences of people from ethnic minorities, and the understanding and importance of an anti-racist approach, through our response to UK Government policy and legislation in the justice space.</p>   |                                    |  |  |  |          |  |
| <p><b>Goal: To continue to pursue the case for the devolution of justice and policing to Wales, which will build on The Thomas Commission report on Justice in Wales recommendation that crime reduction policy should be determined and delivered in Wales.</b></p> |                                    |  |  |  |          |  |
| <p>Take forward our Programme for Government commitment to pursue the case for devolution of justice and policing to Wales.</p>  | <p><b>Action to be removed</b></p> | <p>Our work with experts in youth justice, probation and policing is helping us to understand how devolution would work in practice.</p> | <p>Ongoing. The justice devolution work programme is a long-term programme expected to last at least ten years. We will provide updates on individual projects underneath the broader work programme to the Accountability Group</p> | <p>The Welsh Government Justice Policy Division.</p> | <p>4</p> |  |

## Hate Crime

### Some evidence

- According to the National Hate Crime Statistics for England and Wales 2022/2023, there were 6,041 recorded hate crimes across the four Welsh Police Force Areas of which 3,727 (62%) were race hate crimes. (UK Government 2023)
  - This represented a 4% decrease in recorded race hate crimes across Wales compared to 2021/2022. This was the first annual fall since the Home Office began collecting comparable data ten years ago. (UK Government 2023).

### Introduction

Criminal justice policy is not devolved to Welsh Government. The UK Government is responsible for the Police, Courts and hate crime legislation. The Welsh Government's ability to directly address the prevalence of hate crime is therefore limited. We work closely with UK Government and criminal justice agencies to influence their decisions and actions.

The Wales Hate Support Centre continues to provide an independent and high-quality support and advocacy service which promotes victim-centred choices for victims of race hate crime across Wales. The Centre uses a range of outreach and engagement methods to ensure it is reaching socially and geographically excluded communities and is focused on inclusiveness and intersectionality. The service is free, multilingual, and available 24 hours a day, every day of the year.

*"I felt so lost. But your support helped me to understand what should be happening, it helped me see a light in the darkness I was feeling. My family were at a loss. I can't thank you enough."* – Wales Hate Support Centre service user.

The Centre now delivers a national hate crime service for children and young people, which has been a significant new offer in Wales. This includes advocacy and support for family members affected by race hate crimes.

The 4% decrease in recorded race hate crimes in Wales (National Hate Crime Statistics for England and Wales 2022/2023) immediately raised concerns that these crimes are going unreported due to various barriers. The Centre's Lived Experience Advocacy Forum (LEAF) conducted a piece of work on barriers to reporting hate crime, which identified several common issues which prevent or persuade victims of hate crime from reporting. These barriers included previous poor experience when reporting a hate crime, not knowing about the support available to victims, concerns about not being taken seriously, and mistrust in the criminal justice system.

Addressing some of the identified barriers remains challenging due to the non-devolved nature of justice in Wales. However, we place collaboration at the heart of our work, working closely with Criminal Justice partners via the Hate and Community Tensions Board Cymru. We

worked with Criminal Justice in Wales to co-produce a piece of research around hate crime perpetrators, which explored out of court alternatives to addressing hate crime, perpetrator diversion schemes, and restorative justice practices with the aim of better understanding what techniques have been successful when influencing behavioural change.

In February 2023, we relaunched Hate Hurts Wales to coincide with Black History Month with media activity running throughout the year including television, radio, online and out of home advertising. The refreshed version of the campaign aimed to empower victims to report hate crime and called for witnesses and bystanders to step forward and report incidents. As part of the monitoring of the campaign, we conducted an omnibus survey either side of the activity to develop a baseline of awareness and attitudes. Overall, we saw a decrease in the willingness of victims and bystanders to report hate with a drop from 66% to 59% of the people surveyed. However, we did see a positive response from the Minority Ethnic people who took part in the survey. We saw a 21% increase in Minority Ethnic people who said they would be willing to report if a victim of hate crime (56% to 77%) and an 8% increase in Minority Ethnic people who said they would report if they were a bystander (69% to 77%). There was also a 12% decrease in Minority Ethnic people who agreed with the statement 'there's no point in reporting a hate crime' (27% to 15%). Although a small sample, it does provide encouraging evidence that targeted communications can make a difference in raising awareness and highlighting the importance of reporting hate crime.

Tackling online hate remains a challenging and prevalent global issue. Whilst there is plenty that Welsh Government can do, such as supporting victims of online hate via the Wales Hate Support Centre and through education via Keeping Safe Online, what has become clear since the launch of the Anti-Racist Wales Action Plan is that we need to work with partners in this area as telecommunications is not devolved. This is why we have been strengthening links with Ofcom as it takes on its new role as regulator of online safety in the UK. We have also conducted a piece of engagement work with social media companies to build relationships and an avenue to directly flag up concerns and issues around hate on their platforms.

We have independently reviewed the effectiveness of the Community Cohesion Programme and have shaped the work of the programme around the priorities identified via engagement with a range of organisations, including those representing minority ethnic people. In December 2022, we secured longer term funding for the programme to help map out long-term strategic goals within the work of the teams.

### **What we will do**

In response to the decrease in recorded race hate crime in Wales and to concerns that race hate crime is going unreported, we will focus on addressing barriers to reporting hate crime. We will continue to focus on encouraging both victims and bystanders to report incidents of race hate crimes, through initiatives such as our anti-hate crime campaign Hate Hurts Wales, and the awareness raising activities of the Wales Hate Support Centre. In recognition that trust issues may discourage ethnic minority people from reporting hate crime to the police, we will have an increased focus on third-party reporting as an option to report hate crime. We will provide more signposting to the Wales Hate Support Centre via Hate Hurts Wales and do more to highlight the support and advocacy available, as well as providing information on what happens when a victim or bystanders contacts the service, to help building an understanding of the process.

The review of the Community Cohesion Programme recognised that one of the main strengths of the Programme was its flexibility to respond to emerging and unforeseen issues, such as assisting with the delivery of resettlement schemes or supporting community members through periods of heightened community tensions. Going forward, this flexibility will remain central to the programme to ensure we have the capacity to support communities when they need it the most.

We will focus on Islamophobic and Antisemitic hate crime and will work with the Holocaust Memorial Day Trust to mark the 80<sup>th</sup> anniversary of the liberation of Auschwitz-Birkenau in January 2025. Although out of our powers, we will endeavour to work with police and Home Office to improve the collection of categorised religious hate crime in Wales to better understand the scale of the issue.

#### **6. Implications for leadership and representation**

The Wales Hate Support Centre's Lived Experience Advocacy Forum (LEAF) is central to this approach and to ensuring that people with lived experience are providing valuable insight to shape and review our work and we are continually seeking improvement of these initiatives, such as reviewing the development of resources and messaging for Hate Hurts Wales.

#### **7. Implications for intersectionality**

The five strands of hate crime are represented in LEAF which helps ensure we are capturing intersectional experiences and to explore the commonality and shared experiences across the protected characteristics. The Wales Hate Support Centre provides an independent and high-quality support and advocacy service which promotes victim-centred choices for all victims of hate crime across Wales, including tailored support for those experiencing intersectional hate crime. The Hate Hurts Wales campaign resources will increase the visibility of intersectional experiences of hate crime.

#### **8. Implications for the needs of Gypsy, Roma, and Traveller people.**

The Community Cohesion Programme includes an action to support the fostering of good relations between Gypsy, Roma, and Traveller communities and the wider community, as well as supporting access services.

#### **9. Implications for any data/research needs.**

The Wales Hate Support Centre is providing statistics relating to hate crime referrals, including demographic breakdown of victims and police force area. The National Survey for Wales also helps us to monitor belonging and community cohesion across Wales.

#### **10. Strengthening complaints system: Enhance current systems/mechanisms to make them more effective and responsive.**

The Lived Experience Advocacy Forum will continue to review the services of the Wales Hate Support Centre, including its the complaints procedure. The Centre will respond to this feedback as part of its commitment to continually improve the service to better suit the needs of its users.

### 11. Positive action as per the Equality Act 2010

The Community Cohesion Programme includes an action to ensure that public bodies are engaging with minority groups and considering their perspectives and circumstances when developing policies or taking decisions which are likely to affect them.

| Existing Actions   | Amended Actions   | Desired Outcomes   | By When  | Lead and Partners                    | Key Priority Areas (1-6) |
|--|---|--|--|--------------------------------------|--------------------------|
| <p><b>Action:</b> Raise awareness of the impact of hate crime on victims from ethnic minority communities through our 'Hate Hurts Wales' campaign. This campaign will address victims, perpetrators and bystanders through various materials. Campaign materials will be developed with those who have been affected by racist hate crime.</p> | <p><b>C&amp;SJ 7:</b> Raise awareness of the impact of hate crime on victims from ethnic minority communities through our 'Hate Hurts Wales' campaign, encourage victims and bystanders to report hate crime and reinforce the message that victims of hate crime are protected by law in the UK.</p> | <p>Bystanders will better understand hate crime and be motivated to act in an anti-racist way in support of victims.</p> <p>Increased awareness of the option of third-party reporting if victims or bystanders do not feel comfortable approaching the police to report a hate crime.</p> | <p>By 31 March 2025.</p>                                       | <p>Cohesive Communities Division</p> | <p>2 and 6</p>           |
| <p><b>Action:</b> Enhance our support and advocacy for those who have experienced racist hate crime through a refreshed Wales Hate Support Centre, including consideration of incidents where intersectional hate has taken place and the</p>  | <p><b>C&amp;SJ 8:</b> Enhance our support and advocacy for those who have experienced racist hate crime through the Wales Hate Support Centre. Support is 'co-reviewed' with</p>  | <p>A more tailored support service, developed through the continual input of people with lived experience of hate crime.</p>   | <p>Ongoing. Contract will run until at least 31 March 2025</p> | <p>Victim Support</p>                | <p>2, 3 and 6</p>        |

|  |  |   |                   |  |         |
|--|--|---|-------------------|--|---------|
| specific support which may be required in those circumstances.   | people experiencing intersectional hate crime.   |   |                   |  |         |
| <b>Action:</b> Undertake direct work with hate crime perpetrators to better understand how to reduce racial abuse. | <b>C&amp;SJ 9:</b> We will work with partners to focus on developing ways of dissuading potential perpetrators before they commit hate offences and enter the justice system. Criminal justice policy is not devolved to Welsh Government.         | A greater understanding of why people commit hate crime.  | By 31 March 2025. | Cohesive Communities Division. Criminal Justice in Wales | 3 and 6 |
| <b>Action:</b> Counter online racist hateful attitudes.  | <b>C&amp;SJ 10:</b> Work with Ofcom and tech companies to counter online racist hate crime. Telecommunications and online regulation is not devolved to Welsh Government. We can only seek to influence UK Government actions through partnership. | An Increase in the awareness and understanding of the different mechanisms for reporting online hate crime.<br><br>Social media companies are aware of and respond to periods of heightened community tension in Wales. | By 31 March 2026. | Cohesive Communities Division                            | 3 and 6 |
| <b>C&amp;SJ 11:</b> Provide Third Sector based funding to build community cohesion and address community tensions. | No change – keep as is.  | Opportunities for grassroots community groups and those closest to the issues to deliver work to promote cohesion.  | By 31 March 2025. | Cohesive Communities Division                            | 3 and 6 |

|  |   |   |                |                                      |                |
|--|---|---|----------------|--------------------------------------|----------------|
| <p><b>Action:</b> Create sustainable funding arrangements to fund Holocaust Memorial Day.</p> <p>Continue funding Holocaust Education Trust (HET) “Lessons from Auschwitz” programme. Reinforce our commitment to the International Holocaust Remembrance Association definition of anti-Semitism.</p> <p>Mainstream tackling anti-Semitism in Welsh Government’s anti-racism training and policy-making processes.</p> <p>Ensure the Hate Hurts Wales campaign highlights the harm caused by religious hate and bigotry</p> | <p><b>C&amp;SJ 12:</b> Tackle anti-Semitic hate crime through increased awareness initiatives and highlighting religious hate through Hate Hurts Wales.</p> | <p>The Jewish community in Wales feels supported and is aware of the culturally appropriate hate crime support available to them.</p> | <p>Ongoing</p> | <p>Cohesive Communities Division</p> | <p>2 and 6</p> |
| <p><b>Action:</b> Work with faith groups, community leaders and equalities partners to explore the adoption of a definition of Islamophobia that fits the Welsh context.</p> <p>Mainstream tackling Islamophobia in the Welsh Government’s anti-racism</p>   | <p><b>C&amp;SJ 13:</b> Tackle Islamophobic hate crime through increased awareness initiatives and highlighting religious hate through Hate Hurts Wales.</p> | <p>The Muslim community in Wales feels supported and is aware of the culturally appropriate hate crime support available to them.</p> | <p>Ongoing</p> | <p>Cohesive Communities Division</p> | <p>2 and 6</p> |

|   |  |   |                          |                                      |                   |
|---|--|---|--------------------------|--------------------------------------|-------------------|
| <p>training and policy-making processes.</p> <p>Ensure the Hate Hurts Wales campaign highlights the harm caused by religious hate and bigotry.</p>  |  |   |                          |                                      |                   |
| <p><b>Action:</b> Community Cohesion Programme will focus on events and activities which foster good relations between groups through reducing segregation and increasing empathy and understanding.</p>      | <p><b>C&amp;SJ 14:</b> Community Cohesion Programme will deliver engagement and activities which foster good relations between groups through reducing segregation and increasing empathy and understanding. This engagement is tailored to each local area and will respond to existing or emerging community tensions where necessary.</p> | <p>Foster cohesion and forge links between people from different backgrounds.</p> | <p>By 31 March 2026</p>  | <p>Cohesive Communities Division</p> | <p>2, 3 and 6</p> |
| <p><b>C&amp;SJ 15:</b> 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.</p> | <p>No change</p>   | <p>Policymaking to be more inclusive of ethnic minority communities.</p>          | <p>By 31 March 2026.</p> | <p>Cohesive Communities Division</p> | <p>2, 3 and 6</p> |

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# Anti-racist Wales Action Plan

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### Evidence

Despite some improvements, the employment rate for Black, Asian, and Minority Ethnic individuals remains lower than that of white individuals. In 2022-23, the employment rate for Black, Asian and Minority Ethnic people aged 16 to 64 in Wales was 71.4%, an increase of 7.0 percentage points on the previous year and the employment rate for White people was 73.1%, a 0.9 percentage point decrease over the year, more information is contained within [Wellbeing of Wales, 2023: ethnicity and well-being \(gov.wales\)](#). The corresponding unemployment rate for Black, Asian and Minority Ethnic people aged 16 and over in Wales was 6.6%, more than double the rate for white people but a decrease of 2.8% points from the previous year. More information can be found in the [Labour market statistics \(Annual Population Survey\): April 2022 to March 2023 | GOV.WALES](#). Ethnic minority workers, in Wales, are generally more likely than white workers to be in insecure employment (8.0% than White workers which stands at 14.2%) in 2019/20 taken from the [Equality and Human Rights Monitor: Is Wales Fairer? \(equalityhumanrights.com\)](#).

### Introduction

The Programme for Government outlined our ambitions to create a Wales where individuals of all ages can receive a high-quality education, with jobs for all, where businesses can thrive in a net zero economy that champions fairness and equality. In [Stronger, fairer, greener Wales: a plan for employability and skills](#), we commit to targeting our employability programmes by building on evidence and the lived experience of those people we seek to support.

Over the last two years, we have had a particular focus on young people not in education, employment or training (NEETs) supporting young people to realise their potential through our Young Person's Guarantee. It provides young people aged between 16 – 24 in Wales with an ongoing offer of support to gain a place in education or training, find a job or become self-employed. The latest figures suggest in the three-year period ending December 2023, 9% of young Black, Asian and Minority Ethnic people in Wales were estimated to be NEET, compared to 13.4% of young White people ([Young people not in education, employment or training \(NEET\): 2023 | GOV.WALES](#)).

During May 2023, Welsh Government completed qualitative research on the lived experiences of learners and staff via a series of interviews and surveys to obtain a better real time understanding of the employability issues Black, Asian and Minority Ethnic people are facing when entering the labour market. The learners interviewed felt they had not experienced any discrimination in getting onto a programme of employability support, and their experiences on the programmes were positive, especially where deliverers and other participants were from racially diverse backgrounds. However, interviews highlighted the ongoing importance of representation, role models and community-based outreach facilities in building trust and encouraging participation among Black, Asian and Minority Ethnic young people in programmes. Many of these features have been built into the Jobs Growth Wales Plus programme and we are currently seeing more young people seeking access to the programme than had originally been anticipated, reflecting continued adverse impacts (including loss of confidence and anxiety) from the pandemic and the cost-of-living crisis.

Our employability programmes have also engaged increasing numbers of Black, Asian and Minority Ethnic young people, compared to previous years (see Programme Performance Data Dashboard below).

Since the publication of the Anti-Racist Wales Action Plan in 2022, progress has been made on the actions that are key to progressing the three goals within the Employability and Skills Section.

### Summary of achievements so far

#### **Goal: “Improved information and performance data on ethnic minority groups’ participation in the Welsh Government Skills and Employability programmes”**

We offer a number of employability programmes to enable people to enter or progress into employment or further learning, including:

- Jobs Growth Wales Plus (JGW+) - a training and development programme for 16-19 year olds that provides the skills, qualifications and experience needed to get a job or further training.
- ReAct Plus (ReAct+) – tailored support for people aged 20+ trying to re-enter the labour market by removing barriers and providing grant support for vocational training, and other costs such as travel and care (including childcare) for eligible participants.
- Communities for Work Plus (CfW+) - community-based employability mentoring and guidance delivered in partnership with Local Authorities across Wales.
- Apprenticeships - combining practical training in a job with study, leading to a nationally recognised qualification. Apprenticeships in Wales are open to anyone over the age of 16.
- Careers Wales and Working Wales provides professional careers advice to young people and adults across Wales.

Our Programme Performance Data Dashboard shows:

- Apprenticeship starts from people with a Black Asian and Minority Ethnic background has risen to 4.9% during the 2021/22 academic year, up from 2.7% during 2016/17.
- The percentage of CfW+ participants from Black Asian and Minority Ethnic backgrounds was 20%, compared to 7% on the previous associated programme Communities for Work. (Source May 2015-2023 [Evaluation of Communities for Work and Communities for Work Plus: Participant characteristics and experiences](#)).
- JGW+ 6.9% of programme starts from April 2023 to March 2024 were by Black, Asian and Minority Ethnic learners, compared to 6% in the previous year. (Source [Jobs Growth Wales+ statistics April 2023 to March 2024](#) and [April 2022 to March 2023](#))
- [ReAct Plus – 6.5% of approved applications between June 2022 and March 2024 were from ethnic minorities, compared to 2.7% of approved applications \(on ReAct III\) between January 2015 and May 2022](#) (unverified internal data).
- The 2022/23 Careers Wales, Working Wales annual report states: We collect anonymous protected characteristics data from customers who receive their service and uses this data to drive improvements. A non-mandatory survey was completed by 1,976 customers over the year, which was 6.6% of the total number of customers supported. The proportion of customers supported from Black/ African/ Caribbean/ Black

British backgrounds is almost double that in the population data for Wales. The overall representation of non-white ethnic groups among customers has significantly increased since the last report from 4.62% to 9.34%”.

**Goal: “The Welsh Government employability programmes will offer a safe, positive, and inclusive environment for all staff and participants, where racism is addressed”.**

We have undertaken a range of activities with our providers on anti-racism practice during the first iteration of ArWAP:

- Working with the Butetown Youth Development Project (BYDP) the CfW+ programme has provided outreach locations and operated out of faith buildings, sport facilities, youth clubs, street outreach, community buildings, women’s groups and partner organisations. Current monitoring data for CfW+ shows that in the Cardiff local authority area, 62.8% of individuals supported identified as Black, Asian or minority ethnic.
- JGW Plus Contractors are required to deliver activities for supporting mental health, well-being interventions, anti-racism training and awareness sessions (for all staff and participants).
- Careers Wales / Working Wales have implemented a staff training programme of anti-racism training and anti-racism awareness sessions to raise awareness of the experiences of Black, Asian and Minority Ethnic groups, with a specific focus on the intersectionality issues facing women and disabled people. Training includes prevent, your rights in the UK, what fuels prejudice, understand the impact of hate, good practice in the workplace and refresher training. All training is evaluated in-house to ensure it evolves and continues to meet needs. Carers Wales/Working Wals have also been developing co-shaped proposals to improve their delivery by working directly with young people from ethnic minority backgrounds to ensure their service is truly representative in order to raise career aspirations.
- The Get into Housing project provides ethnically diverse participants with experience, training, and access to employment opportunities with the long-term goal of gaining meaningful careers within and outside the housing sector. [The project](#) supported by the Young Person’s Guarantee alongside the Principality Building Society and Registered Social Landlords offered opportunities for people that identify from a minority ethnic background. The latest phase requires participants to be between the age of 18 – 24; unemployed; living in South Wales; and the first phase in 2022 saw 75% of participants securing permanent employment following their time on the project, 47% of which remained in the housing sector.
- Wales Union Learning Fund (WULF) has worked with trade unions to develop the essential skills and employability of the workforce, with a particular emphasis on removing barriers for traditional non-learners. Current delivery asks unions to extend and improve opportunities for lifelong learning and increase training and employment support for under-represented groups which includes ethnic minority workers. Some unions have been particularly successful in encouraging employers to engage in dialogue about their needs and gaps in order to work towards solutions. For example, some employers have requested more bespoke training to help with diversity panels and ethnic minority staff upskilling and WULF was able to respond. Some WULF Projects have been working with Diverse Cymru who have delivered Cultural Competency sessions. Another example is where a union runs a 'Race Matters' programme which promotes and provides training to help staff identify and challenge racism and inequality.
- Welsh Government has featured a range of role models from minority ethnic groups within its major campaigns such as “We’re in your corner” and “Feed your positivity”.

- The Young Persons Guarantee “National Conversation” has specifically targeted young people from minority ethnic groups in order to gain lived experience data to use when managing contractors. We intend to publish the results of this review, which has a focus on intersectionality and the experiences of women and disabled young people, later in 2024.
- We have also been working alongside the Learning and Work Institute on the production of an independent report regarding a family learning framework, developed with people with lived experience of barriers to education. Findings will be used to influence future practice across Wales .

### *Challenges*

- We have been focussed on ensuring our service providers work in an anti-racist way and tackle racism but this has been challenging given the complex nature of our programme structures and differing aims and objectives on programmes. During the next phase of the plan, we intend to complete a series of programme level deep dives which drive change in terms of anti-racism, ensuring that providers’ operations are inclusive, and not at risk of deepening any existing inequalities and disparities in supporting people into fair and rewarding work. We also have a unique window of opportunity in terms of co-designing employability programmes. The Plan for Employability and Skills commits us to bring all Welsh Government funded programmes into a single operating model (SOM) over the next two years. Focusing our efforts into a more flexible, person-centred approach. Current programmes of Jobs Growth Wales Plus, Communities for Work Plus and ReAct Plus are in scope and we will be using anti-racism as a lens to consider how the programme provides wider engagement and positive outcomes for people from ethnic minority communities, particularly where they face barriers that are intersectional in nature, and ensure better opportunities are made available to them.

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### **Goal: “To increase the number of ethnic minority people starting and completing Apprenticeships”.**

- The proportion of apprenticeship starts from ethnic minorities has risen to 4.9% during the 2021/22 academic year, up from 2.7% during 2016/17.<sup>1</sup> We have used the data we collect on the central post 16 data collection system - Lifelong Learning Wales Record (LLWR) to provide us with a trend breakdown on participation and enable us to benchmark ethnicity data by apprenticeship provider. This enables us to monitor completion data for ethnic minority people and take action with the apprenticeship provider if the dropout rate gives cause for concern.
- We have issued guidance to apprenticeship providers on how they should develop, monitor and evaluate organisational Anti-racist Action Plans. It is primarily intended for Commissioned Contract Holders which are Independent Training Providers. Commissioned Contract Holders, which are colleges, are expected to include apprenticeship delivery in their overall college anti-racist action plans. Providers have completed self-evaluation and action plans, with a need to fully involve their sub-contractors/consortium members. Actions aim to address

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<sup>1</sup> [Apprenticeship learning programmes started: interactive dashboard | GOV.WALES](#) (published 23 Aug 2023 – accessed 15.09.23)

any significant gaps or inconsistencies in policy and practice across sub-contractors. We are also working across the apprenticeship provider network where we use our monitoring processes to highlight good practice and take forward areas for improvement.

## What we will do

Our goals for the period 2024 – 2026 remain the same, we will, however, focus our efforts on a set of actions that take account of emerging needs and developments. We will focus more on data around participation and outcomes and best practice for different groups of learners making recommendations to improve the current employability and apprenticeship programmes. Also, ensure future employability programmes are designed using anti-racism as a critical development lens.

### Key Priority areas for consideration set out by the External Accountability Group

1. **Implications for leadership and representation (for example, policy areas to improve their workforce, senior leadership and the arms length bodies that we work with to be more diverse and representative of the local demographics).** We will continue to work with providers and employers across the employability system to act as champions for change. We are using our levers to affect positive changes to cultures, attitudes and behaviours to enable them to lead by example for others.
2. **Implications for intersectionality (cumulative impact of disadvantage i.e. disability, gender, sexual orientation, etc.)** Our agenda is not restricted to one particular protected characteristic. Our policies and programme delivery takes an intersectional approach in order to maximise our impact on those facing multiple intersectional barriers. For instance, we will work with the Disabled Peoples Employment Champions, and the Disabled Peoples Employment Working Group, with the aim of increasing access to support for people most at risk of disadvantage in the workplace.
3. **Implications for the needs of Gypsy, Roma, and Traveller people.** Our work encourages providers, stakeholders and employers to commit to actions aimed at addressing under-representation across all the protected characteristics at all levels of the organisation and to narrowing gender, ethnicity and disability employment gaps. We need to do more to focus on the employability needs for Gypsy, Roma and Traveller people. We will carry out deep dives to understand their needs and remove barriers to receiving employability support. We will also promote the adoption of effective processes to tackle bullying, harassment, and discrimination.
4. **Implications for any data/research needs.** We are committed to improving disclosure, disaggregated data collection and data reporting which is critical if we are to realise improvements in the employment outcomes of Black, Asian and Minority Ethnic people.
5. **Strengthening complaints system: Enhance current systems/mechanisms to make them more effective and responsive.** Our plans are to conduct Deep Dives into the management actions taken on anti-racism by employability providers and this will involve scrutiny of their complaints processes, also how they use data to seek out, understand and address the negative experiences of people from ethnic minority groups.
6. **Positive action as per the Equality Act 2010 – Fully implement this in team/board recruitments, as well as more broadly, e.g. service delivery, engagement etc.** Where Deep Dives identify weakness within the employability system we are committed to taking forward positive and proportionate action.

**Employability and Apprenticeships - Goals new and amended action table.**

**Goal: “The Welsh Government employability programmes will offer a safe, positive, and inclusive environment for all staff and participants, where racism is addressed”.**

| ARWAP 1 - Previous Actions  | New and amended Actions   | Desired Outcomes   | By When   | Lead and Partners  | Impact on Key Priority Areas (1-6) |
|---|---|--|---|--|------------------------------------|
| <p>Review and evaluate the data we collect on ethnic minority participants in Employability Programmes.</p> <p>Analyse participation and outcomes for different groups of learners in our statistical reporting, developing disaggregated data by differing ethnic minority groups and gender.</p> <p>An ongoing review of data using anti-racism as a lens of our employability programmes including Working Wales, ReAct+, and Jobs Growth Wales+</p> | <p><b>E&amp;S 1:</b><br/>                     Programme performance data will be collected and published regarding Black, Asian and Minority Ethnic participants on Welsh Government funded Employability Programmes.</p> <p>Work is ongoing to bring together a disaggregated data set in order to target our programmes more effectively.</p> | <p>Increased visibility and accountability, ensuring that Welsh Government employability programmes are anti-racist.</p> | <p>May 2025<br/>                     May 2026</p> | <p>Contracted providers, Careers Wales and Local Authorities</p> | <p>1, 2, 3, 4</p>                  |

**Goal: “The Welsh Government employability programmes will offer a safe, positive, and inclusive environment for all staff and participants, where racism is addressed”.**

| Previous Actions  | New and amended Actions   | Desired Outcomes  | By When                               | Lead and Partners  | Impact on Key Priority Areas (1-6) |
|---|---|---|---------------------------------------|--|------------------------------------|
| <p>Co-designed review of our employability programmes using anti-racism as a lens.</p> <p>Review actions taken on anti-racism within the workforce of our providers of learning and delivery organisations for employability programmes and services.</p> <p>Review delivery partner engagement to include a specific focus on understanding the experiences of women from ethnic minority communities to increase awareness of support available.</p> <p>Review community delivery locations to increase accessibility of provision to individuals from ethnic minority communities.</p> | <p><b>E&amp;S 2:</b><br/>Conduct a series of deep dives on providers who deliver Welsh Government funded employability programmes focusing on:</p> <ul style="list-style-type: none"> <li>-Participation and outcomes for different groups of learners</li> <li>-Management actions taken on anti-racism by providers, including complaints and how providers understand and address the negative experiences of people from ethnic minority groups, particularly women.</li> <li>-Provider effectiveness in terms of engagement with minority ethnic communities, with a specific focus on Gypsy, Roma and Traveller people.</li> <li>-The extent to which anti-racism training and anti-racism awareness sessions has been provided to staff working on employability programmes, and an evaluation of the effectiveness of the training.</li> <li>- Deep dives will be integrated into our evaluation framework in order to measure progress.</li> </ul> | <p>Improved experiences and outcomes of employability programmes for people from ethnic minority groups.</p> <p>A better understanding of where direct and effective anti-racist actions in programme delivery can be made.</p> | <p>Summer 2025</p> <p>Summer 2027</p> | <p>Contracted providers, Businesses, Careers Wales and Local Authorities</p> | <p>1,4 &amp;5, 6</p>               |

| Previous Actions  | New and amended Actions  | Desired Outcomes  | By When           | Lead and Partners  | Impact on Key Priority Areas (1-6) |
|---|--|---|-------------------|--|------------------------------------|
| <p>Review the impact of our support on women from Black, Asian and Minority Ethnic backgrounds in order to understand the issues they face and how we can support them through our programmes.</p> <p>Pack Page 100</p> | <p><b>E&amp;S 3:</b><br/>Examine issues related to race and racism with a critical perspective using lived experiences when we are designing, developing and delivering new employability programmes.</p> <p>Ensure the new Single Operating Model (SOM) for employability programmes provides wider engagement and positive outcomes for people from ethnic minority communities, particularly where they face barriers that are intersectional in nature to ensure better opportunities are available.</p> <p>Ensuring the SOM focuses on the need to increase the capacity of anti-racism training throughout its delivery network and that it is embedded into delivery practices.</p> | <p>Welsh Government employability programmes are anti-racist.</p> | <p>April 2026</p> | <p>Contracted providers, Businesses, Careers Wales, Local authorities, learners and equality organisations</p> | <p>1&amp;6</p>                     |

| Previous Actions  | New and amended Actions   | Desired Outcomes  | By When                               | Lead and Partners                         | Impact on Key Priority Areas (1-6) |
|---|---|---|---------------------------------------|---|------------------------------------|
| <p>Review and improve Careers Wales/Working Wales services to increase the number of ethnic minority people that access their services. Develop co-shaped proposals to raise career aspirations for young people from Black, Asian and Minority Ethnic backgrounds.</p> <p>Ensure providers continue to monitor the increased risks of COVID-19 when considering the needs of participants and staff from ethnic minority communities.</p> <p>Introduce a programme of anti-racism training and anti-racism awareness sessions for all programme providers and learners that will raise awareness of the experiences of Black, Asian and Minority Ethnic groups, including of the specific experience of women and disabled people.</p> | <p><b>E&amp;S 4:</b></p> <p>Careers Wales will take a strategic approach to reviewing the ethnicity and intersectionality of customers capturing their experiences and develop initiatives that will inform the future delivery of service.</p> <p>No action moving forward.</p> <p>Integrated into Deep Dive work on Employability Programmes and within the Employability Single Operating Model.</p> | <p>Ethnic minority experiences are captured and fed into the decision making process and publication of the Careers Wales Annual Report</p> | <p>Autumn 2025</p> <p>Autumn 2026</p> | <p>Careers Wales and Welsh Government</p> |                                    |

| Previous Actions  | New and amended Actions  | Desired Outcomes  | By When   | Lead and Partners                       | Impact on Key Priority Areas (1-6) |
|---|--|---|---|---|------------------------------------|
| <p>Roll out awareness and training on anti-racist recruitment practices and anti-racism awareness to businesses. Utilise the Wales Union Learning Fund (WULF). Working with trade unions to develop the essential skills and employability of the workforce, with a particular emphasis on removing barriers for traditional non-learners.</p> <p>Explore avenues for developing a co-created framework for family learning as a route into skills development of employment opportunities.</p> | <p>Utilise the Wales Union Learning Fund (WULF). Working with trade unions to develop the essential skills and employability of the workforce, with a particular emphasis on removing barriers for traditional non-learners.</p> <p>No action moving forward</p> | <p>Improved access to relevant training provided through WULF</p> | <p>Next round of WULF programme will begin in April 2025.</p> | <p>Welsh Government &amp; Wales TUC</p> | <p>-</p>                           |

**Goal: “To increase number of ethnic minority people starting and completing Apprenticeships”.**

| Previous Actions   | New and amended Actions   | Desired Outcomes   | By When         | Lead and Partners               | Impact on Key Priority Areas (1-6) |
|--|---|--|-----------------|---------------------------------|------------------------------------|
| <p>Apprenticeships - Issue Lifelong Learning Wales Record (LLWR) reports showing trend, breakdown and benchmarking ethnicity data to Lead Contract Holders (LCH.) Monitor completion data for ethnic minority people and action if drop rate is above thresholds. Utilise LCH contract management processes to highlight good practice and areas for improvement. Share good practice through Equality Diversity and Inclusion Monitoring Group and include monitoring targets as refreshed apprenticeship policy and monitor LCH against this target.</p> <p>Ensure case studies and promotional materials include ethnic minority people</p> | <p><b>E&amp;S 5:</b></p> <p>Working with Medr, programme performance data, including trends, benchmarking and completion data, will be collected and published regarding ethnic minority participants on Apprenticeships. We will also share good practice, develop case studies and ensure all promotional materials include ethnic minority people.</p> | <p>Improved experiences and outcomes for people from ethnic minorities when participating in Welsh Government employability support.</p> | <p>Annually</p> | <p>Apprenticeship providers</p> | <p>1</p>                           |

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

### Social Partnership and Fair Work

#### Evidence

- Recent evidence ([Well-being of Wales 2024](#)) shows the employment rate gap has generally decreased over time, although those from a Black, Asian and Minority Ethnic background continue to have a lower employment rate than white individuals.
- The ethnicity pay gap has generally widened since 2019, however data for 2023 shows a reduction in the pay gap falling from 16.8% in 2022 to 13.8% in 2023. ([Well-being of Wales 2024](#))
- In Wales, ethnic minority workers are more likely to be in insecure employment (8.0%) than White British workers (14.2%) in 2019/20. ([Equality and Human Rights Monitor – Is Wales Fairer](#))
- Ethnic Minority groups in Wales are more likely to report experiences of discrimination and bullying in the workplace. ([Equality and Human Rights Monitor – Is Wales Fairer](#))

#### Introduction

Since publication of the Anti-Racist Wales Action Plan in 2022, we have continued to work in social partnership to deliver our fair work agenda. This is an important lever in achieving an anti-racist Wales.

At an individual level, fair work empowers people to meet their needs, provides a sense of fulfilment and enables individuals to contribute, develop and grow. At a societal level, it enables inclusion, participation and social and economic development. Working in social partnership with employers and trade unions, we are able to challenge prejudice in the workplace, tackle workplace discrimination, bullying and harassment and promote anti-racism at work. This will require long-term and sustained changes in organisational cultures, behaviours, and ways of working. We have made progress against each of our Goals but recognise there is more to do.

Our refreshed set of actions have been developed in consultation with the External Advisory Group and Sub-Group.

## Summary of achievements so far

**Goal: To embed anti-racism into our social partnership structures and our approach to increasing the prevalence of fair work.**

We have established an 'Equality, Diversity and Inclusion' (EDI) sub-group of the [Workforce Partnership Council](#) (WPC). The WPC is a partnership of trade unions, employers, and Welsh Government. It covers the devolved public services in Wales and is a forum for cross-public services workforce matters. The EDI sub-group aims to promote best practice, remind devolved public bodies of their statutory obligations and encourage greater transparency on pay gaps and the actions organisations are taking to address them. Through the WPC, we developed and agreed a published [joint statement](#) which reinforces the importance of diversity monitoring and which encourages public bodies to review their data collection processes and to follow best practice. It also published a [report on diversity monitoring arrangements within 3 public sector bodies](#). We will aim to build on this work with further activity to promote more transparency and consistency in diversity pay gap reporting, recognising the importance of public bodies in Wales setting an example of best practice.

**Goal: To improve awareness, understanding and adoption of anti-racist workplace practices, processes and cultures.**

We have used our social partnership structures to promote fair work at a sectoral level including through the Retail Forum and Social Care Fair Work Forum. These have provided valuable opportunities to work jointly with employers and unions to address issues relating to anti-racism and equality, diversity and inclusion in the workplace. As a result of this work, the [Social Care Fair Work Forum](#) has established an EDI sub-group and the [Retail Forum](#) has published the [Retail Action Plan](#) that includes actions to produce guides on wellbeing, equality, diversity and inclusion for the sector.

In August 2023, the Welsh Government published its first Modern Slavery Statement. The Statement raises awareness of modern slavery and highlights what we are doing to reduce the risk of labour market abuse and exploitation. To help provide leadership and co-ordination to efforts to prevent and tackle modern slavery and support survivors, we have established the Anti-Slavery Wales Forum and its working groups on training and awareness; victims and survivors; prevention; and supply chains. These bring together a range of partners, including from Government, law enforcement and third sector organisations. Many of these partners were also brought together at the Anti-slavery Wales Conference 2023, where delegates heard first-hand accounts from modern slavery survivors. We intend the Conference to become an annual event, which we will hold at or around Anti-slavery Day (18 October).

In October 2023, the Welsh Government established the [Workplace Rights and Responsibilities Forum](#). The purpose of the Forum is to improve collective understanding of the workplace rights and responsibilities landscape; identify common challenges and barriers; consider factors that may influence better outcomes; and improve communication and relationships between business representatives, trade unions, and enforcement and advisory agencies. In doing so, we expect the Forum will consider differential outcomes and impact on different groups of workers, including Black, Asian and Minority Ethnic workers and disabled workers.

***Goal: To reduce and eliminate the ethnicity pay gap between ethnic minority and white employees.***

Ethnic minority workers are more likely to find themselves in lower paid and more precarious jobs. Paying the Real Living Wage makes an important contribution to uplifting the wages of low paid workers and this significantly benefits minority ethnic workers, who are disproportionately represented in low paid roles (A Living wage matters: the role of the living wage in closing ethnicity pay gaps).

We work closely with Cynnal Cymru, the Real Living Wage accreditation partner for Wales, to increase real living wage adoption and accreditation. We are exploring the potential for targeted action in the retail sector where we know ethnic minority workers receive low pay. We have delivered on our commitment to pay the Real Living Wage to social care workers, increasing the wages of the lowest paid in the social care sector including ethnic minority workers who are less likely to be in higher paid managerial roles.

We have continued to work across Welsh Government to scope levers that will contribute to our national milestone to eliminate the pay gap for gender, ethnicity and disability by 2050, recognising that achievement of the milestone will require concerted effort from employers in Wales. Our levers include responsibility for devolved public services and their workforces; grant and procurement levers; our convening power to bring partners together to promote, share and advocate for best practice; our skills and employability interventions; and promotion of Welsh interests in relation to reserved employment matters.

The Race Disparity Evidence Unit is working with Knowledge and Analytical Services to explore ways of supporting a more detailed analysis of pay gaps for protected and associated characteristics, including ethnicity. Discussions to secure access to administrative data held by other government departments on pay are ongoing and we are moving towards a data sharing agreement. If successful, the Welsh Government will be able to link pay data to other sources such as Census 2021. This will provide us with access to more detailed analysis than is currently possible.

***Challenges***

One of the key challenges in delivering our goals is the lack of direct levers we have over employment terms and conditions. Employment law is reserved to the UK Government and this impacts on what we can do and how we do it. Despite this, we remain committed to use every lever we have to promote anti-racism to the private sector. This includes more effective use of our grants and procurement processes and encouraging employers to work in partnership with recognised trade unions.

We acknowledge there are constraints around data and evidence, with gaps in the availability of robust, repeatable and reliable data which is disaggregated to the right level. Whilst we recognise this an issue, we have not been able to address it prior to publishing this Plan. However, we will continue to work with the Race Disparity Evidence Unit to identify sources of available data and evidence.

We also recognise the challenge of measuring the outcome and impact of the behavioural changes we encourage through social partnership. Much of our activity in this chapter is on using our influence to affect changed ways of working, behaviours and outcomes and using indirect and

softer levers. In addition, we acknowledge the challenges in attribution – measuring to what extent a change might be attributed to a specific action we have undertaken. We recognise this approach will need to be measured through qualitative evidence and not simply quantitative data. The development of case studies will be particularly important in demonstrating and communicating impact. As we embed the ArWAP, we will develop those case studies.

### **What we will do**

Our goals for the period 2024 – 2026 remain unchanged. We will, however, focus our efforts on a set of actions that recognise achievements to date, as well as emerging needs and developments. Our priorities for 2024-2026 are to:

- Facilitate cross-government and public sector engagement in contributing to the delivery of our national milestone on pay gaps.
- Progress the Workforce Partnership Council equalities workstream and embed equality, diversity and inclusion and anti-racism into the work programme of the Social Partnership Council.
- Further our work to improve awareness of workplace rights amongst workers and employers.

There is significant complementarity between the Social Partnership and Fair Work goals and actions and the ‘Leadership and Representation’ chapter of the ArWAP. In particular, there are touchpoints between the ‘Leadership and Representation’ chapter’s ambitions around improving ethnic minority recruitment, representation and progression across public bodies, and the aspirations set out in this chapter to work in social partnership with public sector employers and trade unions; to improve the lived experiences of ethnic minority workers; promote anti-racist workplace practices, processes and cultures; and tackle the ethnic minority pay gap.

### **Priority areas for consideration set out by the External Accountability Group**

**Implications for leadership and representation (for example, policy areas to improve their workforce, senior leadership and the arms lengths bodies that we work with to be more diverse and representative of the local demographics.)** One of our key actions is to engage social partners to ensure that employers and trade unions act as champions for change. We are using our levers to affect positive changes to cultures, attitudes and behaviours in the public sector, to enable them to lead by example for others. Ways in which we do this include sharing advice and guidance and in engaging public sector employers and trade unions on the Workforce Partnership Council.

**Implications for intersectionality (cumulative impact of disadvantage i.e. disability, gender, sexual orientation, etc.).** Our fair work agenda is not restricted to one particular protected characteristic. Our policy takes an intersectional approach in order to maximise our impact on those facing multiple barriers.

**Implications for the needs of Gypsy, Roma, and Traveller people.** Whilst we have not developed and undertaken bespoke fair work interventions for Gypsy, Roma and Traveller people, we encourage employers to commit to actions aimed at addressing under-representation across the protected characteristics at all levels and to narrowing gender, ethnicity and disability pay gaps. We also promote the adoption of effective processes to tackle workplace bullying, harassment, and discrimination.

**Implications for any data/research needs.** We know that data relating to the unemployment rate and pay gap for Black, Asian and Minority Ethnic people shows particularly high volatility. We recognise that improving disclosure, data collection, and data reporting is critical if we are to realise improvements in the employment outcomes of Black, Asian and Minority Ethnic people.

The reasons for the volatility relate to a number of factors including (a) population size i.e. the minority ethnic population is a relatively small proportion of the overall workforce and as a consequence any change in their representation (positive or negative) can lead to more pronounced changes in pay gap percentages; (b) sample sizes i.e. when the sample size is relatively small, even minor shifts can significantly impact the overall pay gap data; (c) imbalances of representation between ethnic minority and white employees across different organisational levels and sectors.

**Strengthening complaints system: Enhance current systems/mechanisms to make them more effective and responsive.** In terms of workers' rights and addressing complaints relating to the workplace, the Workplace Rights and Responsibilities Forum brings together key stakeholders including enforcement agencies, trade unions and employers, providing opportunity to share best practice and identify strategic issues where organisations on the forum can act differently, either collectively or individually, to improve outcomes. However, there are limitations and constraints on our levers in Wales in relation to remedying complaints which relate to employment and workplace regulations which are reserved matters.

**Positive action as per the Equality Act 2010 – Fully implement this in team/board recruitments, as well as more broadly e.g., service delivery, engagement etc.** We will encourage employers to use best practice in establishing anti-racist practices in recruitment and progression.

**Social Partnership and Fair Work - Goals new and amended action table.**

| Existing Actions  | Amended Actions  | Desired Outcomes   | By When              | Lead and Partners   | Impact on Key Priority Areas (1-6)      |
|---|--|--|----------------------|---|---|
| <b>Goal: To embed anti-racism into our social partnership structures and our approach to increasing the prevalence of fair work.</b>  |  |  |                      |   |   |
| <p>Include anti-racism in the future operating arrangements of the new statutory Social Partnership Council and the Workforce Partnership Council and ensure anti-racism is embedded into their work and that ethnic minority voices are heard.</p> | <p><b>E&amp;S 6:</b></p> <p>Include anti-racism in the future operating arrangements of the new statutory Social Partnership Council. We will advocate for anti-racism and equality, diversity and inclusion in the approach of the Social Partnership Council and Workforce Partnership Council.</p> <p>Continue to drive forward the work of the Workforce Partnership Council sub-groupworkstream on Equality, Diversity and Inclusivity, The Workforce Partnership Council will embed anti-racism in its work on voluntary agreements, sharing good practice, and influencing policy development across the devolved public sector in Wales.</p> <p>The Workplace Rights and Responsibilities Forum will ensure ethnic minority voices are surfaced.</p> | <p>The Social Partnership Council and Workforce Partnership Council deliver and promote an anti-racist approach.</p> <p>The SPC will include Equality, Diversity, and Inclusion considerations in all discussion papers.</p> | <p>December 2026</p> | <p>Welsh Government</p> <p>Social Partnership Council</p> <p>Workforce Partnership Council</p> <p>Workforce Rights and Responsibilities Forum</p> <p>Equality and Human Rights Commission</p> | <p>Priority areas 1,2, 3, 5 &amp; 6</p> |

|   |   |  |               |                                      |                 |
|---|---|--|---------------|--------------------------------------|-----------------|
| Seek out qualitative research, including a literature review, and listen to the lived experiences of ethnic minority workers. We will use this to inform social partnership and fair work policy development and interventions. | Seek out qualitative research, including a literature review, and listen to the lived experiences of ethnic minority workers. We will use this to inform social partnership and fair work policy development and interventions. | Ethnic minority workers feel confident that social partnership and fair work policies have been designed with consideration of their lived experiences of work in Wales. | December 2026 | Social Partners*<br>Welsh Government | Priority Area 4 |
|---|---|--|---------------|--------------------------------------|-----------------|

| Existing Actions | Amended Actions | Desired Outcomes | By When | Lead and Partners | Impact on Key Priority Areas (1-6) |
|------------------|-----------------|------------------|---------|-------------------|------------------------------------|
|------------------|-----------------|------------------|---------|-------------------|------------------------------------|

**Goal: To improve awareness, understanding and adoption of anti-racist workplace practices, processes and cultures.**

|   |   |  |               |  |                              |
|---|---|--|---------------|--|------------------------------|
| Engage social partners to ensure that employers and trade unions act as champions for change in promoting awareness and understanding of anti-racist practice and tackling workplace harassment. We will accelerate this activity and establish ways of measuring progress. | <b>E&amp;S 7:</b><br>Engage social partners to ensure that employers and trade unions act as champions for change in promoting awareness and understanding of anti-racist practice and tackling workplace harassment. We will work with the Race Disparity Evidence Unit to explore ways of measuring progress. | Better informed employers and workers and reduced levels of non-compliance with employment law is evident. | December 2026 | Welsh Government<br>Social Partners*<br>Equality and Human Rights Commission | Priority Areas 1,2, 3, 5 & 6 |
|---|---|--|---------------|--|------------------------------|

|   |  |  |               |  |                             |
|---|--|--|---------------|--|-----------------------------|
| Improve employee awareness of workers' rights and employer awareness and understanding of their legal responsibilities, to increase levels of compliance. This will include building on our workforce rights and responsibilities campaign to | <b>E&amp;S 8:</b><br>Continue to improve employee awareness of workers' rights and employer awareness and understanding of their legal responsibilities, to increase levels of compliance. | Better informed employers and workers, and reduced levels of non-compliance with employment law. | December 2026 | Welsh Government<br>Social Partners*<br>Equality and Human Rights Commission | Priority Areas 1,2,3, 5 & 6 |
|---|--|--|---------------|--|-----------------------------|

|   |  |  |  |  |  |
|---|--|--|--|--|--|
| improve access to relevant information, advice and guidance. We will build a more effective relationship with the Equality and Human Rights Commission and others to support this work. | We will continue to build a more effective relationship with the Equality and Human Rights Commission and others to support this work. |  |  |  |  |
|---|--|--|--|--|--|

| Existing Actions   | Amended Actions  | Desired Outcomes   | By When       | Lead and Partners   | Impact on Key Priority Areas (1-6) |
|--|--|--|---------------|---|------------------------------------|
| <b>Goal: To reduce and eliminate the ethnicity pay gap between ethnic minority and white employees</b>   |  |  |               |   |                                    |
| <b>Action:</b> Deliver our National Milestone to eliminate the ethnicity pay gap by 2050. In the short term we will incorporate data on Black, Asian and minority ethnic pay and employment into our fair work outcome measures, and progress plans to review the Public Sector Equality Duty. | <b>E&amp;S 9:</b> Contribute to the delivery of the Milestone to eliminate the ethnicity pay gap by 2050. We will do this by facilitating cross-government and public sector engagement, scoping levers and interventions that will address pay gaps.<br><br><b>E&amp;S 10:</b> Identify opportunities to reduce and eliminate the ethnicity pay gap across deep dive areas outlined within the economic strategy. | An improving trend in the pay gap between ethnic minority and white workers.                                       | December 2026 | Welsh Government<br><br>Social Partnership Council<br><br>Workforce Partnership Council | Priority Areas 1 & 6               |
| <b>Action:</b> Work with our social partners to proactively promote the advantages for all of a diverse workforce and working environments that support Black, Asian and minority ethnic workers to participate, progress and thrive.  | <b>E&amp;S 11:</b> Work with our social partners to proactively promote the advantages for all of a diverse workforce and working environments that support Black, Asian and minority ethnic workers to participate, progress and thrive.  | More diverse, cohesive and productive workplaces which enable Minority Ethnic people to reach their full potential | December 2026 | Welsh Government<br><br>Social Partners*<br><br>Equality and Human Rights Commission    | Priority Areas 1,2,3,5 & 6         |

\*Social partners are defined as employers / employer representative bodies and trade unions

### Entrepreneurship

#### Evidence

The Welsh Government's Business Wales programme proactively supports entrepreneurship through policies and programmes aimed at encouraging the creation, growth and sustainable development of micro businesses, SMEs, and Social Enterprises. The current Business Wales service is designed to offer a service that recognises and aims to meet the needs and aspirations of individuals that seek to start or grow their business, whether this is working on a self-employed basis, starting a high-growth business, or sustaining an existing business. Business Wales works with a breadth of community partners that reach into communities to increase engagement. These partners include EYST, Assadaqaat Community finance (ACF), the Centre for African Entrepreneurship, Welsh Bangladeshi Chamber of Commerce and Chinese in Wales Association (CIWA).

Since the publication of the Anti-Racist Wales Action Plan in 2022, Welsh Government, through the Business Wales service, have progressed the Goals and Actions within the Entrepreneurship chapter, driving the Business Wales service to becoming an anti-racist organisation. Welsh Government and Business Wales have developed a Business Wales Anti-racist Action Plan and an anti-racist statement which contains actions to deliver a service that is anti-racist and will embed an environment in which clients from all backgrounds accessing the Business Wales service do not experience prejudice, discrimination, or marginalisation.

#### Summary of achievements so far

Our vision continues to be clear, an anti-racist Business Wales service that is culturally confident and is held accountable throughout delivery by a comprehensive set of equality KPI's as well as the actions set out in the Business Wales anti-racist Action Plan

<https://businesswales.gov.wales/business-wales-anti-racist-action-plan>

Welsh Government continues to collect data and has further improved the data collection to ensure that we continue to remove any barriers to access and adapt our services for black and ethnic minority communities. The data is a key component to drive service delivery, ensuring understanding of any gaps in provision and directly informs Business Wales's activity on the ground as well as with external stakeholders. This analysis and monitoring are undertaken by Welsh Government and Business Wales on a quarterly basis.

Since 2016 of the 7614 clients supported by Business Wales to start a business, 548 (7%) identify as Black, Asian and Minority Ethnic. Business Wales has directly supported over 21,272 business owners since 2016 to support their business development and growth, with 1211 (6%) identifying as Black, Asian and Minority Ethnic. This is a 1.6% increase from previous reporting.

Business Wales has utilised the Participation Discretionary Fund on 45 occasions since Oct 2023 for translations services. This has been for various languages, such as Arabic, Tamil, Ukrainian and Sinhalese. This has enabled clients to seamlessly access the Business Wales support provision.

Business Wales service collects data on Gypsy, Roma and Traveller people. From the period 1st June 2023 – 31st January 2024, Business Wales registered 0.2% of Gypsy, Roma and Traveller people onto the service. Even though the percentage is in line with the Census 2021 data, Business Wales will engage with community groups to further understand requirements and barriers and will look to deliver outreach activities if required.

## Introduction

Since the publication of the Anti-Racist Wales Action Plan in 2022, progress has been made on the actions that are key to progressing the overall goal of “creating an anti-racist Business Wales service that engages with diverse communities in a culturally appropriate way to increase business start-ups and growth amongst Black Asian Minority Ethnic people”. Race Equality First (REF) were appointed to undertake a review of the Business Wales services in 2023. The methodology for this review included analysing the Business Wales website and documents that are used to manage and deliver the contracted Business Wales service. The review resulted in a Business Wales Anti-racist Action Plan which is available on the Business Wales website, there is also an accompanying anti-racist statement. The actions within this Plan are monitored by Welsh government on a quarterly basis.

The Anti-Racist E-Learning training for external Business Wales staff is currently being developed, the training will be a requirement for Business Wales staff to complete. Recognising the importance of driving the principles of anti-racism in businesses and employers across Wales, Welsh Government are also creating a BOSS anti-racist workshop that will be placed on the Business Wales website that all businesses can access. It is expected that both E-Learning modules will be available in late summer 2024. Business Wales will monitor the effectiveness of the training by uptake as well as pre and post evaluation forms for those undertaking the training.

Welsh Government has embedded the requirement to meet the actions contained in both the Anti-racist Wales Action Plan (ARWAP), the Business Wales Action Plan as well as a set of equality KPI's. into all Business Wales contracts. This ensures the principles of anti-racism is embedded at point of contract. Welsh Government recognises the importance of receiving business advice in the client's choice of language and has secured funding for translators, interpreters, and alternative communication methods for those wishing to access via the Business Wales service. To date, this has proven popular, and will continue to be resourced. Welsh Government conducts customer satisfaction on the Business Wales service, these surveys record a full ethnicity breakdown to identify any trends in unsatisfactory outcomes of service for clients from certain ethnic groups.

## What we will do

Our goal for the period 2024 – 2026 will remain unchanged. We will, however, focus our actions for this period on the delivery and monitoring of the Business Wales Action Plan to progress the anti-racist Business Wales service and an increase in business start-ups and growth amongst Black Asian Minority Ethnic people.

### Priority areas for consideration set out by the External Accountability Group

- **Implications for leadership and representation (for example, policy areas to improve their workforce, senior leadership and the arms lengths bodies that we work with to be more diverse and representative of the local demographics.)** We will continue to work with providers and employers across the employability system to act as champions for change. We are using our levers to affect positive changes to cultures, attitudes and behaviours to enable them to lead by example for others.
- **Implications for intersectionality (cumulative impact of disadvantage i.e. disability, gender, sexual orientation, etc.)** Business Wales recognises the importance of intersectionality within the Black, Asian, Minority Ethnic Community. Business Wales analyses the data collected in this way and uses the intelligence to inform our outreach activity. Furthermore, the activities delivered via Business Wales encompass multiple protected characteristics, to maximise our impact on those facing multiple intersectional barriers.
- **Implications for the needs of Gypsy, Roma, and Traveller people** . The Business Wales service collects data on Gypsy, Roma and Traveller people; from the period 1st June 2023 – 31st January 2024, Business Wales registered 0.2% of Gypsy, Roma and Traveller people onto the service. Even though the percentage is in line with the Census 2021 data, Business Wales will engage with community groups to further understand requirements and barriers and will look to deliver outreach activities in coming months if required.
- **Implications for any data/research needs** Business Wales will continue to collect data and compare to relevant sources to enable the service to reflect the communities they serve. Business Wales will continue working with stakeholders, communities and deliver outreach activity based on data analysis.
- **Strengthening complaints system: Enhance current systems/mechanisms to make them more effective and responsive.**  
A robust complaints system is in place for both the Business Wales service internally and externally.
- **Positive action as per the Equality Act 2010 – Fully implement this in team/board recruitments, as well as more broadly e.g., service delivery, engagement etc.**  
Positive action, based on analyses of data is undertaken via outreach activities delivered through the Business Wales service.

**Entrepreneurship - Goals new and amended action table.**

| Existing Actions   | Amended Actions  | Desired Outcomes  | By When       | Lead and Partners                   | Impact on Key Priority Areas (1-6) |
|--|--|---|---------------|-------------------------------------|------------------------------------|
| <b>Goal:</b> To create an anti-racist Business Wales service that engages with diverse communities in a culturally appropriate way to increase business start-ups and growth amongst Black Asian Minority Ethnic people                          |  |   |               |                                     |                                    |
| <p>Work with Representative bodies and Individuals especially from the ethnic minority Business community to develop an anti-racist plan for the Business Wales service.</p> <p>Deliver anti-racist training for all staff on Business Wales</p> | <p><b>E&amp;S 12:</b><br/>Business Wales will continue to implement and monitor the Business Wales Anti-racist Action Plan</p> <p>Ensure the anti-racist training for Business Wales staff is delivered.</p> | <p>A service provision that is aware of how racism creates disparities is culturally confident and generates increased numbers of ethnic minority people using the service.</p> <p>All Staff on Business Wales contracts to undertake anti-racist training.</p> | December 2024 | Welsh Government / entrepreneurship | 2                                  |
| <p><b>Action:</b> Use Business Wales contracts arrangements to secure anti-racist provision through contractual arrangements.</p>  | <p><b>E&amp;S 13:</b><br/>Welsh Government will continue to monitor contractual requirements to secure anti-racist provision through Business Wales contracts.</p>   | <p>A service underpinned by anti-racist requirements to deliver services.</p>   | December 2025 | Welsh Government / entrepreneurship | 2                                  |

## Chapter Homes and Places

### Some evidence

Black, Asian and Minority Ethnicity is linked with a greater likelihood of relative income poverty. For the period between 2015-2016 and 2019-2020 (an average of 5 financial years) there was a 29% likelihood of people whose head of household comes from a non-white ethnic group living in relative income poverty. This compares to a 24% likelihood for those whose head of household comes from a white ethnic group. However, because the vast majority of households in Wales have a head who is from a white ethnic group, most people (97%) who were living in relative income poverty were from such households (the Welsh Government, 2021c).

In 2011 in Wales, 28.7% of Gypsy or Irish Travellers and 27% of Bangladeshi people lived in overcrowded housing (that is, they had fewer bedrooms than they needed to avoid undesirable sharing), whilst 19.4% of Black people and 18.5% of Arabs did so compared to 4.9% of White British people (the Welsh Government, 2020b).

The 2021 census indicates all minority-ethnic groups continue to have higher levels of overcrowding than the White British group across all types of location. Overcrowding is most likely in England and Wales in households where all residents identify as 'Black, Black British, Black Welsh, Caribbean or African'; 16.1 per cent of this group were living in overcrowded housing compared to 2.5 per cent of the White ethnic group. The Census also recorded high levels of overcrowding in households where all residents identify as 'Asian, Asian British or Asian Welsh' (14.6 per cent). More fine-grained analysis of the 2021 Census reveals wide variations in levels of overcrowding between specific ethnic groups, with the highest levels of overcrowding in the Bangladeshi (39 per cent), Pakistani (31 per cent) and African (32 per cent) groups.

People from the Black, Asian and Minority Ethnic Communities continue to be overrepresented in homelessness statistics. In Wales, the ten per cent of applicants assessed as homeless or threatened with homelessness in 2022/23 were from an ethnic minority background, despite representing only six per cent of the population.

TPAS Cymru published the results of its third All Tenants Survey in January 2024. Of the tenants responding in the survey, 4.6% identified as having a Black Asian Minority Ethnic background, with 2.6% of tenants in social housing and 6.8% of tenants in private rental housing identified as having a Black Asian Minority Ethnic background. This reflects previous evidence that Black, Asian and Minority Ethnic families are most likely to live in homes in the Private Rented Sector where rents are higher, and quality is lower when compared to social housing.

In relation to training, since its introduction in March 2023, [Rent Smart Wales](#) reports 1,207 hate crime awareness sessions have been completed. Since summer 2019, more than 4,500 equality and diversity training sessions have been delivered.

## Introduction

The Welsh Government is committed to delivering 20,000 social homes for affordable rent in the current Senedd term. Providing decent homes in which people can live is one of the most powerful tools in alleviating poverty, and creating the environment where people are able to build better and more secure futures. Improving the availability of good quality affordable housing will tackle increasing levels of homelessness, whilst reducing the harmful carbon emissions that are damaging our environment for generations to come. Our actions will benefit all people in Wales, but specifically people who are disadvantaged by the lack of affordable housing and who continue to experience discrimination in all its forms. This is particularly relevant for Gypsy, Roma and Traveller communities as evidenced by the lack of suitable pitch provision.

Since the launch of the Anti-Racist Wales Action Plan in 2022, some progress in the advancement of equality of opportunity and elimination of discrimination has been made.

- The proportion of Black, Asian, and Ethnic Minority Registered Social Landlord (RSL) board members (9%)<sup>2</sup> is higher than the general population (about 5%) and has steadily increased by 4% since 2014.
- Staff Diversity: Housing Sector Staff is representative at customer facing level (6.4% of staff are from ethnic minority communities), although management levels remain low (source: [Anti-racist Wales Social Housing survey report](#))
- The Pathway to Board Project<sup>3</sup> continues to offer a continuous professional development opportunity designed to better equip individuals from minority ethnic communities who want to contribute to the leadership of an organisation.
- The Get into Housing Project<sup>4</sup> offers paid work placements to long-term unemployed individuals from minority ethnic communities in Cardiff, aligning with the Anti-racist Wales Action Plan goals.
- A workforce recruitment campaign to encourage a diverse range of people to join the homelessness and housing support sector launched in February 2023. As of March 2023, the number of users to the jobs site in March 2023 was 19,101 compared with 574 prior to the campaign. Initial feedback has included an increase in the diversity, number and quality of applicants.
  - Rent Smart Wales, with support from Tai Pawb and Victim Support Cymru, published training for all landlords and managing agents to raise awareness of racism and hate crime.
  - Additional funding to Tai Pawb has made it possible to provide further support to the housing sector to consider the impact of their work on Black, Asian and Ethnic Minority communities and publish revised guidance on equality impact assessments and culturally sensitive design.

<sup>2</sup> **The Registered Social Housing Diversity Report 2023 was published in July 2024** [Housing associations boards: equality and diversity report 2023 | GOV.WALES](#)

<sup>3</sup> Taff, CCHA, Linc Cymru, Cadwyn and Hafod housing associations launched in March 2022

<sup>4</sup> The Get into Housing project led by CCHA also includes [Cadwyn](#), [Hafod](#), [United Welsh](#), [Linc Cymru](#), [Wales & West Housing](#), and [Taff Housing](#).



- The regulatory standards for housing associations have been revised. RSLs are required to have effective strategic leadership and governance arrangements in place, which enable it to achieve its purpose and objectives. Social landlords are expected to have measurable, evidence-based commitments across all areas of its business in relation to equality, diversity, and inclusion (including anti-racism and tackling hate crime) reflecting the diversity of the communities with which it works.
- The new process for undertaking Local Housing Market Assessments is now in place. It requires Local Authorities to include an analysis of the need for homes of key groups (Black, Asian and minority ethnic people and others sharing the protected characteristics).
- Positive change in presence of Anti-racism plans: 80% of housing organisations surveyed in 2023 have an anti-racism plan compared to only 25% in 2021. Plans are either standalone or embedded in EDI plan although only 30% are published. (Sources: [Tai Pawb Deeds not Words Baseline Survey and 2 years on survey](#) P.44 and [Anti-racist Wales Social Housing survey report](#))
- Funding through the Cite Capital Grant fund of £3.44m in 2024-25, the purpose of the funding is to support site development. It can be used for refurbishing existing accommodation, purchasing of land for pitches, constructing new pitches and improving the sustainability of sites for residents, and other capital expenditure related to improving sites as well as fund either residential sites or transit sites.
- We have awarded a new 3-year advice and advocacy contract to provide support to families, from September 2024. This will help provide support to Gypsy, Roma and Traveller community members seeking advice in relation to their rights and provide advice and advocacy support to families on issues such as accommodation, sites, planning and accessing services.
- We launched a Winter Fuel Support programme for Gypsy, Roma and Traveller communities in 2024-25.

### **What we will do**

In the next two years, we will:

- Ensure the housing policies and practices of the Welsh Government are assessed to ensure the needs of people with a Black, Asian and Minority Ethnic background are met.
- Work with sector partners to improve support and guidance in relation to effective engagement, impact assessments and inclusive design.
- Work with stakeholders and Local Authorities to improve awareness of the plan and its commitments to ensure inclusive service improvements are achieved.
- Develop an anti-racism action plan for use in the Private Rented Sector and publish it before the end of 2024.



- Bring forward proposals to improve inclusive tenant participation.
- Establish a specific Gypsy, Roma and Traveller Group consisting of community members, local authorities and key Welsh Government officials. This gives community members the opportunity to share their lived experiences and inform our policy decisions.
- Engage with Gypsy, Roma and Traveller community members to update the:
  - Managing Gypsy and Traveller Sites in Wales guidance.
  - Designing Gypsy and Traveller Sites guidance.
  - Guidance on Managing Unauthorised Camping 2013 guidance; and
  - Undertaking Gypsy Traveller Accommodation Assessments guidance.
- Procure a pilot programme to provide independent and professional advice on all planning matters to families, wishing to purchase land for private sites.
- Procure a national evidence base to make recommendations about the most appropriate location for transit provision across Wales.
- Work with the Welsh police forces to formalise the Police Forces Protocols on Managing Unauthorised Encampments.

| Existing Actions   | Amended Actions  | Desired Outcomes   | By When                         | Lead and Partners  | Key Priority Areas (1-6) |
|--|--|--|---------------------------------|--|--------------------------|
| <p>Goal: To significantly increase representation of ethnic minority people in senior leadership and at all levels to create a workforce within the homes sector to reflect the diversity of the population in which they operate.</p>   |  |  |                                 |  |                          |
| <p>Ensure organisations' boards, advisory groups, senior leadership and workforce reflect the diversity of ethnic minority people by working with Black, Asian and Minority Ethnic organisations, and partners such as Tai Pawb, Chartered Institute of Housing (CIH), Community Housing Cymru (CHC), Welsh Local Government Association (WLGGA) and Cymorth Cymru to:</p> <ul style="list-style-type: none"> <li>• implement Reflecting Wales in Running Wales: the diversity and inclusion strategy for Public Appointments, in collaboration with the Public Bodies Unit, specifically in relation to the following goals: <ul style="list-style-type: none"> <li>- demonstrate open and transparent recruitment practices.</li> <li>- demonstrate diversity within Boards.</li> <li>- demonstrate that they are building a community of</li> </ul> </li> </ul> | <p><b>H&amp;P 1:</b></p> <p>Ensure organisations' boards, advisory groups, senior leadership and workforce reflect the diversity of their local populations or service users.</p> <p>To do so, organisations will</p> <ul style="list-style-type: none"> <li>• Review their recruitment procedures to ensure they are open and transparent.</li> <li>• Demonstrate that steps have been taken to encourage applications from Black, Asian and Minority Ethnic Communities</li> <li>• Ensure representation to administrative advisory groups, including but not limited to the Ending Homelessness National Advisory Board, reflect the diversity of service users.</li> <li>• Prepare and publish and report on plans that set out how diversity and anti-racism is being advanced in their organisation</li> </ul> | <p>Increased diversity across the workforce. Improved access to better job roles, and development opportunities for ethnic minority people.</p> <p>Increased engagement with ethnic minority communities and ensure policy is informed by people's lived experience.</p> | <p>By June 2025 and ongoing</p> | <ul style="list-style-type: none"> <li>• The Welsh Government.</li> <li>• Local Authorities</li> <li>• Registered Social Landlords</li> <li>• Community Housing Cymru</li> <li>• Third Sector Organisations</li> </ul> |                          |

| Existing Actions  | Amended Actions | Desired Outcomes | By When | Lead and Partners | Key Priority Areas (1-6) |
|---|-----------------|------------------|---------|-------------------|--------------------------|
| <p>individuals (in particular ethnic minority women) who are interested, aware and nearly ready for Board membership (i.e. to build a robust pipeline).</p>   |                 |                  |         |                   |                          |
| <p>Housing Associations, local authority housing departments and third sector support organisations to demonstrate how they will ensure anti-racism and race equality are to be embedded within their organisations both as employers and service providers, including initiatives such as the Tai Pawb's Deeds not Words pledge; this work should be informed by involvement of third sector organisations and community groups.</p> <p>Recommendation is to remove this action. It is difficult to demonstrate anti racism is embedded throughout the organisation beyond the tangible activities included in this action plan.</p> <p>Improved recruitment, training and complaints procedures</p> |                 |                  |         |                   |                          |



| Existing Actions  | Amended Actions  | Desired Outcomes  | By When   | Lead and Partners   | Key Priority Areas (1-6) |
|---|--|---|---|---|--------------------------|
| Diversity and Inclusion, including anti-racism, are clear.  | on Registered Social landlords to tackle racism and discrimination.  |   |   | Authorities<br><ul style="list-style-type: none"> <li>• Registered Social Landlords</li> </ul>  |                          |
| Ensure The Welsh Government housing Boards and advisory groups, including the National Housing Support Advisory Group, reflect ethnic minority people's voice and representation in the transformation of homelessness services. <span style="color: red;">This activity has been included in the first action above to reduce duplication. Therefore deletion is recommended.</span> |  |   |   |   |                          |
| <b>Goal:</b> Goal: To ensure that standards provision and services around the provision of homes advance race equality, embed anti-racism, equality and human rights, and meet the diverse needs of ethnic minority people.   |  |   |   |   |                          |
| Work with ethnic minority-led organisations, Tai Pawb, Chartered Institute of Housing (CIH), TPAS Cymru, CHC, Cymorth Cymru and WLGA to: <ul style="list-style-type: none"> <li>• provide ongoing anti-racism and cultural competence training to the workforce involved in service provision for tenants and customers (and as part of</li> </ul>                                    | <b>H&amp;P 4:</b><br>Review housing related standards and guidance to understand how services can be designed to meet the needs of service users, identify race-based discrimination and hate crime.<br><br>Ensure the policy and legislative framework supports the commissioning of culturally sensitive housing and | Tenants are confident in reporting hate crimes and incidents are dealt with appropriately and robustly; service delivery is improved.<br><br>Ethnic minority people are able to access support services which are culturally appropriate and meet their needs.<br><br>Assessment reports published in relation to reviews undertaken on policies and practices, to include changes that have been adopted following engagement with Black, Asian and Minority Ethnic communities. | Arrangements in place by June 2025 and ongoing thereafter | <ul style="list-style-type: none"> <li>• The Welsh Government.</li> <li>• Local Authorities</li> <li>• Registered Social Landlords</li> </ul> |                          |

| Existing Actions  | Amended Actions  | Desired Outcomes   | By When        | Lead and Partners  | Key Priority Areas (1-6) |
|---|--|--|----------------|--|--------------------------|
| <p>Continued Professional Development)</p> <ul style="list-style-type: none"> <li>review guidance for the above organisations to support staff and tenants to understand how to report racism and hate crime, and provide support to those reporting (actively ensuring tenants are aware of their rights and the support available) ensure all landlords demonstrate that they are responding quickly to complaints of racism, harassment and hate crime and offer appropriate support.</li> </ul> | <p>accommodation- related support services to meet the needs of diverse ethnic minority people.</p> <p>Ensure that arrangements are in place to provide tenants with information on how to report incidents of hate crime</p>  | <p>Publication of data on complaints</p>   |                | <ul style="list-style-type: none"> <li>Community Housing Cymru</li> <li>Third Sector Organisations</li> </ul>  |                          |
| <p>Building on the literature review undertaken on overcrowding amongst ethnic minority people and communities, undertake further research and/ or analysis to better understand the link between overcrowding in homes and the increased risk of catching COVID-19 amongst ethnic minority people.</p>   | <p><b>H&amp;P 5:</b></p> <p>Research and evaluation relating to homes and places commissioned, by the Welsh Government, Local Authorities and Third Sector Organisations will be delivered in a way that enables the experiences of people sharing protected characteristics, including race, to be captured and reported on to ensure programmes are aligned to deliver on priorities, such as reducing</p> | <p>Better evidence delivers better policies, programmes and initiatives for all.</p> | <p>Ongoing</p> | <ul style="list-style-type: none"> <li>The Welsh Government.</li> <li>Local Authorities</li> <li>Registered Social Landlords</li> <li>Community</li> </ul> |                          |

| Existing Actions   | Amended Actions   | Desired Outcomes   | By When | Lead and Partners  | Key Priority Areas (1-6) |
|--|---|--|---------|--|--------------------------|
|  | levels of overcrowding and homelessness.  |  |         | Housing Cymru<br><ul style="list-style-type: none"> <li>Third Sector Organisations</li> </ul>  |                          |
| Work with ethnic minority-led organisations, local authorities, Housing Associations, Shelter Cymru and Citizens Advice Cymru to demonstrate the information, advice and advocacy needs of ethnic minority people are met in relation to accessing appropriate homes, including Gypsies and Travellers, ethnic minority women and asylum seekers and refugees. | <b>H&amp;P 6:</b><br>Information, advice and advocacy services in relation to accessing appropriate homes, including Gypsies and Travellers, ethnic minority women and asylum seekers and refugees, are designed to meet the needs of the service user. | Services, including advice services become fully accessible to the full diversity of ethnic minority people. | Ongoing | <ul style="list-style-type: none"> <li>The Welsh Government.</li> <li>Local Authorities</li> <li>Registered Social Landlords</li> <li>Community Housing Cymru</li> <li>Third Sector Organisations</li> </ul> |                          |
| Revise the current regulatory standards to ensure the expectations placed Housing Associations with regards to standards, provision and services on equality, diversity and inclusion, including anti-racism, are clear. <span style="color: red;">See action</span>   |   |  |         |  |                          |

| Existing Actions   | Amended Actions  | Desired Outcomes   | By When                       | Lead and Partners  | Key Priority Areas (1-6) |
|--|--|--|-------------------------------|--|--------------------------|
| above. Regulatory standards applied to registered Social Landlords have been amended. The need is to ensure the new standards are achieved and maintained as measured through regulatory judgements.   |  |  |                               |  |                          |
| <p>Develop new guidance for Local Housing Market Assessments (LHMAs) with local authorities and housing associations to include:</p> <p>an analysis of the need for homes of key groups (Black, Asian and minority ethnic people, disabled people, homeless people, older people, those with mental health conditions, ethnic minority women, etc.) within each local authority to understand:</p> <ul style="list-style-type: none"> <li>- the availability of appropriate housing;</li> <li>- the estimated future need;</li> <li>- what any shortfall is for each key group.</li> </ul> <p>The Welsh Government to provide all local authorities with training and ongoing support.</p> | <p><b>H&amp;P 7:</b></p> <p>Working with organisations and people sharing protected characteristics including Race, prepare Local Housing Market Assessments in accordance with revised guidance issued in March 2022, to ensure Local Authorities accurately assess the housing needs of their local population. Once housing need is identified, work with key partners to deliver housing that better meets demand.</p> | <p>Local authorities and Housing Associations can build affordable housing that meets the needs of ethnic minority people and others in their communities.</p> | <p>March 2024 and ongoing</p> | <ul style="list-style-type: none"> <li>• The Welsh Government.</li> <li>• Local Authorities</li> <li>• Registered Social Landlords</li> <li>• Community Housing Cymru</li> <li>• Third Sector Organisations</li> </ul> |                          |

| Existing Actions  | Amended Actions | Desired Outcomes | By When | Lead and Partners | Key Priority Areas (1-6) |
|---|-----------------|------------------|---------|-------------------|--------------------------|
| Ensure that the LHMA's, and their assessment of needs for ethnic minority people and other key groups inform the prospectus as part of the Social Housing Grant programme monitoring.<br><span style="color: red;">Merged with activity above</span>  |                 |                  |         |                   |                          |
| <p>Ensure the barriers faced by the full diversity of ethnic minority people are specifically addressed to ensure they have equal access to homelessness services and homes. This will include:</p> <ul style="list-style-type: none"> <li>making race equality an integral and focused part of the transformation of homelessness services (including future consideration of priority need and allocations) and ensuring success in addressing the needs of ethnic minority people is built into the evaluation of the transformation;</li> <li>ensure the policy and legislative framework supports the</li> </ul> |                 |                  |         |                   |                          |

| Existing Actions  | Amended Actions | Desired Outcomes | By When | Lead and Partners | Key Priority Areas (1-6) |
|---|-----------------|------------------|---------|-------------------|--------------------------|
| <p>commissioning of culturally sensitive housing and accommodation- related support services to meet the needs of diverse ethnic minority people;</p> <p>ensure that all Welsh Government homes related guidance to local authorities, such as the "Rapid Rehousing guidance or Code of Guidance on Allocations", includes consideration of the full diversity of ethnic minority people.</p> <p style="color: red;">Merged with activities above</p> |                 |                  |         |                   |                          |
| <p>Over next 5 years – Ensure the needs of all ethnic minority people are included in the reviews of the provision of homes/housing related legislation and policy in the next Senedd term, including on homelessness and allocations.</p> <p style="color: red;">Revised action above covers this activity.</p>  |                 |                  |         |                   |                          |

| Existing Actions   | Amended Actions  | Desired Outcomes   | By When                                     | Lead and Partners  | Key Priority Areas (1-6) |
|--|--|--|---|--|--------------------------|
| <p>Goal: To ensure that Private Rented Sector (PRS) housing and accommodation, and service provision advances equality, embeds anti-racism and meets the diverse needs of ethnic minority people.</p>  |  |  |   |  |                          |
| <p>Develop a Private Rented Sector (PRS) Action Plan improving the equality 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 taking account of intersectionality and socio-economic disadvantage in the PRS and determine options to address this</li> <li>research and review the evidence base of the support provided to ethnic minority tenants to access and sustain tenancies in the PRS</li> <li>further research the scale of overcrowding in the PRS, and how the ability of local authorities to enforce standards in the PRS could be strengthened</li> <li>strengthen the support to those on lower incomes to access affordable and longer</li> </ul> | <p><b>H&amp;P 8:</b></p> <p>Develop a Private Rented Sector (PRS) Action Plan improving the equality of the sector, which has anti-racism at its core. To include:</p> <ul style="list-style-type: none"> <li>support to those on lower incomes to access affordable and longer term tenancies</li> <li>continue to deliver anti-racism and hate crime training for landlords and agents.</li> <li>Provide information to tenants to enable them to report racism and hate crime.</li> <li>Improve communication and engagement with private sector ethnic minority tenants so that they are aware of their rights and how to enforce them and have confidence in doing so.</li> </ul> | <p>Better understanding of the scale of the issues and barriers within the PRS to prioritise actions to improve support provided for tenants.</p> <p>Increased support to enable tenants to access the PRS and sustain tenancies.</p> <p>Greater understanding of impact of racism and hate, and confidence for landlords and agents in tackling racism.</p> <p>Greater advice and support for tenants experiencing racism and hate crime so racism reduces.</p> <p>Engagement of ethnic minority tenants and communities to inform private sector policy.</p> | <p>December 2024 and ongoing thereafter</p> | <ul style="list-style-type: none"> <li>The Welsh Government.</li> <li>Local Authorities</li> <li>Rent Smart Wales</li> <li>Third Sector Organisations</li> </ul> |                          |

| Existing Actions  | Amended Actions   | Desired Outcomes   | By When        | Lead and Partners  | Key Priority Areas (1-6) |
|---|---|--|----------------|--|--------------------------|
| <p>term tenancies</p> <ul style="list-style-type: none"> <li>work with Rent Smart Wales to develop anti-racism and hate crime training for landlords and agents. Provide information to tenants to encourage them to report racism and hate crime in the PRS</li> </ul> <p>Improve communication and engagement with private sector ethnic minority tenants so that they are aware of their rights and how to enforce them and have confidence in doing so.</p> |   |  |                |  |                          |
| <p>Goal: To ensure ethnic minority people across Wales have a voice and influence in ensuring the Welsh Government policies around the provision of homes reflect the diversity of ethnic minority people's needs and priorities.</p>   |   |  |                |  |                          |
| <p>Make the Welsh Government Housing and Regeneration Directorate communications and communication campaigns engaging for ethnic minority people in their design and roll out and ensure ethnic</p>   | <p><b>H&amp;P 9:</b><br/>Ensure that campaigns and information materials are designed to meet the needs of the intended audience.</p> | <p>Campaigns and materials designed in collaboration with intended service users will have a greater impact and better support people from Black, Asian and Minority Ethnic communities.</p> | <p>Ongoing</p> | <ul style="list-style-type: none"> <li>The Welsh Government.</li> <li>Local Authorities</li> </ul> |                          |

| Existing Actions   | Amended Actions  | Desired Outcomes   | By When                       | Lead and Partners  | Key Priority Areas (1-6) |
|--|--|--|-------------------------------|--|--------------------------|
| <p>minority-led organisations and ethnic minority people are involved in the development, monitoring and evaluation.</p>   |  |  |                               | <ul style="list-style-type: none"> <li>Registered Social Landlords</li> <li>Community Housing Cymru</li> <li>Third Sector Organisations</li> </ul>   |                          |
| <p>Ethnic minority tenants must have channels to voice concerns, challenge and influence the Welsh Government Housing and Regeneration policy through:</p> <ul style="list-style-type: none"> <li>working with ethnic minority-led organisations and partners including Tai Pawb, Cymorth Cymru, CIH, CHC, and TPAS Cymru;</li> <li>work with ethnic minority-led organisations and partners including Tai Pawb, Cymorth Cymru, CIH, CHC, and TPAS Cymru to develop effective practice on engagement and communication in respect</li> </ul> | <p><b>H&amp;P 10:</b></p> <p>Take steps to engage with Black, Asian and Minority Ethnic Communities to improve levels of engagement.</p> | <p>The views and experiences of Black, Asian and Minority Ethnic Peoples are taken into account when developing policies and practices and setting budgets.</p> <p>Increased participation in surveys, such as tenants' pulse.</p> <p>Published Black, Asian and Minority Ethnic community engagement rates.</p> | <p>June 2025 then ongoing</p> | <ul style="list-style-type: none"> <li>The Welsh Government.</li> <li>Local Authorities</li> <li>Registered Social Landlords</li> <li>Community Housing Cymru</li> <li>Third Sector Organisations</li> </ul> |                          |

| Existing Actions  | Amended Actions | Desired Outcomes | By When | Lead and Partners | Key Priority Areas (1-6) |
|---|-----------------|------------------|---------|-------------------|--------------------------|
| of Equality, Diversity and Inclusion, including anti-racism.  |                 |                  |         |                   |                          |
| <p>To better understand and remove barriers to tenant involvement and ensure closer alignment of accountability for tenant services in both local authorities and Housing Associations; working with ethnic minority- led organisations; CHC, CIH, Tai Pawb, TPAS Cymru and WLGA to ensure landlords collect and publish data on ethnic minority tenant involvement data.</p> <p style="color: red;">Merged with revised action above</p> |                 |                  |         |                   |                          |
| <p>During the policy evaluation/development phase, the Welsh Government will work with ethnic minority- led organisations; CHC, CIH, Tai Pawb, TPAS Cymru and WLGA and ethnic minority people, to understand how the potential for Domain Regulation (i.e. regulation of local authorities as well as housing associations in respect of landlord services)</p>   |                 |                  |         |                   |                          |

| Existing Actions   | Amended Actions  | Desired Outcomes  | By When        | Lead and Partners  | Key Priority Areas (1-6) |
|--|--|---|----------------|--|--------------------------|
| <p>may impact on outcomes for ethnic minority people and communities. The design making and implementation of legislation, including regulation, falls within the policy and practices of the Welsh Government, subject to engagement and consultation provisions as appropriate. The scoping of proposed reforms considers the most appropriate method to secure positive policy outcomes.</p> <p>As such, this activity has been included in proposed activity above, which reads</p> <p>ensure the policy and legislative framework supports the commissioning of culturally sensitive housing and accommodation- related support services to meet the needs of diverse ethnic minority people"</p> |  |   |                |  |                          |
| <p>Establish a Group to continue to oversee the implementation of the Anti-racist Wales Action Plan within the Housing and Regeneration Directorate, including structures for sharing information and effective practice.</p>  | <p><b>H&amp;P 11:</b></p> <p>Maintain a Group to continue to oversee the implementation of the Anti-racist Wales Action Plan within the Housing and Regeneration Directorate, including structures for sharing information and effective practice.</p> | <p>Achievement of goals and actions relating to Housing and Regeneration.</p> | <p>Ongoing</p> | <ul style="list-style-type: none"> <li>• The Welsh Government.</li> <li>• Local Authorities</li> <li>• Registered</li> </ul> |                          |

| Existing Actions  | Amended Actions  | Desired Outcomes  | By When  | Lead and Partners   | Key Priority Areas (1-6) |
|---|--|---|--|---|--------------------------|
| Pack Page 134   |  |   |  | Social Landlords<br><ul style="list-style-type: none"> <li>• Community Housing Cymru</li> <li>• Third Sector Organisations</li> </ul> |                          |
|   | <p><b>Goal:</b> To recognise that safe, culturally appropriate accommodation is necessary in order for individuals to flourish in other parts of their lives and to address the lack of site provision and poor quality of Gypsy and Traveller accommodation in Wales.</p> |   |  |   |                          |
| <p><b>Old Action:</b> Create a national network of transit provision to facilitate travelling life, with consideration for negotiated stopping, as appropriate.</p> | <p><b>Refreshed Action 2024:</b></p> <p><b>H&amp;P 12:</b></p> <p>Work with Gypsy, Roma and Traveller community members, local authorities and others to provide appropriate transit provision. Decisions will be taken based on evidence of where transit is needed.</p>  | <p>Improved evidence for transit provision.</p> <p>Better relationships with and across local authorities.</p> <p>Better services for Gypsy, Roma and Traveller people.</p> <p>Travelling life for Gypsy, Roma, Traveller people is enabled through evidence based transit provision.</p> | <p>2025/6</p> <p>Equality and Human Rights Division</p> <p>Planning Division</p> <p>Land Division</p> <p>Gypsy, Roma and Traveller communities</p> <p>Local authorities</p> <p>Gypsy Roma and Traveller stakeholders</p> | <p>Priority area 1, 2, 3, 4 and 6</p>   |                          |

| Existing Actions  | Amended Actions  | Desired Outcomes   | By When   | Lead and Partners   | Key Priority Areas (1-6)              |
|---|--|--|---|---|---------------------------------------|
| <p><b>Old Action:</b> Pilot additional or new ways of funding permanent provision.</p>  | <p><b>Refreshed Action 2024: H&amp;P 13:</b><br/>Pilot additional or new ways of funding permanent provision.</p>                            | <p>Gypsy, Roma and Traveller communities housing needs are being met.</p>                        | <p>2024/25 for pilot development<br/><br/>2025/26 for pilot implementation.</p> | <p>Equality and Human Rights Division<br/><br/>Planning Division<br/><br/>Land Division<br/><br/>Gypsy, Roma and Traveller communities<br/>Local authorities<br/><br/>Gypsy Roma and Traveller stakeholders<br/><br/>Housing Associations</p> | <p>Priority area 1, 2, 3, 4 and 6</p> |
| <p><b>Old Action:</b> Explore the potential for a mobile home rental scheme run through social housing in order to improve quality and cost of rental provision in Wales.</p> | <p><b>Refreshed Action 2024: H&amp;P 14:</b><br/>Fund a study to look at options for a mobile home rental scheme through social housing.</p> | <p>Improved access to quality rental mobile homes for Gypsy, Roma and Traveller Communities.</p> | <p>Study looking at this procured in 2024/25</p>                                | <p>Equality and Human Rights Division<br/><br/>Housing Division<br/><br/>Gypsy, Roma and Traveller communities<br/><br/>Local authorities<br/><br/>Gypsy Roma and Traveller stakeholders<br/><br/>Housing Associations</p>                    | <p>Priority area 1, 2, 3, 4 and 6</p> |

| Existing Actions  | Amended Actions   | Desired Outcomes   | By When  | Lead and Partners  | Key Priority Areas (1-6)              |
|---|---|--|--|--|---------------------------------------|
| <p><b>Old Action:</b> Capital requirement for mobile home rental pilot.</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg); font-weight: bold; font-size: 1.2em;">Pack Page 136</p>   | <p><b>Refreshed Action 2024:</b></p> <p><b>H&amp;P 15:</b><br/>Depending on outcome of the mobile home rental scheme study, set up pilot scheme.</p>  | <p>Improved access to quality rental mobile homes for Gypsy, Roma and Traveller people and communities.</p>  | <p>2025/26</p> <p>Further discussions to take place following the findings of the mobile home rental scheme study.</p> | <p>Equality and Human Rights Division</p> <p>Housing Division</p> <p>Gypsy, Roma and Traveller communities</p> <p>Local authorities</p> <p>Gypsy Roma and Traveller stakeholders</p> <p>Housing Associations</p>             | <p>Priority area 1, 2, 3, 4 and 6</p> |
| <p><b>Old Action:</b> Provide learning and development support to Local Authority Elected Members on Gypsy, Roma and Traveller communities' culture, needs and strengths. The specification for the service will be drawn up to ensure the support will go beyond awareness-raising and will include anti-racism.</p> | <p><b>Refreshed Action 2024:</b></p> <p><b>H&amp;P 16:</b><br/>We will procure a framework for an external training company to develop and deliver a training course to upskill all 22 Local Authorities on Gypsy, Roma and Travellers nomadic ways of living. This will be developed with Gypsy, Roma and Traveller community members.</p> | <p>Elected members are informed and sensitive to the needs of Gypsy, Roma and Traveller communities.</p> <p>Racist language, sentiment and actions towards the Gypsy, Roma and Traveller communities are not tolerated and widely condemned.</p> | <p>2024/25</p> <p>Procurement of contract complete</p> <p>First round of training delivered</p>                        | <p>Equality and Human Rights Division</p> <p>Local Government Division</p> <p>Local authorities</p> <p>WLGA</p> <p>Involvement of Gypsy, Roma and Traveller communities to contribute to content and design of training.</p> | <p>Priorities 1 - 6</p>               |

| Existing Actions   | Amended Actions   | Desired Outcomes  |   | By When   | Lead and Partners                  | Key Priority Areas (1-6) |
|--|---|---|---|---|------------------------------------|--------------------------|
| <p><b>Old Action:</b> Commission a three-year pilot programme to provide independent, trusted advice to those seeking to develop private sites.</p>  | <p><b>Refreshed Action 2024:</b></p> <p><b>H&amp;P 17:</b><br/>Commission a three-year pilot programme to provide advice to those seeking to develop private sites.</p>   | <p>Increased private site provision, to an acceptable standard.</p> | <p>Procurement in 2024</p> <p>Pilot launch 2025</p> | <p>Training providers with lived experience.</p> <p>Equality and Human Rights Division</p> <p>Local authorities</p> <p>WLGA</p> <p>Gypsy, Roma and Traveller communities</p> <p>Gypsy, Roma and Traveller stakeholders</p> <p>Contract providers with lived experience.</p> | <p>Priorities 1, 2, 3, 4 and 6</p> |                          |
| <p><b>Old Action:</b> Review the current funding policy for Gypsy and Traveller sites and assess its effectiveness, with a view to piloting additional or new ways of funding site provision, including support for private sites.</p> | <p><b>Refreshed Action 2024:</b></p> <p><b>H&amp;P 18:</b><br/>Review the Gypsy and Traveller capital sites guidance. This will include reviewing the piloting of funding for buying land, feedback from the communities and a decision on funding for private sites.</p> | <p>More accessible and flexible ways of developing sites.</p>       | <p>2024 for 2025/26 capital funding</p>             | <p>Equality and Human Rights Division</p> <p>Local authorities</p> <p>WLGA</p> <p>Gypsy, Roma and Traveller communities.</p> <p>Gypsy, Roma and Traveller stakeholders</p>  | <p>Priorities 1, 2, 3, 4 and 6</p> |                          |

| Existing Actions   | Amended Actions  | Desired Outcomes   | By When     | Lead and Partners  | Key Priority Areas (1-6)  |
|--|--|--|-------------|--|---|
|  |  |  |             | Contract providers with lived experience.<br><br>Housing Associations.   |   |
| <p><b>Old Action:</b> Re-draft the Sites Guidance to ensure that the design and location needs of communities are better reflected in this document.</p> | <p><b>Refreshed Action 2024:</b></p> <p><b>H&amp;P 19:</b><br/>Re-draft and simplify the Gypsy and Traveller Sites Guidance, involving community members to reflect their needs.</p> | <p>Improved quality of local authority site homes.</p>   | By 2025     | <p>Equality and Human Rights Division</p> <p>Gypsy, Roma and Traveller communities</p> <p>Gypsy, Roma and Traveller stakeholders.<br/>Local authorities.</p> <p>Housing Associations</p> | Priorities 1, 2, 3, 4 and 6                                     |
| <p><b>Old Action:</b> Ensure existing legal mechanisms are fully utilised to ensure compliance with existing legislation.</p>                            | <p><b>Refreshed Action 2024:</b></p> <p><b>H&amp;P 20:</b><br/>Welsh Government will use its powers to ensure local authorities comply with the Housing (Wales) Act 2014.</p>        | <p>Local authorities compliance with Part 3 of the Housing Act (Wales) 2014 duties</p> <p>Gypsy, Roma and Traveller people receive appropriate housing and homelessness support.</p> | Ongoing     | <p>Equality and Human Rights Division</p> <p>Housing Division</p> <p>Planning Division</p> <p>Local authorities</p> <p>WLGA</p>  | Priorities 1 - 6  |
| <p><b>Goal:</b> To continuously improve our policy-development processes to create anti-racist approaches to all aspects of policy creation.</p>         |  |  |             |  |   |
|  |  |  | By end 2024 | Equality and Human Rights Division and Gypsy Roma  | Priority Areas 1,2,3,4,6<br>Potential for priority area 5 also. |

| Existing Actions  | Amended Actions | Desired Outcomes | By When   | Lead and Partners   | Key Priority Areas (1-6) |
|---|-----------------|------------------|---|---|--------------------------|
|   |                 |                  | <p>Contribution to policy making on an ongoing basis.</p> <p>Programme of meetings outlined for 2024.</p> | Traveller stakeholders  |                          |
| <p><b>Goal:</b> To ensure we engage with Black Asian Ethnic Minority communities and our services are delivered in a culturally competent and appropriate way</p> |                 |                  |   |   |                          |
|   |                 |                  | Procurement exercise during 2024, contract to run over three years  | Equality and Human Rights Division and Successful Bidder for contract | Priority area 3          |

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| <p align="center"><b><u>Please Provide Detail of Any Additional Work Triggered by ArWAP</u></b></p>   |
|---|
| <p>Inclusion of land acquisition within the criteria within the site's capital guidance for 2024/25. The Sites Capital Grant, of £3.44m is available for developments which will commence during the year 2024-2025.</p> <p>A more robust programme of scrutiny of local authority Gypsy Traveller Accommodation Assessments has been put in place.</p> <p>We will review Undertaking Gypsy and Traveller Accommodation Assessments in 2025.</p> <p>We will review the Designing Gypsy and Traveller sites guidance in 2025, and as part of that engagement will be undertaken with the community themselves.</p> |



## Narrative and actions for the Local Government Chapter of the refreshed Anti-racist Wales Action Plan

### Local Government

#### Some evidence

In the survey of candidates for the 2017 local government elections, 2.3% of candidates for county and county borough councils who provided their ethnicity and 1.9% of candidates for town and community councils were Black, Asian and Minority Ethnic people. Of those elected to county and county borough councils 1.8% and 1.2% in town and community councils were from ethnic minority background (Welsh Government, 2018). The response rate was 18%. In the year ending December 2017, analysis from the Annual Population Survey estimated that 4.7% of the population were Black, Asian and Minority Ethnic people (Stats Wales, 2022).

Of the 1,077 individuals who responded to the Local Government Candidate Survey 2022 (Welsh Government, 2022), 96 per cent of candidates reported they were from a White ethnic group, 1 per cent reporting they were from mixed or multiple ethnic groups and less than 1 per cent reported they were from Black, Black Welsh, Black British, Caribbean, or African ethnic groups. The response rate for County candidates was 15% and for Community candidates was 11%. The response rates across all respondents ranged from 40% in Merthyr Tydfil to 1% in the Isle of Anglesey. In 2021, the Census reported Black, Black British, Black Welsh, Caribbean or African" people were 0.9% of the population in Wales. "Asian, Asian British or Asian Welsh" ethnic groups was 2.9% while Mixed or Multiple ethnic groups" was 1.6%.

As both the 2017 and 2021 surveys of local government candidates' response rates have been low so caution should be applied in treating the results as being representative. Nevertheless, the surveys indicate our local democracy is not as diverse as our population.

#### Introduction

Local government in Wales consists of 22 county and county borough councils, 732 town and community councils, 4 national park authorities, 3 fire and rescue authorities and corporate joint committees.

These bodies are democratically led by elected councillors, deliver essential public services, and have an ethical and governance framework in common. Between them they are also major public service employers. There are more than 1,200 principal councillors, over 8,000 town and community councillors and over 125,000 local government employees.

The essential public services provided by local government are considered in all chapters of this Plan and therefore **this chapter should not be read in isolation**. Local government is a key partner in implementing anti-racism across the service delivery areas outlined elsewhere in this Plan and actions relating to these services are set out in those chapters. This Chapter focuses on how we can work with local government to build on existing good practice and embed anti-racism at the democratic, corporate and decision-making heart of councils. This is because local government is much more than a deliverer of public services, it provides democratic community leadership through local vision and ambition.

This Chapter therefore focusses on strengthening governance and corporate systems to enable our local democracy to welcome, value and thrive by embracing diverse voices both elected and participative. The chapter outlines particular strategies that reflect the anti-racist ambitions of this Plan and that focus on proactive steps to garner greater democratic representation of Black, Asian and Minority Ethnic individuals.

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

### **What we will do**

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

Some progress has been made in advancing the goals of promoting anti-racism, inclusivity and representation in local government. These include reducing the voting age to sixteen and enfranchising qualifying foreign nationals, providing local authorities with the flexibility to hold hybrid and virtual meetings, enabling job-share arrangements for councillors holding cabinet roles and consultation on job sharing for other senior political roles such as chairs of committees. Wales was the first nation in the UK to introduce family absence for councillors within principal councils and to introduce a candidates' survey to collect diversity data about those standing for and being elected to local government. We have made changes to both since they were established in response to stakeholder feedback, and we continue to look for further development opportunities in these areas to maximise their impact.

The Elections and Elected Bodies (Wales) Act 2024 (the 2024 Act) makes provision for Welsh Ministers to establish financial and non-financial support schemes to promote diversity of elected representation and to remove barriers to standing for election, for people from protected characteristic groups and those impacted by socio-economic circumstances. We will work with Black Asian and Minority Ethnic people to identify evidence based tailored schemes of support for candidates. This work will also include taking a broader approach focussing on building the pipeline of individuals interested in standing for election.

Disability forms an important intersection with race. Work to deliver the pilot Access to Elected Office Fund, designed to support disabled candidates to stand for election at the most recent Senedd and local government elections, has informed the new legislative provision. The 2024 Act will, for the first time, require Welsh Ministers to provide for a scheme of financial assistance to support disabled candidates. This will provide support for disabled Black, Asian and Minority Ethnic people to stand for elected office. The 2024 Act includes provision to ensure anyone involved in decision making about the allocation of support, in particular cases, is independent of Government and political parties.

Embedding anti racism in the democratic and corporate decision-making processes of local government will be supported by the development of a formal strategic relationship agreement between the Welsh Government and local government. This will be co-developed and focused on delivering how we will work together as trusted partners to deliver the shared strategic priorities for national and local government. This agreement will include closer joint working on future policy and legislation proposals. It will also include the expectations national and local government have of each other and regular review of progress against delivery of those expectations, including the Anti-Racist Wales Action Plan. The engagement includes regular meetings between members of the Welsh Government Cabinet and local authority leaders and Chief Executives. Progress against the Anti-racist Wales Action Plan will be prioritised for discussion and follow up action in this forum. This ensures delivery of the Plan is an integral part of the regular political engagement between Welsh Government and local government and the Partnership Council will monitor and evaluate progress against its goals.

We have a long commitment to promoting ethical behaviour amongst our local elected representatives. The current ethical framework has been in place since 2000. We passed legislation in 2021 to strengthen it, by requiring political group leaders to promote high standards of conduct amongst their members and requiring Standards Committees to make an annual report, including recommendations on how local processes can be improved. High standards of ethical behaviour are critical to ensure trust between communities and councillors and to ensure councillors from diverse backgrounds feel they will not be subject to abuse which goes unchecked. We are therefore continuing to review the legislative framework which sets the ethical standards expected of those elected to local government. to ensure the legislative framework promotes anti-racism

We are also reviewing the legislation and guidance which governs political and corporate decision making in councils to ensure anti racism is embedded in democratic processes, and in how democratic engagement is undertaken. We want to create an environment where everyone wants and feels able to participate in democracy, including by exercising their right to vote. This means exploring why people who are already enfranchised do not vote. In taking this forward, we will consider how accessible the process of participating in elections is for ethnic minority people, for example, what voter information and support should be available.

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

The response rates from the Local Government Candidates Survey continue to be disappointing. The Elections and Elected Bodies (Wales) Act 2024 removes the current rigid arrangements around the format and content of the survey and the process underpinning its development and publication. There will, in future, be a core set of questions that will apply to all local authority areas, and an option for each local authority to ask

questions about local arrangements and their impact. The questions will be developed in conjunction with key stakeholders. In parallel we will consider what proactive steps can be put in place to encourage more people from ethnic minority backgrounds to participate in the survey.

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

Local government is an essential part of the Welsh public sector, and we expect local government, as with the rest of the public sector including Welsh Government, to set itself high standards in all areas, including taking a stance as an anti-racist employer. Each local government body is a sovereign body and, in terms of their role as an employer, it is for each council to ensure an anti-racist culture exists within the organisation and that this underpins its recruitment policies, complaints policies, terms and conditions and all aspects of its employment policies. We know that local authorities are doing so and will have agreed these policies in partnership with trade unions. Training on anti-racism is available both through the WLGA and individual local authorities. We will work with local government through WLGA, the HR Directors network and others to explore how to use lived experience from black, Asian and minority ethnic people in their existing improvement approaches including self-assessment, peer mentoring, assessment panels and other expert support to continue to develop as exemplar authorities.

Data and understanding are important aspects of this work. Data should be part of existing administrative systems where possible rather than create new burdens. While this may start with the numbers of black, Asian and minority ethnic people employed it is also important to consider success and progression. While each organisation will need to identify and understand its own information and what this means for its own ability to reflect and respond to its local population, we will work with WLGA to consider how collective information can be available. Our review of the current pay policy statement regulations confirmed that whilst there is no statutory requirement to include ethnicity data, there is nothing preventing local government from going further, and through our discussions at Partnership Council etc we will encourage local authorities to do so.

In the next two years we will:

- support local government's leadership of the delivery of the Anti-racist Wales Action Plan through our regular Ministerial and senior official engagement with the political and senior officer leadership of local government.
- build on the pilot of the Access to Elected Office Fund to inform the financial support scheme for disabled candidates including ethnic minority people for the next Senedd and local government elections as required through the provisions of the Elections and Elected Bodies (Wales) Act 2024.
- work with stakeholders to identify evidence based financial and non-financial support schemes which can be put in place prior to the next Senedd and local government elections, to remove the barriers to standing for elected office for people from a range of protected characteristic groups and those impacted by socio-economic circumstances.
- work with partners to adopt an anti-racist lens in exploring what further steps we can take to promote the importance of the local government candidate survey and encourage a greater level of completion.

- build on the work undertaken to remove the barriers to participation for senior councillors within principal councils, including ethnic minority people through job share arrangements, informed by a consultation about extending provisions to senior councillor non-executive roles within principal councils.
- explore the impact of abuse in politics on minority ethnic groups and identify actions to address it.
- continue our work on reviewing the local government ethical framework with a focus on anti-racism, including the Code of Conduct, to improve the complaints system for public and local government staff, and for those in elected office who may need to complain about the behaviour of other councillors.
- improve the electoral registration system to enable every eligible elector to be registered.
- support better information for electors from ethnic minority backgrounds, so they are confident in participating in electoral events.
- engage with stakeholders to evaluate whether public participation strategies are having a positive impact on the ability of Black, Asian and Minority Ethnic people to participate in their council's decision making.
- work with WLGA and others to support local authorities to continue to improve HR policies, procedures and data to enable authorities to continue to develop as exemplars in this work.

| Existing Actions     | Amended Actions   | Desired Outcomes   | By When                | Lead and Partners                                     | Key Priority Areas (1-6) |
|----------------------|---|--|------------------------|---|--------------------------|
| Pack Page 145<br>New | <b>Action:</b><br><b>LG 1:</b><br>Embed anti racism at the heart of our strategic partnership working with local government | More inclusive policies and practices that address systemic racial inequalities fostering improved public trust, particularly among marginalized communities, by ensuring fair access to services and opportunities.<br><br>More effective solutions to racial disparities reduces discrimination, and promotes economic and social equity where all | Immediate and on-going | WLGA, local authorities, Local Government Directorate | 1-6                      |

|  |  |   |            |   |     |
|--|--|---|------------|---|-----|
|  |  | individuals are valued and empowered.   |            |   |     |
| <b>Action:</b><br>Expand the principles of the access to elected office fund.<br><br>Pack Page 146 | <b>LG 2</b><br>Build a legislative framework which enables Welsh Ministers to establish, evidence based, financial and non-financial support arrangements for candidates from Black, Asian and Minority Ethnic backgrounds and other under-represented groups including those from lower socio-economic backgrounds prior to the next Senedd and local government elections. | Identification of barriers to participation and proposed schemes to address barriers through evidence based specific tailored support schemes for Black, Asian and Minority Ethnic individuals.<br><br>Increased levels of Black, Asian and Minority Ethnic people putting themselves forward to stand in the next local government elections | End 2024   | Local Government Directorate in Welsh Government, local authorities, Welsh Local Government Association (WLGA), One Voice Wales, political parties and third sector partners. | 1-3 |
|  |  |   | March 2025 |   |     |
|  |  |   | End 2025   |   |     |
|  |  |   | May 2027   |   |     |
| <b>Action:</b>   | <b>LG 3</b><br>Build on the arrangements for senior councillors within principal councils to undertake roles on a job share basis.   | Promotion of inclusivity and work-life balance leads to increased diversity in leadership with greater opportunities for individuals with caregiving responsibilities, disabilities,  | End 2024   | Local Government Directorate in Welsh Government, local authorities, Welsh Local Government Association (WLGA), political parties   | 1-3 |

|   |   |  |                           |   |     |
|---|---|--|---------------------------|---|-----|
|   |   | or other commitments to step into senior roles.  | End 2025                  |   |     |
| <b>Action:</b><br>Review and implement changes to the local government ethical framework.     | <b>LG 4</b><br>Build on the outcome of consultations through updated legislation and guidance in respect of the ethical framework   | Black, Asian and Minority Ethnic people trust their elected representatives and feel able to stand for election.   | End 2025.<br><br>End 2025 | Local Government Directorate in Welsh Government, local authorities, Welsh Local Government Association (WLGA), One Voice Wales, Public Services Ombudsman Wales.   | 1-5 |
| <b>Action:</b><br>Review guidance on involvement and participation in local government.       | <b>LG 5</b><br>Establish the nature and extent of public participation strategies.<br><br>Evaluate the impact of guidance published in 2023 on involvement and participation in local government. | Black, Asian and Minority Ethnic people feel engaged and represented by local democracy.   | End 2024.<br><br>End 2025 | Local Government Directorate in Welsh Government, local authorities, Welsh Local Government Association (WLGA),<br><br>External research commissioned as appropriate.                                     | 1-5 |
| Publish plans for improved information and engagement in relation to registration and voting. | <b>LG 6</b><br>Pilot registration of voters without application, using powers in the Elections and Elected Bodies (Wales) Act 2024.   | A more complete electoral register, using data held by local authorities, reducing rates of under-registration. Black, Asian and Minority Ethnic people feel engaged and represented by local democracy. | End 2025.                 | Local Government Directorate in Welsh Government, local authorities, electoral registration officers, Electoral Commission, Welsh Local Government Association (WLGA), One Voice Wales, political parties | 1-5 |

|   |  |  |                                      |  |               |
|---|--|--|--------------------------------------|--|---------------|
| <p><b>Action:</b></p> <p>Use improvement funding to local government to drive best practice in employment policies as part of good governance and performance - completed</p> | <p><b>LG 7</b></p> <p>Work with WLGA to support councils existing improvement methods to continue to embed anti-racism in HR Policies for principal councils</p> | <p>Effective anti-racist HR policies ensure Black, Asian and Minority Ethnic people feel safe, confident and supported when working within local government.</p>   | <p>By March 2026</p>                 | <p>Local Government, Local Government Directorate in Welsh Government, WLGA, , Trade Unions,</p> | <p>1-4, 6</p> |
| <p><b>Action:</b></p> <p>Review data Publishing requirements in relation to pay policy statements - completed</p>   | <p><b>LG 8</b></p> <p>Consider, with local government, how existing data collection can be developed locally and nationally</p>                                  | <p>Good quality employment data is collected in each local authority, including useable, harmonised ethnicity categorisations. This data supports development of effective anti-racist policies and decision making.</p> <p>Data is understood and used by local political and executive leadership.</p> | <p>By March 2026</p> <p>Reviewed</p> | <p>Local Government, Local Government Directorate in Welsh Government, WLGA, , Trade Unions,</p> | <p>1-4, 6</p> |



## Welsh Government Anti-racist Wales Action Plan (ArWAP) Refresh June 2024 – June 2026

### Childcare and Play

#### Some evidence

Despite improvements over time, attainment in the early years in Wales has been shown to vary by ethnicity. Data for 2018/19 showed that Gypsy Roma and Traveller children had the lowest attainment and also experienced the largest decline in attainment since 2016/17. Conversely, Indian, Chinese and Pakistani ethnic groups had the highest attainment rates ([EHRC, 2023](#)). Data have also shown that Black and Black British children have lower attainment levels in the early years compared to their peers ([Stats Wales, 2017-19](#)).

2021 Welsh Government published findings from a qualitative study of beliefs, behaviours and barriers affecting parental decisions regarding childcare and early education. The study covered nine areas of Wales and included seven Black, Asian, and Minority Ethnic parent(s) and the researchers found most of the Black, Asian and Minority Ethnic families accessed some Foundation Phase Nursery (FPN) or childcare provision, even if they were not eligible for the Childcare Offer. Some of the considerations they had in relation to accessing childcare and early education provision included negotiating different educational experiences compared to their own in their country of origin, attempting to replicate some of their own upbringing and maintaining cultural and language practices while managing the different social norms and behaviours expected in childcare and FPN provision in Wales. In addition, Black, Asian and Minority Ethnic parents mentioned how different educational experiences are now compared to their own, and were keen to replicate some of their own upbringing ([Welsh Government, 2021](#)).

A literature search undertaken by the Welsh Government library service revealed that research and evidence relating to access to childcare and play services is also limited, especially in a Wales or UK context. Our ongoing engagement with the Welsh Government appointed Community Mentors has indicated that there are a variety of barriers that can discourage individuals from Black, Asian and Minority Ethnic communities from accessing childcare and play services. Further work exploring these issues is underway via a project being undertaken by the International Public Policy Observatory (IPPO).

Data on the ethnicity of the childcare and play workforce in Wales is currently very limited. In the absence of larger data sets and to support the action plan we will continue to work with key partners and stakeholders to focus on smaller scale work to develop our understanding further.



## Introduction

Since the last iteration of the ArWAP, the Childcare and Play sector and partners have been working collaboratively with Welsh Government on delivering the commitments in the ArWAP. The first action of the group was to recognise the lack of racial representation and for each person to complete Diversity and Anti Racist Professional Learning (DARPL). This has provided a strong collective understanding of what being anti-racist means helping to ensure that what the group does, as well as how the work is undertaken is anti-racist.

Three Sub-Groups have been established to ensure the specific actions within the ArWAP are progressing and delivered. These are aligned and are responsible for specific goals and actions: Research; Professional Learning and Best Practice; and Community Mentoring and Allyship. Each Group meet on a quarterly basis and are overseen and report to the main Governance Group. The Governance Group is a central point for the race-related work in the sector. The Group supports key partners to join up and share in both the shaping and delivery of the actions, ensuring timely delivery and progress.

In May 2023 in collaboration with [Diversity and Anti Racist Professional Learning \(DARPL\)](#) and [Childcare, Wales Learning and Working Mutually \(CWLWM\)](#), Wales' first Early Years anti-racist learning resources were launched [Childcare, Play and Early Years - DARPL](#). The DARPL resources are peer reviewed drawing on lived experiences. The provision comprises free online sessions and guidance, and through in-person consultations and events. DARPL supports leadership and professional practice in tackling anti-racism and cultural change through professional learning continuums, exploring commitments, actions, policies, research approaches and strategies for all levels of the workforce.

Welsh Government have recruited 9 Community Mentors who are individuals from Black, Asian and Minority Ethnic communities with knowledge or experience of the impact of racism within childcare, playwork and early years. The Community Mentors have been supporting and working with Welsh Government policy teams and childcare and playwork sector partners to develop understanding of lived experiences of childcare and how we can develop and embed an anti-racist approach across the sector. Our Community Mentors have a role in the strategic direction of our ArWAP work as members of our three childcare ArWAP sub-groups and Governance Group and have a direct impact on the work being undertaken to progress our ArWAP goals through their involvement in operational aspects of the work. Community Mentors have supported a variety of work to date, from working with CWLWM partners to develop anti-racist and inclusive resources, through to working with local authorities to improve childcare sufficiency assessments. We will continue to work with Community Mentors in 2024/25 to collaborate and support the actions and deliverables of ArWAP, to ensure the work, policies and resources are being developed through an anti-racist lens.

Within the Childcare and Play ArWAP commitments, a key action is research and data. Data on ethnicity of the childcare and play workforce in Wales is very limited. Various avenues have been explored to obtain further data with key stakeholders including CWLWM members with limited



success. We have recognised that due to the absence of large data sets, in order to better understand the ethnicity in the sector and those who access and take up childcare there is a need to focus on smaller scale projects. There are currently a number of activities ongoing, including -

- International Public Policy Observatory (IPPO) Project around enablers and barriers to participation in early childhood, play, learning and care (ECPLC) among Black, Asian and Minority Ethnic children and families.
- Lived experience Project with Community Mentors to understand the attitudes and lived experiences of those who have considered using or have used childcare as well as those that have worked in the sector.
- Workforce Mapping, seeking to understand the make-up of the workforce and modelling the workforce needs to meet current commitments.

In collaboration with DARPL and CWLWM partners a Creating an Anti-racist Culture in Childcare Settings<sup>5</sup> Toolkit for the Childcare, Play and Early Years sector has been developed and was launched at the DARPL National Leadership Conference in June 2024. The toolkit is a practical resource to promote, support and challenge professional learning in anti-racist professional practice. The vision is that the toolkit will be as accessible and practical as possible. To complement this a 'Tube Map'<sup>6</sup> has been developed which will support individuals at all levels to identify appropriate resources and training.

To specifically support settings to understand and deal with racist incidents and bullying, the Creating an Anti-racist Culture in Childcare Settings Toolkit contains a flowchart to help childcare and playwork providers understand what comprises a racist incident and how it should be addressed. A further specific guide, Eradicate Racism in Learning Organisations<sup>7</sup> also launched at the DARPL Conference in June 2024 offers further support and practical guidance for settings on this specific issue.

Welsh Government have been working with Care Inspectorate Wales (CIW) to support inspectors to become racially literate. Supported by DARPL, leaders in CIW have established an anti-racist champions group, the CIW leadership team are committed to long-term professional learning and development. Resources and programmes are currently being developed for inspectors to understand how to sensitively and proactively champion good anti-racist practice and appropriately challenge poor practice. Community Mentors will be working with CIW to review

<sup>5</sup> [DARPL-Early-Years-Toolkit\\_ENGLISH.pdf](#)

<sup>6</sup> [Map-Tiwb-Terfynol\\_Final-Tube-Map-CPEY-DARPL-CWLWM-dragged.pdf](#)

<sup>7</sup> [DARPL-Eradicating-Racism-Guide\\_ENGLISH.pdf](#)



their Inspection Framework (the basis on which inspections are undertaken) through an anti-racist lens to support inspectors to recognise anti-racist good practice and identify where practice and provision needs further support in adopting anti-racist approaches.

CWLWM partners are working closely with Welsh Government and DARPL to develop a range of resources and programmes to support an anti-racist approach some of which are already available and being utilised while others are at varying levels of development. These include short and longer term anti-racist training and CPD programmes for childcare leaders and practitioners, resource packs to support settings to celebrate diversity and the reviewing of a variety of policies and policy templates. Community Mentors have been supporting the progression of these programmes and resources to ensure they are fit for purpose and include the perspective of people from Black, Asian and Minority Ethnic communities and those with lived experience.

We are working with local authorities to improve their engagement with Black, Asian and Minority Ethnic people when taking forward some of their regulatory duties, such as undertaking Childcare and Play Sufficiency Assessments. Local authorities and sector partners have been engaging with Community Mentors to help them progress this work.

### What we will do

Further progress is required to ensure that experiences of those working within childcare and play and those using these services are anti-racist. The priorities over the next two years are not considerably different from those in the first iteration of the plan. We will continue to develop the understanding of the challenges being faced by people working in the childcare and play and those receiving care and support, including working with our Community Mentors to ensure that lived experiences of racism is a key focus in shaping policies, research and resources.

- **Leadership and Representation:** The DARPL training and professional learning opportunities resources are available, to target cultural change and supports and challenges leadership and professional practice in tackling anti-racism, exploring commitments, actions and strategies. Further collaborative advocacy work is needed in promoting and publicising these within the sector. The Creating an Anti-racist Culture in Settings toolkit will help setting leaders better understand anti-racism and how they can implement anti-racist approaches to attract staff from diverse backgrounds. Further senior leaders sessions with DARPL will be run over 2024/25 to support the implementation of the best practice toolkit and wider professional learning. We are striving to develop a research approach that enables us to engage with Black, Asian and Minority Ethnic people to understand their perspectives of childcare as a place to work and engage with existing staff to understand experiences of working in childcare and how those working in childcare from Black, Asian and Minority Ethnic backgrounds can be supported both to work in childcare but also to enter leadership positions.



- **Intersectionality:** We are striving to obtain further data on the childcare and playwork workforce, this will include data on all protected characteristics and the interplay between race and geography/rurality and socio-economic background when it comes to accessing or working in childcare. We will work collaboratively to develop a monitoring approach to assess cultural change in the childcare and playwork sector including consideration of the impact of the Creating an Anti-racist Culture in Settings toolkit.
- **Gypsy, Roma and Traveller:** We will continue to work with local authorities via their Flying Start programmes to support and help Gypsy, Roma and Travellers to access services and provisions. Currently, Gypsy, Roma and Traveller communities are listed as a possible 'community of interest' in Flying Start guidance, with LAs encouraged to consider them for Flying Start outreach support. Local authorities are also asked to report on engagement with Gypsy, Roma and Traveller communities as part of their Flying Start provision. Work is currently underway to understand the extent of the engagement and support to date. Further small scale qualitative research with Gypsy, Roma and Traveller communities is being explored.
- **Data and Research:** Due to lack of large childcare workforce datasets that provide detail on the make-up and diversity of the workforce, work is underway to gain insight and understanding of the diversity of the workforce on a smaller scale. The aim is to build the evidence base through further lived experience projects and other smaller focused qualitative research projects and activities. We will also work with the Welsh Government's Equalities Evidence Units to improve larger data collections. In developing research designs and approaches we will be mindful of the need to consider lived experience representation and will ensure we involve individuals and teams from the very outset. To develop our data and understanding of those accessing childcare, from 2024 all parents who apply to access the Childcare Offer for Wales will be asked optional questions about their ethnic group, and the ethnic group of the relevant child and of any other parent or partner in the household. These questions will not be mandatory. Data gathered through these questions will be used as part of routine monitoring of the Offer. If sufficient responses are received to these questions, analysis will be included in annual published reporting. The aim of this data collection will be to identify whether families who access the Offer are representative of the target population (parents of children aged 3 and 4 years who are in employment or education) in terms of ethnic background. Findings may then be used to inform the design of future research and policy development.
- **Strengthening Complaints System:** There are not currently clear routes and mechanisms for childcare and playwork workers and users who are experiencing racism to raise their concerns and receive support. As a sector comprising mostly small private businesses or charities, it is notable that there is no single national complaints system in childcare, but we want to make sure that childcare settings are able to recognise and respond to racist incidents or bullying. Welsh Government also has a clear aim to work with CWLWM and DARPL to help create a culture where people feel able to raise concerns; where settings are supported to enhance their



knowledge of anti-racism and have processes and systems in place to deal with complaints. The Creating an Anti-racist Culture in Settings toolkit contains advice and guidance to settings on recognising and responding to racist incidents. It contains a flow chart to help settings identify racist incidents and the steps that can be taken in response to ensure the incident is dealt with and the victim supported. The Eradicating Racism in Learning Organisations Guidance can be used with the flow chart and provides further guidance on approaches that can be taken depending on the circumstances and role of those involved. DARPL senior leader and practitioner professional learning sessions will be developed to support the implementation of the toolkit with a focus on raising and dealing with complaints. We will work collaboratively to develop a monitoring approach to assess cultural change in the childcare and playwork sector including raising and dealing with complaints as part of consideration of the impact of the Creating an Anti-racist Culture in Settings tool kit.

- **Positive Action:** Involving Community Mentors in our approach to implementing the actions in ArWAP has provided a powerful and dynamic way to engage with and work collaboratively with the sector to ensure that what we do, and how we work, is anti-racist. We will continue to work with Community Mentors and DARPL Community of practice in 2024/25 to collaborate and support the actions and deliverables of ArWAP, to ensure the work, policies and resources that are being developed by us and partners focus on lived experiences and are through an anti-racist lens.

We have been working collaboratively with sector representative bodies, sponsored bodies, local authorities, individuals with lived experiences and key internal partners to review, shape and refresh the ArWAP goals and actions.

These bodies and key partners include but are not limited to:

**CWLWM** – A consortium of 5 Childcare and Play partners, whose focus is to provide a bilingual integrated service that will ensure the best possible outcome for children and families across Wales.

**Play Wales** – The National charity for children’s play in Wales, whose campaign is to create play-friendly Wales by leading with intention, collaborating with inclusivity, educating with enthusiasm, and supporting with sensitivity.

**Care inspectorate Wales (CIW)** – Who register, inspect and take action to improve the quality and safety of services for the well-being of the people of Wales.

**Diversity and anti-racist Professional Learning (DARPL)** – DARPL brings together a diverse team and a dynamic community of practice comprised of those with lived and professional experience. DARPL provides anti-racist professional learning for education and childcare sectors.



**Community Mentors** - are individuals working with Welsh Government and are from Black, Asian and Minority Ethnic communities with knowledge or experience of the impact of racism within childcare, playwork and early years.

| Existing Actions   | Amended Actions  | Desired Outcomes   | By When                      | Lead and Partners   | Key Priority Areas (1-6) |
|--|--|--|------------------------------|---|--------------------------|
| <p><b>1.1 Action:</b> The Welsh Government will work with sector representative bodies and sponsored bodies to develop plans to support the An Anti-Racist Wales Action Plan in their work and report progress against objectives in relation to anti-racism as part of their organisations work to meet the vision of an Anti-racist Wales.</p> | <p><b>C&amp;P 1:</b> The Welsh Government will set up working groups meeting no less frequently than 6 monthly to work with sector representative bodies, sponsored bodies and individuals with lived experience. The groups will support the implementation of the Anti-racist Wales Action Plan in their work and report progress against objectives in relation to anti-racism as part of their organisations' work to meet the vision of an Anti-Racist Wales.</p> | <p>Meaningful change to anti-racist approach in childcare and playwork is achieved through co-production between the sector and anti-racist experts with lived experience.</p> <p>Developed sub-groups and overarching Governance group provide structure to ensure progress against ArWAP goals and actions is monitored.</p> | On-going                     | In partnership with sector representative bodies and sponsored bodies | 1-6                      |
| <p><b>1.2 Action:</b> Focused on lived experience, anti-racism, allyship</p>   | <p><b>C&amp;P 2:</b> The Welsh Government will work in collaboration with sector</p>   | <p>Sector wide promotion of a variety of anti-racist training and support available ensures anti-racism is embedded in the work and practices of the sector.</p>   | On-going – reviewed annually | In partnership with sector representative bodies and sponsored bodies | 1,2,3,4,5                |

| Existing Actions   | Amended Actions  | Desired Outcomes  | By When  | Lead and Partners  | Key Priority Areas (1-6) |
|--|--|---|--|--|--------------------------|
| <p>and cultural competence, the Welsh Government will work in collaboration with sector partners and Black, Asian and Minority Ethnic partners to develop and refresh anti-racist training for the sector and promote its use.</p>   | <p>partners and Black, Asian and Minority Ethnic partners to promote and encourage the Childcare and Play workforce to undertake Anti-racism training. Take up rates will be monitored through existing reporting mechanisms. Annual review of progress.</p>   |   |  |  |                          |
| <p><b>1.3 Action:</b> The Welsh Government will consider, in partnership with sector partners, whether the childcare and play workforce should be required to complete training programmes in relation to anti-racism, and if so</p> | <p><b>C&amp;P 3:</b> – Bringing together original 1.3 and 1.4 The Welsh Government, in partnership with sector partners will develop (and keep under review) an Anti-racist best practice toolkit to be attached to the National Minimum Standards – this will include practical best practice advice for:</p> <ul style="list-style-type: none"> <li>• Governance and Leadership</li> </ul> | <p>Using a best practice toolkit mentioned in the national minimum standards for regulatory childcare, an anti-racist approach in the provision of childcare and playwork becomes a best practice standard within the industry.</p> | <p>Best practice toolkit launched in June 2024.</p> <p>Review and update if necessary 2025</p> | <p>In partnership with sector representative bodies and sponsored bodies</p> | <p>1-6</p>               |

| Existing Actions   | Amended Actions   | Desired Outcomes | By When | Lead and Partners | Key Priority Areas (1-6) |
|--|---|------------------|---------|-------------------|--------------------------|
| <p>through what mechanisms.</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Pack Page 157</p> | <ul style="list-style-type: none"> <li>Setting floor / environment</li> <li>Parents, Carers and Community Partnerships</li> <li>Professional Learning</li> <li>Practice, Play and Curriculum</li> <li>Dealing with racist incidents/bullying</li> </ul> <p>The Toolkit is reviewed within the first year to determine its effectiveness and amended if necessary following feedback from childcare and playwork settings.</p> <p>Cultural change in the sector is monitored in collaboration with stakeholders.</p> |                  |         |                   |                          |
| <p><b>1.4 Action:</b> The Welsh Government will, in partnership with sector partners,</p>                          | <p><b>Covered by C&amp;P 1.3 above.</b></p>   |                  |         |                   |                          |

| Existing Actions  | Amended Actions  | Desired Outcomes   | By When                                       | Lead and Partners   | Key Priority Areas (1-6) |
|---|--|--|---|---|--------------------------|
| <p>consider how to collate and review concerns of workforce discrimination and bullying raised by staff.</p>  |  |  |   |   |                          |
| <p><b>1.5 Action:</b> Supporting Workforce change, Welsh Government and sector partners will review existing best practice templates for workforce policies and procedure developed to support providers through an anti-racist lens, to ensure that policies reflect change.</p> | <p><b>C&amp;P 4:</b> Supporting Workforce change, Welsh Government and CWLWM partners will promote the use of the best practice tool kit and review it within one year of launch to ensure that the toolkit is fit for purpose and takes account of challenges settings may face in embedding the practices.</p> <p>CWLWM partners will support settings to use the toolkit embedding an anti-racist approach in setting policies and practices.</p> | <p>Best practice templates provided by CWLWM partners to their members (i.e. settings) will reflect an anti-racist approach and settings feel confident and knowledgeable about how deliver an anti-racist approach for their provision.</p> | <p>September 2025</p>                         | <p>Promotion In partnership with sector representative bodies and sponsored bodies.</p> <p>Review to incorporate feedback from settings and in partnership with sector representative bodies, sponsored bodies.</p> | <p>1,2,3,4</p>           |
| <p><b>1.6 Action:</b> The Welsh Government will work with Care Inspection Wales</p>   | <p><b>C&amp;P 5:</b> To support the development of anti-racist practice within settings, CIW will develop and</p>  | <p>CIW inspections promote and enable an anti-racist approach in childcare because CIW inspectors feel confident</p>   | <p>Professional learning programme live -</p> | <p>CIW in partnership with Welsh Government policy teams, sector</p>  | <p>1-6</p>               |

| Existing Actions   | Amended Actions   | Desired Outcomes  | By When                   | Lead and Partners   | Key Priority Areas (1-6) |
|--|---|---|---------------------------|---|--------------------------|
| <p>and other partners to promote anti-racist working practices in workforce policies and procedures of providers.</p>  | <p>implement a programme of professional learning for inspectors.</p> <p>Welsh Government and CIW will annually review and update the inspection framework through an anti-racist lens.</p>   | <p>and knowledgeable about how to deliver an anti-racist approach.</p>  |                           | <p>representative bodies, sponsored bodies</p>  |                          |
| <p><b>7 Action:</b> The Welsh Government, working with sector partners will commission a programme of work to survey staff from Black, Asian and Minority Ethnic backgrounds on their experiences of working in the sector and co-produce proposals on improving their experiences and career prospects.</p> | <p><b>C&amp;P 6:</b> The Welsh Government, working with sector partners will build on existing research with those from Black, Asian and Minority Ethnic backgrounds to understand their experiences of working in the sector and co-produce proposals to support greater racial diversity in the sector.</p> | <p>Black, Asian and Minority Ethnic people are more included in recruitment campaigns enabling clear career paths and progression to be developed and promoted.</p> <p>There is greater racial diversity across the workforce within the sector at all levels of seniority.</p> | <p>Review – July 2025</p> | <ul style="list-style-type: none"> <li>In partnership with sector representative bodies and sponsored bodies</li> </ul> | <p>1-6</p>               |

| Existing Actions   | Amended Actions   | Desired Outcomes   | By When                                | Lead and Partners  | Key Priority Areas (1-6) |
|--|---|--|--|--|--------------------------|
| <p><b>2.1 Action:</b> The Welsh Government will establish a dedicated working group, the working group including sector representative bodies, will work alongside people from Black, Asian and Minority Ethnic Communities, to identify barriers faced by these communities in accessing services. The working group will make recommendations on how barriers can be removed to ensure equality of access to services.</p> | <p><b>C&amp;P 7:</b> The Welsh Government will continue to work with the Sub-Groups including Community Mentors to work alongside people from Black, Asian and Minority Ethnic Communities, to identify barriers faced by these communities in accessing services. The working group will make recommendations on how barriers can be removed to ensure equality of access to services.</p> | <p>Black, Asian and Minority Ethnic people have equality of access to the services they need.</p>                      | <p>Progress review in July 2025</p>    | <p>In partnership with sector representative bodies and sponsored bodies.</p> <ul style="list-style-type: none"> <li>•Community Mentors</li> </ul> | <p>1-6</p>               |
| <p><b>2.2 Action:</b> Local authority partners, will engage with</p>   | <p><b>C&amp;P 8:</b> Local authority partners, will engage with Black, Asian and Minority</p>   | <p>Local authorities will work closer with Black, Asian and Minority Ethnic communities to ensure their voices are</p> | <p>Review regulations and identify</p> | <ul style="list-style-type: none"> <li>• Local authorities.</li> <li>• Community Mentors</li> </ul>  |                          |

| Existing Actions   | Amended Actions   | Desired Outcomes  | By When                       | Lead and Partners  | Key Priority Areas (1-6) |
|--|---|---|-------------------------------|--|--------------------------|
| Black, Asian and Minority Ethnic communities to identify how the voice and lived experiences of people in these communities can be better captured as part of the Childcare Sufficiency Assessment that local authorities are required to undertake. | Ethnic communities to identify how the voice and lived experiences of people in these communities can be better captured as part of the Childcare Sufficiency Assessment and Play Sufficiency Assessments that local authorities are required to undertake. | heard in CSA and PSAs, and the assessments will reflect the needs of those from Black, Asian and Minority Ethnic backgrounds. | need for amendments– Dec 2025 |  |                          |
| <b>3.1 Action:</b> The Welsh Government and sector partners will work to improve provider’s awareness of anti-racism within the new curriculum.  | <b>C&amp;P 9:</b> The Welsh Government and sector partners will work to improve practitioner awareness of anti-racism within the Curriculum for Wales.  | Practitioners understand and support learning and development via Diversity and Anti-Racist Professional Learning (DARPL).    |                               | <ul style="list-style-type: none"> <li>• In partnership with sector representative bodies sponsored bodies.</li> <li>• Community Mentors</li> </ul>            | 1-3                      |
| <b>3.2 Action:</b> Focused on lived experience, anti-racism, allyship and cultural competence, the   | <b>C&amp;P 10:</b> Focused on lived experience, anti-racism, allyship, advocacy and cultural competence, the Welsh Government will  | Sector partners are supported to understand and practice an anti-racist approach.   |                               | <ul style="list-style-type: none"> <li>• In partnership with sector representative bodies sponsored bodies.</li> <li>• People from Black, Asian and</li> </ul> | 1-6                      |

| Existing Actions   | Amended Actions   | Desired Outcomes | By When | Lead and Partners                  | Key Priority Areas (1-6) |
|--|---|------------------|---------|------------------------------------|--------------------------|
| <p>Welsh Government will work with sector partners, in collaboration with Black, Asian and Minority Ethnic partners, to design learning materials to support settings to include the teaching of Black, Asian and Minority Ethnic communities within childcare and play settings and to ensure practitioners are supported to do so.</p> | <p>work with sector partners, in collaboration with Black, Asian and Minority Ethnic partners and people with lived experiences, to review and design resources to support settings to be culturally sensitive and offer diverse provision within childcare and play settings and to ensure practitioners are supported to do so.</p> |                  |         | <p>Minority Ethnic Communities</p> |                          |



## **Welsh Government Policy Advice for Anti-racist Wales Action Plan (ArWAP) Refresh June 2024 – June 2026**

### **For Internal Use Only**

#### **Narrative: Health Chapter - ArWAP**

##### **Some evidence (post 2022)**

In health we have focussed on improving data collection, transparency and analysis to understand the experience of Black, Asian and Minority Ethnic staff and those who seek care and support. Our goal was to make meaningful changes in the way we provide health and care services and address differences in the outcomes and experiences of our workforce. Since the ArWAP's publication, we have based our work on, evidence of what works and providing a baseline for tracking progress and measuring impact.

The [EHRC's report](#) on lower paid ethnic minority workers in health and social care (2022) and the independent NHS Wales Workforce Policy Audit (2023), both highlight the racism and inequities faced by ethnic minority NHS staff. Recommendations from these reports will shape all-Wales NHS workforce policies, and our NHS health boards, trusts and special health authorities' anti-racism action plans. The introduction of the Workforce Race Equality Standard (WRES) has strengthened our evidence base.

We are acting on recommendations from the Health and Social Care Committee Report [Connecting the Dots](#) (2022). This includes improving access to interpreters, as suggested by the recently published study into [Health Experiences of Asylum seekers and Refugees in Wales](#) (2023).

We're also considering key findings from the Equality Impact Assessment on the new [Mental Health and Wellbeing Strategy](#) and a new [Suicide and Self-Harm Prevention Strategy](#) addressing inequalities faced by ethnic minority people. The Equality and Human Rights Report [Is Wales Fairer?](#) (December 2023) specifically highlighted the detrimental impacts of the COVID-19 pandemic on the mental health of ethnic minority people.

## Introduction

Since the ArWAP was published in June 2022, we have made collective progress to drive systemic change to ensure healthcare is anti-racist. We identified five priority actions in the health chapter which have accelerated our partnership working to meet our ambitions towards an anti-racist NHS Wales.

## Leadership

- Welsh Ministers have used their powers to ensure NHS Wales Health Boards, Trusts and Special Health Authorities demonstrate tangible anti-racist leadership. For the first time in 2022/23, each NHS Wales Board Chair had to provide evidence of anti-racism leadership to the Cabinet Secretary for Health and Social Services. Furthermore, every Board member completed a personal development objective related to anti-racism.
- Each NHS organisation has produced an anti-racism action plan and appointed an executive equality champion. We have scrutinised progress against these plans, through both our planning and performance monitoring mechanisms, ensuring accountability at the highest level.
- Anti-racism has remained high on the agenda for senior leaders within the Welsh Government Health, Social Care and Early Years Group (HSCEY). Key stakeholders with expertise and lived experience of racism closely monitor the work of the HSCEY EDI Implementation and Challenge Board, chaired by Judith Paget, Chief Executive of NHS Wales and Director General. The Board have consistently supported a collaborative approach and have actively addressed systemic barriers and resourcing issues.

## Data and Workforce.

- For the first time in April 2024, NHS Wales Health Boards, Trusts and Special Health Authorities have collected data on the experience of their ethnic minority workforce.
- The national **Workforce Race Equality Standard (WRES)** report suggests racial disparities in NHS staff experiences.
- The data suggests our NHS Health Boards are under representative of Black, Asian and ethnic minority people by a deficit of 5.9% and that NHS organisations are more likely to appoint white colleagues.
- Black, Asian and Minority Ethnic staff are almost four times more likely to be referred into formal capability processes and the data also highlights intersectional bias, with high levels of bullying and harassment and discrimination in NHS Wales and experienced more by women than men, especially from Black, Asian and Minority Ethnic backgrounds.
- As a response to the data, NHS Wales organisations are expected to use the data to refine and prioritise actions in their local anti-racism plans and take targeted actions to address racial disparity. Actions will incorporate recommendations from the independent **audit of all-Wales NHS workforce policies (Diverse Cymru, 2023)** which identified clear recommendations for improvement based on the experiences of racism had by NHS staff.
- A foundational e-learning package on anti-racist practise has been rolled out to all NHS Wales staff. This e-learning forms the basis for a framework of anti-racist health and care workforce education. The framework will include active bystander training, identified by the Senedd Equality and Social Justice Committee as a priority to address racism experienced



by the health and social care workforce raised during their [inquiry about the implementation of the ArWAP](#).

- The establishment of the peer support forum, **Inclusive Maternity Wales**, aims to provide guidance and empowerment to ethnic minority people in the workforce. With the support of the Royal College of Midwives (RCM), trends and themes identified will be reported to the Director of RCM Wales and discussed at Directors/Heads of Midwifery meetings to explore any additional actions required.

## Access to Services

- The **Ethnic Minority Mental Health Task and Finish Group** identified data related to how ethnic minority communities access, and experience mental health services, and what their outcomes are. The evidence is supporting changes that will reduce inequity and improve services. Using the **Mental Health Core Data Set**, we have prioritised demographic information, such as age, gender and ethnicity. This approach has supported better service planning based on the specific needs and demands of our population. The group's work has influenced the draft Mental Health and Wellbeing Strategy and the new Suicide and Self-Harm Prevention Strategy. These strategies recognise the impacts of racism on mental health and address the unique requirements of ethnic minority people.
- We now understand more clearly how to support better access to mental health services (from primary care to inpatients) for minority groups to reduce inequalities after Welsh Government commissioned the Health and Care Research Wales Evidence Centre in 2023 to carry out a rapid review. The [Rapid Evidence Summary](#) has been published, alongside the [full review](#).
- NHS Wales will soon have access to good practice guidelines to improve access to and quality of psychological interventions for people from Black, Asian and Minority Ethnic backgrounds. Developed by Improvement Cymru, the guidelines are based on the [rapid review](#) carried out to inform their development, undertaken by the University of South Wales, and published in January 2024.
- A specific focus on the impacts of racism has also been included in the delivery of the [Trauma-Informed Wales Framework](#) by the ACE Hub Wales and [Traumatic Stress Wales](#), a programme funded by the Welsh Government. A workstream on asylum seekers, refugees and migrants has created a network to share good practice, supporting the co-creation of culturally applicable resources and training for staff supporting these populations affected by traumatic events.
- Mental health and wellbeing organisations working with babies, children, young people and their families are now able to identify barriers to accessing support which can result from racism, bullying, or through organisational blind spots. Through their testing of a self-assessment tool through the [NYTH/NEST Framework](#), they will be able to address the barriers identified.
- [Time to Change Wales](#) continue to collaborate with Black, Asian, and Minority Ethnic people to create meaningful campaign and training materials to tackle **stigma on mental health**. Time to Change Wales have recruited 36 new champions from ethnic minority communities between April 2023 to March 2024. Additionally, 13 new organisations with



high proportions of ethnic minority people in their workforce have signed the Employer Pledge in the same period.

## Health Inequalities

- The [Maternity and Neonatal Safety Support Programme](#), aims to improve the safety, experience and outcomes of **maternity and neonatal care** in Wales. Opportunities for improvements have been identified to address health inequalities both locally and nationally. The Welsh Government appointed a specialist clinical diversity lead to progress the maternity and neonatal priorities within the ArWAP. Collaborating closely with community groups, they are ensuring the implementation of sustainable solutions to enhance the experiences and outcomes of ethnic minority women and babies accessing maternity and neonatal services.
- Additionally, the Welsh Government continues to learn and take action to mitigate the disproportionate impact of the Covid-19 pandemic on ethnic minority people. A fully inclusive and targeted approach has been taken to addressing known health inequalities within our current and future national health strategies.
- An NHS Inequalities Group has been established to maximise the impact of NHS Wales in tackling health inequalities. Its data subgroup group has identified gaps in data collection and conducted an analysis of cancer incidence and vaccination within ethnic minority group, this will then help identify and recommend ways to break down barriers which prevent equitable access to healthcare services for ethnic minority people.
- On the 1 April 2023, The Citizen Voice Body (operating name Llais) was formally established. By July 2023, Llais had engaged with a diverse range of community representatives and groups including people, groups and bodies supporting those of us who are underrepresented, for example the African Community Centre in Swansea. [Our First 100 Days Report | LLais \(llaiswales.org\)](#)

## Challenges

Despite much progress, it is clear we need to do more and faster. Racism in health and social care continues to be reported within, and outside of existing complaints systems. These systems are often seen as inaccessible or ineffective as highlighted in [recent inquiry](#) by the Senedd Equality and Social Justice Committee (March 2024).

Diverse Cymru's independent audit of NHS workforce policies reported scepticism and engagement fatigue amongst the ethnic minority NHS workforce. We know that building confidence in meaningful change requires action and tangible improvements. To address this, NHS Wales staff with lived experience of racism have been directly driving workforce actions. They contribute through the WRES Strategic Steering Group and a cross-organisational task and finish group which directly supported the development of the foundational e-learning package on anti-racist practise.

We will continue to work to ensure the complexities in the way healthcare is commissioned and delivered do not impact the ambition of the ArWAP and that actions to improve staff and patient experience are consistently applied across all NHS settings.



## What we will do

### **Leadership and Representation.**

Our leadership should be both anti-racist and representative of the NHS Wales workforce. We will expect NHS organisations to take targeted action to address racial disparity highlighted by their WRES data, integrating the recommendations from the review of all Wales NHS workforce policies through an anti-racist lens. Progress will be monitored and reported via IMTP and Annual Plans, and the Joint Executive Team process.

A review of the public appointments process is underway to embed an anti-racist approach, and each Board have committed to the Aspiring Board Members Programme which is being developed by Academi Wales.

### **Maternity and Neonatal Workforce**

Implementation of the **Digital Maternity Cymru** programme will improve reliable data to track clinical patterns and poor outcomes in real-time on an ethnicity basis. This will provide clinical decision-makers with the information they need to take action. Using this data, we will also be able to prioritise effective quality improvement initiatives to improve health outcomes for women and babies from ethnic minority communities.

### **Intersectionality**

The WRES for Health and Social Care gives us a robust evidence base to target interventions to address intersectional inequality with detailed workforce data broken down by gender and ethnicity.

The Digital Maternity Cymru programme maternity service data is currently being reviewed to ensure comprehensive capture of key intersectionality measures. The standardised data will enhance oversight and support service provision improvements.

### **Gypsy, Roma, and Traveller people**

We are committed to collaborating with Gypsy Roma Traveller people, both within the NHS workforce and the community in Wales to ensure their challenges and needs are fully considered.

The number of Gypsy Roma Traveler people who chose to disclose their ethnicity within the NHS Workforce was too small to disclose within the inaugural WRES report. However, the WRES data does help to highlight the experiences of the ethnic minority workforce at a more granular level. There was a very limited response from the GRT colleagues in the Welsh NHS to the staff survey of 2023. It is known from similar experience in NHS England that engagement with the community leaders directly resulted in round table discussions and growing of the engagement with these colleagues as reflected in improved survey response rate and participation in change actions. We will work with NHS organisations and the Gypsy Roma Traveller community in Wales to provide assurance around anonymity of data use and improve data quality. In the future we hope to connect the WRES data with health inequalities information specific to Gypsy Roma Traveller individuals to better understand the disparities.

### **Data/ Research needs**



The structures to collect and analyse impactful data continue to be scoped and built. We are working to draft impact measures to evaluate change made and would welcome continued support from ArWAP External Accountability Group members.

### **Strengthening complaints system**

We are working with NHS health boards, trusts and special health authorities to review all systems for reporting racism for both those who seek care and support and the NHS workforce. We will strengthen transparency in processes, ensure access to effective well-being support, and consistently implement robust and restorative resolution.

The 2023 NHS Wales Staff survey showed that only 57% of staff felt confident raising concerns in their workplace. In our refreshed actions, we prioritise the WRES as a central measure to understand staff experience. Additionally, we are refocussing a priority action to formalise monitoring of concerns of workforce discrimination and bullying raised by staff across the NHS in Wales.

We are also scrutinising existing systems for reporting racism in the NHS, specifically 'Putting things Right' for patients and 'Raising Concerns/Speaking up Safely' for workforce, to enhance accessibility and effectiveness. We will continue to raise awareness across health and social care about the importance of reporting racist incidents and the mechanisms available to do so within the respective systems. We will develop accountability mechanisms to monitor incidents and outcomes to ensure an evidence base approach is taken focused on continuous improvement of complaints mechanisms.

### **Positive action**

Since the publication of the ARWAP in 2022 our efforts have centred around embedding structural, systems and governance arrangements. These foundational building blocks serve as a solid platform for us to build and deliver change. The Welsh Government takes accountability seriously and also expects NHS partners to establish assurance mechanisms that promote the principles of anti-racism across health.

The recruitment of an Equality, Diversity and Inclusion Lead Midwife into the Welsh Government has enabled a targeted focus on enhancing workforce diversity. This initiative aims to better reflect the diverse communities across Wales. Additionally, the EDI Lead Midwife provides support to maternity services, enabling them to access cultural competency training to support a safe environment and culture for ethnic minority staff, women and families.

| Existing Actions   | Amended Actions  | Desired Outcomes  | By When           | Lead and Partners   | Key Priority |  |
|--|--|---|-------------------|---|--------------|--|
| [Leadership]   |  |   |                   |   |              |  |
| Goal: The NHS in Wales will be anti-racist and will not accept any form of discrimination or inequality for employees or service users.  |  |   |                   |   |              |  |
| <p><b>Action:</b></p> <p><b>Require anti-racist leadership at all levels by direction. All NHS Boards, Trusts and Special Authorities to report demonstrable progress in driving anti-racism at all levels by:</b></p> <ul style="list-style-type: none"> <li>• appointing ‘Executive Equality Champions’ and ‘Cultural Ambassadors.</li> <li>• implementing a leadership and progression pipeline plan for Black, Asian and Minority Ethnic staff;</li> <li>• providing Ethnic Minority Networks</li> </ul> | <p><b>Revised Action: 2024-26</b></p> <p><b>Hth 1:</b></p> <p>Require anti-racist leadership at all levels by direction. All NHS Boards, Trusts, and Special Health Authorities to report demonstrable progress in <b>driving anti-racism at all levels by:</b></p> <p>Providing assurance that the appointed executive equality champions are working with Black, Asian and Minority Ethnic staff networks to co-develop the organisation’s annual anti-racism plans to correct inequities identified by workforce and patient data sources e.g. the Workforce Race Equality Standard (WRES) and the independent audit of all-Wales NHS workforce policies.</p> | <p>Greater representation of Black, Asian and Minority Ethnic staff at all levels</p> | <p>March 2025</p> | <p><b>Leads</b></p> <p>NHS Health Boards, Trusts and Special Health Authorities</p> <p><b>Partners</b></p> <p>NHS Wales Executive</p> <p>WG</p> | <p>1-6</p>   |  |

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| appropriate levels of resource and access to the Board  |   |  |                 |   |                     |  |
| <p><b>Further Considerations</b></p> <p>The establishment of cultural ambassadors was discounted following consultation with key stakeholders. No longer a priority action and focus shifts to accountability mechanisms and expectation that exec equality champions are working with their networks and involving them in the development in local organisational level anti-racism action plans.</p> |   |  |                 |   |                     |  |
| <p><b>Action:</b></p> <p>Use existing legislative frameworks to require NHS organisations to develop anti-racism action plans, for both employment and service delivery as a specific part of their wider approach to equality, inclusion and diversity. Progress will be monitored and reported via IMTP and Annual Plans, and the Joint Executive Team process.</p>                                   | <p><b>NEW PRIORITY ACTION 1:</b></p> <p><b>Hth 2:</b></p> <p>Use existing legislative frameworks to require NHS organisations to develop anti-racism action plans, for both employment and service delivery as a specific part of their wider approach to equality, inclusion and diversity. Progress with plan implementation will be reported through the SEP and monitored through the IQPD and policy assurance mechanisms.</p> | <p>Anti-racist action plans developed by NHS organisations will be reported on and monitored for progress.</p> | <p>ongoing</p>  | <p><b>Leads</b></p> <p>NHS Health Boards, Trusts and Special Health Authorities</p> <p><b>Partners</b></p> <p>NHS Wales Executive</p> <p>WG</p> | <p>1-6 as above</p> |  |
| <p><b>Action:</b></p>   | <p><b>Revised Action: 2024-26</b></p> <p><b>Hth 3:</b></p>  | <p>Anti-racism is being considered and acted upon by all NHS board members in</p>                              | <p>annually</p> | <p><b>Leads</b></p> <p>NHS Health Boards,</p>   | <p>1 + 6</p>        |  |



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| <p><b>All NHS Board members will undertake an anti-racist education programme and implement and report progress against personal objectives (for all Board members) to meet vision of an anti-racist Wales.</b></p> | <p>All NHS Board members will demonstrate anti-racist leadership through their diversity and inclusion objective, to enable meaningful impact of their organisational anti-racism plan.</p> | <p>their decision making to addressing structural racism.</p> |  | <p>Trusts and Special Health Authorities</p> <p><b>Partners</b></p> <p>NHS Wales Executive</p> |  |  |
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**Further Considerations**

The reference to an anti-racism education programme has been removed from this action to reflect the focus on anti-racism as rooted in action and the expectation that all Board members will embed anti-racism in their responsibilities/area of focus on the Board. The expectation of Board members to have an objective related to anti-racism is within the NHS Board Chair's objectives set by the Minister for Health and Social Services. The work of the members of the Board should be articulated and set out in the organisational anti-racism action plans.

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| <p><b>Senior Leaders in Welsh Government Health and Social Services Group will establish an internal Challenge Board to include external representation to monitor and ensure collective progress against Health and Social Care Goals and Actions.</b></p> | <p><b>Revised Action: 2024-26</b></p> <p><b>Hth 4:</b><br/>Welsh Government Health and Social Services Group (HSSG) Senior Leaders will monitor and ensure collective progress against ArWAP Health and Social Care Goals and Actions through the HSSG EDI Implementation and Challenge Board.</p> | <p>Visible allyship and leadership demonstrated by members of the senior leadership team – HSSG.</p> | <p>Ongoing</p> | <p><b>Lead</b></p> <p>Welsh Government</p> |  |  |
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**[Workforce]**

**Goal: Staff will work in safe, inclusive environments, built on good anti-racist leadership and allyship, supported to reach their full potential, and ethnic minority staff and allies; both be empowered to identify and address racist practice.**

|              | Existing Actions  | Amended Actions   | Desired Outcomes   | By When     | Lead and Partners   | Key Priority   |
|--------------|---|---|--|-------------|---|----------------|
| Pack Page 12 | <b>Priority Action 2:</b><br>Commission an independent audit of all existing workforce policies and procedures through an anti-racist lens, and expect Black, Asian and Minority Ethnic representation within forums or groups established to design the audit/and oversee and support their effective implementation and application | <b>Revised Action: 2024-26</b><br><br><b>Hth 5:</b><br>NHS Wales Boards, Trusts and Special Authorities and the Welsh Partnership Forum implement the recommendations from the independent audit of all-Wales NHS workforce policies, working with Black, Asian, and Minority Ethnic staff groups to support their effective application. | Black, Asian and Minority Ethnic staff have increased confidence that they will work in a safe and inclusive workplace that recognises and promotes their performance and progression. | March 2025  | <b>Lead</b><br><br><b>NHS Wales Boards, Trusts and Special Health Authorities</b><br><br>WG | 1, 2, 3, 4, 6, |
|              | <b>Action:</b><br><br><b>Higher Education Institutions (HEIs) and NHS Organisations will</b>  | <b>Retain</b><br><br><b>Hth 6:</b><br>Higher Education Institutions (HEIs) and NHS Organisations will co-   | Staff more confident in providing allyship and calling out racism by colleagues and public.  | Summer 2024 |   | 1, 5, 6        |

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| <p><b>co-design anti-racist education programmes with Black, Asian and Minority Ethnic people. Set a requirement for all NHS Staff, NHS Volunteers and students to complete redesigned anti-racist education programmes</b></p>   | <p>design anti-racist education programmes with Black, Asian and Minority Ethnic people. Set a requirement for all NHS Staff, NHS Volunteers and students to complete redesigned anti-racist education programmes.</p>   |   |                    |  |                |  |
| <p><b>Each NHS organisation will commit to their involvement in the Aspiring Board Members Programme, ensuring education, mentoring and support to participants who will be from a Black, Asian and Minority Ethnic background. Academi Wales, to work in partnership with NHS Wales and other appropriate organisations to develop and run an Aspiring Board Members Programme</b></p> | <p><b>Retain</b></p> <p><b>Hth 7:</b><br/>Each NHS organisation will commit to their ongoing involvement in the Aspiring Board Members Programme, ensuring education, mentoring and support to participants who will be from a Black, Asian and Minority Ethnic background. Academi Wales, to work in partnership with NHS Wales and other appropriate organisations to develop and run an Aspiring Board Members Programme.</p> | <p>Increase in the number of people from a Black, Asian and Minority Ethnic backgrounds undertaking the role of a non-executive member.</p> | <p>Winter 2025</p> | <p><b>Academi Wales NHS Health Boards, Trusts and Special Health Authorities</b></p> <p>WG</p> | <p>1, 2, 6</p> |  |
| <p><b>Further Considerations</b></p>  |  |   |                    |  |                |  |

**Capacity of independent board members to support the Programme due to the 1-1 nature of the mentoring/reverse mentoring due to resource constraints.**

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| <p><b>HEIW will ensure all commissioned programmes provide evidence of anti-racist principles and reflect HEIW's Strategic Equality Plan in order to meet objectives regarding differential attainment, widening access and under-representation of Black, Asian and Minority Ethnic people in NHS Wales</b></p> | <p><b>Retain</b></p> <p><b>Hth 8:</b><br/>HEIW will ensure all commissioned programmes provide evidence of anti-racist principles and reflect HEIW's Strategic Equality Plan in order to meet objectives regarding differential attainment, widening access and under-representation of Black, Asian and Minority Ethnic people in NHS Wales.</p> | <p>Anti-racist principles are embedded in commissioning process.</p> | <p>Ongoing</p> | <p><b>HEIW</b><br/><br/>HEIs</p> | <p>1, 2, 6</p> |  |
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**Further considerations**  
 Intersectional approach has been taken with regard to the commissioning of our programmes through a review of the wording and pass/fail scoring for the procurement process as agreed with NHS Wales Shared Services Partnership (NWSSP). A decision to take an intersectional approach was driven by the fact that some of the providers of our programmes may be outside of Wales and therefore are not specifically required to have an Anti-Racist Wales Action Plan, however, we require that the principles of the plan should be embedded in their Strategic Equality Plans and/or policies and strategies. This ensures that those from whom we commission programmes provide evidence and a commitment to inclusion and Anti-racist principles. Therefore, the action remains appropriate and should remain.

**Goal: Data in relation to race, ethnicity and intersectional disadvantage will be routinely collated, shared and used transparently, to level inequalities in health and access to health services, and provide assurance that the NHS Wales is an anti-racist and safe environment for staff and patients.**

| Existing Actions   | Amended Actions   | Desired Outcomes   | By When         | Lead and Partners  | Key Priority            |
|--|---|--|-----------------|--|-------------------------|
| <p><b>Improve workforce data quality and introduce a Workforce Race Equality Standard (WRES) to provide an evidence base to make and measure targeted structural change. Underpinned by cultural change, through targeted interventions at both local and national level, developed through social partnership</b></p> | <p><b>Revised Action: 2024-26</b></p> <p><b>PRIORITY ACTION 2:</b></p> <p><b>Hth 9:</b></p> <p>NHS Boards, Trusts, and Special Authorities will continue to:</p> <ul style="list-style-type: none"> <li>- improve workforce data quality.</li> <li>- facilitate and support data collection against the Workforce Race Equality Standard (WRES) indicators</li> <li>- scrutinise WRES data to implement targeted anti-racist workforce actions captured within organisational anti-racist action plans, in response to evidence base through targeted structural change.</li> </ul> | <p>Increased staff confidence in the quality and value of data relating to ethnicity and anti-racism collected through WRES and staff surveys.</p>                                     | <p>ongoing</p>  | <p><b>NHS Health Boards, Trusts and Special Health Authorities</b></p> <p>WG</p> | <p>1, 2, 3, 4, 5, 6</p> |
| <p><b>Implement systemic monitoring of concerns of workforce discrimination and bullying raised by staff through the Joint</b></p>   | <p><b>NEW PRIORITY ACTION 3:</b></p> <p><b>Hth 10:</b></p> <p>Implement systemic monitoring of concerns of workforce discrimination</p>   | <p>High quality workforce data, underpinned by a culture where staff can be safe, and confident to provide ethnicity data and speak up against racist discrimination and practice.</p> | <p>End 2024</p> | <p><b>NHS Health Boards, Trusts and Special</b></p>                              | <p>1, 4, 5, 6</p>       |

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| <p><b>Executive Team process. Sources of workforce data and intelligence will be refined including the WRES and HEIW Centre of Excellence</b></p>  | <p>and bullying raised by staff through the Joint Executive Team process.</p> | <p>Strengthening our 'Once for Wales' protocol to ensure consistent and timely addressing of concerns raised.</p> |  | <p><b>Health Authorities</b><br/><b>NHS Wales Executive</b><br/>WG</p> |  |  |
| <p><b>Further consideration</b><br/> <b>Discrimination law (Equality Act 2010) protects people against discrimination at work. Definitions: Discrimination encompasses harassment (unwanted or offensive behaviour related to a protected characteristic). Serious harassment could be a hate crime.</b></p> |   |   |  |  |  |  |

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| <p><b>Co-design and revise population health data collection, creating an evidence base to develop policies and provide equitable health and social care services.</b></p> | <p><b>Revised</b></p> <p><b>Hth 11:</b><br/>Ensure that the development of datasets in NHS Wales take account of protected characteristics including ethnicity.</p> | <p>Accurate and up-to-date data collected including harmonised ethnicity data standards allows for direct and targeted policy implementation.</p> |  | <p>WG<br/>DHCW<br/>PHW</p> | <p>2, 4,<br/>6</p> |  |
|--|---|---|--|----------------------------|--------------------|--|

**GOAL: We will identify and break down barriers which prevent equitable access to healthcare services for Black, Asian and Minority Ethnic people.**

| Existing Actions  | Amended Actions   | Desired Outcomes   | By When              | Lead and Partners                              | Key Priority    |  |
|---|---|--|----------------------|--|-----------------|--|
| <p>The Maternity and Neonatal Safety Support Programme, co-designed and developed with Black, Asian and Minority Ethnic people and stakeholders, will detail and implement specific changes to maternity services that will improve outcomes and experiences of Black, Asian and Minority Ethnic women and families who experience health inequalities.</p> | <p><b>Revised Action: 2024-26</b></p> <p><b>PRIORITY ACTION 4</b></p> <p><b>Hth 12:</b></p> <p>Support and oversee the implementation phase of the Maternity and Neonatal Safety Support Programme (2024-2027) , with the aim of delivering local and national actions to support improvements in the experiences and outcomes of women, babies and their families from Black, Asian and Minority Ethnic communities.</p> | <p>Effective collection and analysis of ethnicity data allows targeted interventions and improvements to address health inequalities for Black, Asian and Minority Ethnic communities in relation to maternity services.</p> | <p>2024<br/>2025</p> | <p>NHS Wales Executive</p> <p>NHS Wales WG</p> | <p>1-6</p>      |  |
| <p>Establish a dedicated working group on health inequalities to address barriers in accessing services and make recommendations to improve. The group will hear from experts by lived experience and</p>   | <p><b>Revised 2024-2026</b></p> <p><b>Hth 13:</b></p> <p>Establish a dedicated working group to identify and make recommendations for breaking down barriers which prevent equitable access to healthcare services for</p>  | <p>People from Black, Asian and Minority Ethnic backgrounds have greater and more equitable access to healthcare services.</p>   |                      |  | <p>2,3,4,6,</p> |  |

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| <p>draw on evidence that has already been submitted.</p>  | <p>Black, Asian and Minority Ethnic people.</p>   |   |                   |                                       |                  |  |
| <p>Ensure our COVID-19 recovery plans are fully inclusive and targeted to address known health inequalities in access to care and service provision.</p>  | <p><b>Completed</b><br/>(See narrative in introduction)</p>   |   |                   |                                       |                  |  |
| <p>“Time to Change Wales” will develop and deliver an anti-racist mental health anti-stigma programme which is co-designed with people with lived experiences and from Black, Asian and Minority Ethnic people.</p> | <p><b>Revised</b></p> <p><b>Hth 14:</b></p> <p>“Time to Change Wales” will continue to deliver an anti-racist mental health anti-stigma programme which has been co-designed with people with lived experiences and from Black, Asian and Minority Ethnic people.</p> | <p>Increased provision for and access to mental health services for Black, Asian and Minority Ethnic people in Wales.</p> | <p>March 2025</p> | <p>WG Mind<br/>Cymru<br/>Adferiad</p> | <p>1 &amp; 2</p> |  |
| <p><b>Goal: Black, Asian and Minority Ethnic people will have confidence that action is being taken to address health inequalities and their voice is heard in shaping decisions which affect them.</b></p>         |   |   |                   |                                       |                  |  |

| Existing Actions   | Amended Actions   | Desired Outcomes  | By When          | Lead and Partners   | Key Priority |  |
|--|---|---|------------------|---|--------------|--|
| <p><b>Work with community organisations, the third sector and the NHS to ensure the needs of Black, Asian and Minority Ethnic people are considered when developing:</b></p> <ul style="list-style-type: none"> <li><b>new strategies and legislation for Mental Health;</b></li> <li><b>proposals to address the unmet mental health needs of asylum seekers, refugees and migrants;</b></li> <li><b>proposals to reduce health inequalities amongst, Gypsies, Roma and Traveller communities</b></li> </ul>  | <p><b>Revised Action: 2024-26</b></p> <p><b>Hth 15:</b></p> <p>Deliver the priorities and actions set out in the Mental Health and Wellbeing Strategy and Suicide and Self-Harm Prevention Strategy and supporting delivery plans – to ensure equity of access, experience and outcomes for Black, Asian and Minority Ethnic people, including Gypsy, Roma and Traveller people.</p> <p>This includes implementing the Strategic Programme for Mental Health and Strategic Clinical Networks to improve the quality of mental health services in Wales.</p> | <p>Increased provision for and access to mental health services for Black, Asian and Minority Ethnic people in Wales.</p> | <p>2024-2034</p> | <p>WG<br/>NHS<br/>Executive,<br/>HEIW,<br/>Health<br/>Boards,<br/>Local<br/>Authorities,<br/>Third<br/>Sector</p> | <p>1-4</p>   |  |
| <p><b>Further Considerations: Both strategies are currently out to consultation.</b></p> <ul style="list-style-type: none"> <li><b>Understanding the barriers people face and putting necessary systems in place so that when people get support, there is equity in terms of experiences and outcomes. To achieve this, support and services will need to be culturally and age appropriate and meet the needs of Welsh speakers, ethnic minority people (including Gypsy, Roma and Traveller communities), LGBTQ+ communities and people with sensory loss.</b></li> </ul> |   |   |                  |   |              |  |



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| <p><b>Work with representatives of ethnic minority communities to promote the Putting Things Right (PTR) concerns and complaints procedure, including the advocacy services available, ensuring accessibility through additional recommended languages.</b></p> <p><b>Revise Putting Things Right guidance to NHS organisations and include information about on how to respond to patients' complaints about racism in the provision of NHS services.</b></p> <p><b>Complaints are monitored to check whether Black, Asian and Minority Ethnic people are using the process.</b></p> | <p><b>Retain (or revise due to current consultation?)</b></p> <p><b>Hth 17:</b></p> <p>Work with representatives of ethnic minority communities to promote the Putting Things Right (PTR) concerns and complaints procedure, including the advocacy services available, ensuring accessibility through additional recommended languages.</p> <p>Revise Putting Things Right guidance to NHS organisations and include information about on how to capture and respond to patients' complaints about racism in the provision of NHS services.</p> <p>Monitor the capture and organisational response to racist incidents.</p> <p>Monitor the use of the complaints process by Black, Asian and Minority Ethnic people.</p> | <p>Greater levels of awareness/use of the PTR complaints procedure by Black, Asian and Minority Ethnic people.</p> <p>Empowered citizens feeling safe and supported in making complaints about NHS services confident that they will be taken seriously.</p> <p>Empowered NHS organisations putting steps in place to better manage complaints about racism in service delivery.</p> | <p>Spring 2025</p> | <p><b>NHS Health Boards, Trusts and Special Health Authorities</b></p> <p>WG Llais</p> | <p><b>5</b></p> |  |
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| <p><b>Introduce the new Duty of Candour and, by involving Black, Asian and Minority Ethnic people in the development of the guidance and promotion, ensure high levels of awareness of the duty and the benefits it affords all recipients of NHS care.</b></p>  | <p><b>Completed</b><br/>Duty of Candour implemented, and guidance published in April 2023.</p>   |  |  |  |   |
| <p><b>Welsh Government will take an anti-racist approach to the establishment of the new Citizen Voice Body (CVB) for Health and Social Care to ensure that its recruitment processes, governance and policies are anti-racist and fully representative of our communities. Ensure this approach enables the new body to engage meaningfully with the public about matters relating to racism in health and social</b></p> | <p><b>Revised Action: 2024-26</b></p> <p><b>Hth 18:</b></p> <p>Ensure that Llais, the Citizen Voice Body for Health and Social Care, continue to embed anti-racism in their recruitment processes, governance and policies.</p> <p>Llais embeds relationships with ethnic minority-led organisations, local authorities, NHS bodies and those from ethnic minority backgrounds to ensure their views are heard and reflected.</p> <p>Ensure Llais demonstrates meaningful engagement with the public in response to matters relating</p> | <p>The voices and lived experience of Black Asian and Minority Ethnic people and communities are effectively heard and their concerns acted upon. With improvements made to service delivery for those communities</p> |  |  | 5 |

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| <p>services in Wales from the outset. The CVB establishes relationships with ethnic minority-led organisations, local authorities, NHS bodies and those from ethnic minority backgrounds to ensure their views are heard and reflected</p> <p>Annual Remit Letter and Framework Documents to re-enforce above requirements, together with the need to evaluate the effectiveness of their approach.</p> | <p>to racism in health and social services in Wales.</p> <p>Annual Remit Letter will re-enforce above requirements, together with the need to evaluate the effectiveness of their approach.</p> |  |  |  |  |  |
| <p><b>Further Considerations:</b></p> <p><b>Welsh Government uses the Llais Annual Remit Letter to reinforce these requirements. Monthly meetings with the Chief Executive and other senior staff at Llais provide the opportunity to evaluate Llais’s approach.</b></p>  |   |  |  |  |  |  |
| <p>Engage with Black, Asian and Minority Ethnic people to identify how the voice and lived experiences of people in these communities can be captured as part of</p>  | <p><b>Revised Action: 2024-26</b></p> <p><b>Hth 19:</b></p> <p>Welsh Government will consider the consultation responses for the Health Impact Assessment</p>                                   | <p>Black, Asian and Minority Ethnic voices routinely captured as part of the Health Impact Assessment process and their health inequalities are better understood.</p> |  |  |  |  |



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| <p><b>the Health Impact Assessment process which will be mandated in the forthcoming Health Impact Assessment Regulations to be made under the Public Health (Wales) Act 2017 and will assist in tackling health inequities including those which arise as a result of the wider determinants of health</b></p> | <p>Regulations to inform the development of guidance recommending that the voices and lived experience of Black, Asian and Minority Ethnic people are routinely captured as part of the Health Impact Assessment process.</p> |  |  |  |  |  |
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**Please Provide Detail of Any Additional Work Triggered by ArWAP**

Embedded a fully inclusive and targeted approach to addressing known Health inequalities within our National Health Strategies including:

- [Our programme for transforming and modernising planned Care in Wales and reducing the waiting the waiting lists.](#)
- [The refreshed six goals for Urgent and emergency care in Wales](#)
- **The Draft Suicide and Self-harm Prevention Strategy (consultation closed June 24)**
- [Draft mental health and wellbeing strategy](#) (consultation closed June 24).
- Work is underway to improve bereavement support provided to Black, Asian and Ethnic Minority communities through the bereavement support grant which funds third sector bereavement services. To be eligible for an extension to the grant, organisations providing bereavement services needed to demonstrate how they will support Black, Asian and Ethnic Minority communities. This will be assessed through six monthly reporting of actions taken.
- Our refreshed A Healthier Wales long term plan for health and social care, which will be published, Spring 24.

Our National Workforce implementation plans have set specific anti-racist requirements on all NHS Boards, Trusts and Special Health Authorities. These are currently reflected in the [NHS Wales National Workforce Implementation Plan](#), [The Strategic Mental Health Workforce Plan for Health and Social Care – Implementation plan 23-25](#)

# Welsh Government Anti-racist Wales Action Plan (ArWAP) Refresh June 2024 – June 2026

## Social Care

### Some evidence

In Wales, since 2017 the number of Black, Asian and Minority Ethnic children looked after has been increasing. The numbers have nearly doubled from 455 to 830. Black, Asian and Minority Ethnic children now make up 11.6% of looked after children in Wales, a 3.3 percentage point increase compared to the data reported in the initial iteration of the Anti-racist Wales Action Plan (ArWAP) ([Stats Wales, 2023](#)). In comparison, for the wider population, approximately 9.5% of children aged 0-15 report to be from a Black, Asian or Minority Ethnic background ([Annual Population Survey](#))

Similarly, for those children on the child protection register in 2022, 7.1% were Black, Asian and Minority Ethnic children, up from 5.6% in 2017. In 2022, of the 21,000 adults suspected of being at risk or abuse and neglect, 2.4% were reported to be from Black, Asian and Minority Ethnic backgrounds. However, data on ethnicity was missing for 25.9% of these adults and there was no ethnicity information recorded for 18.4% of children on the child protection register. Therefore, data quality and completeness around ethnicity is a challenge in this area and means the figures provided are likely underestimates of the real ethnicity of those at risk of abuse and neglect.

The [Social Care Wales \(SCW\) workforce data report for 2022](#) shows the ethnicity of the social care workforce broadly mirrors that of the Welsh population; 5.5% of the social care workforce were reported to be from any Black, Asian and Minority Ethnic background, compared to 4.2% of the general population. The exception is in the proportion of black (or black British) workers in the social care workforce, which is around 2.5 times more than in the Welsh population, when viewed proportionally. However, this varies by role, with a higher proportion of Black, Asian and Minority Ethnic people working in adult residential care and a lower proportion working in local authority social work teams. Those people working in residential care were found to be more likely to be struggling financially than those working in social work teams according to the recent [Social Care Wales workforce survey](#).

The SCW workforce survey also found that almost half (45%) of registered people from a Black, Black British, Caribbean or African heritage said they have experienced discrimination compared with 21% of those with Asian heritage and 14% of White workers (14%). Asian workers were the most likely to say they had no negative experiences (73%). This aligns with findings from the Equality and Human Rights Commission (EHRC) inquiry into the [experiences from health and social care: the treatment of lower-paid ethnic minority workers](#).

## Introduction

The Welsh Social Care sector has many different types of employers delivering a broad range of services that provide social care for individuals of all ages. As can be seen by the latest evidence, there remains a challenge to address the different experiences of people working in social care and are receiving care and support. The social care sector has a responsibility to ensure that people's characteristics, culture and beliefs (including, for example, language) are considered and used to inform culturally competent service provision. We must ensure that ethnic minority staff, volunteers, managers and leaders working within the sector have a good experience that includes policies and processes to tackle any racism they face.

### **Leadership.**

Alongside health and early years actions, social care is a key element of the HSCEY EDI Implementation and Challenge Board, chaired by Judith Paget, Chief Executive of NHS Wales and Director General. In addition to this, Welsh Government has brought together national delivery leads, such as [Social Care Wales](#) (SCW) and the [Association of Directors of Social Services Cymru](#) (ADSSC) to take forward the actions. Progress is scrutinised by those who represent ethnic minority staff and communities; by organisations such as [Equality and Human Rights Commission](#) and representatives from Welsh Government's External Accountability Group.

### **Service Delivery**

Work has been undertaken to map out the existing [cultural, language, and interpretation/translation needs](#) of minority ethnic people using social care services to aid current and future service planning and the provision of spoken and written translations. A further action has now been added to the plan to follow up on the recommendations provided in this report and see where further support is needed.

### **Workforce**

Work has also started on reviewing selection and progression processes to identify reasons for the exit of Black, Asian, and Minority Ethnic social care professionals from the workforce. [Care Inspectorate Wales](#) has delivered EDI workshops and development events covering issues such as the Social Model of Disability, microaggressions and mental/physical impact of racism on individuals.

### **Accountability**

Some actions have now been completed from the first iteration of the plan. For example, Welsh Government now convenes a working group of statutory, independent and Third sector service partners on a quarterly basis. This group provides regular updates on progress towards delivering on the ambition of the ArWAP and seeks to represent minority ethnic people in its membership bring their lived experiences and expertise. This is alongside a project to explore the information from across the social care services such as concerns and complaints to develop more transparent and effective means of supporting people who experience racism in the workforce.

### **Data and Research**

Much of the focus of the social care actions are on developing the tools and understanding which allow for more direct action to be taken. For example, the development of the [Workforce Race Equality Standard \(WRES\)](#) and [Adults' Receiving Care and Support Census](#) provide invaluable data to understand the experiences of those who work in and make use of social services. Similarly, the research projects into the complaints handling, recruitment and progression processes and translation and interpretation services provide a necessary understanding which can direct future change. Welsh Government has completed to ensure the [Adults Receiving Care and Support Census](#), which will allow for the collection of granular data for those who receive care and support from local authority social services.

Despite the work ongoing, there remains much to be done. It is clear from the evidence collected so far that the numbers of care-experienced children are increasing, there is incomplete data regarding ethnicity for people receiving care and support and people working in social care are still experiencing racism. While a better understanding of the issues is vital to take appropriate action, action is needed urgently. The new [National Office for Care and Support \(National Office\)](#) provides the means by which a collective sector-wide response can be coordinated.

### **What we will do**

More progress is required to ensure that experiences of using social care services are actively anti-racist. Our priorities for the next two years are not considerably different from those in the first iteration of the plan. We will be continuing to develop the understanding of the challenges being faced by people working in social care and those receiving care and support, but also to start exploring ways of addressing people's lived experiences of racism.

- **Leadership and Representation:** There is ongoing research which will seek to make recommendations on how local authorities can improve their handling of incidences of racism and de-bias their approaches to workforce development. This has implications for leadership and representation, as the ongoing work looks to improve the routes for people from different backgrounds to be promoted into leadership roles.
- **Intersectionality:** There is also work to better understand the diversity of those receiving care and support, with the first year of data for adults being made available. This census will not just collect data about people from ethnic minorities, but will include a range of items around diversity, such as gender, disability and age.
- **Gypsy, Roma and Traveller:** One of the key focus areas for new data collection was to make sure there is an inclusion of Gypsy, Roma, and Traveller as a response option for all data collected about people receiving care and support. This will allow for a better understanding of the specific needs and support provided.

- **Data and Research:** There is an expansion of the data being collected, with SCW developing their [workforce data collection](#) and [surveys](#) to better explore the levels of diversity and also racism experienced by the workforce. This will feed directly into the [Workforce Race Equality Standard](#), which seeks to produce benchmark for employers to measure themselves against.
- **Strengthening Complaints System:** The work undertaken so far has revealed the high level of unmet need for people who are experiencing racism and the complaints system not being adequate in all circumstances. There are not always the mechanisms and routes for these people to raise their concerns and receive support. Therefore, Welsh Government will work with the sector to develop a means by which people can get help and seek improvements. This includes [Llais](#), the new citizens' voice body for health and social care.
- **Positive Action:** The recent [Social Care Wales board](#) recruitment was a good example of how to make sure a diverse range of candidates is considered, and this has led to a more diverse board. We hope to take the good practice shown by Social Care Wales and support other organisations, including Welsh Government, in developing positive action to achieving more diverse recruitment practices.

| Existing Actions   | Amended Actions   | Desired Outcome   | By When    | Lead and Partners  | Key Priority Areas (1-6) |
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| <p>Work with Social Care Wales (SCW) and Health Education and Improvement Wales (HEIW) to review implementation of the Workforce Strategy for Health and Social Care so that it delivers actively anti-racist leaders.</p> |   | <p>The Workforce Strategy for Health and Social Care implementation report highlights challenges and successes in achieving an anti-racist health and Social Care Sector.</p> | Completed  | <p><b>Lead:</b><br/>Social Care Wales - Director of Regulation</p> <p><b>Partners:</b><br/>Health Education and Improvement Wales.</p> | 1-3 and 6                |
| <p>Pack Page 191</p>   | <p><b>New Action</b></p> <p><b>SoCa 1:</b></p> <p>Report on the implementation of, and actions from the, <a href="#">Workforce Strategy for Health and Social Care</a> in regards to equalities, including ethnicity.</p> |   | March 2026 |  |                          |
| <p>Leaders to be exposed to the revised leadership behaviours for anti-racism, as part the Leadership Behaviours Framework developed by Academi Wales.</p>   | <p><b>Retain/Revise</b></p> <p><b>SoCa 2:</b></p> <p>The <a href="#">Leadership Behaviours Framework</a> which</p>  |   |            |  |                          |

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|   | promotes anti-racism, including the compassionate leadership approach, is actively promoted to leaders in social care   |   |                         |   |           |
| Take positive action and support a range of leadership development opportunities for minority ethnic members of the social care workforce to develop into middle and senior management roles. | <b>Revise/Merge</b><br><b>SoCa 3:</b><br>Implement a pilot leadership outreach programme for the ethnic minority social care workforce building on the research and recommendations so far.<br><br>This will also promote organisational cultural competency. | A more diverse cohort of individuals in leadership positions in the social care sector. | Extend to December 2026 | <b>Lead:</b><br>Social Care Wales - Director of Regulation<br><br><b>Partners:</b><br>Health Education and Improvement Wales.<br><br>Black, Asian and Minority Ethnic Partner Organisations | 1-3 and 6 |
| Development opportunities such as enhanced access to shadowing, secondments, coaching, mentoring (including reverse mentoring), sponsorship, and bespoke training will be included.           |   |   |                         |   | 1-3 and 6 |
| Develop the social care content of a Health and Social Care Workforce Race Equality Standard as part of the Social Care Health and Wellbeing Framework.                                       | <b>Revise</b><br><b>SoCa 4:</b><br>Develop the social care content of a <a href="#">Health and Social Care Workforce Race Equality Standard</a> as part of  | Anti-racism is embedded in all aspects relating to workforce.                           | Extend to June 2025     | <b>Lead:</b><br>Welsh Government – Chief Social Care Officer<br><br><b>Partners:</b><br>Social Care Wales.  | 1-4 and 6 |

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| This will be used to consider any revisions to the Codes for Employers and Social Care Workers. | the <a href="#">Social Care Health and Wellbeing Framework</a> .  |  |                      | ADSS Cymru.  |           |
|   | <p><b>New action</b><br/><b>SoCa 5:</b></p> <p>Publish first WRES report for social care in Wales and local authorities use the results to inform their strategies and action plans with specific reference to the results in the WRES.</p>   |  |                      |  |           |
|   | <p><b>Revise</b><br/><b>SoCa 6:</b></p> <p>Anti-racism is embedded within any revision to the <a href="#">Codes for Employers and Social Care Workers</a>.</p> <p>Following consultation around any revised code, consider whether specific practice guidance is required for anti-</p> | Greater awareness of anti-racism and support cases in Fitness to Practice around racism. | Extend to April 2026 | <p><b>Lead:</b><br/>Social Care Wales - Director of Regulation</p> <p><b>Partners:</b><br/>Health Education and Improvement Wales.</p> <p>Care Inspectorate Wales.</p> | 1-4 and 6 |

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|  | racism to exemplify the revised code.  |  |                   |  |                  |
|  | <p><b>New action</b></p> <p><b>SoCa 7:</b></p> <p>Develop a consultant social worker role which will advise on delivery of social work practice and the professional development to ensure development of practice in working with individuals at risk of disadvantage based on ethnic origin.</p> | <p>Consultant social worker role would enhance culturally competent practice, reduce discrimination, foster trust, and promote equity and social justice for marginalized communities.</p> | <p>April 2025</p> | <p><b>Lead:</b><br/>Welsh Government – Chief Social Care Officer</p> <p><b>Partners:</b><br/>BASW Cymru</p> <p>Social Care Wales.</p> <p>ADSS Cymru.</p>                                     | <p>1-6</p>       |
| <p>Establish a working group of statutory, independent and Third sector service partners to co-produce anti-racist, culturally competent social care services for users of all ages.</p> <p>The group will provide advice and support to social care officials. The Group will represent minority ethnic people in its membership and some experts in social care to bring their lived</p> | <p><b>Revise</b></p> <p><b>SoCa 8:</b></p> <p>Maintain a working group of statutory, independent and Third sector service partners to co-produce anti-racist, culturally competent social care services for users of all ages.</p> <p>The group will provide advice and</p>                        | <p>Ensure diverse representation, provide expert advice and lived experiences, and foster collaborative efforts to improve services for minority ethnic individuals of all ages.</p>       | <p>March 2026</p> | <p><b>Lead:</b><br/>Welsh Government – Chief Social Care Officer</p> <p><b>Partners:</b><br/>Social Care Wales.</p> <p>ADSS Cymru.</p> <p>CAFCASS Cymru.</p> <p>Care Inspectorate Wales.</p> | <p>1-3 and 6</p> |

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| <p>experiences and expertise.</p>  | <p>support to social care officials. The Group will represent minority ethnic people in its membership and some experts in social care to bring their lived experiences and expertise.</p>  |   |                             | <p>Social Care Fair Work Forum.</p> <p>Third sector providers and advocates.<br/>Independent sector providers.</p>                              |            |
| <p>Care Inspectorate Wales to undertake anti-racism training for all inspectors.</p> | <p><b>Revise</b></p> <p><b>SoCa 9:</b></p> <p>As part of their <a href="#">Joint Equality, Diversity, and Inclusion Strategy</a>, Care Inspectorate Wales will embed equality, diversity, and inclusion in its regulation, inspection and review work, to drive improvements in the delivery of healthcare, social care and childcare services for minority ethnic people. This will include undertaking anti-racism training for all inspectors.</p> | <p>Inequalities in service delivery are identified with reduced discrimination, and the promotion of culturally competent practices.</p> <p>A more responsive, fair, and high-quality services for minority ethnic communities, fostering greater trust and engagement in public services..</p> | <p>Extend to March 2025</p> | <p><b>Lead:</b><br/>Care Inspectorate Wales – Chief Inspector</p> <p><b>Partners:</b><br/>Health Inspectorate Wales</p> <p>Welsh Government</p> | <p>1-6</p> |

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| <p>Map out the existing cultural, language, and interpretation/translation needs of minority ethnic people using social care services to aid current and future service planning and the provision of spoken and written translations.</p> | <p><b>Completed</b></p>  | <p>An increased confidence that services will meet cultural, language and interpretation/translation needs.</p> | <p>March 2023</p> | <p><b>Lead:</b><br/>ADSS Cymru - Chair</p> <p><b>Partners:</b><br/>Social Care Wales.</p> <p>Independent sector providers.</p> <p>Black, Asian and Minority Ethnic partner organisations.</p> | <p>1-6</p> |
| <p>Secure baseline of numbers and nature of complaints in relation to lack of provision to compare with changes sought.</p>  |  |   |                   |   |            |
| <p>When action plan is delivered build in evaluation of the services, using hard data and lived experiences information.</p>   |  |   |                   |   |            |
|  | <p><b>New action</b></p> <p><b>SoCa 10:</b></p> <p>Undertake review of the services to see if changes have been made in response to <a href="#">recommendations</a>, and provide further support and advice where needed</p> |   | <p>March 2026</p> |   |            |

Fast Track

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|  | <p><b>New action</b></p> <p><b>SoCa 11:</b></p> <p>Ensure that <a href="#">Llais</a>, the Citizen Voice Body for Health and Social Care, continue to embed anti-racism in their recruitment processes, governance and policies.</p> <p>Llais embeds relationships with ethnic minority-led organisations, local authorities, social care providers and those from ethnic minority backgrounds to ensure their views are heard and reflected.</p> <p>Ensure Llais demonstrates meaningful engagement with the public in response to matters relating to racism in</p> | <p>The voices and lived experience of Black Asian and Minority Ethnic people and communities are effectively heard and their concerns acted upon.</p> <p>People receiving care have the means by which they can receive independent support, advice and advocacy for helping them when they experience racism from people working in social care.</p> | <p>March 2026</p> | <p><b>Lead:</b><br/>Welsh Government – Health and Social Care Equality Team</p> <p><b>Partners:</b><br/>Social Care Wales</p> <p>ADSS Cymru</p> <p>Trade Unions</p> <p>Llais</p> | <p>1-6</p> |
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|   | social services in Wales.   |   |                                  |   |           |
| Undertake a review of complaints from the social care workforce to identify racist behaviours in the workplace and any associated patterns.   | <b>Move to Accountability section and delete from Workforce section</b> | A reduction in the number of complaints made by Black, Asian and Minority Ethnic people in respect of racism encountered in the delivery of social care services.   | Extend deadline to March 2025    | <b>Lead:</b><br>ADSS Cymru - Chair<br><br><b>Partners:</b><br>Social Care Wales.<br><br>Trade Unions.<br><br>Social Care Fair Forum Wales.      | 2-6       |
| SoCa 12:<br><a href="#">Review of selection and progression processes</a> commencing with Local Authority middle management and leadership roles) and identify reasons for the exit of Black, Asian and Minority Ethnic social care professionals from the workforce. The review will include recommendations for de-biasing the relevant processes and policies and arrangements for ongoing evaluation. | <b>Retain</b>   | Improved processes and policies developed in line with anti-racist principles and practices which result in increased numbers of Black, Asian and Minority Ethnic people in senior positions and the improved retention of Black, Asian and Minority Ethnic people across the workforce as a whole. | Extend deadline to December 2024 | <b>Lead:</b><br>ADSS Cymru - Chair<br><br><b>Partners:</b><br>Social Care Wales.<br><br>Black, Asian and Minority Ethnic partner organisations. | 1-3 and 6 |
|   |   |   | March 2026                       |   |           |
|   | <b>New action</b><br><br><b>SoCa 13:</b>                                |   |                                  |   |           |

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|   | Revisit local authorities to explore what actions and improvement have been undertaken as a result of the review of selection and progression processes  |   |                               |   |           |
| Ensure that all education and training for the social care workforce, including all initial, pre-entry training and continuous professional development has been reviewed in respect of anti-racist content; including cultural awareness and anti-racism training. | <p><b>Revise</b></p> <p><b>SoCa 14:</b></p> <p>Ensure that Welsh social care qualification guidance, for level 2-5 qualifications, has been reviewed in respect of anti-racist content, including cultural awareness and anti-racism training.</p> <p>Work with HEIs around anti-racism in regulated social work programmes in Wales, including a thematic review conducted around anti-racist provision</p> | Ensuring that future social care professionals are equipped with the knowledge and skills to provide inclusive, equitable services. | Extend deadline to April 2026 | <p><b>Lead:</b><br/>Social Care Wales - Director of Regulation</p> <p><b>Partners:</b><br/>Health Education and Improvement Wales.</p> <p>ADSS Cymru.</p> <p>CAFCASS Cymru.</p> <p>Social Care Partnership/Fair Work Forum.</p> <p>BASW Cymru.</p> <p>Universities and colleges providing social care education and training.</p> | 1-3 and 6 |

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| <p>All leaders in Social Care will have training in anti-racism as part of their induction and on-going learning.</p> <p>This will include the development and delivery of cultural competency training as a recommended element of social care Continuous Professional Development.</p> | <p><b>Revise</b><br/><b>SoCa 15:</b></p> <p>Develop an introductory resource for anti-racism for the social care sector, to further expand on learning in qualifications specifically around anti-racism and to compliment cultural competency.</p> <p>Develop confidence of leaders of social care in implementing the resource in Wales.</p> |   | <p>Extend deadline to April 2026</p> | <p>Third sector providers and advocates.</p>   | <p>1-6</p> |
| <p>Annual evaluation of the toolkit's effectiveness in supporting anti-racist delivery.</p>  |  |   |                                      |  |            |
| <p><b>SoCa 16:</b><br/>Map out the Welsh language training needs of minority ethnic social care workforce and how these communities of professionals can be more effectively reached to encourage take up of Welsh and other needed/identified language learning.</p>                    | <p><b>Retain</b></p>   | <p>International workers feel supported to engage with their local communities and have the language skills to do so.</p> | <p>Extend deadline to March 2026</p> | <p><b>Lead:</b><br/>Social Care Wales - Director of Regulation</p> <p><b>Partners:</b><br/>National Centre for Learning Welsh</p> <p>Local Authorities</p> <p>ADSSC</p> <p>CIW</p> | <p>1-6</p> |
| <p>In line with the publication date for the Equality and Human Rights</p>   | <p><b>Revise</b><br/><b>SoCa 17:</b></p>   | <p>Following the implementation of the recommendations, there</p>   | <p>Completed</p>                     | <p><b>Lead:</b><br/>Welsh Government –</p>   | <p>1-6</p> |

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| <p>Commission (EHRC) Inquiry report into the treatment and experiences of the lower paid Black, Asian and Minority Ethnic social care and health workforce, we will respond positively to the Inquiry's findings and look to include its recommendations within the Actions set out here.</p> | <p>In line with the publication of the <a href="#">Equality and Human Rights Commission (EHRC) Inquiry report into the treatment and experiences of the lower paid Black, Asian and Minority Ethnic social care and health workforce</a>, we will continue to consider the Inquiry's findings and meet the ambitions of its recommendations</p> | <p>will be better parity for Black, Asian and Minority Ethnic workforce in relation to pay and conditions.</p>   |                      | <p>Chief Social Care Officer</p> <p><b>Partners:</b><br/>EHRC.</p> <p>Social Care Wales</p>   |                     |
|   | <p><b>New action</b></p> <p><b>SoCa 18:</b></p> <p>Develop a joint SCW and CIW Positive Cultures toolkits for social care employers. which clearly describes the importance of race inclusion and equality, drawing on people's lived experience.</p> <p>Promote the "<a href="#">Your well-being matters:</a></p>                              | <p>Racism is prevented by developing a positive culture and driving behavioural change in social care to bring about supportive and inclusive workplace.</p> | <p>December 2025</p> | <p><b>Lead:</b><br/>Social Care Wales - Director of Improvement and Development</p> <p>Care Inspectorate Wales – Chief Inspector</p> <p><b>Partners:</b><br/>Welsh Government</p> <p>Third sector organisations</p> | <p>1-3, 5 and 6</p> |

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|  | <p><a href="#">workforce health and well-being framework</a>” and cultural competency as tools within the new Positive Cultures toolkits</p>  |   |                   |   |                     |
|  | <p><b>New action</b></p> <p><b>SoCa 19:</b></p> <p>Raise awareness of the <a href="#">Social Care Wales Fitness to Practice</a> processes and where it can be used to challenge racist abuse in the workplace.</p> <p>Clearly articulate the consequences to perpetrators of racist behaviour.</p> <p>Make sure the <a href="#">wellbeing and victim support offer</a> is clearly articulated to people who may be considering raising a complaint.</p> | <p>People have confidence to raise complaints and confidence that they will be resolved if they experience racism from other people working in social care.</p> | <p>April 2025</p> | <p><b>Lead:</b><br/>Social Care Wales - Director of Regulation</p> <p><b>Partners:</b><br/>Welsh Government</p> <p>Third sector organisations</p> | <p>1-3, 5 and 6</p> |

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|  | <p><b>New action<br/>SoCa 20:</b></p> <p>The <a href="#">National Framework</a> for commissioning care and support services principles and standards are followed when commissioning care and support services which takes into account of anti-racism when commissioning social care services.</p> <p>The ARWAP will be provided as a tool to raise awareness for commissioners on the ARWAP plan.</p> | Services commissioned support anti-racism regardless of who is providing these services. | December 2026 | <p><b>Lead:</b><br/>Welsh Government – Chief Social Care Officer</p> <p><b>Partners:</b><br/>Social Care Wales</p> <p>ADSS Cymru</p> <p>Trade Unions</p> <p>Third sector organisations</p> | 1-3, 5 and 6 |
|  | <p><b>New action<br/>SoCa 21:</b></p> <p>Make use of the new <a href="#">Local Authority Social Services Annual Reports</a> to monitor local authority delivery of anti-racist practice, delivery and commissioning.</p>  |  |               |  |              |

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|  | <p><b>New action</b></p> <p><b>SoCa 22:</b></p> <p>The communications package to launch the <a href="#">National Commissioning Framework</a> are provided in an equal and anti-racist approach.</p>   |   |                      |  |                     |
|  | <p><b>New action</b></p> <p><b>SoCa 23:</b></p> <p>Develop clear processes by which commissioned providers of social care can raise concerns about the individuals they have been commissioned to provide care for.</p> <p>Local authorities articulate the process for providers to follow if the recipients of care are racist against the people providing care.</p> | <p>Providers of care and their staff have confidence to report incidents of racism and confidence that they will be resolved.</p> | <p>December 2026</p> | <p><b>Lead:</b><br/>ADSS Cymru - Chair</p> <p><b>Partners:</b><br/>Welsh Government</p> <p>Social Care Wales</p> <p>Trade Unions</p> <p>Third sector organisations</p> | <p>1-3, 5 and 6</p> |

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|  |   |  |                       |  |                  |  |
| <p>Review the membership of all Welsh Government Social Services-sponsored bodies and stakeholder group and where necessary, set expectations of greater representation from ethnic minority communities and leadership performances for anti-racism.</p>                | <p><b>Completed</b></p>   | <p>Minority ethnic people will see more people from their backgrounds occupying positions of influence and feel more confident that issues which matter to them will be represented.</p>                                     | <p>October 2022</p>   | <p><b>Lead:</b><br/>Welsh Government – Chief Social Care Officer</p> <p><b>Partners:</b></p>   | <p>1-3 and 6</p> |  |
| <p>Gather information from across the social care services such as concerns, complaints, grievance, fitness to practice referrals, safeguarding referrals, trade union intervention, staff surveys, annual reviews/ appraisals; exit interviews, and whistleblowing.</p> | <p><b>Revise (moved from Workforce section)</b></p> <p><b>SoCa 24:</b></p> <p>Undertake a <a href="#">review of information from social care workforce</a>, such as concerns,</p> | <p>Social care professionals from minority ethnic backgrounds will feel and see evidence that their employers' complaints processes and policies have been informed and improved by anti-racist principles and practice.</p> | <p>December 2024.</p> | <p><b>Lead:</b><br/>ADSS Cymru - Chair</p> <p><b>Partners:</b><br/>Social Care Wales.<br/><br/>Trade Unions.<br/><br/>Social Care Fair Work Forum.</p> | <p>1-6</p>       |  |

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| <p>Undertake a review of complaints from the social care workforce to identify racist behaviours in the workplace and any associated patterns. Analyse, in the context of confidence to report racist behaviour, that reporting will be taken seriously and proactively acted on. Recommendations to ensure transparency in processes, describe rights to wellbeing support and that restorative approaches to resolution are designed and embedded.</p> | <p>complaints, grievance, fitness to practice referrals, safeguarding referrals, trade union intervention, staff surveys, annual reviews/ appraisals; exit interviews, and whistleblowing to identify racist behaviours in the workplace and any associated patterns.</p> |  |                                      | <p>Care Inspectorate Wales.</p>                                      |            |
| <p>This will be assessed via evaluation following each resolved complaint and a report one year after revised processes and policies are introduced.</p>   | <p><b>Revise</b></p> <p><b>SoCa 25:</b></p> <p>The review of complaints will be assessed via evaluation and a report one year after revised processes and policies are introduced.</p>  |  | <p>Extend deadline to March 2026</p> |  |            |
| <p>Commission an analysis and produce a report of all Welsh Government social services published statistics that contain an</p>  | <p><b>Revise</b></p> <p><b>SoCa 26:</b></p>   | <p>Clearer understanding of disparities in social services based on ethnicity and other protected characteristics,</p> | <p>Complete</p>                      | <p><b>Lead:</b><br/>Welsh Government – Chief Social Care Officer</p> | <p>1-6</p> |

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| <p>ethnicity measure and to do so against national and local population data and the intersection with other protected characteristics. This analysis will also make recommendations about how to fill any gaps in the published data.</p> | <p>Undertake an analysis of all <a href="#">Welsh Government social services published statistics</a> that contain an ethnicity measure and to do so against national and local population data and the intersection with other protected characteristics. This analysis will also make recommendations about how to fill any gaps in the published data.</p> | <p>enabling the Welsh Government to identify gaps in service delivery and improve policies.</p> <p>To highlight areas of inequality, leading to data-driven recommendations and improved outcomes for minority ethnic communities in social services.</p>  |                                      | <p><b>Partners:</b><br/>Local authorities.</p> <p>Social Care Wales.</p>   |            |
| <p>Identify data gaps and what action can be taken to improve confidence in self-reporting of race and ethnicity identities (alongside the other protected characteristics.)</p>   | <p><b>Revise SoCa 27:</b></p> <p>Review data quality around ethnicity and protected characteristics to see where further action is needed.</p> <p>Work with local authority data providers to determine what action can be taken to improve reporting of race and ethnicity identities (alongside</p>   | <p>Improved data accuracy and comprehensiveness regarding ethnicity and protected characteristics, enabling better monitoring and analysis of disparities.</p> <p>More reliable data, allowing for targeted interventions and more informed decision-making to address inequalities in social services and ensure better outcomes for diverse communities.</p> | <p>Extend deadline to March 2026</p> | <p><b>Lead:</b><br/>Welsh Government – Chief Social Care Officer</p> <p><b>Partners:</b><br/>WG – Equalities Evidence Unit</p> | <p>1-6</p> |

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|   | the other protected characteristics.)  |  |             |   |     |
| Ensure the Adults Receiving Care and Support Census (an already identified data gap) collects data and includes data points on ethnicity so that we have better intelligence on minority ethnic people who receive a social service and the types of services they receive.   | <b>Completed</b>   | Improved knowledge about Black, Asian and Minority Ethnic people using care and support services provided by local authorities.  | April 2023. | <b>Lead:</b><br>Welsh Government – Chief Social Care Officer<br><br><b>Partners:</b><br>Local authorities.<br><br>ADSS Cymru. | 1-6 |
| Review and revise the <a href="#">Social Care Research and Development Strategy</a> in respect of matters relating to minority ethnic social care users and the social care workforce (including lived experiences). This will improve the development, collation, and use of evidence in Wales and link to any gaps in research that can assist with the delivery of all the above social care Goals and Actions in this plan. | <b>Completed</b>   | Improved knowledge about minority ethnic people using care and support services.<br>Improved knowledge about the Black, Asian and Minority Ethnic social care workforce. | June 2024   | <b>Lead:</b><br>Social Care Wales - Director of Improvement and Development<br><br><b>Partners:</b><br>Welsh Government       | 1-6 |
|   | <b>New Action</b><br><b>SoCa 28:</b><br><br>Social Care Wales, Welsh Government, | Staff can be safe, and confident to provide ethnicity data and speak up against racist discrimination and practice   | March 2026  | <b>Lead:</b><br>Social Care Wales - Director of Improvement and Development   | 1-6 |

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|  | <p>and Local Authorities will continue to:</p> <ul style="list-style-type: none"> <li>• improve workforce data quality.</li> <li>• facilitate and support data collection against the Workforce Race Equality Standard (WRES) indicators</li> <li>• scrutinise WRES data to implement targeted anti-racist workforce actions</li> </ul> |  |  | <p><b>Partners:</b><br/>Welsh Government</p> <p>Local authorities.</p> <p>ADSS Cymru.</p> |  |
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**Please Provide Detail of Any Additional Work Triggered by ArWAP**

The evidence collected over the last two years shows that the numbers of Black, Asian and Minority Ethnic children looked after has been increasing. More work is needed to better understand the reasons for this and what can be done to better support these children.

The work to develop the Workforce Race Equality Standard (WRES) has highlighted the importance of the data collections which will be used to populate the WRES. Therefore, there will be a focus on making sure these data collections are reliable and robust, to make sure the data is trustworthy and reliable.

It has become apparent through the delivery of many of the actions in the ArWAP that there is a lack of retrospective or benchmarking data to measure improvement. The ArWAP is working to establish new data collections and measures, such as the WRES and Adults Receiving Care and Support Census, but this means many of the actions are difficult to evaluate or determine reliable measures of success. Further work is ongoing to develop these indicators.

## Wales: a Nation of Sanctuary

### Some evidence

The Welsh Government has a vision of Wales as a Nation of Sanctuary. Our ambition was set out originally in our [Nation of Sanctuary Plan published in 2019](#) and then built upon in the [Anti-racist Wales Action Plan published in June 2022](#). In December 2023, the Welsh Government also made a pledge to continue the Nation of Sanctuary work as part of the Global Compact on Refugees. This refreshed chapter consolidates and updates previous commitments made in the 2019 Plan, 2022 chapter, and commitments made elsewhere.

Each of the actions in the Welsh Government's Nation of Sanctuary plan aligns to the goals of the Well-being of Future Generations (Wales) Act 2015, in particular 'a more equal Wales', 'a Wales of cohesive communities' and 'a globally responsible Wales'. The actions embed the five ways of working set out in the Well-Being of Future Generations (Wales) Act 2015 and the Public Sector Equality Duty.

We are working alongside, and listening to the voices of, those who have the lived experience of inequality and disadvantage. We want to ensure we are developing and implementing approaches 'with' sanctuary seekers rather than 'to' them and 'for' them. We are committed to putting those with lived experience at the heart of our policy development.

Our areas in Wales – Cardiff, Swansea, Newport and Wrexham – have supported asylum seekers and refugees for many years. However, all Welsh communities are now engaged in supporting sanctuary seekers. The Home Office now implements a 'Full Dispersal' asylum system and the National Transfer Scheme requires all local authorities to ensure unaccompanied children are looked after. Ukrainians have arrived in all communities through the Homes for Ukraine and Ukraine Family schemes, following the pan-Wales resettlement of Afghans and Syrians in recent years.

Since the 2019 Nation of Sanctuary Plan was published, the UK Government has also added commenced three Immigration Acts. These have added to the complexity of the immigration system and created new risks which need to be navigated to avoid and mitigate harmful outcomes and ineffective community cohesion and integration.

The speed of change in new immigration schemes, legislation and UK Government policy and processes in recent years has meant a new approach to the Nation of Sanctuary policy is required. It is not possible for us to anticipate the next set of changes and world events so our revised approach puts Principles at its heart, rather than focusing too heavily on identified actions. These Principles are described below and will guide our work in the coming years.

Since the Anti-Racist Wales Action Plan was published in 2022, the UK Government has created several new humanitarian protection migration routes and made significant changes to legislation and process. This has included three Ukraine visa schemes following the full-scale invasion of

Ukraine, two Afghan resettlement schemes following the withdrawal of NATO forces and return of the Taliban, and the Hong Kong BNO visa route since the implementation of the National Security Law Hong Kong. We have also seen increased arrivals of asylum seekers on small boats which the Welsh Government believes to be a consequence of withdrawal from the EU. This increase in asylum arrivals has driven the Full Dispersal asylum model and mandatory unaccompanied asylum seeking children National Transfer Scheme participation from all Welsh Local Authorities. Humanitarian protection migration schemes generally make up a minority share of inward migration to the UK, however, those arriving are likely to have experienced more trauma and be more vulnerable to destitution, exploitation and other harmful outcomes compared with those arriving on Planned Migration schemes. The Home Office publishes quarterly immigration statistics, here:

<https://www.gov.uk/government/collections/immigration-statistics-quarterly-release>

Data relating to the outcomes experienced by sanctuary seekers living in Wales can be very hard to gather due to the comparatively small proportion of sanctuary seekers accessing services, data security considerations and the fear of persecution which many arrivals may have towards Welsh service providers because of experiences which displaced them. These challenges are exacerbated by the UK Government's lack of data sharing or publication of data at a Wales-level. Some data is published but not in relation to all schemes. This is a challenge we are seeking to partially address through the implementation of our Migrant Integration Framework for Wales and ongoing discussions with UK Government.

## **Introduction**

Responsibility for asylum and immigration rests with the UK Government rather than the Welsh Government. This means that some of the key levers to prevent harmful outcomes, such as timely and good asylum case decision-making, the quality of asylum accommodation and provision of legal aid, are out of our control. However, the successful integration of refugees and asylum seekers will require concerted effort on the part of the Welsh Government, Welsh public services and Welsh communities.

In this plan we frequently refer to 'asylum seekers' and 'refugees'. These terms have precise meaning and relate to the immigration status of individuals. An asylum seeker is a person fleeing persecution in their homeland, has arrived in another country, made themselves known to the authorities and has exercised their legal right to apply for asylum. These individuals will be awaiting the outcome of their asylum claim.

Under the 1951 United Nations Convention relating to the Status of Refugees, a refugee is a person who "owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion, is outside the country of [his/her/their] nationality, and is unable to or, owing to such fear, is unwilling to avail himself of the protection of that country." The UK Government recognises an asylum seeker as a refugee when they satisfy the above definition. Within this plan, the term 'refugee' also includes individuals not recognised as refugees, but who have been granted indefinite leave to remain, offered humanitarian protection, or provided with discretionary leave following their asylum claim.

We favour the phrase 'people seeking sanctuary' or 'sanctuary seeker' and use these phrases in this document as an umbrella term to refer to those from any background who have been forcibly displaced from their country of origin due to war or persecution. This is to combat the

dehumanising rhetoric which can occur when referring to people by the immigration status which they have been assigned. We must recognise that these members of our communities are people first and foremost, and though their immigration status does confer important rights and obligations, it should not be considered more important than ensuring individual well-being and protection is secured. In Wales, the term 'sanctuary seekers' includes those claiming asylum (including those refused but still present here or those whose claims are considered to be inadmissible), refugees, Ukrainian scheme visa holders, Hong Kong BNO visa holders, Afghan Resettlement scheme beneficiaries, individuals with Humanitarian Protection, or those who have arrived through Family Reunion.

## Principles

The Nation of Sanctuary vision is advanced through the implementation of the 10 principles outlined below. This set of principles ensures we utilise devolved powers for the benefit of Welsh communities, the economy and sanctuary seekers. This section sets out the 10 principles we use to guide our work. Our intention is to embed the 10 principles within each of our activities. In some cases, it may be justified to adopt an approach which does not align perfectly with all principles but this should be exceptional in nature. The principles embed the five Well-being of Future Generations ways of working and the three limbs of the Public Sector Equality Duty. The principles are inter-linked and no hierarchy of importance is implied by the ordering below.

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### 1. Integration from day one

Sanctuary seekers arriving in Wales will have little awareness of how systems and processes work in Wales, will often lack a support network, and may have support needs. Providing integration support services and information as quickly as possible will help individuals to orientate themselves to a new place and culture, preserve their existing skills and well-being, and prevent harmful outcomes due to wasted skills and a lack of purpose or agency.

Our ambition is to ensure everyone arriving in Wales can start to access support from day one of arrival. This means that we try to reduce the time where individuals are unable to access the services or opportunities they need to contribute effectively. Racism in our communities will also hinder integration as sanctuary seekers will be denied opportunities or be fearful of accessing available support.

Many sanctuary seekers coming to Wales will bring with them skills and qualifications, experiences and expertise which is of great value to our communities and economy. We have a long history of drawing upon these skills to support the Welsh NHS, businesses and many other Welsh organisations. These skills are often rare in the Welsh labour market and enable new opportunities and international trade links. We seek opportunities to harness the valuable contributions which these sanctuary seekers can make as early as possible. We continue to advocate for all sanctuary seekers – including asylum seekers who have waited 6 months for a decision on their case – to be granted the right to work.

We aim to ensure sanctuary seekers are given the support and information they need to fully contribute to their new communities, for the benefit of all.

## 2. A person-centred human rights approach, including children's rights

The UK Government is responsible for the immigration and asylum system. This includes decisions about some of the rights and prohibitions on accessing services which sanctuary seekers must comply with. The Welsh Government seeks to ensure we meet sanctuary seekers' needs as far as possible, without undermining UK Government rules and in compliance with our own powers. In all circumstances, we seek to see sanctuary seekers in terms of their needs and skills first, and the barriers created by their immigration status second. We believe this is the compassionate approach and recognises our common humanity.

Our approach is compliant with UK Government rules and ensures that sanctuary seekers do not unintentionally invalidate their claims by accessing services which they are not permitted to access.

Human rights are basic rights and freedoms that belong to everyone. We know that delivering on our equality and human rights duties is fundamental to enabling citizens to live their lives based on shared values of dignity, fairness, equality, respect and independent living. We acknowledge our legal duty to respect, protect and fulfil these rights, without discrimination, and commit to taking a human rights based approach by putting people at the centre of all we do.

Sanctuary seeking children and young people can be particularly vulnerable. We make special consideration to ensure the rights of these young people are respected in any action we take. We promote and safeguard children's rights through our work. We recognise sanctuary seekers are disproportionately likely to have experienced trauma, as well as Adverse Childhood Experiences, and we consider this in our work.

The Social Services and Well-Being (Wales) Act 2014 enshrines an overarching well-being duty upon those exercising functions under the Act – including Welsh Ministers, local authorities, health boards and other statutory agencies – to promote the well-being of people who need care and support. 'Well-being' is defined as people's physical and mental health, and emotional well-being; protection from abuse and neglect; their education, training and recreation; domestic, family and personal relationships; contribution made to society; securing rights and entitlements; social and economic well-being; and suitability of living arrangements. In relation to children, it also means physical, intellectual, emotional, social and behavioural development. In relation to adults, it includes supporting control over day-to-day life and participation in work. Under the Act, public bodies have duties to assess and plan for the care and support needs of those in their area.

The Government of Wales Act 2006 requires Welsh Ministers to ensure functions are exercised with due regard to the principle of equality of opportunity. The Public Sector Equality Duty and Human Rights Act 1998 also influence the way we take action. We ensure we fulfil our international obligations and comply with the seven United Nations Conventions signed and ratified by the UK.

In deciding how to respond to the needs of sanctuary seekers we try to consider individual circumstances, rather than one-size-fits-all approaches. We consider whether any interventions are reasonable, proportionate and necessary. Equality Impact Assessments and Child Rights Impact Assessments will be completed as part of policy development.

### 3. Foster good relations and promote community cohesion

The Welsh Government, like all Welsh public bodies, have a duty to foster good relations between those with who share a Protected Characteristic under the Equality Act 2010, and those who do not. Fostering good relations helps to provide social connections between sanctuary seekers and host communities, opening up opportunities for integration and active participation in Welsh community life. This also ensures misinformation which stokes fears about immigration is less effective.

We need to ensure our actions provide opportunities for sanctuary seekers and host communities to get along together. The Nation of Sanctuary needs to be widely understood as providing benefits to the whole community and community cohesion benefits everyone. Fostering good relations requires an active enabling role from public bodies to support two-way cultural exchange and learning.

Welsh communities have long provided a welcome for sanctuary seekers needing a new home. This has been exemplified in recent times by the Homes for Ukraine scheme, pioneering of the Community Sponsorship programme, and the 'Refugees Welcome'/ City of Sanctuary movement. Historically Welsh communities have supported and benefitted from the contributions of many thousands of Syrians, Ugandans, Somalilanders, Belgians and other groups who needed sanctuary in Wales. Sanctuary seekers who feel a sense of belonging are more likely to integrate quickly and contribute fully to their new lives. We will continue to encourage towns, cities, schools, colleges, universities and other organisations to become places 'of Sanctuary'.

In recent years we have seen some unacceptable responses to accommodation proposals for sanctuary seekers. We also know sanctuary seekers experience discrimination and hate crime. We counter this discrimination and hate where we find it. Wales has no place for hate.

### 4. Prevent harmful outcomes

Sanctuary seekers are often more vulnerable to harmful outcomes due to their previous experiences, lack of financial resilience, lack of social support networks in Wales and difficulty in independently navigating UK processes. Harmful outcomes include homelessness, worsening mental or physical health conditions, poor accommodation conditions, destitution, abuse or other forms of exploitation.

Our approach seeks to provide the necessary information, advice and accessible services to ensure sanctuary seekers can understand UK laws and cultural norms. These interventions will help to prevent harmful outcomes occurring. We also work closely with the UK Government to advise them about the likely impact of their immigration and asylum systems.

Sanctuary seekers coming to Wales are likely to have been displaced by war or persecution. After being forced to flee, sanctuary seekers often experience further trauma on perilous journeys or in refugee camps. Upon arrival in Wales, individuals are highly vulnerable many harmful outcomes which can create yet further trauma.

The Welsh Government's approach is to minimise further trauma and risks of re-traumatisation, as well as promote a post-trauma recovery phase as quickly as possible. For this to occur, individuals need control in their own lives, privacy, dignity and to feel safe. The Trauma-Informed Wales Framework promotes compassionate, empathetic and supportive relationships, services and personalised interventions. Our actions seek to create these conditions to help sanctuary seekers to stabilise and recover as early as possible. Without taking this approach, more harmful outcomes are likely to occur, with greater costs to the Health and Social Care system and with a loss of talent to our economy.

This approach requires us to oppose the forced room sharing of unrelated adults and advocate for better protections, including for LGBTQ+ individuals and those at risk, or survivors, of gender-based violence. We will seek to minimise non-essential data sharing with immigration enforcement and undertake pro-active work to prevent exploitation or destitution – amongst other actions. We will ensure asylum seekers, including those refused asylum or whose case is considered inadmissible, continue to be able to access NHS treatment for free on the same basis as UK nationals. The All-Wales Standards for Accessible Communication and Information for People with Sensory Loss will ensure that access to healthcare services in Wales is inclusive and considers the requirements of those with additional communication needs. We will continue to work with local authorities to minimise harmful outcomes experienced by those with No Recourse to Public Funds.

Considering how to safeguard people from all forms of harm is at the heart of everything we do to support sanctuary seekers.

The most effective support is often to help sanctuary seekers to be able to help themselves, rather than building dependency. Our proposals should consider how to support individuals to build their own agency, wherever possible.

## 5. **Involve those directly affected**

Our approach involves those directly affected by our plans at every stage of development. By taking a person-centred approach, we should ensure we understand the likely needs, desires and impacts of proposals on sanctuary seekers. Working alongside and listening to the voices of people with lived experiences of inequality and disadvantage should ensure our actions are as efficient and effective as possible. Sanctuary seekers can come from any part of the world and, therefore, different cultural norms and priorities are likely to occur. This process of involving sanctuary seekers will help us to identify any differences, respect and preserve culture, and communicate and navigate any misunderstandings which could occur.

This approach will ensure that those arriving know what their new community's expectations and laws are. It will also help public services to be more effective in the way they provide services and provide opportunities for closer engagement.

The approach also requires us to consider the needs of host communities. Local communities need to be informed and consulted about proposals, where safe to do so, to support effective community cohesion and integration.

## 6. **Collaborate as 'Team Wales'**

The Welsh Government is responsible for many areas of policy and law in Wales but much of the support required by sanctuary seekers will be provided by local government, local health boards, or the Third Sector. Similarly, although the Welsh Government will seek to support effective integration, the private sector will have a key role in employing new arrivals to support the Welsh economy. Our 'Team Wales' concept reflects a whole-of-society approach which sees the Nation of Sanctuary as a shared vision for all organisations and communities in Wales. Solutions are discussed and designed together to provide the most effective means of integration. 'Team Wales' has demonstrated tangible benefits, enabling the arrival and settlement across Wales of around 4,000 sanctuary seekers between September 2021 and July 2024, who otherwise would not have been able to come to safety.

We work with Welsh partners and the UK Government to promote a 'Place Based' Approach to resettlement and dispersal. This means that we consider the collective pressures and opportunities in each area which can be created by various migration schemes, local homeless population support, and other public service requirements. We will work with partners to seek equitable support arrangements in all areas of Wales. Historically, migration schemes have been operated individually by the UK Government but we are working towards a more holistic approach in Wales. Wales will continue to play a proportionate role in all resettlement and dispersal schemes but local pressures and capacity need to be fully considered to achieve this.

We will jointly convene and coordinate the Nation of Sanctuary Governance Structure for Wales with the Welsh Local Government Association/Wales Strategic Migration Partnership. This will help to ensure effective political and strategic oversight of our response to migration.

As part of this work, we continue to work with the UK Government and the Welsh local government to support the UK Government's delivery of an effective Wales Asylum Plan.

## 7. Integrated responses

Sanctuary seekers need to engage in all aspects of Welsh life upon arrival in Wales. Barriers may occur to make services inaccessible but looking at each barrier in isolation can prevent issues being resolved effectively. The most efficient solution is usually to ensure existing services can be made more inclusive of sanctuary seekers, rather than creating a parallel or bespoke service exclusively for sanctuary seekers. However, in some circumstances dedicated services may be required. Where that is the case, each proposal should be examined carefully to see if it can integrate holistically with the other services which sanctuary seekers may need to access.

We should also assess whether there are intersectional impacts being experienced because of a combination of Protected Characteristics, which may mean a more nuanced or different approach is required. Intersectional impacts can be far more difficult to mitigate or overcome if these are not considered in the design of the proposed solution.

## 8. Look for long-term solutions

Sanctuary seekers often arrive in Wales following a high-profile war or horrendous atrocity. In the immediate aftermath of these incidents, short-term support is often mobilised. Our approach is to plan for the long-term support needs which sanctuary seekers will have. It is not easy to learn English or Welsh in a single year, and the trauma people have suffered may need life-long treatment. Being separated from family members who may continue to be in harm's way can have a significant ongoing effect on mental health and the ability of individuals to fully integrate. As a consequence, our work tries to avoid short-term, incident-specific responses. Instead, we recognise that long-term support services need to be established for all sanctuary seekers.

War and persecution, as well as perilous journeys to get to the UK and very limited resettlement scheme places, means that families often end up forcibly separated. Our approach recognises that the outcomes for the family members residing in Wales, and those residing elsewhere, will be much better if we can support the reunification of that family. Family Reunion improves mental health and well-being, improves the support network, and provides opportunities for financial resilience, amongst other benefits. It also enables individuals to feel more secure and to integrate more fully in their new community.

Children and young people who come to Wales seeking sanctuary are likely to be particularly vulnerable. Providing appropriate and good quality support early and continuously helps young people to reach their full potential and contribute fully to Welsh life. Unaccompanied children are looked after by Local Authorities, like any others with care and support needs.

## 9. Ensure equality of treatment and opportunities

Our Nation of Sanctuary work involves seeking to ensure sanctuary seekers have equality of opportunity, as far as this is possible in accordance with the rights permitted by the UK Government. We seek to ensure that different cohorts of sanctuary seekers have equitable opportunities, avoiding 'two-tier' approaches where possible which might create an unhelpful and unjust perception of 'deserving' or 'undeserving' cohorts of sanctuary seekers.

Except where explicitly prohibited by Immigration Rules or law, we aim to ensure all sanctuary seekers can access all mainstream public services. There will be certain schemes which preclude some groups because inclusion would create unreasonable risks or where a separate bespoke provision exists. Equitable support for those with No Recourse to Public Funds is particularly difficult to achieve in some areas due to the UK Immigration Rules. However, taking a person-centred human rights approach helps us to consider what support can be offered.

Equality of treatment and opportunities also relates to ensuring those who share intersecting minority protected characteristics are supported to access fair and appropriate services. For example, we seek to eliminate any inequalities which could arise for sanctuary seekers who are further disadvantaged because of their race, faith or belief, disability, sexual orientation, sex or gender identity, age, pregnancy and maternity, or marriage or civil partnership.

We also seek to ensure the support we give to sanctuary seekers is reflective of the support we are able to give to other vulnerable people, such as those who are homeless and residing in temporary accommodation. We try to ensure there is equity in the support we can provide to ensure there is fairness in our approach.

## 10. Take a proactive approach

Our approach recognises that we can often make a positive contribution to addressing the global refugee crisis and furthering the Well-being of Future Generations goal of a globally responsible Wales. Our Nation of Sanctuary vision is about ensuring Wales plays a full part in the UK's global responsibilities but it is not about developing a parallel immigration policy. We seek to support the UK Government to ensure effective sanctuary seeker support within the boundaries of Wales and we make efforts to communicate our practice to the other three nations of the UK and internationally. Wales makes up approximately 5% of the UK population and we expect to support roughly 5% of the UK's sanctuary seeker population, as a result.

We take a proactive approach to identify opportunities to develop innovative and compassionate ways of achieving this support. Our Homes for Ukraine Super Sponsor route is an example of how we have been able to break new ground in recent years to achieve warm and effective integration at scale.

We are committed to fostering improvements and innovative approaches with the UK Government to encourage better alignment between the operation of asylum and resettlement schemes and community cohesion and integration. We also implement these recommendations when delivering any Welsh Government welcome accommodation.

## What we will do

The actions below provide updated delivery timeframes and potential indicators in relation to our consolidated list of actions. The Welsh Government's ability to improve situations for sanctuary seekers and host communities is limited by the extent of policy levers which are not devolved by the UK Government. The UK Government is responsible for the existence, operation and scale of humanitarian protection migration pathways, decision-making in asylum and resettlement cases, choices around where and how sanctuary seekers will be accommodated, the provision of non-devolved integration services like immigration legal advice, and other areas.

In 2024-25 we will be prioritising implementing our Programme for Government commitment to uphold the rights and best interests of unaccompanied children, as the former UK Government introduced legislation and processes which pose new challenges and risks to the effective implementation of children's rights in Wales. We will also be prioritising the effectiveness of the Wales Sanctuary Service and reviewing a potential extension of the service for 2025-2027.

The Migrant Integration Framework for Wales was published in December 2023 and sets out a long-term plan to better monitor the outcomes of migrants living in Wales. This will help us understand inequalities and work to mitigate and eliminate differences over time. In 2024-25 we will focus on implementing better data collection from various sources to ensure the longer-term aims can be met. We have a dearth of available data to help us monitor the experience and outcomes of sanctuary seekers in Wales. We will utilise the Framework implementation and wider discussions with UK Government partners to try to improve this situation. However, currently, measuring the impact of the actions below will often be extremely difficult to achieve.

Finally, we will prioritise preventing the most harmful impacts which are disproportionately experienced by sanctuary seekers, such as homelessness, destitution, exploitation, unemployment and mental ill-health. Our work to support those who have No Recourse to Public Funds and work to support sanctuary seekers at key 'transition points', such as upon arrival in Wales and on point of exit from asylum accommodation, will help to reduce the most harmful outcomes being experienced.

Welsh Government  
2024

This chapter also contributes to the six Anti-Racist Wales Action Plan cross-cutting priorities:

1. **Leadership and Representation:**

Welsh Government will continue to drive forward the Nation of Sanctuary vision, seeking to encourage all Welsh Public Bodies, third sector, companies and Welsh households to play a part in Wales achieving this ambition.

We will work with people with Lived Experience to put their voices at the heart of our policy development and our governance structure.

2. **Intersectionality:**

The Wales Sanctuary Service will develop specific intersectional support for LGBTQ+ and disabled sanctuary seekers, as well as specific interventions to support women and children.

In seeking improved data collection and publishing on migrant experiences, we also want to ensure other demographic characteristics are being collected to consider intersectional outcomes.

Data will be collected by Welsh Government-funded services on other protected characteristics to monitor any intersectional disadvantages experienced by those accessing services.

3. **Gypsy, Roma and Traveller:**

There are no known Gypsy, Roma or Traveller sanctuary seekers in Wales.

4. **Data and Research:**

The possible indicators align with indicators which we intend to encourage development of via the implementation of the [Migrant Integration Framework for Wales](#). This Framework defines integration in Wales and sets out the information we need to collect to meaningfully measure the integration of migrants and Welsh host communities.

We will require many data controllers to work with us to effectively implement the Framework, including ONS, DWP, Electoral Commission, Home Office, and Welsh Government. Data will need to be collected and published on migrant experiences where it currently is not. If these data controllers do not work collaboratively with us it will be very difficult to monitor progress.

Potential indicators would need development in relation to integration services (ESOL, health registration and vaccinations, Higher Education enrolment and retention) to ensure an accurate Wales-wide picture relating to outcomes. Further work is needed to understand how viable this is. Local authorities will be supported to develop indicators to reliably measure the number of NRPF individuals being supported due to having care and support needs.

**5. Strengthening Complaints System:**

Advice services complaints will be monitored to help sanctuary seekers complain effectively and have advocacy support if needed.

We will encourage Welsh Public Bodies to limit data sharing information with the Home Office for Immigration Enforcement purposes to build confidence in complaints processes.

**6. Positive Action:**

This work focuses on the Public Sector Equality Duty, namely by advancing equality of opportunity for sanctuary seekers, fostering good relations between sanctuary seekers and other community members, and strengthening work to eliminate discrimination and hate.

| Existing Actions  | Amended Actions   | Desired Outcomes  | By When<br>(Welsh Government budgets only set for 2024-25 at present)                        | Lead and Partners  | Key Priority Areas (1-6) |
|---|---|---|--|--|--------------------------|
| <p><b>Action:</b><br/>Ensure forced migrants living in Wales can access the advice and advocacy services that they need and are supported to effectively integrate with communities through the procurement and management of the Sanctuary Seeker Support Service.</p> | <p><b>NoS 1:</b> Ensure sanctuary seekers living in Wales can have equitable access to advice and advocacy services in every part of Wales through the procurement and management of the Wales Sanctuary Service.</p> | <p>Sanctuary seekers can better integrate with communities and the wider community can thrive.</p> <p>Sanctuary seekers accessing advice services are less likely to experience most harmful outcomes when living in Wales.</p> | <p>Wales Sanctuary Service funded until March 2025, possible extension until March 2027.</p> | <p>Welsh Government Cohesive Communities Division</p> <p>Wales Sanctuary Service delivery partner(s)</p> | <p>2, 4, 5 and 6</p>     |

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| <p><b>NoS 2:</b><br/>Implement our Migrant Integration Framework for Wales.</p>   | <p>[Unamended]</p>   | <p>Migrant experiences and outcomes in Wales will be better understood. Inequalities can be addressed to improve integration.</p> <p>Public bodies and service providers will understand how their services and data contribute to increasing understanding of migrant integration and effective processes.</p> | <p>Annual report on progress – long-term action to align with Anti-Racist Wales 2030 vision.</p> | <p>Welsh Government Cohesive Communities Division</p>   | <p>2, 4 and 6</p> |
| <p><b>Action:</b><br/>Ensure the sustainability of English for Speakers of Other Languages (ESOL) Hubs to provide consistent high-quality language proficiency assessments and provision of appropriate language courses.</p> | <p><b>NoS 3:</b> Maintain ESOL Policy for Wales and support access to appropriate language tuition, including access to consistent high-quality language proficiency assessments and appropriate language courses.</p> | <p>Language acquisition will be adequately supported to ensure migrants only ever experience short-term language proficiency barriers to employment, education or training.</p>   | <p>ESOL Hubs funded until March 2025</p>   | <p>Welsh Government Cohesive Communities Division</p> <p>Further Education and Apprenticeships Division</p> <p>REACH Partnership (led by Cardiff and Vale College)</p> <p>Medr – the Commission for Tertiary Education and Research</p> | <p>4 and 6</p>    |

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| <p>[New Action for ARWAP – 2019 NoS Plan action]</p>   | <p><b>NoS 4:</b> Enable access and promote opportunities for sanctuary seekers to learn Cymraeg via National Centre for Learning Welsh projects.</p>  | <p>Sanctuary seekers can integrate more effectively in Welsh-speaking communities.</p> <p>Sanctuary seekers can learn and enjoy the Welsh language and get to know more about Wales.</p>   | <p>Promotion of learning opportunities from 2024 onwards</p>  | <p>WG Cymraeg 2050</p> <p>National Centre for Learning Welsh</p>  | <p>4</p> |
| <p><b>Action:</b><br/>Ensure refugees are supported to avoid destitution and homelessness through continued funding for a 'Move On' accommodation project.</p>   | <p><b>NoS 5:</b> Ensure refugees are supported to avoid destitution and homelessness through continued funding for a 'Move On' accommodation project.</p> <p>Explore opportunities to identify clearer pathways to alternative accommodation.</p> | <p>Newly granted refugees can find alternative accommodation, access bank accounts and work/social security, as quickly as possible, avoiding destitution and homelessness.</p>  | <p>Funding provided until March 2025.</p>   | <p>Welsh Government Cohesive Communities Division</p> <p>Housing Policy Division</p> <p>Welsh Refugee Council</p>                     | <p>2</p> |
| <p><b>Action:</b><br/>Provide advice to Public Bodies and capacity- building support to the Third Sector to ensure those with No Recourse to 'Public Funds' (NRPF) are able to access services to which they are entitled to</p> | <p><b>NoS 6:</b> Provide guidance and training to Public Bodies and the Third Sector to ensure those with No Recourse to 'Public Funds' (NRPF) are able to access services to which they are entitled.</p>  | <p>Fewer sanctuary seekers with NRPF will be turned away without being supported. Fewer harmful outcomes will be experienced.</p> <p>Welsh Government will better understand extent of destitution and will engage UK Government to seek resolution.</p> | <p>Guidance to be kept under review as caselaw and policies change.</p> <p>Training delivered to local authorities in 2024-25</p> | <p>Welsh Government Cohesive Communities Division</p> <p>Housing Policy Division</p> <p>Social Services Safeguarding and Advocacy</p> | <p>4</p> |

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| <p>avoid them becoming more vulnerable to violence and exploitation and treated with compassion and harmful outcomes are avoided.</p>  | <p>Develop data collection and NRPF pathways with local government.</p>  |   |   | <p>Welsh Local Authorities</p> <p>Welsh Refugee Coalition</p> <p>WLG/WSMP</p>                                  |                |
| <p>[Split out from previous action]</p> <p>[Elements added in revised action to address Audit Wales recommendations 2024]</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Park Page 224</p> | <p><b>NoS 7:</b> Ensuring hosting capacity and innovative housing models are developed for those with No Recourse to Public Funds who are engaging with UK immigration processes.</p> <p>Develop a sponsor and host database to ensure sanctuary seekers can be hosted where needed.</p> | <p>Shelter can be provided where individuals have opportunities to regularise their immigration status or quickly find sanctuary in Wales.</p> <p>Those refused asylum but with grounds to challenge the decision are supported to do so.</p> | <p>Funding of hosting schemes in 2024-25</p>  | <p>WG Housing Policy</p> <p>WG Cohesive Communities</p> <p>Welsh Refugee Coalition</p>                         |                |
| <p><b>Action:</b> Health inequalities experienced by forced migrants are mitigated and reduced through ensuring the sustainability of the Cardiff and Vale Health Inclusion Service (CAVHIS),</p>                | <p><b>NoS 8:</b> Develop a 'Health Assessment and Screening Pathway for Sanctuary Seekers' to ensure new arrivals are effectively screened, registered for healthcare and</p>  | <p>Sanctuary seekers will receive fair and equitable health services.</p>   | <p>2024-2026 – work required to improve data reporting and ongoing monitoring of pathway implementation and training delivery</p> | <p>Welsh Government Mental Health, Health Protection and Primary Care</p> <p>Cohesive Communities Division</p> | <p>4 and 6</p> |

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| <p>encouraging vaccine take-up and maintaining a focus on these communities as part of the work of Traumatic Stress Wales as well as a specific focus on supporting better access to mental health services among Black, Asian and Minority Ethnic communities.</p> | <p>offered appropriate vaccinations.</p> <p>Ensure sustainability of Cardiff and Vale Health Inclusion Service and promote best practice for other Health Boards.</p>                                |  |                  |  |                |
| <p>[Split out from existing health action above]</p> <p>Page 225</p>  | <p><b>NoS 9:</b> Maintain a focus on the mental health of sanctuary seekers as part of Traumatic Stress Wales due to the trauma they are likely to have experienced.</p>                             | <p>Trauma experienced by those forced to migrate will be understood and mitigated.</p> | <p>Ongoing</p>   | <p>Welsh Government Mental Health, Health Protection and Primary Care</p>                                  | <p>4 and 6</p> |
| <p>[New Action for ARWAP – 2019 NoS Plan action]</p>  | <p><b>NoS 10:</b> Ensure healthcare is accessible for those whose preferred language is not English or Welsh, in line with the All-Wales Standards for Accessible Communication and Information.</p> | <p>Sanctuary seekers will receive fair and equitable health services.</p>              | <p>2024-2026</p> | <p>Welsh Government HSS Equalities Team, Mental Health and Primary Care</p> <p>WG Cohesive Communities</p> | <p>5 and 6</p> |

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| <p><b>Action:</b><br/>Employability of forced migrants is supported through awareness raising of migrant rights to work with employers, sector-specific employment programmes such as the Wales Asylum and Refugee Doctors scheme and advocating for the right to work for asylum seekers.</p> | <p><b>NoS 11:</b> Work with employers to improve the employment of sanctuary seekers with right to work.</p> <p>Encourage the role of the private sector in employment and integration, initially via the Wales Jobs Portal.</p> | <p>Pathway to employment for sanctuary seekers will be improved. Better community integration.</p>                                 | <p>Wales Sanctuary Jobs Portal supported for 2024-25</p> | <p>Welsh Government Cohesive Communities Division</p> | <p>6</p> |
| <p>[Split out from previous action above]</p>  | <p><b>NoS 12:</b> Entrepreneurship support schemes (Business Wales) will be accessible to sanctuary seekers with right to work, including via translation services, workshops and one-to-one advice.</p>                         | <p>Sanctuary seekers will be able to utilise their entrepreneurial skill to enhance their opportunities and the Welsh economy.</p> | <p>2024-26</p>   | <p>Welsh Government Employability and Skills</p>      | <p>6</p> |
| <p>[Split out from previous action above]</p>  | <p><b>NoS 13:</b> Develop and maintain pathways for sanctuary seeker</p>   | <p>Welsh NHS and social care sectors are better able to recruit necessary</p>  | <p>Funding for WARD maintained for 2024-25</p>           | <p>Welsh Government NHS Workforce</p>                 |          |

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|   | <p>employment in critical sectors like health and social care.</p> <p>Ensure Health Education and Improvement Wales (HEIW) continues to support initiatives such as the Wales Asylum Seeking and Refugee Doctors (WARD) Group to utilise talents of sanctuary seekers present in Wales. Consider extension of this approach to other sectors and professions.</p> <p>Work with Talent Beyond Boundaries to support safe and legal humanitarian protection migration to support these sectors.</p> | <p>skills to provide required care.</p> <p>Talent of sanctuary seekers is fully harnessed.</p> <p>Public awareness increased of value of migrant integration.</p>                | <p>Funding for Talent Beyond Boundaries for 2024-25</p> <p>Consideration of other schemes 2024-26</p> | <p>Welsh Government Social Care Workforce</p> <p>Welsh Government Cohesive Communities Division</p> |  |
| [New ARWAP action – 2019 NoS Plan action] | <p><b>NoS 14:</b> Explore with the UK Government the prospect of reviewing the Civil Service Nationality Rules to improve eligibility for</p>   | <p>Welsh Government will be able to draw upon talents of sanctuary seekers.</p> <p>Welsh Government will be seen as providing clear and strong leadership, encouraging other</p> | 2024-26   | <p>WG HR and Resourcing</p> <p>Welsh Government Cohesive</p>  |  |

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|   | <p>refugees to be considered for employment in the Civil Service, including Welsh Government.</p> <p>Promote Welsh Government as an employer, demonstrating fairness, openness and transparency to allow as many people as possible the chance to apply.</p> | <p>employers to replicate our example.</p> <p>Sanctuary seekers will see Welsh Government and Wales as a place to call home.</p> |  | Communities Division  |                      |
| <p><b>Action:</b> Increase opportunities for forced migrants to access further and higher education through exploring funding changes and ensuring refugees continue to be considered as 'home students'.</p> | <p><b>NoS 15:</b> Work with Higher Education Institutions to identify opportunities to increase the participation and retention of refugees and asylum seekers in Higher Education.</p>  | <p>Sanctuary seekers can better fulfil their potential and, in turn, contribute more effectively to Welsh society.</p>           | <p>2024-26</p> <p>Work on improving data relates to implementation of the Migrant Integration Framework for Wales.</p> | <p>Welsh Government Learner Experience Division</p> <p>Cohesive Communities Division</p> <p>Welsh Higher Education Institutions</p> <p>UCAS</p> | 4                    |
| <p>[New ARWAP action – LGBTQ+ Action Plan commitments]</p>  | <p><b>NoS 16:</b> Ensure Welsh Government services are meeting the</p>   | <p>Intersectional impacts are reduced, supporting better well-being and integration.</p>   | <p>2024-26</p>   | <p>Welsh Government Cohesive</p>  | <p>2, 4, 5 and 6</p> |

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|   | <p>intersectional needs of sanctuary seekers with additional protected characteristics. Advocate for improvements to UK Government processes where negative intersectional impacts are identified.</p>  | <p>Equality impact assessments undertaken for policy development.</p>  |  | <p>Communities Division</p> <p>WG-contracted delivery partners</p>   |          |
| <p><b>Action:</b><br/>Continue to support and uphold the rights and best interests of unaccompanied asylum-seeking children and young people.</p> <p>Programme for Government commitment to be further developed with policy leads.</p> | <p><b>NoS 17:</b> All unaccompanied migrant children will be treated as any looked after child by Welsh local authorities. All looked after children have a statutory right to advocacy.</p> <p>Undertake work with advocacy providers and local authorities to ensure improved understanding of asylum seekers and asylum processes.</p> | <p>Unaccompanied children and young people receive the care and support they need to integrate effectively in Wales.</p> | <p>2024-26 – ongoing work to ensure children’s rights are being upheld</p> | <p>Welsh Government Social Services Safeguarding and Advocacy</p> <p>Enabling People Division</p> <p>Cohesive Communities Division</p> | <p>4</p> |
| <p>[New ARWAP Action – Refreshed</p>  | <p><b>NoS 18:</b> Support Foster Wales to enhance the recruitment, training and support for</p>   | <p>Unaccompanied children and young people receive the care and support they need to integrate effectively in Wales.</p> | <p>2024-26</p>   | <p>WG Health and Social Services Enabling People</p>   | <p>4</p> |

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| 2019 NoS Plan action]                     | foster carers who care for young people arriving, including under the National Transfer Scheme.   |   |   |                         |         |
| [New ARWAP Action – 2019 NoS Plan action] | <b>NoS 19:</b> Work with the Wales Council for Voluntary Action (WCVA), County Voluntary Councils and other partners to identify and promote opportunities for sanctuary seekers to access volunteering opportunities.  | <p>Better well-being and mental health for sanctuary seekers due to reduced isolation and increased purpose.</p> <p>Increase in volunteering provides wider community benefits.</p> <p>Increased informal language acquisition.</p> | 2024-26   | WG Cohesive Communities | 4       |
| New ARWAP Action – 2019 NoS Plan actions] | <p><b>NoS 20:</b> Foster good relations between arrivals and host communities to build community cohesion.</p> <p>Continue to fund the Community Cohesion Programme and facilitate engagement between communities, as well as between arrivals and Police forces.</p> | <p>Community tensions are prevented or mitigated where they occur. Community members feel they get along well.</p> <p>Sanctuary seekers have trust in public institutions and will access them when needed.</p>                     | 2024-26 – ongoing funding of Community Cohesion Programme | WG Cohesive Communities | 1 and 6 |

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|   | Promote understanding of the Nation of Sanctuary vision.   |  |  |  |         |
| [New ARWAP Action – Refreshed 2019 NoS Plan action] | <b>NoS 21:</b> Involve sanctuary seekers as experts by experience at the heart of policy development and to improve the integration of new arrivals.                                 | Policies and projects are likely to be more fit-for-purpose.<br><br>Integration outcomes should be improved.   | Fund work with those with lived experience in 2024-25.<br><br>Ongoing work to embed voices in 2025-26. | WG Cohesive Communities  | 1       |
| [New Action]<br><br>Pack Page 231                   | <b>NoS 22:</b> Implement Welcome Connectivity project to enable access to the Welcome Ticket bus travel scheme and Databank internet scheme for asylum seekers with an active claim. | Asylum seekers feel more connected to Welsh communities and more able to access culture from their country of origin. Improved mental health and well-being, as well as community integration. | Scheme introduced in 2024-25   | WG Cohesive Communities<br><br>Good Things Foundation<br><br>Transport for Wales | 6       |
| [New ARWAP Action – 2019 NoS Plan action]           | <b>NoS 23:</b> Maintain and promote alignment between the Credit and Qualifications Framework for Wales, UK Qualifications Frameworks and the European Qualifications Framework to   | More sanctuary seekers have their existing qualifications recognised, improving access to commensurate jobs.   | 2024-26  | WG Learner Pathways  | 4 and 6 |

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|  | support sanctuary seekers to have their existing qualifications recognised.   |  |   |   |         |
| [New ARWAP Action – Refreshed 2019 NoS Plan action, extended to those learning]  | <b>NoS 24:</b> Increase uptake of Childcare Offer to enable qualifying sanctuary seekers to attend language tuition or enter employment.  | Sanctuary seekers are able to access education or employment, improving economic well-being.   | 2024-26   | WG Early Years, Childcare and Families  | 4 and 6 |
| <div style="writing-mode: vertical-rl; transform: rotate(180deg); position: absolute; left: -40px; top: 50%; font-size: small;">       Draft Document 2022     </div> [New ARWAP Action – Refreshed 2019 NoS Plan action, no EMA but Welcome Ticket instead] | <b>NoS 25:</b> Improve access to the Financial Contingency Fund to ensure sanctuary seekers have access to additional funds to help remove financial barriers to studying in college.                 | Sanctuary seekers will be able to access funding from their local college to support them in Further Education.                                      | 2024-26   | WG Further Education and Apprenticeships<br><br>Medr once transfer of responsibilities is complete. | 4 and 6 |
| [New ARWAP Action – Refreshed 2019 NoS Plan and GRF Pledge 2023]   | <b>NoS 26:</b> Work with Gender-Based Violence and sanctuary seeker support organisations to support access to dedicated GBV support services, including for people with No Recourse to Public Funds. | Sanctuary seekers who are survivors of Gender-Based Violence will be supported appropriately, improving their safety and ability to access services. | Pilot continues in 2024-25<br><br>Ongoing GBV awareness 2024-26 | WG Cohesive Communities<br><br>Gender-based violence support organisations                          | 2 and 6 |

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| [New Action – responds to Audit Wales 2024 recommendation] | <p><b>NoS 27:</b> Support the development and effective implementation of Safe and Legal resettlement schemes in Wales.</p> <p>Develop a handbook for responding to new schemes and establish criteria for future super sponsor opportunities, regardless of the national or ethnic origins of those needing sanctuary.</p> <p>Welsh Government scheme eligibility rules are updated promptly to ensure equitable access to services for new arrivals.</p> | <p>Welsh Government and other Public Bodies are ready to respond to any future resettlement scheme.</p> <p>Developing standard approaches in calmer periods is likely to lead to more viable solutions which can be implemented to respond to crises.</p> <p>New arrivals will be able to access equality of opportunity.</p> | 2024-25 | <p>WG Cohesive Communities</p> <p>Welsh Local Government Association / Wales Strategic Migration Partnership</p> <p>Welsh Refugee Coalition</p> | 6 |
| [New ARWAP Action – 2019 NoS Plan and GRF pledge 2023]     | <p><b>NoS 28:</b> Welsh Government will work closely with Welsh local government, communities and other partners to increase the role which community sponsorship can</p>  | <p>Sanctuary seekers will feel welcome and supported by their host communities.</p> <p>Sanctuary seekers integrate more quickly with ready-made support network.</p>  | 2024-26 | <p>WG Cohesive Communities</p> <p>WSMP</p>  | 6 |

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|  | play in supporting refugee resettlement.   |   |   |  |         |
| [New ARWAP Action – GRF Pledge 2023]         | <b>NoS 29:</b> Welsh Government will continue to fund family reunion integration services in Wales and advocate for a broad definition of family to maximise opportunities for families to be reunited within UK Government immigration rules. | Families can be reunited which benefits childhood development, mental health of all family members, financial well-being of the family, and better integration. | British Red Cross funded in 2024-25<br><br>Ongoing support for Family Reunion 2024-26   | WG Cohesive Communities  | 6       |
| [New ARWAP Action – Refreshed 2019 NoS Plan] | <b>NoS 30:</b> Support victims of hate, including by funding the Wales Hate Support Centre. Raise awareness of hate crime amongst sanctuary seekers and promote increased reporting.   | Sanctuary seekers can challenge hate crime they have experienced.   | Funding for Wales Hate Support Centre until March 2025, possible extension to March 2027.<br><br>Promotion of service and rights, 2024-26 | WG Cohesive Communities  | 5 and 6 |
| [New ARWAP Action – Refreshed 2019 NoS Plan] | <b>NoS 31:</b> Support sanctuary seekers to access information about financial resilience and poverty alleviation. Promote the Discretionary Assistance Fund   | Fewer sanctuary seekers will experience destitution.  | 2024-26   | WG Tackling Poverty & Supporting Families<br><br>WG Cohesive Communities | 6       |

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|  | exceptional claims process to people seeking sanctuary.   |   |  |  |            |
| [New ARWAP Action – Refreshed 2019 NoS Plan actions] | <b>NoS 32:</b> Promote awareness and access to training in safeguarding risks, modern slavery and the potential exploitation of sanctuary seekers (including those with No Recourse to Public Funds), including unaccompanied children. | Partners and sanctuary seekers will better recognise the risks of exploitation and how to mitigate those risks.   | 2024-26  | WG Safeguarding and Advocacy and Modern Slavery and Workers' Rights branches.<br><br>Welsh Local Authorities | 1 and 6    |
| [New ARWAP Action – Refreshed 2019 NoS Plan action]  | <b>NoS 33:</b> Monitor the availability of immigration legal advice and advocate for the UK Government to ensure sufficient capacity. Provide limited legal advice capacity to prevent most harmful outcomes.                           | Welsh and UK Governments will better understand immigration legal advice capacity gaps.<br><br>Provision of advice will ensure access to justice and minimise incorrect decisions which could lead to harmful outcomes. | Funding of last-line legal advice and capacity building in 2024-25 | WG Cohesive Communities<br><br>Immigration legal advice providers  | 5 and 6    |
| [New ARWAP Action – Refreshed 2019 NoS Plan actions] | <b>NoS 34:</b> Maintain the Sanctuary website as the primary source of up-to-date information about rights and services   | Sanctuary seekers can integrate and experience fewer harmful outcomes.  | 2024-26  | WG Cohesive Communities  | 1, 5 and 6 |

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|  | <p>in Wales for sanctuary seekers. Ensure website continues to be accessible in many languages. Ensure information about key immigration status changes is communicated appropriately.</p> |  |  |  |  |
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## Blank Template

| Existing Actions   | Amended Actions  | Desired Outcomes  | By When  | Lead and Partners   | Key Priority Areas (1-6)  |
|--|--|---|--|---|---|
| <p><b>Old Action:</b><br/>Continue to run a regular Gypsy, Roma and Traveller stakeholder meeting to inform Welsh Government actions and policymaking.</p> | <p><b>Refreshed Action 2024:</b><br/><b>H&amp;P 21:</b><br/>Have regular meetings with Gypsy, Roma and Traveller people and stakeholders to inform Welsh Government policy. Ensure people feel included in the meetings.</p> | <p>Gypsy Roma Traveller people and stakeholders feel confident that their expert lived experience is built into policymaking and delivery decisions and that is delivering better policies for their community.</p> | <p>By end 2024</p> <p>Contribution to policy making on an ongoing basis.</p> <p>Programme of meetings outlined for 2024.</p> | <p>Equality and Human Rights Division and Gypsy Roma Traveller stakeholders</p> | <p>Priority Areas 1,2,3,4,6<br/>Potential for priority area 5 also.</p> |
| <p><b>Old Action:</b><br/>Support to Black, Asian, and Minority Ethnic communities to access services, advice, and benefits</p>                            | <p><b>Refreshed Action 2024:</b><br/><b>H&amp;P 22:</b><br/>Provide advice and advocacy services to Gypsy Roma and Traveller communities.</p>  | <p>Advice and advocacy tailored to Gypsy, Roma and Traveller needs is available.</p> <p>Better services for Gypsy, Roma and Travellers.</p>   | <p>Procurement exercise during 2024, contract to run over three years</p>  | <p>Equality and Human Rights Division and Successful Bidder for contract</p>    | <p>Priority area 3</p>  |
| <p><b>Old Action:</b><br/>Commission a national training scheme for Welsh local authority</p>  | <p><b>Refreshed Action 2024:</b><br/><b>Lead 23:</b> Set up community mentor or liaison roles for</p>  | <p>Local authorities provide culturally appropriate support services that meet the needs of Gypsy Roma and Traveller communities.</p>   | <p>December 2025</p>   | <p>Equality and Human Rights Division</p>                                       | <p>Priorities 1 - 6</p>   |

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| <p>housing options teams, and other relevant professionals, to improve the approach taken and support offered to community members seeking help for homelessness and accommodation issues by creating "Gypsy and Traveller champions" or "leads" in each local authority.</p> | <p>Gypsy, Roma and Traveller people. This work will include leadership training as identified by the mentors, ensuring it is community-led.</p> | <p>Increased participation of Gypsy Roma Traveller people in leadership groups</p> |  | <p>Local Government Division<br/><br/>Housing Division<br/><br/>Local authorities<br/><br/>WLGA<br/><br/>Gypsy, Roma and Traveller communities</p> |  |
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**Please Provide Detail of Any Additional Work Triggered by ArWAP**

Winter fuel support for Gypsy Roma Traveller communities provided during 2023/24.

As part of the Digital Communities Wales contract, a work stream will focus on embedding digital inclusion within organisations working with the Gypsy, Roma and Traveller communities in Wales. Funding will be available until 2025-26.

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| Existing Actions  | Amended Actions   | Desired Outcomes  | By When   | Lead and Partners  | Key Priority Areas (1-6)              |
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| <p><b>Old Action:</b> Create a national network of transit provision to facilitate travelling life, with consideration for negotiated stopping, as appropriate.</p> | <p><b>Refreshed Action 2024:</b></p> <p><b>H&amp;P 12:</b></p> <p>Work with Gypsy, Roma and Traveller community members, local authorities and others to provide appropriate transit provision. Decisions will be taken based on evidence of where transit is needed.</p> | <p>Improved evidence for transit provision.</p> <p>Better relationships with and across local authorities.</p> <p>Better services for Gypsy, Roma and Traveller people.</p> <p>Travelling life for Gypsy, Roma, Traveller people is enabled through evidence based transit provision.</p> | <p>2025/6</p>   | <p>Equality and Human Rights Division</p> <p>Planning Division</p> <p>Land Division</p> <p>Gypsy, Roma and Traveller communities</p> <p>Local authorities</p> <p>Gypsy Roma and Traveller stakeholders</p> | <p>Priority area 1, 2, 3, 4 and 6</p> |
| <p><b>Old Action:</b> Pilot additional or new ways of funding permanent provision.</p>  | <p><b>Refreshed Action 2024: H&amp;P 13:</b></p> <p>Pilot additional or new ways of funding permanent provision.</p>  | <p>Gypsy, Roma and Traveller communities housing needs are being met.</p>   | <p>2024/25 for pilot development</p> <p>2025/26 for pilot implementation.</p> | <p>Equality and Human Rights Division</p> <p>Planning Division</p> <p>Land Division</p> <p>Gypsy, Roma and Traveller communities</p> <p>Local authorities</p>  | <p>Priority area 1, 2, 3, 4 and 6</p> |

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|   |  |  |   | Gypsy Roma and Traveller stakeholders<br>Housing Associations   |                                |
| <b>Old Action:</b><br>Explore the potential for a mobile home rental scheme run through social housing in order to improve quality and cost of rental provision in Wales. | <b>Refreshed Action 2024: H&amp;P 14:</b><br>Fund a study to look at options for a mobile home rental scheme through social housing.     | Improved access to quality rental mobile homes for Gypsy, Roma and Traveller Communities.            | Study looking at this procured in 2024/25   | Equality and Human Rights Division<br>Housing Division<br>Gypsy, Roma and Traveller communities<br>Local authorities<br>Gypsy Roma and Traveller stakeholders<br>Housing Associations | Priority area 1, 2, 3, 4 and 6 |
| <b>Old Action:</b> Capital requirement for mobile home rental pilot.  | <b>Refreshed Action 2024:</b><br><b>H&amp;P 15:</b><br>Depending on outcome of the mobile home rental scheme study, set up pilot scheme. | Improved access to quality rental mobile homes for Gypsy, Roma and Traveller people and communities. | 2025/26<br>Further discussions to take place following the findings of the mobile home rental scheme study. | Equality and Human Rights Division<br>Housing Division<br>Gypsy, Roma and Traveller communities<br>Local authorities  | Priority area 1, 2, 3, 4 and 6 |

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|   |  |  |   | Gypsy Roma and Traveller stakeholders<br><br>Housing Associations   |                             |
| <p><b>Old Action:</b><br/>Provide learning and development support to Local Authority Elected Members on Gypsy, Roma and Traveller communities' culture, needs and strengths. The specification for the service will be drawn up to ensure the support will go beyond awareness-raising and will include anti-racism.</p> | <p><b>Refreshed Action 2024:</b><br/><b>H&amp;P 16:</b><br/>We will procure a framework for an external training company to develop and deliver a training course to upskill all 22 Local Authorities on Gypsy, Roma and Travellers nomadic ways of living. This will be developed with Gypsy, Roma and Traveller community members.</p> | <p>Elected members are informed and sensitive to the needs of Gypsy, Roma and Traveller communities.</p> <p>Racist language, sentiment and actions towards the Gypsy, Roma and Traveller communities are not tolerated and widely condemned.</p> | <p>2024/25</p> <p>Procurement of contract complete</p> <p>First round of training delivered</p> | <p>Equality and Human Rights Division</p> <p>Local Government Division</p> <p>Local authorities</p> <p>WLGA</p> <p>Involvement of Gypsy, Roma and Traveller communities to contribute to content and design of training.</p> <p>Training providers with lived experience.</p> | Priorities 1 - 6            |
| <p><b>Old Action:</b><br/>Commission a three-year pilot programme to provide independent, trusted advice to those seeking to</p>  | <p><b>Refreshed Action 2024:</b><br/><b>H&amp;P 17:</b><br/>Commission a three-year pilot programme to provide advice to those seeking to</p>  | <p>Increased private site provision, to an acceptable standard.</p>  | <p>Procurement in 2024</p> <p>Pilot launch 2025</p>   | <p>Equality and Human Rights Division</p> <p>Local authorities</p> <p>WLGA</p>  | Priorities 1, 2, 3, 4 and 6 |

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| develop private sites.   | develop private sites.   |  |                                  | Gypsy, Roma and Traveller communities<br><br>Gypsy, Roma and Traveller stakeholders<br><br>Contract providers with lived experience.   |                             |
| <p><b>Old Action:</b><br/>Review the current funding policy for Gypsy and Traveller sites and assess its effectiveness, with a view to piloting additional or new ways of funding site provision, including support for private sites.</p> | <p><b>Refreshed Action 2024:</b><br/><b>H&amp;P 18:</b><br/>Review the Gypsy and Traveller capital sites guidance. This will include reviewing the piloting of funding for buying land, feedback from the communities and a decision on funding for private sites.</p> | More accessible and flexible ways of developing sites. | 2024 for 2025/26 capital funding | <p>Equality and Human Rights Division</p> <p>Local authorities</p> <p>WLGA</p> <p>Gypsy, Roma and Traveller communities.</p> <p>Gypsy, Roma and Traveller stakeholders</p> <p>Contract providers with lived experience.</p> <p>Housing Associations.</p> | Priorities 1, 2, 3, 4 and 6 |
| <p><b>Old Action:</b> Re-draft the Sites Guidance to ensure that the design and location needs of communities are</p>  | <p><b>Refreshed Action 2024:</b><br/><b>H&amp;P 19:</b><br/>Re-draft and simplify the Gypsy</p>  | Improved quality of local authority site homes.        | By 2025                          | Equality and Human Rights Division   | Priorities 1, 2, 3, 4 and 6 |

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| better reflected in this document.  | and Traveller Sites Guidance, involving community members to reflect their needs.   |   |         | Gypsy, Roma and Traveller communities<br><br>Gypsy, Roma and Traveller stakeholders.<br>Local authorities.<br><br>Housing Associations |                  |
| <b>Old Action:</b><br>Ensure existing legal mechanisms are fully utilised to ensure compliance with existing legislation. | <b>Refreshed Action 2024:</b><br><b>H&amp;P 20:</b><br>Welsh Government will use its powers to ensure local authorities comply with the Housing (Wales) Act 2014. | Local authorities compliance with Part 3 of the Housing Act (Wales) 2014 duties<br><br>Gypsy, Roma and Traveller people receive appropriate housing and homelessness support. | Ongoing | Equality and Human Rights Division<br><br>Housing Division<br><br>Planning Division<br><br>Local authorities<br><br>WLGA               | Priorities 1 - 6 |

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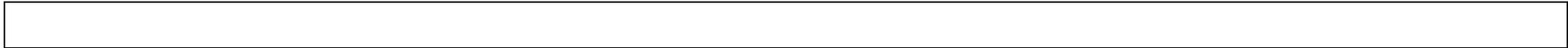
**Please Provide Detail of Any Additional Work Triggered by ArWAP**

Inclusion of land acquisition within the criteria within the sites capital guidance for 2024/25. The Sites Capital Grant, of £3.44m is available for developments which will commence during the year 2024-2025.

A more robust programme of scrutiny of local authority Gypsy Traveller Accommodation Assessments has been put in place.

We will review Undertaking Gypsy and Traveller Accommodation Assessments in 2024.

We will review the Designing Gypsy and Traveller sites guidance in 2024, and as part of that engagement will be undertaken with the community themselves.



| Existing Actions  | Amended Actions   | Desired Outcomes   | By When | Lead and Partners   | Key Priority Areas (1-6) |
|---|---|--|---------|---|--------------------------|
| <b>Old Action:</b> Review “Managing Unauthorised Camping” to reflect changes to legislation since last reviewed and changes to be brought in under the forthcoming Police, Crime, Sentencing and Courts Bill. | <b>Refreshed Action 2024:</b><br><b>C&amp;SJ 16:</b> Update the Managing Unauthorised Camping guidance, involving community members to reflect their needs. | Revised guidance to Local Authorities to mitigate negative impacts on traditional nomadic ways of life, settled people and landowners. | 2024/25 | Equality and Human Rights Division<br><br>Local Government Division<br><br>Housing Division<br><br>Crime and Justice Division<br><br>Local authorities<br><br>WLGA<br><br>Gypsy, Roma and Traveller communities | Priorities 1 - 4         |
| <b>Old Action:</b> Work with Policing in Wales on the enforcement of the clauses on unauthorised  | <b>Refreshed Action 2024:</b><br><b>C&amp;SJ 17:</b> Work with police and community members to adopt  | Consistent use of and awareness of the police unauthorised encampment protocol.  | 2024/25 | Equality and Human Rights Division<br><br>Local Government Division   | Priorities 1 - 6         |

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| <p>encampments in the Bill, to ensure that partners in Wales take a progressive and constructive approach to working with Gypsy and Traveller communities.</p> | <p>unauthorised encampments protocol.</p> |  |  | <p>Crime and Justice Division</p> <p>Local authorities</p> <p>Police colleagues</p> <p>WLGA</p> <p>Gypsy, Roma and Traveller communities</p> |  |
|--|---|--|--|--|--|

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## Chapter 5: How we will measure change

### Introduction

The Anti-racist Wales Action Plan sets out the vision for Wales to be an anti-racist country. Its aim is to work together to make a measurable difference to the lives of Black, Asian and Minority Ethnic people. The plan was co-produced with Black, Asian and Minority Ethnic people and there was a clear message that **people don't just want to see things done, they want to see improvements to their lives because of this plan.**

Since the first version of the plan was published, our work with ethnic minority people and other key stakeholders has revealed the need to expand on the monitoring and measuring aspirations in the first version of the Plan to measure its long-term impact.

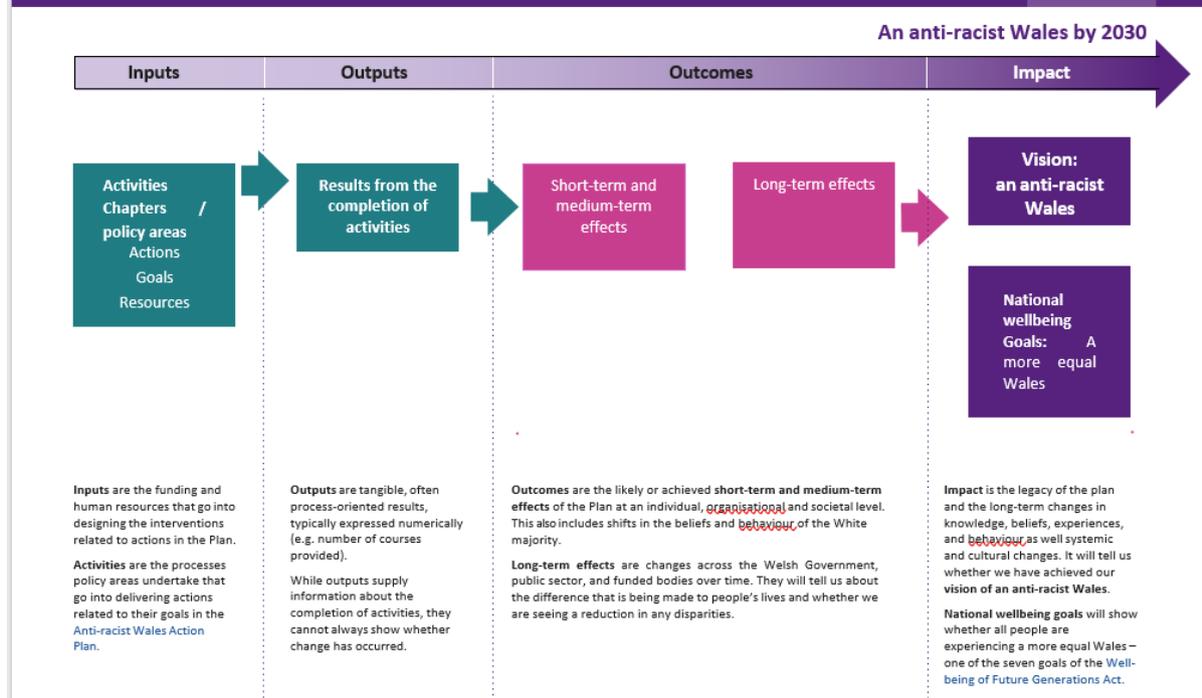
The first version of the Plan started to set out priorities for what needs to change and what success in achieving this change would look like. In this chapter we build on this by introducing the concept of a logic model which shows how we expect the actions being taken to lead to change and describe the development of a framework for measuring this change. A vital part of understanding how changing is happening is to include the lived experiences of ethnic minorities in Wales throughout everything we do in implementing the Plan.

### A logic model for the Anti-racist Wales Action Plan

The Race Disparity Evidence Unit was established in January 2022. One of its key roles is to develop an approach to track the progress of the plan and to measure any changes that it has brought about. It looks at the Plan as a whole and how the individual actions contribute to the end-result of making Wales an anti-racist nation by 2030. This means that different actions in different policy areas will all contribute towards the overall aim of an anti-racist Wales.

The Anti-racist Wales Action Plan logic model is a map that represents the shared relationships among the resources, activities, outputs, outcomes, and impact for the Plan. The model connects how the delivery of actions will lead to the overall intended effect of the Plan - an anti-racist Wales - by 2030. The logic model provides a consistent and comparable approach across chapters to measuring the overall impact of the Plan.

## The Anti-racist Wales Action Plan: A Logic Model



The over-arching logic supporting the necessary change is that the Welsh Government is committed to a more equal Wales through the intentions of the Well-being of Future Generations Act. This can only be realised if all partners are working actively towards equity in wellbeing for everyone in Wales now, and in the future. Addressing systemic racism and the inequality it has created and continues to sustain are fundamental to the purpose of the Act. Anti-racism must be central to the implementation of the Act – otherwise it risks perpetuating existing injustice. An Anti-racist Wales is an Equal Wales for everyone.

The overall impact is the legacy of the Plan and the long-term changes in knowledge, beliefs, experiences, and behaviour as well systemic and cultural changes which mean we have achieved the vision of an anti-racist Wales. The Anti-racist Wales Action Plan should take us towards a more equal Wales.

**Inputs** are the funding and human resources that go into designing the activities related to actions in the Plan. The plan has set out actions, things we will do, that we expect to cause change.

**Outputs** are solid, often process driven results, typically expressed in numbers. While outputs supply information about the completion of activities, they cannot always show whether change has occurred.

**Outcomes** are the changes due to an activity or group of activities at an individual, organisational and societal level. We expect groups of actions together to help us

achieve our Anti-racist Wales Action Plan goals. Outcomes can be seen in the short, medium, and long term.

**Impacts** are the broad long-term intended effects of the Anti-racist Wales Action Plan on individuals, organisations, and society.

An outcome is a fixed and often measurable change - outcomes are focused on the measurable real changes that are brought about by actions. Impact refers to a much broader effect and can be more difficult to measure.

For example, we would expect actions in the Plan to lead to a reduction in incidences of bullying and harassment for ethnic minority people. We can collect outcome data on whether recorded incidences have gone down and this shows us whether we are going in the right direction or not. To understand more about impact, and how and why the actions in the Plan have made a difference, we must collect evidence on what difference this is making to people's lives, what effect it has had on them and how this has changed their experiences of living and working in Wales.

### **Measuring the impact of the Anti-racist Wales Action Plan**

The logic model sets out how the Plan is intended to bring about change, but we must also develop a framework for ensuring we can measure whether change has happened. The Race Disparity Evidence Unit is developing an impact measurement framework that sets out what needs to be measured to understand whether change is taking place. We will need to measure at several different levels to ensure we have the evidence to feed identified and developing indicators. An indicator is something that helps provide evidence that a change has happened – it is not the desired change itself. Indicators may be designed to measure desired changes at output, outcome, or impact level. We will also measure change in the short, medium, and long-term. Indicators are numbers based and whilst they give valuable information, they do not tell the whole story. We will also collect lived experience.

**Lived experience (impact measures):** Lived experience will play a key role in the impact measurement framework. Lived experience is information about individual experiences, gathered in a way that it can be used to reflect what is happening in people's lives. It will provide more comprehensive, fair, and impactful findings, focussing on people's experiences and not just overall numbers. Whilst we will use existing data where possible for our measures it may take some time to develop new data sources; collecting lived experience will be a way of assessing whether change is taking place for individuals in the first few years of the plan.

**Output measures:** These measure the outputs from actions in the plan, for example percentage of people who have had anti-racism training. These measures don't tell us what impact is being seen but that progress against actions is being made. We can count the numbers of people who have attended a training course, but this does not necessarily tell us about the difference that course has made.

**Short / medium term outcome measures:** These will measure change across the Welsh Government, public sector, and funded bodies. These will tell us about the difference that is being made to people's lives and whether we are seeing a reduction in any disparities. For example, whether ethnic minorities feel more confident to report incidences of bullying and harassment in the workplace would be an intended outcome common to a number of the actions in the Plan. Short / medium term outcome measures will include the following types of measures:

- *Common measures:* These measures have emerged from goals and actions across the Plan that have a common focus for change and will be measured consistently, they include complaints, workforce and bullying and harassment.
- *Existing measures from policy performance frameworks:* Many policy areas have their own performance frameworks which measure outcomes, these could also be used to look at policy outcomes by ethnicity.
- *Other:* New measures may be developed where there are gaps, the underlying data for these measures may already exist or this may need to be collected.

**National well-being indicators (long-term measures):** These are an established set of indicators required under the [Well-being of Future Generations \(Wales\) Act](#) which assess progress towards achieving the 7 well-being goals. We will look at these measures by ethnicity (where possible) to show whether all people are achieving the well-being goals and any disparity in the outcomes of ethnic minorities against these indicators is eliminated.

## Data and evidence

The Race Disparity Evidence Unit have mapped out what needs to be measured at a strategic level and identified existing measures and data sources which can be used to populate the strategic measures. We have identified key gaps where measures and data do not exist. We have assessed existing measures for whether they can be broken down by ethnicity.

The Race Disparity Evidence Unit is working towards the development of a dashboard that tells a story through visualizations of where we are in terms of disparities in ethnic minority outcomes in Wales. As data availability and quality improves, we will be able to improve and update this dashboard to track the progress of the effect of the Anti-racist Wales Action Plan.

In some cases, the data to measure changes that the plan has brought about will not be available or hasn't been collected. In other cases, the data exists, but it can't be broken down by ethnicity.

The Race Disparity Evidence Unit are also undertaking projects:

- to fill priority evidence gaps in outcome measures and lived experience; and to
- explore how we can improve the granularity of ethnicity data and improve sample sizes so that we can break down measures by ethnicity.

Measuring the impact of the Anti-racist Wales Action Plan and improving the availability and granularity of ethnicity data and evidence requires a **combined effort by many partners** to collect, collate and share this data to feed the proposed measurement framework.

The Race Disparity Evidence Unit has worked with policy colleagues throughout the development of this Plan to ensure goals and actions are measurable, suitable outcome and short / medium term impact measures are developed and to advise on data collection. This will be an on-going process and will evolve alongside the impact measurement framework and must also include the wider public sector in Wales.

A list of our projects and progress can be found on our website [Equality, Race and Disability Evidence Units strategy \[HTML\] | GOV.WALES](#)

### Optional case study

#### Understanding Racism in the Further Education Sector in Wales

**Why measure?** Several actions in the Further Education (FE) section of the Plan relate to improving the experiences of ethnic minority students and staff. To measure change we need to firstly understand the current position (the baseline) so that we can track whether change is happening. If positive change is seen, we can assume that the actions within the Plan are making a difference. If it isn't, we know we need to understand why and how we can improve our actions.

**How to measure?** People's experiences could be measured through a learner and staff voice survey. This would collect a mixture of numerical data - such as numbers of complaints, length of time to resolve and information about people's experiences in open questions - such as confidence in the making and resolution of complaints. It can also include open questions to allow the collection of qualitative data about experiences.

**What to measure?** To collect accurate data about the experiences of people we need to understand what those experiences are, so that we ensure we ask the right questions. The Further Education team at Welsh Government commissioned research to build a basis of understanding of lived experiences of racism in the FE, apprenticeship, and adult learning sectors. This forms the basis for the development of a learner voice survey putting the lived experience of ethnic minority people at the centre of the design and delivery of research. [Towards Anti-Racist Further Education: Qualitative research on the lived experiences of learners and staff \(gov.wales\)](#)

## **July 2024 RAESCC contribution**

In June 2022, the Anti-racism Wales Action Plan (ArWAP) emerged as a transformational path toward creating an anti-racist Wales by 2030. In its first iteration ArWAP referenced the need for inclusion of climate change and environmental matters for action. Reports on diversity in UK workplaces consistently identify that Environment sector is one of the least diverse sectors in the UK. Work on developing a Just Transition Framework also identified ethnic minority communities are more likely to be at risk from a changing climate and more likely to be negatively impacted by the transitioning economy.

Since this iteration, the Environment and Strategic Evidence teams, within Welsh Government, have commissioned an evidence programme to understand what information was already available about the relationship between ethnic minority people and environmental matters; and where there were evidence gaps to begin to gather the information from ethnic minority people in Wales. It achieved this by examining Welsh data available to test findings from other parts of the UK in Welsh communities, review the research literature available, and initiate dialogue with Welsh ethnic minority communities about their views, experiences and ambitions.

In 2023, alongside the main Wales Climate Week programme which focused on a Just Transition to a net zero economy, an innovative climate conversations fund was launched to support communities to hold outreach events. These events were primarily hosted by organisations with strong links to marginalised groups and young people, resulting in rich insights into how people with seldom heard voices saw how to achieve a fair transition to net zero in Wales.

The engagement projects across the department have provided a rich understanding of the unique challenges marginalised communities face, the opportunities to fully involve them in policy development and where and how to deliver benefits to those we serve. From all of this work, what has strongly emerged is the enthusiasm of ethnic minority groups to be involved and participate in society's grand challenges.

Following on from this work, teams are now in the process of evaluating the findings against their current activity, to identify actions which will feed into our objectives to improve opportunities, and challenge racism in the Environment sector. Teams will also continue and develop further discussions with ethnic minority communities, to better inform our actions and ensure they are aligned with the needs and aspirations of those with lived experience.