

28 September 2023

Equality and Social Justice Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

Dear Sir/Madam

Anti-racist Wales inquiry – consultation response to the education policy area

The Higher Education Funding Council for Wales (HEFCW) is the public body operating between the Welsh Government and higher education providers. We regulate fee levels at higher education providers, ensure a framework is in place for assessing the quality of higher education and scrutinise the performance of universities and other designated providers. We also provide funding for higher education teaching, research and innovation, and apply our influence and expertise to help deliver Welsh Government priorities for higher education that also have wider societal and economic benefits. We welcome this opportunity to respond to the Equality and Social Justice Committee inquiry into an anti-racist Wales as it relates to higher education.

We have set out our responses against the inquiry questions provided.

The effectiveness of Welsh Government actions to deliver the Plan, including what is being done to ‘lead by example’ in taking a pro-active and cross-governmental approach to racism.

We consider that the Anti-Racist Wales Action Plan (the Plan) is a clear statement of the Welsh Government’s commitment to achieve an Anti-racist Wales. The Plan sets out clear expectations for Wales, Welsh Government and public bodies. We welcome the short term actions to ensure deliverables are achieved at pace and enable ongoing review to meet the 2030 goal.

We welcome that Welsh Government referenced the Plan in HEFCW’s [2023-24 remit letter](#), thereby ensuring a ‘joined up’ approach to policy development and reaffirming the importance of higher education’s contribution to the Plan.

HEFCW has used the Welsh Government’s Anti-racist Wales Action Plan goals and actions to drive its anti-racism policy developments. We welcome the cross-governmental approach and, although our actions primarily relate to higher education, we recognise that we are challenged to contribute to other areas and work with other

Mr Rob Humphreys
Cadeirydd | Chair

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partners. We expect that, where we are named as partners in areas other than education e.g. asylum seekers and refugees, there will be benefits to, and learning from, collaboration. We welcome the Welsh Government's inclusive approach when engaging us in reporting to the Plan's Accountability Group to provide assurance and scrutinise our progress against the goals. The Welsh Government has transparently communicated progress towards Plan's goals, to ensure completion of its actions at pace.

The progress and monitoring arrangements for the Plan, including the role of the public sector (local authorities, health, education), third sector and where applicable, the private sector.

We welcome the two specific goals for higher education identified in the Plan. We continue to provide regular updates to Welsh Government on progress against these goals. Our monitoring of universities' actions inform our reporting and provide assurance of actions and progress.

We provided a presentation to the Welsh Government's Accountability Group on 26 May 2023 to update the group on the actions for higher education in the Plan. We received feedback on potential future priorities for us to consider.

HEFCW's accountability for progress against the Plan is provided through regular reporting to HEFCW's Council.

Some of HEFCW's further actions against the goals are set out below:

Goal one: Staff and students can expect their experience of HE to be positive irrespective of their racial ethnic background.

- We established an anti-racism network across the higher education sector led by [Advance HE](#) to share good practice in addressing racial harassment and promoting anti-racist culture (February 2023). The network includes staff and students with lived experience and/or equality and diversity expertise.
- We have grant funded a Vice-Chancellors' masterclass to secure leadership and culture change.
- We will publish an annual race equality/ anti-racism data monitoring report from 2023, to monitor progress towards an anti-racist Wales within higher education.
- We will use our policy and funding levers, as well as qualitative analysis, as appropriate, to contribute to the Anti-Racist Wales Action Plan and the Well-being of Future Generations (Wales) 2015 goals, including but not limited to an Equal Wales and a Wales of Cohesive Communities.

Goal two: Better use of levers available to promote anti-racist culture in higher education.

- All universities in Wales committed to race equality charter membership by March 2023. This is not the position in other UK nations.
- We have grant-funded Advance HE to provide anti-racism support in higher education, informed by UK-wide practice. We fund universities with £1m

annually, match funded by universities, to make progress at pace in tackling anti-racism.

- The Welsh Government's remit letter to HEFCW confirms its expectation that all universities should achieve a race equality charter by July 2025.
- [Circular W23/20HE Supporting anti-racism in higher education: 2023/24 guidance and allocations](#) expects universities to report to us on how they are addressing inequalities, including pay disparities and reviewing existing recruitment policies and procedures through an anti-racist lens. We will monitor their progress.
- We published circular [W23/06HE: Safe and inclusive higher education: supporting equality and diversity education](#) which included our progress towards the Plan's goals, recognising the intersectional nature of the challenge to achieve an equal and diverse Wales.

The progress made by the Racial Disparity Unit, and whether there are gaps in data collection and analysis of data is being carried out effectively.

To date, we are not aware of any specific progress made by the Race Disparity Unit in collating data as it relates to, or informs higher education. We agree that quantitative data and qualitative information must contribute to the evidence base for effective action, monitoring and evaluation of progress.

We have analysed race equality data for higher education which we will publish annually.

Universities submit staff and student data to the Higher Education Statistics Agency (HESA), including as this relates to protected characteristics. Universities are required to analyse their institutional data on staff and students ethnicities as part of their Race Equality Charter applications.

What channels of communication have been established to ensure people with lived experience are informed of the plan's progress and what changes are happening as a result of the Plan?

The Plan's Accountability Group ensures that people with lived experience are informed and exercise scrutiny of progress towards its goals.

Our funding circular ([W23/20HE](#)) sets out our expectations that universities engage with students, including those with lived experience. This approach contributes to Wellbeing and Future Generations (Wales) Act 2015 ways of working including involvement and collaboration.

As the new Commission for Tertiary Education and Research (CTER) will oversee post-16 education, training and research from April 2024 we have begun to work more closely with Welsh Government colleagues across the post-16 sector and are members of the Further Education Anti-racist Wales Action Plan Steering Group. HEFCW's membership enables a clearer understanding of issues, actions and opportunities across the post-16 education sector.

We would welcome future opportunities to engage with other public sector bodies at Welsh Government's Anti-Racist Wales Action Plan summits. These summits could be thematically focused, share practice and have clearly stated outcomes.

The effectiveness of the Plan in its first year, including whether actions have been delivered, what the key outcomes have been so far and to determine why any outstanding actions have not been implemented.

The Plan has been a significant, public, practical driver for action. We have set out how HEFCW and the higher education sector has responded to the goals and actions in the questions above. We have referenced it in policy discussions with other UK higher education funding and regulatory bodies, noting that there are not equivalent government expectations in other parts of the UK.

Help further understanding of what other interventions are needed to support delivery of the plan and whether there are barriers to implementing the plan.

- We would welcome a coherent approach to training in the areas covered by the Plan across the public sector.
- The Welsh Government should ensure that the Wales-wide training opportunities it procures include higher education and post 16 education as we move towards the establishment of the Commission for Tertiary Education and Research.
- Training opportunities that include higher education would help to manage the burden of expectations on third sector or other training providers and secure sufficient resources.

Given the importance of intersectionality, the inquiry will also consider how people's intersecting identities have been taken into account when developing and implementing the Plan.

Welsh Government should articulate clearly and continually review how its various equalities-related strategies and plans relate to each other, taking account of the importance of a single Equality Act and issues of intersectionality. Welsh Government's Cymraeg 2050 plan should be fully integrated into further development of the Anti-Racist Wales Action Plan.

Contact details

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Yours faithfully



David Blaney