

Written Response by the Welsh Government to the report of the Equality and Social Justice Committee – Actions, not Words: towards an anti-racist Wales by 2030

APRIL 2024

I thank the members of the Equality and Social Justice Committee for their report 'Actions, not Words: towards an anti-racist Wales by 2030' which my officials and I have considered carefully.

Welsh Government is committed to creating an anti-racist nation by 2030. The [2022-23 ArWAP Annual Report](#) shows the impact of the Anti-racist Wales Action Plan (ArWAP) may not yet be as apparent in the lived experience of Black, Asian and Minority Ethnic communities as we would want, but significant structural foundations have been laid for long-term change and some tangible progress achieved.

A refreshed re-iteration of the ArWAP is underway and will cover 2024-2026. It will refine existing goals and actions to strengthen implementation and measurement of progress.

I am committed to tackling systemic and cultural racism in all forms as a priority, as is the Welsh Government. We will continue to use every lever we have available and take a leading role in eradicating racism in Wales.

I have set out my response to the Committee's recommendations below.

Recommendation 1.

The Welsh Government should continue performing a central leadership role by prioritising actions that demonstrate its commitment to an anti-racist Wales.

These should include:

- **redoubling efforts to diversify its workforce by the 2025-26 financial year and sharing best practice in relation to anti-racist recruitment mentoring and retention policies with other organisations**
- **improving its performance on narrowing the ethnicity pay gap in 2024-25 and eliminating it by 2025-26**
- **ensuring that resources are deployed wisely by publishing a definitive breakdown of the identifiable funding and resources available to support the ArWAP for 2023-24, 2024-25 and every remaining financial year for the lifetime of the plan**

Response: The Welsh Government accepts in principle.

The Welsh Government is committed to demonstrating a leadership role as both a government and as an employer. We have ambitious recruitment and progression objectives to help us attract and retain more people from an ethnic minority background, ensuring that our workforce better represents the people and communities we serve. The ArWAP commitment to review HR policies and practices through an anti-racist lens will be central to this. Due to conclude in autumn 2024, the review is likely to deliver a series of recommendations on improving inclusive recruitment practices and building a wholly anti-racist culture within the organisation where ethnic minority colleagues feel fully supported to develop and progress their careers. We will continue to share our learning in anti-racist recruitment, development and retention with organisations across Wales and the wider civil service in order to drive best practice, build our knowledge, and increase understanding of anti-racism across sectors and professions.

We have seen a slight narrowing of our ethnicity pay gap from 2022 to 2023, which indicates a positive shift, but we will continue taking action to ensure that Black, Asian and Minority Ethnic colleagues at all levels of the organisation can develop to their full potential and further their careers in the way that's right for them. Our refreshed internal development programme for aspirational minority ethnic staff has recently been launched, while removing cultural and practical barriers impacting recruitment and progression for minority ethnic staff remains a key priority of the Workforce Equality, Diversity and Inclusion Strategy.

We are focused on ensuring resources are deployed appropriately across the Welsh Government to deliver on the ArWAP. However, it would be impossible to provide a definitive breakdown of all resources deployed to support implementation. With the exception of the dedicated ArWAP Implementation Team, the plan cuts across a large number of policy areas within the Welsh Government. While ArWAP actions and commitments may be an important aspect of delivery for a number of teams, it does not constitute the totality of their roles. On funding of external organisations, again, much of the funding awarded across the Welsh Government supports a number of priority areas throughout policymaking and delivery, which while not all explicitly aligned to delivery of the ArWAP, is underpinned by our ambitions for an anti-racist Wales.

We also publish substantive information throughout the financial year in our draft, final and supplementary budget publications, and will continue to report the monitoring and delivery of outcomes for our full range of policies through the Programme for Government report. In addition, throughout the year we will publish a range of information on our website about the monitoring and outcomes of policy areas.

Financial Implications – None (however, opportunities for recruitment are impacted by available organisational budget).

Recommendation 2

The Welsh Government should conduct a rapid review of the structures established to facilitate collaboration and oversee implementation of the ArWAP.

The review must:

- **examine whether existing arrangements are maximising the potential for high quality collaboration and effective implementation of the ArWAP and, where possible, seek to streamline and simplify existing structures.**
- **consider how a greater sense of parity of esteem and recompense between paid professionals and those not contributing in a professional capacity (i.e. contributors who are not being paid for their time) can be measured in future collaboration**
- **map out the new and existing governance structures for the purposes of comparison in an easy-to-understand infographic which sets out in plain language the roles and responsibilities of everyone involved in implementation and the relationship or interaction between them.**
- **clarify the difference between lead and partner organisations and establish mechanisms which ensure that every action has a designated lead alongside a list of named partners**

Response: Accept in full

A review of the current contract of our EAG members is currently being planned to examine EAG members' participation, contributions, and the value brought to the implementation of ArWAP.

The review will:

1. **Maximise Collaboration and Implementation Effectiveness:** The review will thoroughly examine existing arrangements to ensure they are optimised for high-quality collaboration and effective ArWAP implementation. Where possible, the review will aim to streamline and simplify these structures to enhance efficiency and effectiveness. This will include examine the membership of the current EAG and EAG sub-groups.
2. **Improve Parity of Esteem and Recompense:** The review will assess how to achieve a greater sense of parity of esteem and recompense between paid professionals and unpaid contributors. Future collaboration efforts will include mechanisms to measure and address any disparities in recognition and compensation.
3. **Map Governance Structures:** An easy-to-understand infographic have been created to map out both proposed and existing governance structures. This infographic will clearly outline the roles and

responsibilities of all stakeholders involved in ArWAP implementation, as well as the relationships and interactions between them.

4. Differentiate Lead and Partner Organisations: The review will provide clarity on the distinction between lead and partner organizations. It will establish clear mechanisms to ensure that every action within the ArWAP has a designated lead organisation, along with a list of named support partner organisations. This will help streamline accountability and facilitate effective collaboration.

See Annex 1 for an infographic map of the existing ArWAP governance structures, roles and responsibilities.

See Annex 2 for an infographic map of the proposed ArWAP governance structures, roles and responsibilities.

Financial Implications: None, with the exception of staff resource.

Recommendation 3.

The Welsh Government should consider utilising the expertise of an external organisation to examine the [Strategic Equality Plans] SEPs of each public body.

Identify improvements as part of the setting of new Plans in April 2024

Response: Reject

This recommendation is beyond the remit of Welsh Government. The Equality and Human Rights Commission (EHRC) is the regulator for these matters in Wales. The EHRC sets out general guidance on the creation and expected content of Strategic Equality Plans for public and other bodies covered within equality and human rights legislation.

Welsh Government has an important leadership role and will continue to collaborate with public bodies in Wales to share examples of best practice and to drive integrated and joined up working on tackling inequality and promoting human rights.

Financial Implications: None.

Recommendation 4.

The Welsh Government should create a one-stop shop dedicated to the Anti-racist Wales Action plan on its website. This should be launched with the support of a communications campaign to raise awareness among other organisations and the public.

The microsite should include:

- all relevant materials including events and stakeholder bulletins
- minutes of meetings and links to research and publications by the RDEU

- **a dashboard summarising progress towards key milestones**
- **an interactive space or online forum to facilitate dialogue and collaboration**

Response: Accept in part

The communications team has recently created [a new ArWAP collection](#) on Gov.Wales which acts as a microsite, bringing together all published documents related to the programme including different versions of the Action Plan, stakeholder engagement and progress updates. This collection also has the functionality to host stakeholder bulletins and promote events.

The communications team are exploring setting up an ‘organisation page’ which brings together the publications from a working group and would allow Welsh Government to host minutes from stakeholder meetings. This would follow a similar format to the [Period Dignity Roundtable](#). The team are also looking at creating a tracker page to mark progress towards key milestones. This could be similar to the progress tracking established for the [LGBTQ+ Action Plan](#). The collection and association pages will be launched alongside the refresh of the ArWAP later this summer. We are working with stakeholders to see how we can promote ArWAP through more direct channels that are more likely to be used by Black, Asian and Minority Ethnic communities as well as looking at materials that can be used in training and public events. We are also working with stakeholders to better promote their events and announcements on social media, as well as creating a collection of ArWAP-funded case studies which are likely to attract media attention, further raising awareness of the programme amongst members of the public.

The Race Disparity Evidence Unit is working with Knowledge and Analytical and policy officials to prioritise the improvement of quality and availability of data. The unit will work closely with the Anti-racist Wales Action Plan Implementation team and communications team to ensure links to all relevant research and publications are included.

In addition, the Culture Division is seeking to develop a digital learning platform to host anti-racism learning and training resources for the culture, heritage and sport sectors. The platform aims to provide professionals in the sectors to engage in continuous professional development in embedding anti-racisms in their service design and delivery.

Financial Implications – None.

Recommendation 5.

The Welsh Government must improve the quality and availability of data to support the plan and publish a finalised monitoring and evaluation framework as a priority.

The monitoring framework must be available to all organisations involved in the delivery of the plan.

Response: Accept in full

The Race Disparity Evidence Unit has developed an impact evaluation framework for the Anti-racist Wales Action Plan with the engagement of the External Accountability Group. A high-level summary will be published before October 2024 as part of the plan refresh, followed by a full technical report. As part of the development of the impact evaluation framework the Race Disparity Evidence Unit has created a map of evidence across policy areas that will be used to populate the monitoring framework which will be published as a dashboard. This includes quantitative indicators that are specific to policy areas, as well as measures that are common to all areas, such as workforce composition and complaints. This map also highlights the gaps in data that exist, and we will work closely with Welsh Government policy officials and organisations involved in the delivery of the plan to support the improvement of data collection. The development of a full monitoring framework is therefore an on-going process.

Financial Implications –
None.

Recommendation 6.

We recommend that the Welsh Government recognises that failing to provide adequate interpretation to individuals with incomplete command of either English or Welsh in a medical situation is unacceptable by redoubling efforts to eliminate the use of family members as interpreters in medical settings.

In particular, it must ensure implementation of the recommendations from our report and the HEAR 2 report as a matter of priority.

Response: Accept in Full

Welsh Government has been working closely with Public Health Wales regarding the implementation of the findings of the Hear 2 study.

The Wales Interpretation and Translation Service (WITS) has developed an E-Learning module – which is intended for anyone who works with interpreters or translators. The aim of the training is to enhance proficiency when public sector officers and interpreters/translators work together. It includes practical guidance and a specific focus on the need for and importance of interpreters and translators; the role of an interpreters; deciding what interpretation service is required; translations; requesting an Interpreter; preparing to work with an interpreter; working with an interpreter; and follow up after appointments. This training has been shared with NHS Equalities Leads in the health boards, and wider networks.

As part of the Migrant Integration Framework – materials are also being developed (e.g. video animation) to promote a person's right to access to interpretation and translation services, taking a rights based approach.

The draft Mental Health and Wellbeing Strategy also includes a focus on access to services in a person's preferred language. The draft strategy is underpinning by a number of core principles, one of which is: **Person-centred**: this means treating people as individuals and as equal partners in their healthcare, being mindful and respectful of their individual needs (including a person's preferred language), providing any reasonable adjustments to meet needs and providing compassionate care.

The WITS training has also been referenced in forthcoming good practice guidelines (developed by Improvement Cymru) to improve access to, and quality of, psychological interventions for people from Black, Asian and minority ethnic communities.

Financial Implications –
None.

Recommendation 7.

The Welsh Government should work with the health and social care sector to

- **deliver a safe, reliable and consistent way to report racist incidents and behaviour**
- **ensure the rollout of Active Bystander training for the health and social care workforce.**

Response: Accept in Full

Work in social partnership to strengthen the systems to raise workforce confidence to report racism will continue, by ensuring that the recommendations of the Diverse Cymru audit of NHS Wales Workforce Policies and Procedures are implemented. This will build on the work initiated during 2023-24 through the development of the Speaking up Safely Framework for NHS Wales, and the refresh of the Respect and Resolution Procedure which specifically acknowledges racism as needing specific pathways to resolution to ensure that staff do not fear detriment and further discrimination.

If NHS staff members are assaulted and/or subject to racially aggravated violence, the **Obligatory Response to Violence in Healthcare** would be initiated and staff member supported by multi-agency staff. The Obligatory Response to Violence (ORV) in healthcare is overseen by the NHS Wales Anti-Violence Collaborative who are refreshing the ORV to ensure that anti-

racism principles are embedded. All violence and aggression incidents against NHS staff members are reported via Datix Cymru.

As part of the Anti-Racist Wales Action Plan, Welsh Government will be working with the sector to explore the development an independent advocacy mechanism for people working in social care, and those receiving care and support, to raise complaints about racism or discrimination.

Several NHS Wales Health Boards and Trusts have successfully rolled out active bystander training to their staff. Policy officials will work with the Equality Leads in the NHS Wales organisations to gather lessons learnt and understand what the capacity and resources may be available to ensure that more staff can understand and implement the principles of being an active bystander. Active Bystander training is not currently provided to the social care workforce. However, Social Care Wales is working to 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.

Social Care Wales is also working with Diverse Cymru to provide cultural competency training to all people working in social care. The cultural competency scheme supports workplaces to 'start a journey' to explore commonly held unconscious bias, so that their services and employment practices are fair and equitable.

Financial Implications – None.

Recommendation 8

The Welsh Government should raise awareness of the anti-racist Wales agenda by

- **dedicating a forthcoming INSET day to the theme of anti-racism in the context of the new curriculum.**
- **It could also be used as an opportunity to showcase best practice from across Wales, the UK and internationally.**

Response: Accept in principle

Our guidance on the use of INSET sets out that we expect schools to use the equivalent of 4 INSET days to address national education priorities to implement Curriculum for Wales, ALN reforms, equity in education and Cymraeg 2050, and to enable all staff to engage with professional learning and collaboration. Schools should use their remaining INSET days to address the priorities set out in their individual School Development Plans.

Diversity and Anti-racism Professional Training (DARPL) supports education professionals to understand and develop anti-racist and non-racist practice.

Resources, training, and guidance are available in one place through the DARPL virtual campus. Work to continually this repository is ongoing. Schools can make use of these resources during INSET days.

Financial Implications – None.

Recommendation 9

The Welsh Government must ensure that the revised anti-bullying guidance emphasises a zero-tolerance approach to racism and racist abuse and bring forward proposals that would ensure greater consistency across all local authorities in the logging, monitoring, and reporting of racist incidents by schools and other education settings. The new system for reporting and monitoring racist incidents should be ready to launch within a year, and no later than the end of April 2025.

Response: Accept in principle

We will be strengthening our existing ‘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, including racist incidents, and the use of data. Preparatory work has commenced, and the Welsh Government intends to carry out a full public consultation for the refreshed guidance in autumn 2024.

We will also be exploring 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. This work will involve consulting with a wide range of stakeholders, including schools and learners in the coming year. Any system will need to be tested and relevant guidance developed therefore an explicit timetable cannot be set.

Financial Implications – None.

Recommendation 10.

The Welsh Government should establish a Welsh criminal justice observatory and seek further opportunities for collaboration with academia in the context of the ArWAP.

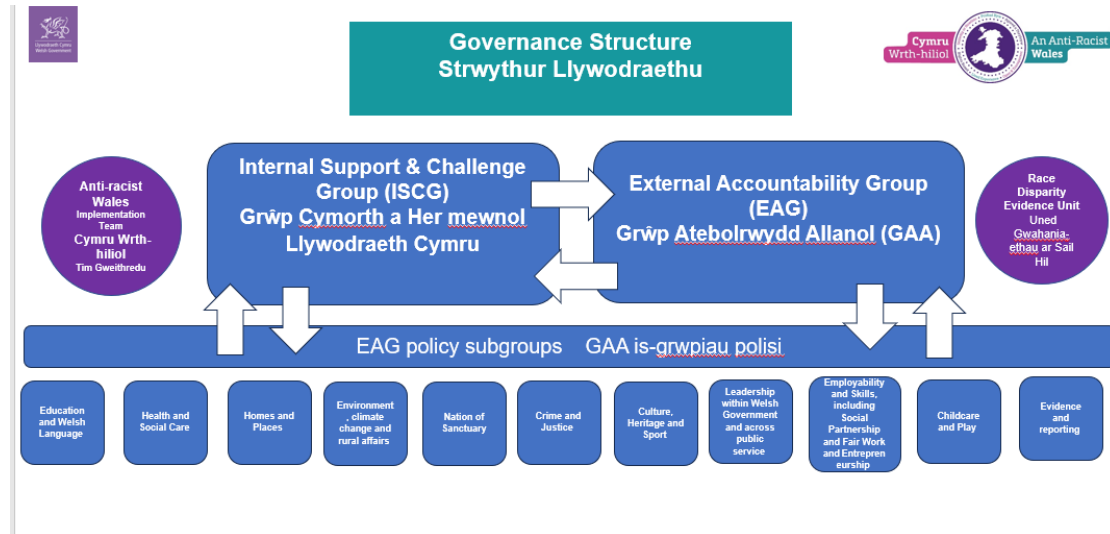
Response: Accept in principle

We are developing a research project which we anticipate will include elements similar to our understanding of the idea of a criminal justice observatory. The project would be to provide information and analysis about the current operation of the justice system in Wales and inform preparations for the devolution of justice. This is consistent with the Co-operation

Agreement commitment on the ArWAP and statement to support work on pursuing devolution of policing and justice powers to deliver a reformed justice system that is right for Wales. It is also reflective of feedback Criminal Justice in Wales has received from its Independent Oversight & Advisory Panel, Community Engagement Network, and academic partners that action is prioritised over further research.

Financial Implications – None

Annex 1: infographic to map the existing ArWAP governance structures, roles, and responsibilities.



Annex 2: infographic to map the proposed ArWAP governance structures, roles, and responsibilities.

