

WELSH GOVERNMENT RACE EQUALITY ACTION PLAN

Purpose

1. To summarise the Welsh Government's Race Equality Action Plan and seek members' views to inform the WLGA's draft consultation response.

Background

2. The Welsh Government published its 'Race Equality Action Plan: An Anti-racist Wales' on 24th March¹. The consultation closes on 17th June 2021 and the Welsh Government intends to publish a final Plan in September 2021.
3. The Plan aims to make Wales an anti-racist nation and make the Welsh Government and all public bodies become anti-racist organisations by 2030.
4. Jane Hutt MS, the then Deputy Minister and Chief Whip and Minister with lead responsibility for equalities updated leaders on the Race Equality Action Plan (the REAP) at the Leaders' Meeting on 12th March. Civil servants also provided a briefing on the Action Plan to Equalities Cabinet Members on 3rd March 2021.
5. The REAP has been informed by research and existing evidence and wide engagement with community representatives and stakeholders and has been shaped by lived experiences. It also incorporates commissioned research from the Wales Centre for Public Policy and the work and recommendations of wider working groups convened by the Welsh Government in response to Black Lives Matter and the impact of COVID-19 on Black, Asian and Minority Ethnic people, including the COVID 19 BAME Socio-economic Sub-Group.
6. The REAP steering group was co-chaired by Professor Emmanuel Ogbonna, Cardiff University and Dame Shan Morgan Permanent Secretary, Welsh Government. The WLGA was represented on the steering group (of circa 40 participants) by the Head of Policy and several WLGA officials commented on draft sections and discussions during drafting.
7. There was however limited pre-consultative engagement with local authorities or professional groups due to the pre-election protocol period, although the Welsh Government is currently organising several consultation events with relevant professional or service networks, for example social services.

¹ [Race Equality Action Plan: An Anti-racist Wales | GOV.WALES](#)

Race Equality Action Plan

8. The REAP is ambitious and is challenging of the status quo and demands leadership and commitment to action from public bodies.
9. The REAP states that despite concerted efforts and previous action plans: *'Wales is not an equal country, and the experiences of the many communities within it are very different. Black, Asian and Minority Ethnic people face discrimination and racism.'*
10. The REAP sets the 'case for change' and notes several concerns that:
 - This should not be "another strategy" but focus on delivery of actions, including delivery of pre-existing plans and promises
 - the Welsh Government does not have all the necessary systems and levers in place to incentivise action or apply appropriate sanctions
 - current regulatory organisations do not have a strong enough experience or understanding about racism
 - public bodies' compliance with the Equality Act 2010 is inconsistent; and
 - 'generic Diversity and Inclusion Plans' tended to result in a lack of focus on race issues.
11. The diagram below summarises the core focus of the REAP:



12. The REAP defines anti-racism as:

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

13. The work also explored language and terminology, with consensus emerging that that 'BAME' as an acronym should not be used. The Welsh Government has decided to discontinue the use of 'BAME' but to retain the use of 'Black, Asian

and Minority Ethnic' in full in all its communications, and when shortened it is to be 'ethnic minority groups' (or communities or individuals).

14. In summary, the draft REAP states that by 2030 Public services and the third sector will have:

- Provided demonstrable leadership at all levels to meet their existing commitments to challenge systemic and institutional racism.
- Self-motivated to comply with Equality Act (2010) and Well-being of Future Generations (Wales) Act 2015.
- Changed the experience of education, job seeking and career progression for ethnic minority people, to bridge the "attainment gap" in education and the "reward gap" in employment.
- Provided equitable, culturally appropriate services, recognising intersectionality and differences among groups.
- Provided a safe and nurturing workplace for ethnic minority people to thrive and flourish.
- Implemented the policies they agreed to deliver.
- Collected the right data, established baselines from which to measure progress and used evidence to identify where action is needed.
- Recognised the differential impact of racism in different locations in Wales.

Local Government Commitment to Zero Racism

15. Local government in Wales has always stood firmly against racism and discrimination and is committed to promoting equality and fairness for all communities.

16. There is widespread recognition that inequalities remain embedded in Wales and in its communities and that councils, the Welsh Government and public services need to do more individually and collectively to address entrenched inequalities.

17. Councils responded to COVID-19 and the Black Lives Matter movement during the summer of 2020, with several establishing race forums or task and finish groups to tackle racism or to undertake reviews of statues or street names.

18. The WLGA contributed to several Welsh Government convened groups including the BAME Socio-Economic Advisory Sub-Group and the Welsh Government's Audit of statues and street names.

19. The WLGA is coordinating the Welsh Government funded Hate Crime Project in schools, working with partners such as the North Wales Race Equality Network Ltd, Race Council Cymru, Race Equality Wales and Show Racism the Red Card and SAPERE: Philosophy for Children (P4C), to deliver the Hate Crime in Schools project across Wales, which will deliver training and produce resources on critical, collaborative, creative and caring thinking skills to teachers and others around tackling hate crime.

20. Local authorities have a proud record in supporting and welcoming refugees and asylum seekers and in supporting their integration into local communities. All Welsh authorities participated in the Syrian Refugee Resettlement Programme and the majority have committed to continuing their participation in the further settlement of refugees across Wales. Four local authorities have also accommodated dispersed asylum seekers in their areas and more recently the majority of authorities also agreed to their participation in the future. A number of authorities also care for unaccompanied asylum-seeking children and all have been involved in ensuring EU nationals in the care of the authority are able to apply for settled status following Brexit. The WLGA also host the Wales Strategic Migration Partnership, funded by the Home Office to help coordinate migration issues in Wales. Four local authorities (Wrexham, Swansea, Cardiff & Newport) already act as Initial Accommodation & Dispersal Areas, and more recently the majority of authorities agreed to their participation into the future. A number of authorities also care for unaccompanied asylum-seeking children, and, following Brexit all have been involved in ensuring EU nationals in the care of the authority are able to apply for settled status. The WLGA also host the Wales Strategic Migration Partnership, funded by the Home Office to help coordinate migration issues in Wales.
21. The WLGA Council recently made a commitment to deliver an ambitious 'Diversity in Democracy' programme ahead of the 2022 elections to seek to encourage more diverse candidates to stand for election.
22. The WLGA and each of Wales' 22 councils signed the #ZeroRacismWales pledge in advance of the publication of the draft REAP and to mark UN International Day for the Elimination of Racial Discrimination on 21st March. The pledge sees all councils commit to:
- take a stand against racism and promote a more inclusive and equal society for all.
 - not tolerate racial prejudice, discrimination, harassment, victimisation, abuse, or violence against any individual.
 - stand in solidarity, come together, and say no to racism, in all its forms.
 - promote good race relations between people from diverse ethnic backgrounds in organisation.
 - promote equal and fair opportunities for people from diverse ethnic backgrounds to attain promotion.
 - eliminate unlawful race discrimination, harassment, victimisation and abuse.
23. The WLGA welcomed the publication of the REAP, with Cllrs Mary Sherwood and Susan Elsmore, Joint WLGA Spokespersons for Equalities, Welfare Reform and Anti-Poverty stating:

"We are committed to working with the Welsh Government and our communities to make Wales an anti-racist country. The Welsh Government's Race Equality Action Plan is welcome in challenging our public bodies and wider society to do more. It demands leadership, it demands action and it demands change. We are

committed to responding positively to this consultation to ensure we tackle racism and inequality in Wales."

"Councils have worked towards reducing inequalities but the Race Equality Action Plan shows that we need concerted, collective action as racism remains within our society and inequality continues to adversely affect the lives of Black, Asian and Minority Ethnic people in Wales."

REAP: Expectations of Local Government

24. The REAP sets out ambitious and challenging expectations for action for all public bodies to improve engagement and involvement, improve services and employment practices.
25. Much of the focus of the REAP is on the Welsh Government itself, however, there are several chapters and actions which will have an indirect or direct impact on or expectation of local government.
26. The WLGA is currently seeking the views of authorities and is engaging with relevant professional groups and cabinet member networks to consider the response to the REAP consultation. Most local authorities will be considering their draft responses in early June, ahead of the consultation deadline of 17th June.
27. It is proposed therefore that Executive Board provide initial comments on the REAP to inform the WLGA's developing draft response, which then incorporates authority feedback and the final draft response is considered by the Equalities Cabinet Members' Network on 10th June, with final approval via the WLGA Spokesperson for Equality in consultation with WLGA Group Leaders.
28. The WLGA has received limited feedback from local authorities to date, but there have been some discussions amongst Equality Cabinet Member and Education Cabinet Member networks, where the REAP's aims and ambitions were supported. It was also noted that:
 - Black, Asian and Minority Ethnic role models, whether in senior leadership positions and particularly teachers and teaching assistants, were vital; and
 - Although actions and targets need to be proportionate and reflective of the demographic diversity of local populations, it was important that all authorities and all organisations demonstrated a clear commitment and progressed actions. =
 - Support and improved awareness and anti-racist approaches were needed in organisations where there were fewer black, Asian or Minority Ethnic employees, school pupils or residents than other areas; without such corporate leadership, empathy and understanding there was a risk the emotional burden of promoting anti-racism and tackling racism would fall disproportionately on a limited number of, often black, Asian and minority ethnic, individuals or staff members.

29. The REAP is a large, complex document at 147 pages with around 64 goals and approximately 340 actions. It covers 13 policy themes and 5 cross-cutting themes.

30. This report therefore seeks to summarise the main themes of most relevance to and/or impact on local government and local services.

Leadership and Representation

31. This section applies to all public bodies and seeks to ensure that the public sector workforce and senior leadership is representative and inclusive, that people in public bodies are anti-racist and provide a safe and inclusive environment for ethnic minority people and that spending power is used to improve leadership and representation across the public, private and third sectors.

32. The REAP notes that leadership extends beyond senior leaders in public bodies and it is important to recognise, value and cultivate the essential contribution made by community leaders.

33. Local government is likely to be supportive of the principles and objectives and many align with Strategic Equality Plans or build on existing corporate arrangements, for example:

33.1 Use conditions of grants and public procurement to incentivise other organisations to improve leadership and representation and anti-racism;

33.2 Making available existing provision for ethnic minority staff within organisations to community leaders; and

33.3 Co-create mentoring, coaching, community mentorship, reverse mentoring for community leaders with public service leaders.

34. There are also several proposed actions that would apply *personally* to public service leaders, for example:

34.1 All public service leaders held personally accountable for delivering a representative workforce;

34.2 Chief executives to identify one inclusion and diversity objective, with a focus on anti-racism;

Local Government

35. The local government section builds on local leadership, developing practice and recent legislation. There is also a separate section on health, in recognition of both sectors as major employers and public service deliverers.

36. The section recognises the critical importance of local government as an employer, a service provider, procurer of services and as a community leader.

37. It focuses on ensuring local democracy is more representative of the population it serves. This aligns with (and references) the Diversity in Democracy commitments the WLGA has already made about encouraging and supporting more diverse candidates to stand for election.
38. Several democratic and electoral reforms within the Local Government and Election (Wales) Act are also detailed, much of which the WLGA has supported previously.
39. The REAP focuses on local government becoming an exemplar employer where '...all employment and human resources policies are anti-racist to create a safe and inclusive environment for black, Asian and minority ethnic people.'
40. In seeking to achieve this, the Welsh Government specifically proposes to:
- 40.1 Review the workforce data which local government is required to publish in its pay policy statements to ensure accurate and timely diversity data is used to inform policies and performance frameworks.
 - 40.2 Work with the WLGA, local authorities, professional bodies and One Voice Wales to support reviews of recruitment, human resources and internal complaints processes including coaching and employee support schemes to ensure they are anti-racist and that good practice examples such as staff support groups are promoted.
 - 40.3 Work with the WLGA, One Voice Wales, Academi Wales and local government bodies to ensure all graduate recruitment and mentoring schemes are accessible to minority ethnic people.
41. Data is a theme running through many of the interventions and is identified as cross-cutting. There are already systems in place that seek to capture data to meet requirements of current broader equality duties.
42. There are likely to be administrative and resource implications in changing data collection, collation and reporting as well as wider human resource implications of reviewing and introducing new initiatives, policies, processes and training programmes.

Social Care

43. Social care services are key public services through which anti-racist, intersectional and dignified practice can be delivered. There are duties on those performing social services functions to ensure that the rights, views, wishes and feelings of those receiving services are considered and acted on. There are also duties to ensure that people's characteristics, culture and beliefs are taken into account and acted on.
44. At its core social care is a profession which values everybody no matter how society perceives them, it seeks to ensure social justice, equality and human

rights are accessible to all and where they are absent does something about it. Despite this there is clear evidence that racial disparities are experienced by health and social care staff, mental health and social care service users.

45. We know that the health and social care sectors tend to be more diverse than the Welsh population as a whole, with Black, Asian and Minority Ethnic health and social care staff being over-represented in lower paid and lower status health and social care jobs in the UK. In addition, it is likely that the proportion of Black, Asian and Minority Ethnic practitioners in senior levels of management is far lower than at the front line.
46. A key part of this is recognising the important value people working in social care play. This includes making sure there is parity of pay and terms and conditions with comparable roles in the NHS as well as ensuring that social care is considered as a career option in the same way that NHS roles are. This needs to include professional qualifications, career progression, as well as equal pay. As a starting point we believe that the resources need to be made available which enable the whole social care workforce to be paid the Real Living Wage as a minimum.
47. The REAP highlights the need to bridge the operational gap between what the legislation and policy tells leaders and practitioners to do and how leaders lead it and practitioners do it. As the REAP recognises there are many complex and systemic factors that contribute to these implementation gaps and the structure and make up of the sector adds to this. It is essential that thought is given to how we can best support the whole range of providers and employers across the sector to tackle racism and promote race equality and guide behaviour change, both in how they support their own workforces, but also in how they deliver services.
48. A major feature highlighted in the plan is to significantly increase the range and the quality of the data, research and evidence that is available about people who use social care services and the social care workforce and this is supported. This is needed to help design future, more targeted activity that benefits the Black, Asian and Minority Ethnic people that use services and their families, builds the cultural competence and assets based practice of the wider workforce and protects and develops our Black, Asian and Minority Ethnic workforce.
49. During the consultation work that has led to the publishing of the draft Plan there were clear and strong messages from Black, Asian and Minority Ethnic people about past experiences and their levels of trust in the system. A key focus of the work going forward must be on how this can be addressed and how services to Black, Asian and Minority Ethnic people are delivered in order to ensure that social care services are provided with the highest quality support that is accessible, dignified and culturally appropriate and that people are confident in accessing and using social services whenever they are needed.
50. Social services professionals and stakeholders have been invited to a social services-specific REAP consultation event on 9th and 14th June.

Education

51. Education and in particular schools, play a key role in promoting anti-racism and tackling racism in society.
52. There are significant challenges within schools currently, as has been noted in recent reports (Race Alliance Wales 'Show us you care' April 2021 and Show Racism the Red Card – Report June 2020²), notably that 'there is growing evidence of the extent of racist bullying they experience in schools and colleges during their formative years' and 77% of pupils told Show Racism the Red Card that racism existed in their schools.
53. Show Racism the Red Card have also noted that recording of racist incidents in schools and authorities is mixed and therefore the true scale of the problem is not known.
54. The REAP's goals and actions are supported and present an opportunity to bring together and ensure improved alignment of ambition between the various policy initiatives including Curriculum for Wales, anti-bullying guidance, Home Office initiatives such as Prevent and also the ambitions of Cymraeg 2050.
55. The REAP aims to improve the experiences of Black, Asian and Minority Ethnic learners and teachers in schools and improve the diversity of the teaching workforce and improve understanding of diversity and racism in the wider education sector. Specific actions include:
 - Strengthening rights, respect, equality anti-bullying guidance, with a particular focus on the disciplinary procedures in schools for handling incidence of identity-based bullying:
 - Strengthen data collection and reporting of racist incidents and harassment in schools:
 - publishing statutory Gypsies, Roma and Travellers' guidance:
 - Strengthening guidance on Exclusion from Schools and PRUs:
 - making learning about Black, Asian and Minority Ethnic stories mandatory within the Curriculum for Wales and take forward the recommendations set out in Professor Charlotte Williams' report:
 - Raising awareness and encourage increased take-up of Welsh medium education by Black, Asian and Minority Ethnic children:
 - Strengthening and enhancing training for all teachers in Wales on race equality and anti-racism:
 - Developing a strategy to increase the numbers in the teaching workforce from Black, Asian and Minority Ethnic groups:
 - Working with Estyn to determine how a refreshed inspection framework can be strengthened for anti-racism.

² <https://racealliance.wales/wp-content/uploads/2021/04/Show-Us-You-Care-Full-Report-1.pdf>
<https://www.theredcard.org/news/2020/6/2/7h506q77y3wunscc33ot983m2u8m6y>

Housing

56. Securing safe and appropriate housing has long been viewed as a basic human right and there is much evidence that good quality housing is an integral factor for the general wellbeing and health of people and communities, for example, bad quality housing and instability can negatively affect children's mental and physical health. Over the last century, council house building has been essential in helping the most vulnerable in society gain access to a home and has helped to prevent homelessness and following recent changes, many councils are building homes at a scale not seen for many decades.
57. The housing function in local government however is more than the provision of homes and tackling homelessness as not all local authorities are landlords, the strategic housing role of all local authorities is important, involving assessing needs, determining local priorities and planning how the need for good quality affordable housing can best be met. Housing also plays an important role in the economy and economic development of local areas, including bringing jobs and training opportunities for local people. Ensuring there is fairness and equality for all in all aspects of the housing agenda is therefore integral to achieving fairer and more equal outcomes.
58. The proposed actions for housing and accommodation in the draft REAP will help drive forward improved race equality, tackling racial inequalities and achieving more equal outcomes in housing, addressing both employment and service delivery issues.
59. While improved data and information collection and analysis is required across all relevant areas, which will help identify racial disparities against which progress can be monitored and evaluated, existing evidence and discussions on key housing issues with Black and minority ethnic people with lived experience have been used to identify and inform the priority areas for action included in the draft plan. It is therefore proposed that we support the proposed action. However, better links and reference to related issues would be helpful (while noting there are a number of cross-cutting issues in the plan that will also requires addressing in the area of housing such as data collection), for example reference to employment and training opportunities: skills development: and commissioning and contracting processes.
60. There are a number of areas in the proposed actions where the involvement of the WLGA is identified, many working with other partners in the housing sector, and this is supported.
61. The WLGA Housing Spokesperson met *Tai Pawb* at the end of last year, and *Tai Pawb* also attended a meeting with Housing Cabinet Members to discuss their *Deeds not Words* pledge: housing organisations have been asked to commit to the pledge to make change in four key strategic areas of work: mitigating the impact of COVID-19 on Black and minority ethnic staff and communities; improving the ethnic diversity of board and staff at all levels; communication and engagement; and developing an inclusive culture. Within each strand are

practical action points that housing providers can work towards over the short, medium and long term, with a view to overall achievement within five years.

Other Themes

62. The above are the major themes demanding action from local government leadership or significant local government services. The REAP includes several other chapters which will demand attention by local authorities or their partners:

- **Social Partnership and Fair Work** – which aims to build diversity, inclusion and anti-racism objectives into the new work programme of the Workforce Partnership Council and ensure the Council supports the actions in the REAP and improve access to Trade Unions and the support they provide in tackling discrimination, bullying and harassment in workplaces.
- **Crime, justice, hateful attitudes and community cohesion** – key role for authorities and their partners around improvements in tackling hate crime and a focus on enhancing the community cohesion programme and teams.
- **Culture, Heritage & Sport** – focusing on celebrating cultural diversity, as well as an emphasis on the leadership of relevant governing bodies.
- **Welsh Language** – review and remove barriers regarding access to the Welsh language and Welsh medium education, including working with local authorities and schools
- **Environment** - encouraging efforts to improve engagement and involvement in environmental activity by black, Asian and minority ethnic communities.
- **Income, Employability and Entrepreneurship** - including supporting people from ethnic minority people undertaking Apprenticeships and improved data analysis.
- **Health Services and Health Outcomes** – a focus on health (as social care is covered separately) with similar emphasis on leadership, workforce, data, access to health services and tackling health inequalities.

Governance and Support

63. The Welsh Government is currently scoping the remit of a proposed new Race Disparity Unit and an Equality Data and Evidence Unit. It is envisaged that the Race Disparity Unit will play a key role by providing data and analysis. The Race Disparity Unit could also play a role of sharing good practice across public services.

64. The proposed Race Disparity Unit is a welcome development as is ongoing funding for particular programmes delivered through local government, such as the Hate Crime in Schools project and the Community Cohesion Programme.

65. There are however likely to be significant administrative and resource implications on local government, particularly within human resources, and within the WLGA, given expectations around coordination and support.

66. The REAP understandably focuses on delivery, reflecting an impatience in public bodies' ability to deliver on agreed actions. The Welsh Government therefore commits to a governance framework that provides 'a robust level of authority and power to ensure delivery of the actions stated in the Race Equality Action Plan, both creating an enabling environment and compelling people to action.'
67. The Race Disparity Unit will provide valuable data and evidence to assess improvements and progress on a community, organisational and all-Wales level.
68. The Welsh Government's core proposal however is to change the Steering Group into an Accountability Group to hold the Welsh Government, public services and others to account on their commitments and actions in relation to race equality/anti-racism as outlined in the Plan.
69. This model although appropriate for the monitoring the Welsh Government's own compliance and progress, is not an appropriate governance or accountability model to oversee local government or arguably other public bodies.
70. The Steering Group's membership is largely civil servants and stakeholder representatives, and whilst it can play a vital continued role in providing guidance, and reporting progress, it would not be appropriate for such a forum to hold to account or scrutinise democratically accountable organisations.
71. This is reflected in the Local Government section of the REAP, which notes that '...each local government body is a sovereign body in its own right and in terms of their role as an employer it is for each body to ensure an anti-racist culture exists within the organisation and that this underpins its recruitment policies, complaints policies, terms and conditions'.
72. Local authorities have their own internal democratic and managerial governance and accountability arrangements. Progress against REAP actions, as well as wider Strategic Equality Objectives, should be overseen by cabinet and senior leadership teams with oversight and challenge through scrutiny committees, informed by staff forums and networks and community and local stakeholder engagement. Authorities are also subject to regulatory regimes, including through the Equality and Human Rights Commission and Estyn.

Recommendations

73. Members are recommended to:

- 73.1 Consider the contents of the report;**
- 73.2 Provide views on the draft Race Equality Action Plan's aims, goals and actions to inform the WLGA's draft consultation response;**
- 73.3 Note that the draft WLGA consultation response will be considered by Equality Cabinet Members' Network on 14th June and agree that the response is approved on behalf of the**

- WLGA by the Spokesperson for Equalities in consultation with
WLGA Group Leaders; and**
73.4 **Encourage all local authorities to respond to the Race Equality
Action Plan consultation.**
-

Report Cleared by:

Cllr Susan Elsmore

WLGA Spokesperson for Equalities, Welfare Reform and Anti-Poverty

Authors: Daniel Hurford, Head of Policy

E-mail: daniel.hurford@wlga.gov.uk