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Consultation – Summary of Responses

Race Equality Action Plan – An Anti-racist Wales

August 2022

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Overview

This document provides a full summary of the responses to the consultation on the Race Equality Action Plan – An Anti-racist Wales.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies:

The summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Race Equality Action Plan – An Anti-racist Wales](#)

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Introduction

1. This document provides a summary of the responses to the Race Equality Action Plan (REAP) – Anti-racist Wales consultation. The document provides a summary of the responses received. It does not aim to capture every point raised by respondents but outlines the key themes.

Engagement

2. The consultation began on 24 March 2021 and ended on 15 July 2021. The consultation was published on the consultation pages of the Welsh Government's website. Respondents were able to submit their views and comments on paper, by email or online in Welsh or English. In addition, Welsh Government invited community groups to apply for funding to undertake community engagement on the draft Race Equality Action Plan. The output of this engagement is also reflected in this analysis.
3. A list of respondents to the consultation is provided at Annex A.

Overview of Responses

4. The consultation received 330 responses from more than 1,992 individuals in total. This report focuses on a detailed analysis of 255 out of the 330 responses that were submitted to the Welsh Government. 66 responses have been categorised as responses that either contained racist / offensive comments or focused on issues not related to the content of this consultation. A summary of the comments received in these 66 responses can be found at the end of this document, in the 'Other Comments' section. A total of nine responses have not been analysed for the following reasons: inaccessible files or format (2); duplicated responses (4); blank forms (2) and illegible written responses (1).
5. Please note that at times, this report refers to contested terms where these have been used by respondents.
6. Responses were submitted in various formats (questionnaires, videos, audios, narrative responses, surveys, focus group notes etc.) and there was a wide range of views from respondents across the policy areas of the REAP. Some key themes emerged about the Plan. Key themes included:
 - a. Around 90 per cent of responses supported the ambition of the Plan set out in its vision, purpose, values. However, 89 per cent of responses expressed reservations about whether the Plan, as consulted on, would succeed in delivering that vision. A range of factors were cited in support of these reservations. These included: the size of the Plan; missing actions; inadequate or no reference to monitoring, evaluation and lack of accountability.
 - b. There was also a consistent message about the need to strengthen alignment between the Plan and other policies, corporate plans and legislation such as the Equality Act 2010 and the Future Generations Act. Organisations from all sectors stated that the Plan would be strengthened by such alignment and must not be seen as a standalone document or action plan.
 - c. Over 90 per cent of responses stressed that nothing would change without accountability, monitoring and governance and the need to strengthen this in the Plan.
 - d. Over 90 per cent of responses highlighted the importance of appropriate staffing and financial resources to implement the Plan.
 - e. Predominantly, local government and health organisations felt the actions in REAP were already being addressed through their Strategic Equality Plans. In contrast other responses questioned whether it might be more impactful to strengthen existing legislation to ensure that equality laws are implemented effectively, rather than creating another plan which may be 'left on the shelf'?
 - f. Many responses highlighted the need for the Plan to be clearer about what would be delivered, by when and by whom. The importance of measurable, SMART actions was highlighted in over 60 per cent of responses.
 - g. Around 70 per cent of responses stated that the Plan was too large in breadth and / or highly ambitious.
 - h. Around two-thirds of responses (66 per cent) identified that there was little mention of the impact of Covid-19 on ethnic minority populations or actions

proposed to address this. This was an area respondents wanted to see strengthened and linked to potential pressures in the post-pandemic world in health, employment and education.

- i. Over 50 per cent of responses highlighted the need to strengthen the consideration of intersectional inequality, including focusing on priorities for Black, Asian and Minority Ethnic women.

Respondent groups	Number	Percentage
Third sector organisations and networks	57	22.35%
General public / individual respondents	52	20.39%
Health organisations (including boards, networks and associations)	34	13.33%
Public sector organisations and networks	26	10.2%
Local Authorities	25	9.8%
Community organisations	24	9.41%
Education boards, networks and associations	21	8.24%
Trade unions	6	2.35%
Criminal justice agencies	4	1.57%
Private sector organisations	1	0.4%
Religious representational bodies	1	0.4%
Funding bodies	2	0.78%
Other organisations	2	0.78%
Total	255	100%

Summary of Responses

7. This document provides a summary of the responses received. It does not aim to capture every point raised by respondents but outlines the key points and themes.

Q1. Does the vision, purpose, values and the imagined future to 2030 reflect what you would like to see achieved by 2030? What may get in the way to realise the vision and values? What may help to realise the vision and values?

8. Health organisations (n = 34), third sector organisations and networks¹ (n = 48+), community organisations (n = 21+), criminal justice agencies (n = 4+), public sector organisations and networks (n = 24+), funding bodies (n = 2), individual respondents (n = 40), trade unions (n = 6), education boards, networks and associations (n = 20), LAs (n = 25), one private sector organisation (n = 1) and other organisations (n = 2) have provided comments on question 1².
9. Health organisations (n = 34), third sector organisations and networks (n = 48+), community organisations (n = 21+), criminal justice agencies (n = 4+), public sector organisations and networks (n = 24+), funding bodies (n = 2), individual respondents (n = 40), trade unions (n = 6), education boards, networks and associations (n = 20), LAs (n = 25), one private sector organisation (n = 1) and other organisations (n = 2) stated that the vision, purpose, values and imagined future to 2030 in the Plan does reflect what they would like to see achieved by 2030. However, respondents also expressed doubts that the Plan would succeed in achieving this vision by 2030 due to: the size of the plan; missing actions; inconsistent or lack of timeframes; failure to use the SMART approach; inadequate or no reference to monitoring, evaluation and lack of accountability. One of the primary concerns which was repeated across every question and policy area was that the Plan is not aligned or linked with Welsh Government policies, corporate plans, equality objectives and existing legislation such as the Equality Act 2010 and the Future Generations Act. Organisations from all sectors stated that the REAP would be strengthened by alignment to legislation to improve the social, economic, environmental and cultural well-being of Wales and that the REAP must not be seen as a standalone document or action Plan but should be fully integrated within existing strategies.

¹ In relation to question 1, 48 responses were received from third sector organisations / networks, '48+' thus refers to how some responses were received from networks that are made up of several organisations or from several organisations teaming together to submit a consultation response. Thus, the number who support / echo the points that have been made by third sector networks is larger than the number in parenthesis – hence the '+'. The '+' may also refer to community consultations, which have engaged a group of people through surveys and / or focus groups on the REAP.

² The points raised in the summary response to question 1, have been raised by respondents across their response to the consultation. Common themes are on existing policies / strategies, concerns over timescales and about robust monitoring and accountability structures, to name a few, and have been raised in consultees' responses to several questions in the REAP consultation.

Other comments on this question:

10. One LA (n = 1) suggested marketing the vision, purpose, values and imagined future through a short video / animation, which would be more visual for people, especially young people.
11. One third sector organisation (n = 1) stated that to make this vision a reality, Welsh Government need to work with people in a meaningful and thoughtful way. Changes need to be communicated clearly and in an accessible format for all to understand the motivations behind the vision.
12. Criminal justice agencies (n = 1+) stated that the following may help to realise the vision:
 - a. Widespread promotion and / or targeting of the Plan so members of the public can hold Government bodies accountable for their actions / commitments – consider infographics of key elements to highlight what public expect us to achieve within a certain timescale.
 - b. Widespread recruitment for hard-to-reach communities. If ethnic minority applicants consistently fail to secure full time positions, consider changing or at the least, reviewing the process to ensure the recruitment process is inclusive.
 - c. Publicise figures to show that actions are working and more ethnic minority people or those from a lower socio-economic background, or other protected characteristics are gaining employment / promotions etc. Showcasing positive story will change the stereotypical view that portray, in some mainstream media, ethnic minority people as offenders, gang members, on low incomes etc.
 - d. Continue to review / inspect public body services to hold us accountable for the change that has been promised. Implementation of action plans is key to sustained change.
 - e. Support organisational-led employment-based progression for underrepresented people. E.g., HMPPS staff to deliver presentations to Secondary Schools; Consider a joined-up approach with local YOS to develop relationships with local youth community groups.
13. One public sector organisation (n = 1) highlighted that the values could be strengthened. The third value, Open and Transparent, could ask us all to not only be open, but also self-questioning and welcoming challenge. One of the key messages of an anti-racist approach is not to simply be nonracist, but to actively pursue change. This value could therefore be about being open, transparent and welcoming of challenge.

Q2. We would like your views on the goals and actions.

To comment on some or all of the goals, actions and outcomes please reflect on the below:

- Does the explanation (narrative / background) make clear why we have chosen the goals and actions in this policy area?
- Is it missing any priorities, background or other information?
- Do you agree with the selected goals and actions? What would you add or take away in relation the actions?
- Will each goal and associated actions create the desired outcomes we have stated? If not, what would you want to change so that we achieve changes that are truly anti-racist in the time scales stated?
- How could the positive or negative effect be increased, or mitigated?

Leadership and Representation:

14. Third sector organisations and networks (n = 9+), LAs (n = 12), health organisations (n = 9), trade unions (n = 2), individual respondents (n = 7), community organisations (n = 1+), criminal justice agencies (n = 1+), public sector organisations and networks (n = 7+) and funding bodies (n = 1) commented on the leadership and representation section of the Plan. A range of comments have been received detailing what this section of the Plan omits, where this section does not appear to align with already existing levers and which actions do not go far enough.

Clarity needed on who the actions within this section apply to:

15. There was confusion among some third sector organisations (n = 2), health organisations (n = 3), one LA (n = 1) and one public sector organisation (n = 1) at who the actions within this section are aimed at. Some respondents assumed the actions within this section are all for Welsh Government to undertake. Respondents asserted the need for this section to be rebalanced to make it clear that the REAP is about leadership across the whole of the Welsh Public Sector. It was noted that the terms public sector bodies / public bodies / public services appear to be used interchangeably meaning that it is not clear if certain actions are applicable personally to leaders and / or chief executives or within local government.
16. Third sector organisations (n = 2), health organisations (n = 3), one LA (n = 1) and one public sector organisation (n = 1) asserted that the 'Leadership and Representation' goal on workforce representation should also apply to organisations who are commissioned to provide public services as the public does not differentiate between public sector and contracted providers.
17. Third sector organisations (n = 2), health organisations (n = 3), one LA (n = 1) and one public sector organisation (n = 1) asserted that clarity is needed on what is meant by, "appropriate incentives," are these incentives for the leader, the organisation or the individual recruited? Respondents questioned why leaders of public bodies should be "incentivised" to take action viewing this as extremely problematic. Respondents asserted that there should be punitive measures in place if

these leaders choose not to take anti-racism work seriously and there should be a minimum requirement of people from marginalised communities on Boards.

18. Third sector organisations (n = 2), health organisations (n = 3), LAs (n = 3) and public sector organisations and networks (n = 4+) stated that more information and discussion is needed on how, “*leaders of public bodies are held personally accountable for delivering a representative workforce,*” to establish what this means in practice. More needs to be said in the Plan on how senior leaders will be scrutinised on the accountability of delivering a representative workforce.
19. Third sector organisations (n = 3), LAs (n = 3), trade unions (n =2), individual respondents (n = 3), public sector organisations (n = 2), and community organisations (n = 1+) asserted that specific goals and actions on achieving a more representative workforce and leadership should be included in each policy section of the Plan, not just in the ‘Leadership and Representation’ sector.

Comments on training, support & guidance needs in this area:

20. Community organisations (n = 1+), public sector organisations and networks (n = 3+), one third sector organisation (n = 1), health organisations (n =3) and one individual respondent (n = 1) asserted Welsh Government should ensure that all senior leaders have the right skills and understanding to introduce and support anti-racist work. All leaders need to be trained coached and mentored in order for the Plan to be successful. Some of these respondents stated that in relation to Goal 3 / Action 3 (pg. 39) the objective should be to upskill all managers involved in recruitment activity to ensure that they are all willing and able to make good decisions around appointments and reasonable adjustments. The aim should be to remove any potential barriers and obstacles from selection processes. Respondents also stated that training should be for all staff, not just managers and that this needs to take place urgently – respondents advocated for accelerating the timescale within the Plan for this from medium to short term. Some respondents also suggested that reverse mentorship should be initiated where Black, Asian or Minority Ethnic staff mentor leaders in developing their anti-racist modelling knowledge and skills. The third sector organisation which commented on this issue was disappointed that the Plan does not detail provision of any standard monitoring however, only reverse monitoring (Goal 3 / Action 9, pg. 40).
21. One public sector organisation (n = 1) discussed how a shared training and support programme operating across organisations across Wales would be ideal to ensure consistent delivery across all authorities and for those from audit and regulatory bodies, inspectorates and ombudsmen to have a common training and support programme also.
22. Community organisations (n = 1+), public sector organisations and networks (n = 3+), one third sector organisation (n = 1), health organisations (n = 3) and one individual respondent (n = 1) expressed the view that it would be helpful if Welsh Government shared its learning and experience of developing an anti-racist culture, including what constitutes ‘good’ anti-racism training and its ethnicity pay gap calculation.

23. Community organisations (n = 1+), public sector organisations and networks (n = 3+), one third sector organisation (n = 1), health organisations (n = 3) and one individual respondent (n = 1) stated that, for public bodies to use their spending power to improve leadership and representation across the public, private and third sectors, additional provision will need to be made for operators in these sectors. This would include providing any relevant guidance, training, and involvement in schemes Welsh Government makes available to public bodies to support with anti-racist action and tackling inequalities. Additional guidance and support should be made available to the organisations who will be impacted by the goals and actions as outlined to support them in fulfilling their obligations. Respondents also felt strongly that a timescale to measure success is needed and sufficient time for the sector to adjust to new requirements.

Comments on representation, recruitment, development & progression:

24. One third sector network (n = 1+), public sector organisations and networks (n = 5+), LAs (n = 6), community organisations (n = 1+), individual respondents (n = 4), criminal justice agencies (n = 1+), health organisations (n = 2) and one funding body (n = 1) acknowledged the need for sufficient diversity at all levels, but especially in middle management. Third sector organisations stated that modelling anti-racism within the current structures of White Privilege, however, will not result in any meaningful change, it will reinforce the oppression, disadvantage and trauma experienced by ethnic minority people in the workforce and those needing support and care.

25. One third sector network (n = 1+), public sector organisations and networks (n = 5+), LAs (n = 6), community organisations (n = 1+), individual respondents (n = 4), criminal justice agencies (n = 1+), health organisations (n = 2) and one funding body (n = 1) stated the need for clearly defined timeframes and processes for recruiting Black, Asian and Minority Ethnic people into leadership roles and clear procedures for ensuring accountability if this does not happen. More focus also needs to be given to retention policies across the board, but particularly in leadership positions. Respondents stated that the action relating to ethnic minority representation on interview panels should be strengthened to make a firm commitment rather than just to 'explore.'

26. One public sector network (n = 1+) expressed reservations about the target for a representative workforce to be a minimum of 30 per cent of those recruited during or after January 2023 to be from an ethnic minority background. It was felt this target was unsophisticated and could result in the hiring of a large number of individuals from a single ethnic group. They felt this target failed to recognise that different ethnic minorities face different barriers. It was suggested the following additional targets be included as part of this action: for at least 3 per cent of Welsh Government Senior Civil Service staff to be from an ethnic minority by 2025 and for at least 6 per cent of Welsh Government Senior Civil Service staff to be from an ethnic minority by 2028 to more accurately represent the populations the organisations serve. It was questioned

whether there would be targets and measures put in place for all protected characteristics in the future.

27. Third sector organisations and networks (n = 2+), public sector organisations and networks (n = 5+), LAs (n = 6), community organisations (n = 1+), individual respondents (n = 4), criminal justice agencies (n = 1+), health organisations (n = 2) and one funding body (n = 1) expressed concern at the lack of acknowledgement in the Plan of the diversity profile of different LA areas / regions and that rural areas have a much lower population base. As a result, there will be greater challenges in some areas to achieve a representative workforce. LAs indicated that they required support from Welsh Government in geographical areas where the communities of interest are less in numbers. To address this, the responses which raised this issue suggested the Plan should consider the level of expertise available in these areas and how the static nature of the workforce in some areas limits the opportunities for diversification. It was stated that setting targets for percentages of minority ethnic people recruited needs to be determined by individual organisations because census data shows that minority ethnicity levels vary across Wales. If one target were to be set, then it would be too easy for some and too challenging for others.
28. One public sector organisation (n = 1) asserted that the Plan needs to consider specific sectoral differences, for instance the social care workforce has a significant majority of female staff, as does early years sector – they believed that it would be counterproductive to seek to artificially reshape this ratio to meet a goal of gender balance.
29. One third sector network (n = 1+) cautioned against attaching too much value to representation as an end goal as equal focus must be placed on other measures necessary to bring about meaningful change. Respondents stated that this might lead to unintended consequences such as tokenism, which individual respondents feel should be avoided because roles should be awarded on merit.
30. One third sector network (n = 1+) highlighted their experience that ethnic minority people do not come forward for senior roles despite community groups and third sector organisations aiming to encourage interest and to communicate opportunities appropriately.
31. One third sector network (n = 1+), public sector organisations and networks (n = 5+), LAs (n = 6), community organisations (n = 1+), individual respondents (n = 4), criminal justice agencies (n = 1+), health organisations (n = 2) and one funding body (n = 1) stated that the suggested remit of the diversity and recruitment team was too narrow because the team seemed to have no functions in relation to monitoring the achievement of the recruitment target. Respondents asserted that the team should be tasked with monitoring (and making public) reports on the achievement of both the recruitment target and other targets. Respondents also stated that a core function of the Accountability Group should be to facilitate opportunities for the public sector to report data and to share learning in how at all levels of public life, diversity in representation can be harnessed.

32. Criminal justice agencies (n = 1+) stated the importance of development opportunities that are open to staff and community members being widely reported on, rather than just printed in an obscure part of policy or web page. Welsh Government should ensure opportunities are widely promoted with additional support made available if required. Such opportunities should be reviewed, and organisations held accountable for the provisions they have offered.

Accountability & alignment to existing levers / powers:

33. One individual respondent (n = 1), public sector organisations and networks (n = 2+), LAs (n = 8), health organisations (n = 6) and third sector organisations and networks (n = 3+) pointed out that many of the suggested actions and areas for improvement within the leadership section of the REAP have been a work in progress for a long time (e.g., executive board member arrangements and minority ethnic staff networks). Respondents emphasised the importance of the REAP being aligned and supported by other key strategic equality programmes instead of duplicating existing legislation, because if existing legislation has not made a difference thus far, then doing more of the same will not bring about the change that is needed.

34. One individual respondent (n = 1), public sector organisations and networks (n = 2+), LAs (n = 8), health organisations (n = 6) and third sector organisations and networks (n = 3+) also stated the importance of diversity and representation being normalised and not treated as an add-on or achievement in itself. More needs to be said in this section of the Plan on Welsh Government's leadership role, its acceptance of the underlying context and the proposals in the Plan, and how it plans to reform the regulatory framework to support and scrutinise organisations to ensure they achieve equitable outcomes.

Suggested amendments to already existing actions:

35. Third sector organisations (n = 2), LAs (n = 2), trade unions (n = 2), one public sector network (n = 1+), one individual respondents (n = 1) and one health organisation (n = 1) stated that several vague suggestions have been made in this section of the Plan without clear, specific methods being suggested. Specific comments included:

- a. Goal 1 seems poorly worded – the words “is at least” could be deleted so that it reads: *“the public sector workforce in Wales properly represents the population it serves,”* – the wording is crucial in setting the tone on this matter.
- b. Goal 3 / Action 1 (pg. 38) – other people need to be included in this, not just academics: *“any other,”* is too vague, define who, where from, what sector, background, specify the action.
- c. The proposed external audit should not be a one-off. A separate action within goal 3 is for regular audits of lived experience and this should be adopted in relation to Welsh Government procedures and staffing levels.
- d. The actions under goal 4 (pg. 40) are brief and lacking in detail. More specificity is needed as to what will actually be done and how.
- e. “Lower risk from speaking up” action is not currently fit for purpose as it elides two very distinct areas which are very different phenomena and should be

treated as such. It was suggested the action is replaced by two actions: firstly, to completely eliminate the risk of speaking up or voicing concerns at work – these activities should never carry any risk whether in the field of race or any other area. Regarding the second new action, it was not clear what ‘mistakes’ are being referred to. If being used in a general sense, they suggest the second action should aim to ensure that ethnic minority staff are treated no less favourably when they make mistakes than other staff. Regardless, what the word ‘mistakes’ is supposed to refer to here should be clarified.

36. Third sector organisations (n = 2), LAs (n = 2), trade unions (n = 2), one public sector network (n = 1+), one individual respondent (n = 1) and one health organisation (n = 1) highlighted the lack of clear definition on the scope of positive action – it seemed to be seen as just target setting in the way actions are written. Actions should go further than seeking key heads / CEOs to ‘understand’ positive action and instead to mandate implementation. It was stated that, regarding resources, it should be made compulsory that a certain percentage of the board be from ethnic minority backgrounds.
37. Third sector organisations (n = 2), LAs (n = 2), trade unions (n = 2), one public sector network (n = 1+), one individual respondent (n = 1) and one health organisation (n = 1) stated in relation to the reference to understanding positive action in Goal 1 / Action 2 (pg. 34) – this should go beyond just understanding but look for people to learn to implement and utilise with specificity on what and by when. Targets should also encompass positive action looking to address queer people of colour and disabled people of colour as well, not just women of colour. Third sector organisations (n = 2), LAs (n = 2), trade unions (n = 2), one public sector network (n = 1+), one individual respondent (n = 1) and one health organisation (n = 1) stated in relation to Goal 2 for Leadership and Representation (pg. 37) which outlines the expectations for Chairs, Board Members and Health Officials to implement the 2020 Diversity and Inclusion Strategy for Public Appointments – there will need to be some staging in relation to implementation given the continued pressure of the pandemic in organisations. Comments included that Welsh Government should make it mandatory, not just aspirational, to have staff and boards which reflect the local or national demographic profile (whichever is the most diverse); positive action should be undertaken, and targets should be in place for this, which should be reported on and scrutinised by regulators. It was also noted that although there are pockets of success, there is not always a clear link between third sector run pipeline schemes and a connection to opportunities in public and political life. Thus, there may need to be stronger commitment from or requirement for public body chairs and appointment panels to taking people in from that pipeline. Third sector organisations (n = 2), LAs (n = 2), trade unions (n = 2), one public sector network (n = 1+), one individual respondent (n = 1) and one health organisation (n = 1) have also commented on the commitment to eliciting role models (Goal 1 / Action 5, pg. 36) and stated that the Plan must detail how tokenism and saviourism will be avoided but more equal representation achieved.
38. Third sector organisations (n = 3) have stated that having one diversity and inclusion champion on the board moves away from CEO / entire board responsibility. Remit of

this 'Champion' must be clear and ensure that tokenism is not expected / nor representation of all marginalised people and to make provisions that their role is advisory. The board should retain responsibility for implementing the necessary changes, championing should be embedded in everyone and not just fall on one person (Goal 2 / Action 5, pg. 38). Disappointment with Goal 2 / Action 3, pg. 37: "*identify one inclusion and diversity objective, with a focus on anti-racism,*" was expressed, noting one is not enough. It was also suggested that it would be appropriate for voluntary sector representatives, such as CVCs to also have the opportunity to receive training.

39. Third sector organisations (n = 3), LAs (n = 2), trade unions (n = 2), public sector organisations and networks (n = 2+), one individual respondent (n = 1) and one health organisation (n = 1) stated that action 3 (Goal 1) regarding high quality learning and development for upskilling and empowering under-represented groups is very vague and not specific – more needs to be said about what this means in practice. Senior leaders should also have anti-racism in their performance management as stated for board members. The proposed Plan learning points need to be directed at middle managers in addition to senior leaders / Ministers in the new Cabinet and board members and should be made mandatory for all staff. There should be a focus on empowering community members and groups, not just individual leaders. There is a danger in public bodies investing too much authority in individuals as leaders and representatives rather making time and resources to fully engage with communities. Many leaders are self-appointed and do not represent the interests of a whole group. For instance, many of the self-appointed leaders are male and do not convey the interests of women from that community, disabled people, LGBTQ+ etc. Third sector organisations also stated that more needs to be said surrounding Goal 3, Action 2 (pg. 38) and Goal 3, Action 6 (pg. 39) on how empowerment is defined, what empowerment looks like and how Welsh Government will empower people. Third sector organisations and Community Voluntary Councils asserted that Welsh Government consider previous research, such as WCVA's report on [Empowering Communities](#) undertaken on place-based theory, looking at how a sense of pride in the place they live can empower communities and create leaders.
40. Trade unions (n = 2) suggested the Plan consider worker voice and workers on boards as a way of achieving parity for Black, Asian, and Minority Ethnic workers, and improving representation whilst offering an opportunity to implement the necessary changes that workplaces require to move towards anti-racism. There are other mechanisms for worker voice in corporate governance that exist in some European countries, sometimes alongside board representation rights. These include Worker 'consultative' representative in boardrooms: there are countries where workers have the right to attend and speak at board meetings and receive papers but cannot vote – France, Norway, and Sweden – this operates (in certain cases) alongside full board representation rights. Worker involvement in selection of top management team: in certain cases, in Slovenia, Germany and Poland, the workforce is entitled to appoint or elect a member of the management team. Worker representation at the Annual General Meeting (AGM) Provisions exist for workers in

certain cases to attend and / or submit a resolution to the company AGM in France, Sweden, Bulgaria, Hungary, and the Netherlands.

41. Third sector organisations (n = 3), LAs (n = 2), trade unions (n = 2), public sector organisations and networks (n = 2+), one individual respondent (n = 1) and one health organisation (n = 1) asserted that it is not enough to consult with public body leads to determine the data needed to ensure the public sector workforce in Wales at least accurately represents the population it services. Public body leaders will have a personal stake in presenting data favourably – the decisions around what data should be collected and used should be better scrutinised, and the use of race equality experts in determining data collection should be used. They also stated that all data should be made publicly available to ensure full transparency.
42. Third sector organisations (n = 2), trade unions (n = 2), public sector organisations and networks (n = 4+), one individual respondent (n = 1), one health organisation (n = 1) and community organisations (n = 1+) commented on action 3 (Goal 4, pg. 40) in this section of the Plan about data collection for ethnicity pay gap reporting and that it was not clear in what it has to do with procurement / spending powers and thus needs to be elaborated on. It is also not clear how reporting ethnicity pay gap data will improve leadership and representation because this action is about monitoring but does not actively contribute to achieving the goal to increase ethnic minority people in leadership and representation. The publication of ethnicity pay gaps will require Welsh Government to provide categorical and clear advice about how to calculate the pay gap so that organisations are comparing like with like (unlike the gender pay gap which has already created inconsistencies when the legislation stated one calculation and ACAS subsequently suggested excluding teaching staff, resulting in inconsistent data). It was questioned why it is necessary to wait for UK Government guidance on the ethnicity pay gap when the Plan is an initiative of Welsh Government – the reasoning for this should be explained within the Plan.
43. Third sector organisations (n = 2), one health organisation (n = 1) and one public sector network (n = 1+) queried what existing provision is Goal 5 / Action 1 (pg. 40) referring to and stated that this needs to be specified so that people know and can access and so Welsh Government can be held accountable. There were questions about what is meant by 'possible' or 'appropriate' in Goal 5 / Action 4 (pg. 40) – Welsh Government govern this, so must define what is possible or appropriate as this will ensure accountability if actions are not met.

Missing actions from this section of the Plan:

44. One Third sector organisation (n = 1), one individual respondent (n = 1), public sector organisations and networks (n = 3+), community organisations (n = 1+) and health organisations (n = 3) stated that the Plan also needed to focus on actions that will influence the private sector.
45. One third sector network (n = 1+) noted that Welsh Government should be reflective of the populations they serve by 2030 and they should consider rurality and

differences in demographics in different parts of Wales. These respondents also felt that the Plan was only referencing large communities and not small ones

46. One third sector organisation (n = 1), one individual respondent (n = 1), public sector organisations and networks (n = 3+), community organisations (n = 1+) and health organisations (n = 3) asserted that, to increase racial diversity in political representation, Welsh Government should call on the UK Government to commence section 106 of the Equality Act 2010 in relation to Senedd Cymru elections, to transfer the powers to do so, or to legislate for the Senedd's electoral arrangements to ensure that diversity data is collected. Comments include that Welsh political parties should undertake positive action initiatives specifically aimed at increasing the racial diversity of election candidates. It was also suggested Welsh Government take action to increase the number of ethnic minority people registered to vote and collect data to contribute to addressing the disproportionately low numbers of ethnic minority people UK-wide who are not registered to vote. It was asserted that resourced programmes needed to be in place to support transition into public / political life to help represent the Welsh population – such processes should ensure obtaining a seat on a board is accessible.

Housing and Accommodation:

47. Third sector organisations and networks (n = 14+), LAs (n = 10), one health organisation (n = 1), trade unions (n = 1), individual respondents (n = 12), public sector organisations and networks (n = 2+) and one private organisation (n = 1) provided comments on the housing and accommodation section of the Plan.

Gypsy and Traveller Accommodation / Housing:

48. One LA (n = 1), third sector organisations and networks (n = 2+) and one individual respondent (n = 1) expressed concerns that the Plan does not specifically reference any intention to address the inequalities and issues faced by Gypsy and Traveller communities. Respondents stated that Gypsy, Roma, and Travellers will always be on the bottom rung.
49. One third sector organisation (n = 1) was unhappy with the repeated use of the exclusive term 'housing' in the Plan, rather than accommodation. They felt this shows how some people's 'normal' overshadows the 'normal' of smaller or less powerful groups like Gypsy and Traveller communities.
50. There was concern among some LAs (n = 3) that the Plan does not recognise the diverse accommodation needs of Gypsies and Travellers – not all Gypsies and Travellers prefer to live in mobile homes. This means, in their view, that not all accommodation needs can be met through increased site provision, (and two LAs (n = 2) reported that Gypsies and Travellers in their area have stated that they would not use a transit site if they were to provide it). One LA (n = 1) suggested that Welsh Government conduct research to see if the provision of such sites would be used. If

the research shows that sites are required, funding should then be made available to those LAs where the provision is situated, not only in terms of the initial outlay, but also for the ongoing management and maintenance. One LA (n = 1) asserted that re-drafting the sites guidance should be done with full engagement with Gypsy and Traveller communities and LAs. Three LAs (n = 3) agreed that Welsh Government should develop a regional approach to assist Gypsy and Traveller accommodation needs:

- a. One LA (n = 1) stated this specifically in relation to transit sites.
- b. Another LA (n = 1) stated that the development of Temporary Stopping Places, their management and resourcing should be undertaken on a pan-Wales basis and in consultation with the Gypsy and Traveller communities.
- c. Another LA (n = 1) stated that developing a regional approach would be helpful, particularly in relation to developing a resource that is reflective of actual likely demand. This LA stated that this could be funded jointly as this would not be financially sustainable for individual councils. This LA also stated that they required additional support from Welsh Government with a list or map of Welsh Government-owned land available in each county.

51. There was confusion among some LAs (n = 3) on what is meant where the Plan talks of better data in this area. LAs stated that clarification is needed on whether the Plan means more frequently collected, more comprehensive or more detailed data? LAs feel that the Gypsy and Traveller Accommodation Assessment (GTAA), that they are required to carry out every five years, requires a census style collection of evidence.

52. Third sector organisations (n = 2) were concerned at the absence of reference to the land use planning system from any consideration in the Plan. The actions in the Plan will bring Gypsy and Traveller groups into contact with the planning system, which can be complex and a difficult process to engage with. It was suggested that Welsh Government should therefore fund one or more specific Gypsy and Traveller planning officers in communities across Wales.

53. Third sector organisations and networks (n = 2+) asserted that this section of the Plan should include a goal ensuring accountability and redress when LAs identify accommodation needs for Travellers, Gypsies and other nomadic peoples and fail to meet those needs. There needs to be more incentive for LAs to offer managed sites and to consult with Gypsy and Traveller people. Responses highlighted that the provision of permanent and transit sites in North Wales is very patchy.

Asylum Seeker and Refugee Housing / Accommodation:

54. Third sector organisations and networks (n = 2+) expressed their frustration at the insufficient amount of time an individual is given to vacate a property and find alternative living arrangements, once granted leave to remain. Third sector organisations stated Welsh Government should explore options for increasing the move-on period to 56 days in line with the Housing Act 2014, including options for continuing to fund asylum accommodation for an additional 28 days to give LAs and individuals an appropriate length of time to secure alternative accommodation.

55. One third Sector organisation (n = 1) stated that greater clarification is needed surrounding the following goal: “*Funding provided to the Third Sector to help expand and professionalise ‘hosting’ arrangements for those with a realistic prospect of achieving leave to remain,*” and asked: will these hosting arrangements include those who have been given leave to remain, to allow them some security for a longer period before they find their own accommodation? It was suggested that this should be considered because it would allow asylum seekers and refugees to remain more local, and provide time for them to seek local accommodation, rather than living in Cardiff (for example) for four years, and then being relocated to London (for example) when they receive leave to remain.
56. Third sector organisations and networks (n = 3+) and one individual respondent (n = 1) asserted that more support is needed for those without resource to public funds if denied asylum, because currently LAs are limited in the assistance they can provide for those with no recourse to public funds (NRPF). It was suggested that Welsh Government should ensure that refuges and shelters for those escaping abuse and violence are funded directly to enable places for people with NRPF (so that organisations providing this service and relying on housing benefit for funding places have alternatives).
57. Third Sector organisations and networks (n = 4+) recommended that the Welsh Government includes the following in this section of the Plan:
- a. Welsh Government should seek the devolution of responsibility and provision for asylum accommodation, dispersal, and support in Wales, to ensure higher standards, improved oversight and an end to housing that is unsafe, unsuitable and unsanitary.
 - b. Welsh Government should take action to mitigate the impact of Westminster policies related to refugees and continue to make strong representations to the UK Government to improve policy and legislation that increases poverty and the risk of homelessness.
 - c. Welsh Government should challenge the UK’s NRPF policy, and work with organisations experienced in helping people in this situation so that all LAs understand the alternative legal mechanisms available to assist people in this situation.
 - d. Welsh Government should ensure that the ‘Right to Rent’ policy which requires landlords to check the immigration status of tenants and has been found to be racially discriminatory by the High Court, is not implemented in Wales.
 - e. Welsh Government should strongly oppose and challenge the use of unsuitable sites for initial accommodation for people seeking asylum, such as the Ministry of Defence barracks in Penally.
 - f. Welsh Government should commit to further long-term funding to deliver the recommendations of the Welsh Government feasibility report on increasing accommodation and support services to people who have been refused asylum, including as recommended beyond the initial two years.

- g. Welsh Government should increase the provision of legal aid funded advisors able to support those with refused asylum claims to challenge those refusals and ensure people are properly represented, with sufficient support for submitting fresh claims.
- h. Welsh Government should advocate for the extension of the current 14-day period for appealing a refused asylum claim and the 21-day move on period for those who have no further rights of appeal.

Council Housing and Social Housing:

58. Third sector organisations and networks (n = 5+), one LA (n = 1) and one individual respondent (n = 1) set out their frustration at cultural and religious needs often not being considered when providing housing. Individuals should feel safe and secure, be able to live independently and their cultural and religious needs should be met (i.e., they should have access to a place of worship nearby). Better understanding of values and beliefs is needed to address needs more appropriately. They suggested that an ongoing programme of anti-racist training should be made available for all residents and, particularly, public sector staff. It is vital that this training is accessible and targeted. Training must clearly lay out the consequences of White Privilege and structural racism and intersectionality. Training and building cultural competence within housing provider organisations, should always be delivered by and with ethnic minority people and organisations, should be administered face to face, not online, and should always be done alongside, not instead of, proactive steps to achieve a more representative workforce.
59. One third sector organisation (n = 1) asserted that Welsh Government should develop guidance for housing organisations to transform their workforce. Regulatory bodies – and Welsh Government as a funder – should hold organisations accountable, evaluating workforce diversity when they are doing audits and housing regulation meetings. Housing providers should be mandated to undertake and publish an ethnicity pay gap review, as part of a wider salary review and pay gap exercise – there seems to be particularly high salaries amongst Registered Social Landlords which appears incongruent with their mission to support the most vulnerable in society, of whom a high proportion are also people from ethnic minority backgrounds. Third sector organisations also stated strongly that housing advice providers do not currently meet the needs of ethnic minority people as they are not required by Welsh Government to create specific roles for people who speak different languages and understand racism. They recommend that there should be a review of the Advice Fund to assess to what extent this fund is meeting the needs of ethnic minority people.
60. Third sector organisations and networks (n = 3+) were concerned that the lack of council housing will impact on Welsh Government’s ability to meet demand for housing and achieve the goals in this section of the Plan. They recommended that Welsh Government set a target for all major housing developments to contain at least 40 per cent social and affordable housing (with housing associations and LAs working with housing developers to finance this). Welsh Government’s commitment

to increasing the housing supply needs to be explored in more detail in the Plan: housing needs should be reflected in build plans and linked with the local housing market.

61. One health organisation (n = 1) and one individual respondent (n = 1) asserted that the under representation of Black, Asian, Minority Ethnic households in social housing needs to be investigated and addressed. Detailed impact assessments of existing allocation systems should be completed to ensure that households are not being discriminated against. In social housing, Welsh Government need to ensure that the lettings and housing allocations process is not discriminatory and should look for opportunities to align with other Welsh Government strategies, like how decarbonising homes and eradicating fuel poverty could contribute to eradicating racial inequality in housing. Social housing needs to be promoted, especially where there may be concerns that disadvantaged groups would not tend to apply for Council and Housing Association homes.
62. Third sector organisations and networks (n = 3+) were frustrated at the absence of reference to the land use planning system from any considerations in the Plan when the planning process is the primary mechanism in which social and affordable housing is built, and that access to good quality affordable housing is a crucial part of improving the lives of minority populations.
63. Third sector organisations and networks (n = 4+) asserted that Welsh Government must ensure that local development plans understand the importance of mixed tenure housing estates, properly supported by infrastructure and public services, rather than seeking to create 'ghettos' of social housing separate to private development. Comments outlined that ethnocentric living areas have been, and still are, caused by poverty because social housing is cheap. Welsh Government must also ensure and clarify that equalities considerations are a material planning consideration, with planning officers, planning committee members, and the Planning Inspectorate receiving the necessary equalities training to ensure they understand this and what it would mean in practice. Welsh Government should remove the ability of the Planning Inspectorate to water down affordable housing commitments imposed by LAs in developments so that they are 'profitable' for large developers. It was highlighted that genuine community consultation is needed, involving all communities, about the types of S106 agreements that should be sought from large developments so that local communities genuinely see benefits from large developments.
64. Individual respondents (n = 2) and one third sector network (n = 1+) stated that there needs to be more focus in this section of the Plan to make all communities safe and any aspects of racially motivated neighbourhood disputes identified and challenged and prosecuted if a crime is committed. More needs to be said on the many forms of discrimination (relating to more than one protected characteristic) that can too often occur in Wales and Welsh Government need to provide more guidance on when police / social services should step in and rehouse people before situations of racial discrimination / harassment / abuse escalate as these incidents typically receive last minute support. Respondents also reported experiences where the services that are

there to protect individuals (LAs / housing associations / police) gaslight people by making them doubt whether they are really experiencing the hate / discrimination they say they are.³

65. One trade union (n = 1) suggested there needs to be a goal within the Plan committing to the funding of grassroots health clubs, regular safety checks of housing, workshops on how to deal with bad landlords in a variety of languages and eviction of racist tenants. This goal would relate to both council and social housing and the private rented sector.
66. One third sector network (n = 1+) and one private organisation (n = 1) recommend that the Plan should encourage LAs where the local Black, Asian and Minority Ethnic population is considered to be too small to justify the commissioning of specialist services, to work with neighbouring LAs to jointly commission Black, Asian and Minority Ethnic led organisations to deliver the service on a regional or sub-regional basis. There were also calls for Welsh Government to match or better the UK Government's now ended Green Homes Grant and for the Plan to ensure LAs liaise with energy providers to maximise and target the use of Eco-Flex money and other grants.

Homelessness:

67. One health organisation (n = 1) identified the need for front line housing solutions services to be accessible and to provide appropriate support for the needs of Black, Asian, and Minority Ethnic people, specifically in relation to the 'move on' from temporary accommodation into permanent housing. They asserted the continual need for LAs to prioritise local strategies and approaches which prevent and minimise homelessness and prevent any return to the volumes of people who were rough sleeping.
68. One third sector organisation (n = 1) asserted that the Plan should include a goal regarding meeting the housing needs of the growing ethnic minority older population, including the need for culturally specific sheltered housing (e.g., Red Sea House in Cardiff and Swan Gardens in Swansea), and forecasting future needs.
69. One public sector organisation (n = 1) asserted that Welsh Government should ensure that in delivering against its Strategy for Preventing and Ending Homelessness, specific activity is undertaken to understand and respond to the disproportionate number of people from ethnic minorities, including refugees, who are homeless in Wales. This includes creating improved awareness and access to homelessness advice and support. They also proposed that Welsh Government monitor the effect that the introduction of the statutory duties on LAs to prevent

³ See also: Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.17. Consultees who contributed to the Report expressed concern that the experiences of hate crime victims in Wales are being undermined by LAs and housing associations; when victims report their experiences, LAs / housing associations have responded saying victims had not in fact experienced hate crime.

homelessness under the Housing (Wales) Act 2014 has had on ethnic minorities and take action to address any disproportionate negative impact on those groups.

Actions that fit within / relate to existing strategy / resources / legislation:

70. One public sector organisation (n = 1), one third sector network (n = 1+) and LAs (n = 2) have asserted that the goals and actions in the Plan must correspond with other Welsh Government plans. They stated the importance of the REAP matching up against other plans to ensure effectiveness and avoid silo working. Welsh Government must also provide leadership and support for LAs to comply with the Public Sector Equality Duty when identifying and responding to the housing needs of its diverse population.
71. LAs (n = 2), and one public sector organisation (n = 1) pointed out that the actions on Gypsies and Travellers in the Plan are covered in Welsh Government's Enabling Gypsies, Roma and Travellers Strategy, (2018), and this strategy is not referenced in the Plan. This illustrates a problem within the REAP: that actions from other plans / strategies are not integrated into the Plan and not referenced. Respondents asserted the importance to ensure that plans are not just duplicated in the REAP but that the REAP explains how it can add value to what is in existence already. It is also recommended that Welsh Government publish an update on progress in implementing the actions in the Enabling Gypsies, Roma and Travellers 2018 Plan, evaluate outcomes, and set out next steps.

Private-rented sector (PRS):

72. Third sector organisations (n = 3), and one trade union (n = 1) noted the absence of reference to Rent Smart Wales in the Plan (which is meant to be improving the experience of those renting whether in private or social housing). They felt this was a key omission and a missed opportunity where Welsh Government have devolved power and have created something separate for Wales. It was suggested that Welsh Government look at rent control measures, (to address poor quality housing and affordability of housing within the PRS) as other devolved governments have done and fully enforce Rent Smart Wales legislation within the PRS and strictly monitor the sector.
73. One third sector network (n = 1+) suggested Welsh Government consider how it can use levers such as the Housing Support Grant terms and conditions, Housing Support Grant guidance and the development of housing support programme strategies to ensure that changes to the size and nature of contracts do not result in barriers to Black, Asian and Minority Ethnic-led support providers being able to deliver services to diverse communities. Welsh Government should ensure that available levers are used to their full capacity, as accountability is generally much weaker than in social housing, due to the nature of the sector and linked policy. There is also a need for a system of checks and balances to be in place to ensure that fairness and transparency is at the centre of private rented lettings.

74. One third sector network (n = 1+), one LA (n = 1), and one private organisation (n = 1) asserted that more needs to be said about how Welsh Government will prevent private landlords from using their positions of power to overcharge and overcrowd through multi-occupancy households and how they will be penalised if they continue to do so.
75. One third sector network (n = 1+), one LA (n = 1), and one private organisation (n = 1) stated that more should be said in the Plan about how Welsh Government will successfully engage with independent landlords, owning one or two properties; those who operate on a large scale and those who use letting agents. (The latter can be a problem if the letting agent is based in England and not in Wales.) One private sector organisation (n = 1) made the following suggestions:
- a. Landlords could be used to meet the objective of filling empty homes, which could help house those from an ethnic minority background (particularly those in overcrowded accommodation), which was a problem identified in the Plan.
 - b. For landlords willing to take on empty homes and bring them back into use through renovation, incentives could be:
 - i. the removal of the second home Land Transaction Tax premium on buy-to-let properties,
 - ii. introducing interest-free council loans or grants in low-value and hard-to-rent areas, and
 - iii. introducing a holistic package of Council Tax incentives, recognising the potential behavioural impact of sanction and reward in the system.
76. One third sector network (n = 1+) highlighted that the European migration and the EU Settlement Scheme (EUSS) is not mentioned in this section of the Plan. This response also detailed that landlords are reluctant to give housing because of the duty to ensure people are allowed to live and work.
77. One individual respondent (n = 1) suggested that private and public rental prices for larger homes (that would suit larger Black, Asian and Minority Ethnic families) should be capped to keep housing affordable and that Welsh Government should ensure that all policies in government and non-government organisations and companies allow for mobile lives.

Data:

78. One third sector network (n = 1+) called for better data collection in this area, particularly in relation to people threatened with homelessness (including those who are homeless with NRPF). Third sector organisations asserted that the Plan could be stronger in reflecting the baseline position and providing outcomes and indicators which will help measure progress in relation to that baseline. Basic interrogation of the diversity data of tenant / service user population and comparison against the diversity of local communities is a necessary prerequisite to establishing whether the services provided are accessible to all populations and whether barriers to access might be experienced. The Plan should also consider whether there should be a requirement to publish such data. More needs to be said in the Plan on the role of the

regulator for social housing, who publishes board diversity data, but no other diversity data. The regulator collects and measures tenant satisfaction data and this data should be broken down by diversity strands.

79. There was confusion from LAs (n = 2) on how the data gap will be plugged to assist in addressing the problems with housing arising from poverty and a general lack of suitable housing. LAs question how this objective can be incorporated into documents such as Local Housing Market Assessment (LHMA), which relies largely on free sources of data to be compiled and the main one for statistics purposes is the census. However, the availability and consistency of data sets has been an on-going issue in relation to the LHMA. They sought clarification on which data sets are expected to be used, these must be up to date and freely accessible if all LAs are to use them consistently.
80. One private organisation (n = 1), and one third sector network (n = 1+) suggested that, rather than a simple review of discrimination in housing, an on-going exercise like the Welsh Housing Survey (WHS) would ensure data on and monitoring of this can produce consistent information for policymakers to tackle racism. They suggested that the Welsh Government implement the National Residential Landlord's Association's (NRLA) Welsh Housing Survey proposal – backed by several sector organisations including Homes for All Cymru, CIH Cymru, and Tai Pawb.

Other comments in this section include:

81. A range of other comments were made about this section. LAs (n = 2), third sector organisations and networks (n = 3+) and individual respondents (n = 2) felt that the Plan failed to adopt a universal right to adequate housing, or to acknowledge the impact poverty has on housing requirements. They also noted that any loan or mortgage scheme should consider that many families may be in receipt of housing or other benefits.
82. Some respondents were disappointed that this section of the Plan started with leadership and not how poor social housing is. One third sector organisation (n = 1) and one LA (n = 1) highlighted that the Plan does not currently mandate that all boards or organisations including housing providers that receive any funding from Welsh Government should be reflective of the communities they serve by 2030. In mandating this, it should consider rurality and differences in demographics in different parts of Wales as there is a perennial problem of recruiting from a very small population. One LA (n = 1) expressed reservations about whether housing teams are capable of delivering on the actions in this section of the Plan.
83. Other points made by LAs (n = 2), third sector organisations and networks (n = 3+) and individual respondents (n = 2) included:
 - a. Confusion about the lack of consistency on timescales within this section of the Plan (i.e., the actions specifically relating to Gypsy and Traveller communities have timescales in place, however other actions within this section do not).

- b. The need for clarity on what Welsh Government means by 'medium term.'
- c. That the goals and actions in this section of the Plan were too soft and that legislation must underpin the REAP.
- d. Frustration that Welsh Government is asking for expertise and intellectual property (on the issues faced by those from an ethnic minority background in Wales) and not paying for this. Several of those who attended community consultations expressed how they were fed up with consultations and talking about the issues and nothing ever changing.

Income and Employability:

84. Third sector organisations and networks (n = 17+), health organisations (n = 5), community organisations (n = 4+), LAs (n = 7), trade unions (n = 3), individual respondents (n = 11), public sector organisations (n = 5), one funding body (n = 1) and one other organisation (n = 1) have provided comments on the income and employability section of the Plan. A range of comments have been received detailing the changes that need to be made in recruitment to ensure increased representation of ethnic minority people in certain and senior roles as well as how asylum seeker and refugee access to employment can be improved. In general, feedback expressed concern that there was too much focus on getting ethnic minority people into employment and apprenticeship programmes and not enough on progression of ethnic minority people in the workplace. There were strong views about the need to set out how ethnic minority people will be protected and safeguarded from discrimination at work.

Already existing strategy / resources / legislation:

- 85. One individual respondent (n = 1) highlighted that a lot of the workforce data suggested in the Plan is already information that must be published in order to comply with the PSED. It was noted that the Welsh Government / the EHRC started a review of this requirement several years ago and needed to set out the latest position.
- 86. One public sector organisation (n = 1) stated that Welsh Government should review and strengthen the specific duties under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, to ensure that Public Bodies in Wales address pay and employment differences, report on progress and publish pay gap data. Similarly, they could require Public Bodies in Wales to use their public procurement activities to achieve the equality objectives they are required to publish under the PSED specific duties and address the most persistent and entrenched inequalities. More generally they suggested that Welsh Government should use public procurement and tender processes to advance equality by requiring suppliers to take action to address their own ethnicity employment gaps.
- 87. One public sector organisation (n = 1) proposed that Welsh government put equality and human rights at the heart of the new 10-year Wales Infrastructure Investment Plan, the reconstruction strategy, the Economic Contract and City and Growth Deals.

Implementation and monitoring of major change programmes and investment should include the impact on race equality (and sex and disability equality) in terms of pay and fair treatment and address inequalities including racial inequalities.

88. One public sector organisation (n = 1) and one trade union (n = 1) asserted that Welsh Government must strengthen and maximise the opportunities presented by the Economic Contract to drive inclusive growth and responsible business behaviours, including promoting equality and human rights. The reach of the Economic Contract needs to be expanded to ensure that financial support from Welsh Government is only offered on a 'something for something' basis with organisations being expected to demonstrate that they fully align their practices with Fair Work Wales Standard(s) and the decarbonisation agenda.
89. One health organisation (n = 1) stated that it would be helpful for the Plan to make links with the Social Partnership and Fair Work actions.
90. Public sector organisations (n = 2), community organisations (n = 1+) and one third sector organisation (n = 1) stated that Welsh Government should develop more joined up approaches to apprenticeship and placement opportunities across providers. The recent Cultural Ambition programme developed by Amgueddfa Cymru and other cultural sector partners in Wales, led by Creative and Cultural Skills in Wales, provides a cross-organisational model to support placements which could be useful.
91. Public sector organisations (n = 2), community organisations (n = 1+) and one third sector organisation (n = 1) suggested Welsh Government should provide guidance for employers that links to the wellbeing values of the Future Generations Act including:
 - a. Modernising cultural competence and diversity training and ensuring content has an active anti-racist focus, which also encompasses perspectives of people with lived experience.
 - b. Ensuring commitment to psychological safety and inclusivity; transparent channels of communication and accountability.
 - c. Access to culturally sensitive psychological interventions.
 - d. Collaborative and person-centred wellbeing approach to personnel processes.
 - e. Research to identify what works to change behaviour in a sustained way.
 - f. Risk assessment that actively consider the physical and mental health of all Black, Asian and Minority Ethnic staff.

Recruitment:

92. Third sector organisations and networks (n = 2+) and one individual respondent (n = 1) asserted that equal opportunities forms at recruitment stage should be removed because they contribute, rather than act against racial disadvantage. Blind applications should be used instead.
93. One LA (n = 1) highlighted that target setting for recruitment is not straightforward and it is not clear who will have a say in target setting – more clarification is needed

here. It was highlighted that it could take longer for recruitment if some areas have a low turnover (as posts are not advertised often) and recruitment challenges such as a shortage of candidates for particular roles / hard to fill posts, therefore a longer-term plan of recruitment and development may be required (this may be particularly relevant for some priority areas such as social care and teaching jobs). The employee journey must be considered also – staff need to be supported to develop and thrive and in some authority areas there are no ethnic minority support groups, therefore, time and resources will be needed for grass-roots engagement. Additionally, LAs (n = 3), community organisations (n = 1+) and one individual respondent (n = 1) highlighted that a single target for public sector bodies in relation to recruiting ethnic minority staff would not accurately reflect the individual circumstances for those bodies with a small diverse demographic and so, some LAs may struggle to achieve the target.

94. One third sector network (n = 1+), one individual respondent (n = 1), health organisations (n = 2) and one LA (n = 1) asserted that the Plan should include a reference to the need for ethnicity pay gap reporting to support the drive for assessing any 'reward gap' in employment.
95. One funding body (n = 1) suggested that Welsh Government should facilitate the collection and sharing of learning between employees. Larger employers should be encouraged to share best practice and learning, particularly on refocusing the diversity of applicants and recruits. Third sector organisations and networks (n = 2+) and one other organisation (n = 1) stated, in relation to recruitment, that Welsh Government should focus on proactively extending networks, innovative recruitment methods and candidate engagement, positive targeting and going much wider than sending adverts to community organisations.
96. One individual respondent (n = 1), one third sector organisation (n = 1) and one trade union (n = 1) asserted that career advisors in educational settings and employment agencies need to be more representative of the communities they serve. One third sector organisation (n = 1) welcome a focus on the efficacy of Careers Wales and Working Wales in reaching and supporting ethnic minority people effectively, but suggested that the current wording of the action: "*Careers Wales / Working Wales services will be asked to take forward developments that enable them to connect in a more effective and relevant way to ethnic minority groups,*" is fairly meaningless and is the least that can be expected rather than being a robust expectation for action which could contribute to becoming an Anti-racist Wales. One trade union (n = 1) was concerned to see references within the Plan to enhance the role of Careers Wales and Working Wales because they both have previously highlighted their own lack of representation within their own services. One trade union (n = 1) asserted that a redesign of careers advice and employability information, advice and guidance may be required to meet the needs of a more diverse society, and Black, Asian, and Minority Ethnic workers and learners.
97. One individual respondent (n = 1) suggested that Welsh Government should consider developing a programme for shadowing of roles to make them more accessible to different communities and to those who may lack experience. One third

sector network (n = 1+) suggested that open days / open forums should be held to allow potential applicants to be able to explain what would make them feel comfortable in the job.

98. One third sector network (n = 1+) asserted that anti-racism should form part of every employee's induction. One trade union (n = 1) proposed that unilateral and mandatory anti-racism questions are needed for workplaces for use in all recruitment, co-drafted by the First Minister's Race Task Forces, Workforce Council, Trade Unions and Race Equality First. Mandatory introduction of anti-racism questions for public sector job interviews must be implemented, as the workforce in Wales is over 1.4 million. Welsh Government should ensure no unlawful discriminatory decisions are being made by devolved public sector employers or recruitment agencies in how they use technology, given evidence that workers are suffering discrimination and other forms of unfairness resulting from use of AI at work.
99. One trade union (n = 1) stated that barriers within workplace policies, such as dress codes which specify hair styles, which disproportionately impact on Black women, must be removed.
100. One third sector organisation (n = 1) highlighted that the way employability programmes are marketed can be a barrier - employability programmes are often marketed as for those with no employability skills, but there are people who join who do have significant skills and experience, which were perhaps gained in another country. It was highlighted that websites and traditional forms of marketing are often in inaccessible languages. Third sector organisations and networks (n = 2+) noted that many European migrants have high qualifications yet are unable to gain employment at the right level because they do not have the language. In relation to the goal around collecting and analysing data from employability programmes, it was assumed that this is already in place particularly for large programmes such as Communities for Work and Working Wales, so it was not clear what, if anything, additional is being committed to and how will this make a difference.
101. One trade union (n = 1) stated that additional funding or grants for Local Government may be necessary in achieving the second goal within this section of the Plan that considers Community Employability Programmes and commits to a review of community employability by 2023. It was suggested that higher levels of funding need to be allocated via local government employability programmes to address specific challenges and barriers that exist in Black, Asian, and Minority Ethnic communities because currently there are no incentives or levers to ensure that LAs invest in targeted interventions around community employability.
102. One third sector organisation (n = 1) stated that it is not clear if the goal to: "*test new employability approaches to anti-racism,*" should be to, "*test new anti-racism approaches to employability*"? The actions for this goal should specify that they will be carried out collaboratively with ethnic minority-led groups.

Increase representation of ethnic minority people in certain and senior roles:

103. One individual respondent (n = 1) highlighted that there is a need for a combination of policies to reduce workplace inequalities for ethnic minority employees that target organisational culture as well as making procedural changes. These should include policies focused on: increasing numerical representation in the workplace and at higher levels of seniority; improving the management of diversity; and inclusive practices. Another individual respondent (n = 1) asserted that the culture of anti-racism in Wales needs to be extended to private workplaces also and stressed the importance of people of colour being employed in positions of power, particularly in the health and social care sectors. One health organisation (n = 1) also asserted that support should be extended to tackling differential attainment within all NHS professions. One third sector organisation (n = 1) was disappointed that the Plan fails to detail how the rights of migrant workers, who are often concentrated in the economic sectors, with the worst terms and conditions (e.g., food manufacture and hospitality) will be protected.
104. One trade union (n = 1) set out priorities for income and employment goals. These were:
- a. Closing the ethnic minority employment gap.
 - b. Tackling the pay gap for Black workers.
 - c. Fighting for equality of opportunity in promotion.
 - d. Dealing effectively with Racial Harassment, Discrimination and Bullying.
 - e. Promoting fairness for Black women workers.
 - f. Negotiating for Union Equality Reps.
 - g. Ensuring fair treatment of migrant workers.

This trade union (n = 1) also highlighted that in order for the goal in income and employment to be met, it is essential to ensure Workplace Equality Impact Assessments are carried out. One third sector network (n = 1+) highlighted that the focus should not just be on recruitment and retention but how someone progresses, thus breakdowns of non-White people per team and pay band would be required. One trade union (n = 1) further highlighted that in-work progression is an area in which the Plan is quite weak. The focus seems too heavily weighted towards getting people from Black, Asian, and Minority Ethnic backgrounds into employment and onto apprenticeship programmes. However, there is a lot of evidence to suggest that an equally big issue is the experiences for people when they are in-work, and the opportunities to progress into better, sustainable employment. This requires better information, advice and guidance for people in the workplace, employer awareness and the engagement of collective bargaining and Fair Work outcomes to negotiate for a reduction of in-work barriers.

105. One trade union (n = 1) highlighted that, although the Plan discusses an increased percentage of Black and Asian individuals in employment, this does not guarantee job satisfaction or good work. It was important to consider these requests for increased diversity alongside the current position of Black, Asian, and Minority Ethnic workers. Diversifying poorer paid, low quality and insecure jobs is not the

intended outcome of this work. Any increase in representation of Black, Asian, and Minority Ethnic workers must sit firmly alongside a commitment to improve the quality of work available. Monitoring thus needs to focus on the worker *experience* as much as simple measures of quality and job outcomes.

106. One individual respondent (n = 1) highlighted that organisations may need support to unpick policies, processes, procedures, norms and attitudes operating within and across institutions.
107. One third sector network (n = 1+) asserted that the Plan should contain more specific goals to include accountability expected from employers on gathering data and what they are going to do about the findings. One other organisation (n = 1) asserted that employers should be encouraged (and required when receiving public funding) to transparently report the ethnic diversity of their workforce, targets and how they are performing against those targets. One public sector organisation (n = 1) stated that Welsh Government should encourage all companies and employers across all sectors in Wales to increase diversity in senior positions by: setting and reporting against targets; advertising widely; using positive action to promote or recruit equally qualified diverse candidates. Welsh Government should seek to address gender, ethnicity and disability pay differences, occupational segregation and employment gaps, and address unfair treatment, bullying and harassment in the workplace. One trade union (n = 1) highlighted that, although the Plan aims to improve data with the goal to review / evaluate data, this is not proactive enough to achieve the wishful outcomes of improved performance levels, employee satisfaction and awareness of career choices. One third sector network (n = 1+) asserted that data needs to be collected periodically so it becomes standard practice.
108. One health organisation (n = 1) suggests introducing a mechanism such as the Rooney Rule to encourage diversity of interview and stakeholder panels for senior management recruitment.
109. One third sector organisation (n = 1) stated that there is too much focus on training of the existing workforce, rather than transforming and making that workforce representative - a goal should be added about achieving a more representative workforce at all levels amongst employability programme providers and commissioners. Welsh Government funded programmes should be mandated to achieve a locally or nationally (whichever is higher) representative workforce by 2030 – this is enough time to achieve and implement this and will prompt urgent action.
110. One trade union (n = 1) highlighted that [one in three apprentices are paid below the legal minimum rate](#). They did not want to see greater diversity pursued without also addressing issues with the quality of employment.

Lived experience of racism at work:

111. Community organisations (n = 3+) and one third sector network (n = 1+) respondents detailed their experience of racism in the workplace, some participants were harassed, and others had unfair treatment in academia and the NHS.

Respondents highlighted that it remains an issue to get promoted to senior level and even if promotion is given then unfair treatment may continue with excessive workload and expectation. Some respondents stated that they did not feel safe in their role. Some examples of the experiences people shared are set out below:

- a. *"I'm ashamed to say but I'll say it to you that I have acted more White in the past to get a job. I changed my accent and pretended my social activities were going out after work and playing golf. I did get the job but no promotion."*
- b. *"During a Skype meeting, we were asked to hold a minutes' silence for George Floyd. These civil servants did not hold back, and it became an All lives matter scenario. People typed horrific things like, "why can't they just leave the country," as a person born and bred here, I can't go back to a place unknown to me. Even with their names and job positions posted next to their horrific comments, management didn't do anything. Culture will never change until management change it."*
- c. *"I work for the MoD, everyone here either has a military background or very much into that lifestyle even as a civilian. So, it is a very standoffish place in which I am forever having to explain I am a part of the mix even though I am a brown Muslim male."*
- d. *"As a person who has previously raised grievances for comments about my religious beliefs, never has management once ever truly intervened and made a decision in which my interests were taken into consideration. They have never questioned the office culture, to resolve this problem would have meant to acknowledge the widespread racism and ignorance the office culture inhabits."*
- e. *"This action plan is 'performative' and I'm being kind. As a Muslim woman who wears a hijab, I'm constantly dismissed and regarded as low intelligence or oppressed by employers, health care professionals and in social settings. Judging by the questions in this questionnaire we have a long way to go before issues are even properly recognised let alone tackled!"*
- f. *"The lack of diverse workforce can make it difficult for racism in such situations to be addressed. Victims are left [to] explain why they feel the situation is racist to individuals who are not able to understand their perspective."*

112. One third sector network (n = 1+) and one trade union (n = 1) stated that what is missing from the Plan is the protection and support of ethnic minority workers within the workplace. For example, if a healthcare worker were to refuse to treat a patient who was being racist towards them then several further questions would then need to be answered; what protections are afforded to the healthcare worker to do this? How does this interact with their professional and ethical contracts? Who ultimately decides if this is racism, the healthcare worker, a manager, or a health board? How is the worker supported when they have made a judgment call on racism? They indicated that addressing these issues be done with the help of unions. Respondents also asserted that there needs to be a specific 24 / 7 helpline to report and support.

Training:

113. One public sector organisation (n = 1) stated that ensuring that the public sector workforce receives cultural competence training, which is updated throughout their careers, is a must. This training should be quality assured, co-designed and co-delivered by Black, Asian and Minority Ethnic people. Clear evaluation mechanisms must be designed to evidence impact of such training on those receiving care and support and unpaid carers. Cultural competence should be seen as gateway training and continuing education and learning, which deepens knowledge and understanding in anti-racism / intersectionality and must be made mandatory on all social work programmes and in post qualifying education and training. Evidencing having undertaken cultural competence and anti-racist education (to include the difference it makes to practice) should be made a mandatory requirement for social work registration, in order to have the greatest impact. They noted that the teaching of anti-racism on social work curricula has been ad hoc at best and non-existent at worst. Social work students and practitioners will rarely encounter any education or learning on anti-Gypsy, Traveller or Roma racism when being taught anti-racism, Welsh Government must change this. The importance of this was supported by third sector organisation and networks (n = 2+), one health organisation (n = 1), one trade union (n = 1) and one LA (n = 1). The importance of all public body employees having mandatory training and this training not being a 'quick fix' and the importance of top-up sessions to ensure people do not go back to their old ways was highlighted. As was the importance of training being delivered by people with lived experience and the importance of time being put to one side for employees to attend such training. It was suggested that Welsh Government should lead on providing workplace education and training to develop a common approach across public bodies e.g., with an E-Learning module for staff and another targeted at councillors, possibly even virtual teams training / raising awareness sessions as a priority and face to face training especially for managers and for those who find e-learning difficult.
114. One LA (n = 1) pointed out that the capacity of suitable training providers to deliver may be limited if all public bodies have the same goals to achieve. This will mean that all LAs will be seeking expertise from organisations such as EYST, Race Council Cymru and Race Equality First – will their already limited resources be in a position to support all public bodies in Wales?
115. One third sector organisation (n = 1) asked will private counselling colleges be eligible for the anti-racism awareness training as an education provider?
116. One trade union (n = 1) suggested a further action around the creation of awareness training for provider networks. Further Education and Welsh Bac providers could do more to display their commitment to this. It would be useful to consider potential targeted recruitment within careers agencies and learning providers themselves, to increase the number of education professionals from Black, Asian, and Minority Ethnic backgrounds for example.

Social Partnership and Fair Work:

117. Third sector organisations and networks (n = 2+) welcomed the inclusion of anti-racist employment practices in the fair work agenda but asked for a clear commitment to adequate representation on the 27-member Social Partnership Council (SPC). Respondents highlighted that the proposed structure of nominated representatives carries with it a danger of unequal representation. It was important that the SPC reflected the principle of minoritised people being able to speak for themselves, thus increased voluntary sector representation is essential – a single rep from WCVA cannot adequately cover all the groups they will be required to represent. Representation from the non-unionised workforce, which is disproportionately composed of ethnically minoritised workers, was also greatly needed. Giving the trade unions all nine places allocated for the workforce, despite minority ethnic membership of trade unions being under 9 per cent, excludes these workers from developing the fair trade and procurement agenda, and is indirectly racially discriminatory. A huge range of voices will potentially go unheard by the SPC if Welsh Government do not ensure that the SPC better represents the diversity of Wales.
118. LAs (n = 2) stated that there is an opportunity, as this work develops, to integrate social partnerships and fair work policies within the REAP and to strengthen links with regulatory bodies. One third sector organisation (n = 1) illustrated that there has been little progression towards diverse partnerships working collaboration with LAs due to lack of trust and cultural misunderstanding. They stated that when it comes to fair work, there is little evidence of it with regards to the Black and Asian diaspora living in Wales. One trade union (n = 1) asserted that fair work and social partnership structures should have a specific role to pay consideration to equality. Council structures should include a position to enhance equality scrutiny and to be able to pursue this aim without having to balance other elements.
119. One trade union (n = 1) highlighted that if Welsh Government intends to use public procurement and commissioning processes as a lever to achieve fair work and to achieve race equality, then existing contracts that run beyond 2025 will be a barrier to achieving the necessary change. Commissioning bodies cannot unilaterally change the terms of an existing contract, yet that same contract may perpetuate inequalities.
120. One trade union (n = 1) asserted the importance of offering fair work needs to be emphasised at an early stage of all new projects. Greater transparency and ongoing monitoring will be needed to ensure that fair work standards are upheld in practice. They also stated strongly that Welsh Government must fully implement the Fair Work Commission's recommendations and ensure that any new green jobs created by organisations receiving public funding meet the Fair Work Wales Standard(s). This includes any organisations receiving funding as part of any post-Covid recovery job guarantee schemes.
121. One third sector organisation (n = 1) explained that with the struggles experienced seeking 'Fair Work' comes the difficulties actually finding work with 'Fair

Pay'. Community organisations (n = 1+) queried how Welsh Government will ensure accountability on developing structures and implementing change within the organisations that will improve fair work and outcomes for ethnic minority groups? They also asked whether, in tackling discrimination from recruitment practices, and workplace, will there be some sort of penalty to ensure adherence or a safety net for the members of Black, Asian and Minority Ethnic populations?

Entrepreneurship:

122. One third sector organisation (n = 1) asserted that there needs to be an increase in social partnerships working across Black and Asian communities, to help identify investment opportunities, and support new ways of working collectively, promoting Black and Asian led projects and incubating social business. Support for emerging Black and Asian businesses across Wales would help to build confidence and trust. It would also help to promote Black and Asian leadership and influence young people living in Wales to pursue their Further Education and career path to enable labour force retention.
123. One third sector organisation (n = 1) welcomed the opportunities for entrepreneurship but stated that many will face issues around access to finance and the Plan lacks detail on how these barriers will be addressed.

Asylum seeker and refugees seeking work:

124. Third sector organisations and networks (n = 3+) asserted that Welsh Government should:
- a. Improve access to employment for asylum seekers and refugees and allow asylum seekers to work. Gainful work is crucial to the successful integration of new refugees, facilitating progress within their own lives, supporting their families, contributing to the Welsh community, and improving their mental health and well-being after an invariably difficult period. Post-pandemic pressures on the labour market have increased barriers to employment, several issues need to be addressed including orientation and language support, increasing awareness of support available and the need to maintain and scale up existing support, for example through ReStart and Careers Wales. Many refugees bring with them significant skills, qualifications and experience and therefore special effort is required to create career pathways that recognise and build on these. Employment support should be detailed in the Plan, including what help can be offered from the point of arrival, especially as ReStart is currently only funded until the end of the year.
 - b. Provide support for asylum seekers and refugees to write a CV and personal statement to increase their chances of obtaining employment.
 - c. Provide asylum seekers and refugees with information about the apprenticeship programmes available as there is a common perception that apprenticeships are just for young people.
 - d. Expand the WARD programme (Wales Asylum Seeking and Refugee Doctors), which supports doctors to retrain while they are awaiting a decision on their asylum claim, to other professions. This could include other roles in

- the health sector, construction, teaching, hospitality, IT, agriculture and interpretation and translation services. This will enable people seeking asylum to have prior experience and qualifications recognised, retrain, and register with professional bodies in order to work as soon as possible.
- e. Provide skills assessments, clear guidance on volunteering and signposting to training and volunteering opportunities. Continue to advocate for lifting the ban on working for people seeking asylum.
 - f. Provide more targeted support to promote self-employment and help refugee-led businesses to start-up and grow.

Apprenticeships:

125. Community organisations (n = 1+) explained that providing opportunities like apprenticeship schemes for ethnic minority people will help them level up their opportunities. Third sector organisations and networks (n = 2+) highlighted that many apprenticeship schemes are just for people under the age of 30, however, and asserted that apprenticeships need to be accessible for all ages. Third sector organisations and networks (n = 2+) and one public sector organisation (n = 1) asserted that the quality of apprenticeships must be monitored to ensure that if apprenticeships are not working then they are improved or scrapped. Apprenticeship providers must be held to account, including through funding mechanisms, by requiring them to set and meet targets for improved participation from under-represented groups, and to use positive action provisions to meet these.
126. One trade union (n = 1) highlighted that it is important that the Employer Incentive Scheme Fund, when it runs out, is replaced with an incentive scheme aimed specifically at incentivising recruitment from under-represented groups to address the current issues with diversity within apprenticeships.
127. One public sector organisation (n = 1) highlighted that there is often a lack of data collected on older people in the workforce, and that the actions in the Plan need to take this into account so that older people are part of the considerations when reviewing the effectiveness of certain areas of work, such as access to apprenticeships. The REAP should address specific issues that older Black, Asian and Minority Ethnic workers face both whilst in employment and when seeking it. Commitments to provide support and training for employers to better identify gaps in career development, training, and retraining opportunities for older workers would be welcomed as well as reference to mid-life MOTs to ensure that as many people as possible can consider their options as they get older.
128. Third sector organisations and networks (n = 2+) asserted that there needs to be a clear path to progression in apprenticeships if they are to work. There is also a need for properly trained careers advisors in schools, colleges and job centres and employment mentors. Third sector organisations and networks (n = 2+) also highlight that some parents do not have information about the apprenticeship programmes on offer and they should be informed. Also, some parents want their children to become

what they want, not what the child wants. Respondents asserted that parents must be educated about apprenticeships, their value and what their child can achieve.

129. Individual respondents (n = 2) and third sector organisations and networks (n = 2+) would like to see the assurance of accessibility to apprenticeships covered in the Plan. For example, if a refugee, the person would be unlikely to have standardised qualifications in order to access the apprenticeships. There needs to be recognition of this, and people must be allowed to bring with them their qualifications, rather than being forced to retake exams or be supported to attain the level needed to access it. This may also need to be considered in line with traineeships and whether there can be positive measures put in place.
130. One third sector organisation (n = 1) felt that one EDI role within apprenticeships is a drop in the ocean and alludes that the scale of the challenge here has not been fully taken on board.
131. One third sector organisation (n = 1) stated that there must be greater emphasis on encouraging young people from diverse ethnic backgrounds to access and become involved in training and apprenticeships within Wales's creative sector. One other organisation (n = 1) however, highlighted that routes to employment should not be limited to apprenticeships as transferable skills are prevalent and can see leaders in one field move to another, accelerating pace of change. Apprenticeships do not work for every sector (e.g., they are very limited and difficult to apply for within the creative industries that relies heavily on freelancers, small companies and project-based work).

Other comments in this section include:

132. One health organisation (n = 1) highlighted that in order for the employment ambitions to be achieved by 2030, pace is needed in many of the other policy areas to support this vision. Third sector organisations and networks (n = 2+) asserted that in order for employment and income equity to be addressed, we need to understand the barriers of different groups accessing childcare, such as through engaging with communities within Local Authority Childcare Sufficiency Assessments. It was suggested that Welsh Government should ensure that people are held accountable – for example, name and shame places or put some kind of punishment in place for noncompliance such as withdrawing funding or restricting operations in some way.
133. One third sector organisation (n = 1) stated that the Plan should recognise the key learning and best practice that groups that help deliver employability activities to the Black and Minority Ethnic population can provide. Such groups as Ethnic Youth Support Team have a deep understanding of the barriers faced by Black and Minority Ethnic people in accessing work, and this in turn helps to address cross-cutting themes such as poverty, social inclusion and sustainability.
134. Third sector organisations and networks (n = 2+) suggested there needed to be a more balanced commentary on unsatisfactory experiences of minoritised groups in relation to their interactions with Trade Unions.

135. One trade union (n = 1) stated that the idea of an equality challenge fund was positive, respondents would be keen to see more details on this, and ensure it was open to employer / union / provider / third sector partnerships and not just employers.
136. One trade union (n = 1) agreed with the renewed focus on family learning but highlighted that there is little funding for family learning programmes and asserted that any commitment would also have to be met with an increase to funding for the Adult Community Learning sector to allow programmes to be set up.
137. One health organisation (n = 1) identified positive actions that many employers can progress such as: incorporating objectives for senior leaders into their annual reviews; reviewing whistleblowing policies and procedures; reviewing attraction strategies; explaining anti-racist behaviour expectations in recruitment and induction practices; reviewing learning and development opportunities and how these are promoted; making a wide range of apprenticeship opportunities available and engaging with local groups to understand the barriers and how to increase accessibility; reviewing current data to assess adequacy and ensuring there are robust data sources to track progress; working with trade union groups to ensure their working practices, policies and procedures are diverse and inclusive and representative of their membership; reviewing social care practitioner training and establishing robust data sources to track progress and engagement with groups to support this; consult and engage on recruitment, retention and progression within social care with development of career progression pathways supported by coaching and mentoring and robust data to track; and using data to inform equality impact assessments.
138. One third sector organisation (n = 1) suggested that, alongside private and third sector employers, public sector employers should take specific steps to progress LGBTQ+ inclusion and race equity, including: having clear policies and procedures to prevent and address anti-LGBTQ+ and racist discrimination, including that experienced by LGBTQ+ people who are Black and of colour; implementing all-staff LGBTQ+ and race equity-inclusive diversity and inclusion training (which explicitly includes the specific needs and experiences of LGBTQ+ people who are Black and of colour); fostering collaboration between LGBTQ+ and race-specific staff networks; and providing clear senior leadership, expressed through internal and external communications reflecting the full diversity of Black and of colour LGBTQ+ communities, highlighting the importance of, and relationship between, LGBTQ+ inclusion and race equity.

Health:

139. Health organisations (n = 16), public sector organisations and networks (n = 5+), trade unions (n = 6), third sector organisations and networks (n = 20+), community organisations (n = 4+), individual respondents (n = 8) and LAs (n = 5) have provided comments on the health section of the Plan.

Existing Policy / Strategy and Resources:

140. Third sector organisations (n = 3) asserted that Welsh Government should implement the actions in the *'Travelling to Better Health'* guidance document in all healthcare practices in Wales.
141. Health organisations (n = 3) highlighted that NHS bodies are already required to use workforce data in the development of their Strategic Equality Objectives and Action Plans as well as the legal requirement to produce Annual Equality Monitoring Reports.
142. One health organisation (n = 1) stated, in relation to the proposal for an associate board programme where people from ethnic minority communities are invited to join a health board for a 6-month period, that learning should be taken from the previous 'All Aboard' programme which did not necessarily lead to increased diversity on the board. They also suggested that the term 'Associate Board Programme' will need re-consideration to avoid any potential confusion as Associate Board Members are already a feature of Health Boards in NHS Wales.
143. One third sector organisation (n = 1) highlighted Diverse Cymru's Certification Scheme, which is a unique scheme that focuses on practice and ensures that managers are on board, that Black mental health is always on the agenda at meetings, reception areas are always welcoming to everyone by including a 'Welcome' sign in different languages to make the practice inclusive etc.
144. One third sector organisation (n = 1) highlighted the valuable support the third sector brings; the sector has also underlined the need for NHS services to take a much more person-centred approach, with more emphasis on overcoming language barriers and cultural gaps affecting asylum seekers and refugees.
145. Health organisations (n = 4) stated that the Equality Act 2010 originally included 3rd Party harassment, which was then removed along with the socio-economic duty at the time. Wales have now introduced the socio-economic duty and respondents feel that Welsh Government should consider guidelines in respect of third-party harassment as this would protect NHS staff facing abuse by allowing NHS bodies to refuse services that are not life threatening. Respondents highlighted that England have brought such guidelines in and that this would support Welsh Government in challenging public racist behaviour towards NHS staff. The Plan should recognise that NHS staff are often victims of hate crime while in their workplace and that this can be instigated by members of the public. One health organisation (n = 1) also asserted that the socio-economic duty and associated impact assessments provide a useful tool to identify actions to identify and mitigate for socio-economic disadvantage and adverse equality impact. One individual respondent (n = 1), health organisations (n = 3), one third sector organisation (n = 1), one trade union (n = 1) and community organisations (n = 1+) further asserted that there needs to be more support and protection of ethnic minority workers who experience racism and this needs to be outlined more practically in the Plan. Respondents asserted that there should be a policy against patients who abuse /

attack health care staff with racist motives; respondents are frustrated that the Plan does not explicitly state how it will address this. Guidance is needed for NHS Wales staff on what to do if they are a victim or witness of racism and the steps which can be taken. The Plan should include an action to develop an NHS Wales policy to deal with racism from patients and maintain a zero-tolerance approach. One trade union (n = 1) also stated that the racism Black, Asian and Minority Ethnic health workers experience must be better researched and better understood – 58.4 per cent of their Black, Asian and Minority Ethnic members stated they have experienced overt or covert racism in the workplace. One third sector organisation (n = 1) is concerned that there is no mention of accountability in tackling the racist bullying or racial discrimination NHS staff experience. Appropriate action is required to address all claims of racial discrimination and hate crime made by NHS staff which should be included in this section of the Plan.

146. Health organisations (n = 2) stated that the restricted input of delivery partners such as this health board to the actions for Health and Health Outcomes is evident in the distinct difference in the actions identified for Health and those identified actions for Social Care. This is despite recognition for a single health and social care system in Wales's 10-year Workforce Strategy, A Healthier Wales: Our workforce Strategy for Health and Social Care launched in October 2020. The very visible differences, if left as they are, could be seen as undermining this new approach. A good example of this is that there is a marked difference between Workforce Data and Intelligence and Workforce Data and Analysis. Respondents highlight that the development of the Single Integrated Outcomes Framework for Health and Social Care provides the opportunity to embed explicit measures aligned to the Plans outcomes and drive action at a range of levels, including via regional partnerships such as Regional Partnership Boards and Public Service Boards.
147. One health organisation (n = 1) and one third sector organisation (n = 1) stated that Welsh Government must implement the recommendations of the Birthrights Inquiry into Racial Injustice in Maternity Care (2021). Respondents also stated that a report on the current state of equity in maternal care in Wales should be published, along with improvement targets and followed by a specific plan.
148. One LA (n = 1) stated that area plans, and population assessments are currently carried out by regional partnerships under the Social Services & Wellbeing Act 2014 to identify and meet emerging needs. These regional plans, together with Local Wellbeing Plans have to fully address the rights of adults, children and young people to have their voice heard and to retain control over their lives and in pursuit of their own wellbeing outcomes. Such plans are now coproduced, but at the same time, there needs to be an acknowledgement that there are health and social care inequalities within these arrangements which have to be addressed, and additional resources may be needed to drive these changes. LAs and health boards need to share resources, including data, when evaluating how effective the whole system is in tackling specific inequalities and helping people achieve their wellbeing outcomes.
149. One individual respondent (n = 1) stated that the current Welsh Government policy is in line with the widely discredited Hostile Environment, a policy by the UK

Government, which includes charging patients for healthcare based on their immigration status. This system is indirectly causing discrimination against all ethnic minority groups. Welsh Government could set a brilliant example and promote anti-racism by dropping this policy which creates suspicion and mistrust between healthcare staff and the patient population and perpetuates racist ideas within society resulting in worse access to healthcare services for people belonging to ethnic minority groups, and reducing the focus on service provision, thereby dropping the quality and efficiency. This policy opens the door to racial profiling in secondary care and legitimises racist behaviour: Any person who looks or sounds 'foreign' may be liable to health care charges and is likely to be questioned accordingly. This constitutes discriminating behaviour based on ethnicity and is promoted by the existing policy. This policy leads to alienation and severely undermines the trust between patient and staff that is necessary for effective health care. Pressure on healthcare staff to identify patients liable to charges creates an atmosphere of suspicion and distraction among staff, with a negative impact on the quality of services. A move like this could be as momentous as the Future Generations Act, and all the actions set out in the Plan regarding Healthcare would be much more effective on this new anti-racist backdrop. The Welsh Government is striving to make Wales a nation of sanctuary - it must prove it by being truly anti-racist.

150. One third sector organisation (n = 1) stated that the Mental Health (Wales) Measure 2010, which has been in force for almost ten years, gives people receiving secondary services the legal right to a comprehensive care plan. The Plan provides an opportunity to discuss Social, Cultural and Spiritual needs – alongside a range of other needs, including housing, employment, etc., and provides a space to discuss culturally specific issues (language preferences, religion, etc.). However, they highlighted that, in practice, care plans have not been of a high standard and represent a missed opportunity to properly address patients' individual needs. As a priority, the Welsh Government should ensure that the care and treatment plan is properly implemented and that services which are individualised and sensitive to the distinct needs of each patient are provided. Part of this process should include training care coordinators to deliver effective care and treatment plans and exercise cultural competency.
151. One third sector organisation (n = 1) proposed Welsh Government re-examine the mix of legislation: the Mental Health (Wales) Measure 2010 and the Mental Health Act 1983 with a specific focus on patients with high needs from ethnic minority groups. This respondent also recommended Welsh Government initiate a process of fundamental review with patients and families and professionals to build on its record with the Mental Health (Wales) Measure and that this review focus on the specific group of those with serious mental illness, who are most likely to become subject to the Mental Health Act. A specific focus should also be placed on people from ethnic minority groups with serious mental illness, with the aim of preventing the need for compulsion. Such review should be led by people with lived experience, including a strong representation of patients and families from ethnic minority backgrounds.
152. One trade union (n = 1) welcomed the idea of anti-racism training but emphasised the need to use readily available resources such as the Guidance on

Caring for ethnic minority Women by Zeenath Uddin to facilitate such training, which could be funded by the Wales Union Learning Fund.

153. One public sector organisation (n = 1) stated that Welsh Government should:
- a. Ensure that the NHS Wales data dictionary is updated to reflect the 2021 Census ethnicity categories, particularly Gypsy, Roma and Traveller categories.
 - b. Improve mental health outcomes for ethnic minorities, including refugees and asylum seekers, and ensure that there is sufficient support available to them. Areas for improvement should be reflected in Together for Mental Health design and delivery. Such strategies must also address the disproportionately high number of Black people detained under the Mental Health Act.
 - c. Ensure that public health strategies are developed, implemented and monitored to acknowledge, understand and tackle the impact that factors such as poverty, poor housing and unemployment have on disproportionately negative health outcomes for ethnic minority people – including Coronavirus – and take steps to remove barriers to ethnic minority groups’ equal enjoyment of the right to the highest attainable standard of health.
154. One trade union (n = 1) highlighted that health boards may already be doing good work in coordinating learning, and there is a perceived weakness that they struggle to learn from best practice / pilots. Central coordination by Welsh Government to collect best practice and good outcomes would ensure a strong learning regime and an efficient rollout of the plan.
155. One trade union (n = 1) stated that Welsh Government may or may not have the primary legislation levers available to mandate racial discrimination and race equality reporting standards, but it could nevertheless lead the way in ensuring such processes are widely embedded and used effectively within its own systems; and also require all public bodies in Wales, including the NHS, to be able to demonstrate they have in place robust reporting processes as part of a wider EDI audit. Some of this may fall within The Well-being of Future Generations Act.
156. One trade union (n = 1) asserted that the impact of health inequalities must be monitored, and realistic and achievable targets to reduce them over time must be set. As called for in a UK-wide report published by the British Medical Association earlier this year [2021], this respondent wants to see the development of comprehensive cross-government strategies to reduce health inequalities as a matter of urgency. Such action needs to be part of a fully joined-up approach across public policy in Wales. This respondent wants to see more action to address issues such as smoking, obesity, physical inactivity and alcohol misuse alongside encouraging the uptake of active travel and sport. They would like to see included in this Plan a commitment to take forward the requirement for public bodies in Wales to undertake health impact assessments as introduced within the Public Health (Wales) Act 2017. Health impact assessments could play a key contributory role in helping to address health inequalities, they thus call for these particular regulations to now be brought forward and agreed with a degree of urgency. In their response they also asserted that addressing health inequalities must go hand in hand with policies aimed at

tackling all factors which contribute to them, including social determinants and those which may have a disproportionate impact on certain groups within society.

157. One trade union (n = 1) has been pressing for the establishment of *Freedom to Speak Up Guardians* along the lines of the role which has already been established within the NHS in England. They welcomed that this is now being actively considered through the Welsh Partnership Forum, with a working group. This new role is specifically recognised by being referenced within the plan.

Workforce – staff and leadership:

158. Trade unions (n = 3) highlighted that their members have fed back that there is a visible lack of ethnic minority representation throughout the senior structures of the NHS. One third sector network (n = 1+) highlighted that 75 per cent of their members / respondents want to see Black-led services. Health organisations (n = 2) asserted that workforces must be representative of the demographic society we have today. Health organisations (n = 2) also asserted that conscious efforts need to be made to promote employment opportunities amongst ethnic minority groups: this includes job placements, volunteering, apprenticeships, promotions, training schemes and honorariums. The recruitment process must be fair and inclusive. One of these health organisations (n = 1) welcomed Health Education and Improvement Wales leading the work with partners to identify plans and targets to increase reach and recruitment from people with ethnic minority backgrounds as part of the workforce strategy. This health organisation (n = 1) and one trade union (n = 1) also asserted that this action should be extended to include addressing the barriers that Black, Asian and Ethnic Minority employees face in terms of career progression. This would include the provision of mentoring / training opportunities, so they are in the same place as others when it comes to interview and to help them achieve their potential at work. It should be ensured that each Health Board / NHS Trust in Wales provides work-observation and shadowing opportunities for 16-18 years olds from disadvantaged Black, Asian and Minority Ethnic families so that they could make an informed choice of progressing in Health Care and allied courses in Further and Higher Education institutions, including for dentistry, medicine, pharmacy. Another health organisation (n = 1) asserted that a race mentorship scheme which provides support would encourage young adults to take up more careers in health. Another health organisation (n = 1) asserted that the Black, Asian and Minority Ethnic outreach workers in each health board need to be extended to all NHS organisations and this will also require funding.

159. One trade union (n = 1) questioned if it is right for the Plan to aim to have an NHS Wales workforce that reflects the population it serves. Elements of the workforce may already have a higher proportion of people from ethnic minorities, or those whose origin is from outside the UK, than amongst the general population. This is something that may vary in certain parts of Wales. The commitment as written could actually have perverse consequences if applied literally, leading to a reduction in the proportion of the workforce who are from ethnic minorities or whose origin is

from outside the UK. Respondents thus suggest the wording for this goal be revised accordingly.

160. Health organisations (n = 2) and one trade union (n = 1) stated that the Plan should stipulate that all health boards must ensure good quality local inductions for all new starters and those returning to practice, to include: gaining access to places and systems; a physical orientation of the setting; team introductions; gaining knowledge of how things work; familiarisation with common cases / procedures; and understanding what is to be expected. Making Welcome to the UK Practice a mandatory part of induction in Wales, as in Northern Ireland, would be a critical step in ensuring new starters new to the UK are supported in their role. Induction programmes should make employees aware of cultural differences and how to deal with any issues related to harassment, bullying, victimisation and race. One health organisation (n = 1) also asserted that all Black, Asian and Minority Ethnic doctors should have access to a Race and Equality mentor or guardian or buddy. Other comments made on these issues included a suggestion to help ethnic minority and International Medical Graduate (IMG) doctors develop broader networks through formal mentoring or coaching programmes or informal networking events with colleagues across Wales to encourage informal mentoring relationships to form. One health organisation (n = 1) also wanted to see health boards setting up schemes to promote and facilitate mentorship for Black, Asian and Minority Ethnic doctors, particularly African and African Caribbean doctors in Wales to be mentored and encouraged to take up senior leadership roles. One trade union (n = 1) added that additional support and induction should be provided to staff who have graduated and / or trained outside of the UK.
161. One health organisation (n = 1) stated that visibility and personal development opportunities could be achieved by publishing race pay gaps and action plans, similarly, to gender pay audits.
162. One health organisation (n = 1) and one individual respondent (n = 1) stated that there should be a move away from a single route such as NHS jobs for recruitment purposes which can create barriers. Diversity panels for senior level recruitment should be introduced and interviews and appointments at top levels should be recorded and scrutinised by independent panels. One trade union (n = 1) stated, that to truly tackle ethnic disparities within the workforce, it is necessary to have a more representative ethnic diversity amongst medical and organisational leadership within the NHS in Wales. This should be achieved alongside more transparent recruitment and promotion systems in all organisations employing doctors to help drive cultural change within all organisations.
163. One individual respondent (n = 1) stated that every board meeting must have a paper on EDI which should publish number of complaints, General Medical Council referrals of ethnic minorities etc., and every Chief Executive should mandatorily give an account every quarter about this information to Welsh Government as religiously as they appear before a Public Accounts Committee. The seven Health Boards should roll out the networks and the structure of this should be designed and regulated led by Welsh Government, not the Health Boards. Appointments to the

local health board networks should be made by the EDI committee, not the health boards. Networks should be fully resourced and properly structured and become the local Board Advisory Group to the health boards.

164. One third sector organisation (n = 1) asserted that the appointment of one diversity champion risks removing the holistic EDI responsibility from the chair and entire board. It should be clear that this role is advisory, and all board members retain responsibility for implementing the REAP.
165. Health organisations (n = 2) stated that the Plan should mandate and define the role of Board Equality Champion and asserted that the role of this appointment needs to be defined in terms of overseeing fairness in recruitment, proportion of complaints and disciplinary referrals against ethnic minority staff and monitoring race related incidents. This is because there is a high representation of ethnic minority doctors in disciplinary procedures both within health boards and externally. There exists an undercurrent of bullying and harassment of ethnic minority staff and there is under-reporting of race related discriminatory incidents. One trade union (n = 1) also highlighted that medical schools across the UK have been grossly under-reporting racism incidents, with only half of medical schools even collecting data on students' complaints about racism and racial harassment. Respondents thus asserted that each health board should report on how many complaints of racism they have received and how many they have resolved.
166. Additionally, one trade union (n = 1) was very concerned about the use of non-disclosure or confidentiality agreements which are often used to sweep incidents of racial discrimination under the carpet of organisational respectability, this also occurs in sexual harassment cases. This respondent asserted that it would be a powerful lever for Welsh Government to direct all its departments and associated or arms-length bodies – including local health boards and special trusts – to ban their use in any discrimination cases, and similarly to legislate or direct LAs to do the same. The Cabinet Office recently provided helpful guidance on the matter.
167. One trade union (n = 1) stated that data should be collected and published on the application of HR policies so that any disproportionate impacts on ethnic minority staff are highlighted and addressed. The extent to which disciplinary processes within the NHS in Wales, as well as within other Welsh public services, may be being disproportionately applied against ethnic minority staff should be considered. This is something which might only come to light through the routine publishing of data on how such processes are being applied. This should include formal referrals of doctors to the General Medical Council and include the usage of local policies within the NHS in Wales, such as the *Upholding Professional Standards in Wales* disciplinary procedure which applies to medical and dental staff. This respondent also suggested incorporating commitment to aggregate any emerging themes from exit interviews that are undertaken with staff leaving the NHS so lessons can be learned and acted upon. One health organisation (n = 1) also stated that equality, diversity and inclusion must inform part of staff appraisals, professional development reviews and supervisory structures to directly inform and reform HR policies and procedures.

168. One health organisation (n = 1) welcomed the use of *Freedom to Speak Up Guardians*. These persons should work outside the organisation and be easily accessible to ethnic minority doctors to address issues at an early stage. Health organisation members find difficulty in raising issues and concerns which affect their wellbeing. It was highlighted that these matters are usually not well resolved. One trade union (n = 1) noted that, in the *Freedom to Speak Up Guardians* model employed in England, the guardians are dedicated members of staff who have no reason to fear for their own roles if raising concerns on behalf of others with management and other staff. A role of National Guardian has also been created with the power to raise matters directly with government, including with ministers. They supported a similar model being adopted in Wales.
169. One trade union (n = 1) asserted that NHS Wales must promote equality for all health and social care workers in their places of work. They suggested this could be done by assessing data on the experience and outcomes of different groups of health and social care professionals – for instance in career progression, leadership roles, access to training and personal development, and by engaging with staff to understand their experiences and barriers they face and developing guidance to support employers to stamp out discrimination. Race equality issues should also be considered as part of the periodic review of HR policies, in consultation with health and social care staff representing a broad range of people with protected characteristics.

Training, education, professional development and cultural awareness:

170. Third sector organisations and networks (n = 3+), trade unions (n = 2), community organisations (n = 2+) and health organisations (n = 3) highlighted that all health care providers must receive adequate training on key cultural norms / cultural awareness to be able to provide care for all cultures, for instance, through Diverse Cymru's Cultural Competence training. Eighty per cent of participants in community organisation consultations (n = 1+) stated that it is important that NHS staff are supported with mandatory training to better understand anti-racism and cultural competency. Intersectionality must be a part of this training and such training should include accounts of lived experience. Community organisations (n = 1+) highlighted that health providers cannot be trained in what *all* people of any ethnic group will want / need. They need instead to be trained to ask and then have the resources to provide what is needed. The importance of addressing these fundamentals in this section of the Plan was highlighted and the current lack of detail noted as a critical gap. It was further noted that the outcomes of the Plan will rely heavily on what kind of training is given and how and who monitors plans, practices and complaints. One health organisation (n = 1) highlighted that training will only work if people are willingly to participate and commit to it – it is not sufficient to just make this mandatory and a tick box exercise. The benefits of training need to be audited and regularly reviewed to see if it is embedded into practices. Individual respondents (n = 2) echoed this, stating that a lot of training attempts to, “*teach staff how to suck eggs,*” cautioning that, if a teaching module on anti-racism is embedded within mandatory training, it will be another tick box exercise.

171. Health organisations (n = 2) asserted that there is a need for a ‘stand-alone’ anti-racism training module because it is unlikely that inclusion of anti-racism within the ‘Treat Me Fairly’ module will be sufficient. They also highlighted that mandating a requirement for all staff to undertake the e-Learning programme may not align with staff learning styles or access needs. Furthermore, they stated that, whilst anti-racist training will be critical to success, there are concerns about the increasing demand on clinical staff, in particular, to complete the ever-expanding requirement for mandatory, statutory and specialist training and the pressure this places on those delivering frontline services. One third sector organisation (n = 1) asked will there be an expectation for partners (Helpforce Cymru) to meet the same anti-racism standards and goals as the NHS and will there be a chance to receive the same training? One health organisation (n = 1) also noted that members of recruitment panels also require equality, diversity and inclusion training.
172. One individual respondent (n = 1) and one third sector organisation (n = 1) stated that health professionals need training on specific conditions that are more prevalent in ethnic minority populations, e.g., sickle cell anaemia, and diseases that different minorities find difficult to deal with due to personal and psychological issues or because their culture does not allow them to talk freely and openly (e.g., mental health support, Autistic Spectrum Disorder etc.). One trade union (n = 1) echoed this, highlighting that the British Medical Association has long held concerns about the almost complete lack of focus on ethnic minority patients and populations in clinical teaching. Diversity in the medical curriculum must be addressed; such changes are also part of creating an inclusive learning environment as students and staff should be able to see themselves and their communities represented in what and how medicine is taught.
173. One trade union (n = 1) emphasised the importance of training midwives to understand pain thresholds in Black birthing mothers and for action on the higher fatality rate of Black women in pregnancy.
174. One trade union (n = 1) highlighted the importance of role models, especially for ethnic minority medical students, noting that it is important to ensure proper representation of ethnic minority citizens, both across the teaching faculty and in the medical school curriculum. Ethnic minority doctors are under-represented in academic medicine and specific measures should be taken address this imbalance. In relation to the NHS in Wales, significant and appropriate funding needs to be allocated to health boards and NHS trusts to ensure their obligations within the Plan are appropriately resourced, including any requirements for training.

Comments on the Workforce Race Equality Standard (WRES):

175. Health organisations (n = 4), One third sector network (n = 1+) and one trade union (n = 1) welcomed the introduction of the WRES. Comments included that the WRES must not focus on just race alone and should consider intersectionality. It was noted that Welsh Government should also consider the impact of the WRES in England to ensure that the WRES adopted in Wales learns the lessons from other

UK nations because health organisations (n = 4) and one trade union (n = 1) were mindful of English colleagues' experiences of focus on metrics and targets, rather than cultural awareness, curiosity and understanding. One health organisations (n = 1) suggested the implementation of a Welsh equivalent of WRES – WWARS (Welsh Workforce Anti Racist standards), to help NHS organisations set indicators of workforce equality and continually review their data against the set indicators. Another health organisation (n = 1) suggested all standards used in NHS England should be introduced in Wales, rather than introducing a WRES. Another health organisation (n = 1) wanted to ensure that that all health professionals will be included so that the standard is fully inclusive and designed to highlight the race inequalities within different sections of the healthcare workforce. This health organisation also stated that Welsh Government should develop a separate Medical Workforce Race Equality Standard (MWRES) specific to doctors – as they have done in England. They believed this standard would provide Welsh Government with the tools to monitor progress over time and thereby ensure that the Plan is fit for the future.

176. One trade union (n = 1) asserted that it is essential that trade unions are involved in the development of a WRES because unions have a key role to play in ensuring compliance through holding employers accountable. The WRES must be independent and strategic delivery partners must be agreed through consensus. This respondent has experience of working with Race Equality First and believes they should host the independent delivery of the WRES. This respondent also asserted that WRES should apply across both health and social care and highlighted that, in England, those Health Boards that have better race indicators as employers tend to perform better overall across the board. The WRES should be issued for full separate consultation.
177. One health organisation (n = 1) suggested an external body that audits health boards regarding their anti-racism policy should be set up. It should be independent so doctors can go outside of their board to get a fair hearing, justice and seek advice.

Data, Intelligence, Research and Measurements:

178. Health organisations (n = 3) and one trade union (n = 1) stated that data on workforce ethnicity, including a breakdown by Agenda for Change grade, must be collected and published. One health organisation (n = 1) stated that the menopause should be considered in ethnic minority workforce research. Health organisations (n = 2), one public sector organisation (n = 1), one trade union (n = 1) and third sector organisations (n = 3) stated that targeted interventions to improve disaggregated data quality and capture and work towards ensuring professionals (and patients) feel safe and confident to provide ethnicity data and have a greater understanding of why the information is needed, is needed and will lead to greater trust. Robust data capture systems are an essential cornerstone of developing an anti-racist Wales. Without reliable data capture mechanisms, it is difficult to measure the scale of the problem nor measure the effectiveness of any intervention. It was suggested that Welsh Government should mandate ethnicity data collection and recording as part of routine data collection systems. One health organisation (n = 1) stated that such data

should be routinely collected and published in the application of HR policies, such as disciplinary policies. One third sector organisation (n = 1) stated that change needs to be measured by: looking at the number of ethnic minorities working in the NHS and comparing the current number of ethnic minorities with the number in ten years, by the number of racist incidents that are reported, through doing a survey on whether ethnic minority people have more confidence to go to hospitals and GPs in a few years' time, and, by reviewing achievement of the goal regularly and not waiting for ten years before reviewing the outcomes.

179. One individual respondent (n = 1) and one health organisation (n = 1) stated that anonymous annual surveys should be encouraged in each health board asking staff of their experiences of racism in that year. They also suggested Welsh Government should ask health regulators (General Medical Council / Nursing and Midwifery Council) to publish statistics each year with a breakdown by race and ethnicity e.g., how many referred. If any disparity is found, action must be taken on the basis of race and the reasons for the disparity should be explained.
180. One health organisation (n = 1) stated that an early intervention approach with commitment to resolving conflicts and to help employers and employees resolve conflicts by nipping problems in the bud should be adopted. There needs to be a sturdy system for reporting any race related incidents which should have an appropriate governance framework incorporated. This data should be published at least annually by all health boards and other healthcare employers.
181. Health organisations (n = 3), one third sector organisation (n = 1) and one public sector organisation (n = 1) stated that additional public health data is required to better understand health inequalities experienced by Black, Asian and Minority Ethnic people and to establish a baseline. One health organisation (n = 1) and one third sector organisation (n = 1) asserted that Welsh Government and NHS Wales must ensure that health and mental health data in relation to race, ethnicity and intersectional disadvantage is actively collected, understood and used to drive and inform continued improvements in services and to ensure the underpinning of equitable outcomes in service delivery. Targeted funding should be provided to collect qualitative and quantitative data and evaluate progress in these areas.
182. One third sector organisation (n = 1) highlighted that more research needs to be carried out on how the impact of adverse childhood experiences impact upon children (and later adults) from Black, Asian and Minority Ethnic groups to inform culturally appropriate services.
183. One health organisation (n = 1) highlighted that data quality for asylum seekers and refugees, for homeless people and for sex workers is particularly poor, making it difficult to evidence their unique problems other than anecdotally. Ethnicity data is not routinely collected or coded in healthcare along with whether an individual is a sex worker or Refugee / Asylum seeker or homeless, ethnicity and other intersectionality factors should thus be coded in primary care and on attendance. One third sector organisation (n = 1) further highlighted the need for people to feel reassured that data collection is going to be used to support them and not against

them – respondents highlighted that asylum seekers and refugees have significant anxieties about how their information will be used – it is important for the Plan to make sure that people feel confident to share their data.

184. One public sector organisation (n = 1) stated in relation to the action on data: *“We will explore changes to population health data collection, monitoring and reporting to ensure arrangements are in place to regularly collect and report data to support understanding and development of policies to provide equitable health and social care services,”* that this could be looked at a lot more broadly e.g., work towards having data on a range of issues such as employment, housing and education, which are all central from a population health and prevention perspective.
185. One health organisation (n = 1) stated that it is not clear who will lead on the action under Population Health Data and Intelligence and that this would be more a medium to long term action.
186. One health organisation (n = 1) stated that appropriate data collection from health boards and other NHS organisations is key to success of this exercise. Welsh Government explore novel ways of information gathering from Black, Asian and Minority Ethnic communities. Wellbeing surveys and data gathering exercises should be undertaken by Welsh Government independent of the health boards. This was demonstrated with completion rates of Welsh Government Covid-19 risk assessment tools.
187. Other suggestions included that future survey reports include a subgroup analysis of the different ethnic minority groups. Although there are common issues, there are striking differences in challenges faced by different minority subgroups. For example, successful complaint resolution at a local level.
188. One health organisation (n = 1) asserted that the goal around monitoring by the Joint Executive Team will be dependent on the data received and it is important that this data is firstly collected by health organisations and national support for specific actions here in terms of the quality of that information and this seems to be weak.
189. One trade union (n = 1) stated that collation of data alone is not enough, data cannot be presented back as a mirror – it must be dissected and specific and must be allied to strategy. It must be broken down on ethnicity to allow full engagement and understanding. Employers must not be allowed to hide behind large collections of homogenous data.

Language, Communication and Access to Services:

190. Third sector organisations (n = 4), one public sector organisation (n = 1), health organisations (n = 2) and community organisations (n = 1+) highlighted that language barriers (alongside cultural differences) prevent ethnic minority people from accessing and engaging with healthcare services and sustaining treatment. It was

noted that accessibility must be improved, and Welsh Government must ensure improved and free access and availability of interpretation services, including NHS and non-NHS services.

191. Participants from community organisation's consultations (n = 1+) highlighted shared negative experiences when it came to language barriers and communications with NHS staff. No participants were offered an interpreter or translator for their appointment, meaning that participants had to take a family member with them in order to have effective communication with health care professionals. Participants highlighted how this raised privacy and confidentiality issues, especially in the case of mental health.
192. One third sector organisation (n = 1) stated that language provision must be made mandatory in all contact with healthcare services, and it must be clearly displayed that healthcare services proactively offer this.
193. One health organisation (n = 1) highlighted that despite long-standing professional guidelines, health professionals are sometimes hesitant to work alongside professional interpreters, or find this relationship challenging, with many 'getting by' in English (or other mainstream language) with the help of ad-hoc interpreters, such as friends and relatives. It was highlighted that within this section there needs to be specific reference to access to services for multi-lingual communities including all speech and language work. It was noted that health professionals should ensure that professional interpreters are involved in all aspects of assessment, providing advice, assessment, intervention, and multi-disciplinary meetings and any decision-making in partnership with the client and family and allocate at least double the time for multi-lingual clients. Where services with a high level, i.e., 5-10 per cent or more of multi-lingual people in the local population, consideration should be given to developing a specialist multi-lingual service.
194. One public sector organisation (n = 1) stated that Welsh Government should work with Healthcare Inspectorate Wales (HIW) to ensure access to services and appointments for digitally excluded populations are considered in all of their inspections also. Welsh Government must also address remaining barriers that Gypsy, Roma and Traveller groups face in registering with GPs, including by ensuring consideration of access to services and appointments for digitally excluded populations in all Care Inspectorate (CIW) Wales inspections.
195. One third sector organisation (n = 1) highlighted that translation alone is not enough, highlighting that there may also be different cultural understandings of death and dying that need to be considered. Where appropriate services do not exist, work should be done to develop solutions that are responsive and person-centred. Community organisations (n = 1+) also highlighted the need for more cultural awareness when it comes to the food options available to ethnic minority patients; they highlighted that this links to language barriers, as patients struggle to communicate their dietary requirements.

Consultation, Engagement and Community Awareness:

196. Third sector organisations and networks (n = 3+) highlighted that there was a lack of reference to liaising with existing community assets and resources, for example groups and organisations that have a remit to consult or raise the voice of people with lived race inequality experiences. There was no mention of working with diverse groups to ensure key messages are delivered and barriers to access services lifted and understood. There is a need for a greater emphasis on developing systems that support the voices of minoritised people (including Gypsy, Roma and Traveller people) to be routinely heard. One trade union (n = 1) made similar points, stating that improved communication with ethnic minority populations is required so there is better awareness of how healthcare can be accessed in a quicker and regular way. One health organisation (n = 1) set out the importance of key health messages and services being taken out to the Black, Asian and Minority Ethnic communities to tackle health inequalities. One health organisation (n = 1) stated that views should be sought more formally from other organisations, such as NWREN, BAWSO, Race Council Cymru etc., that represent ethnic minority communities to provide feedback on access services and support service improvement. One third sector organisation (n = 1) highlighted that Hywel Da University Health Board amongst others are employing outreach workers for engagement work with ethnic minority communities and that they see initial promise in this approach.
197. Community organisations (n = 1+) stated that health providers need a process for simply asking service users when they come into contact with health services, how their language, social and cultural needs can be met.
198. One public sector organisation (n = 1) and one trade union (n = 1) stated that ethnic minority and migrant groups should be engaged before trialling interventions to assess what works in improving their healthcare experiences, and this should take an intersectional approach that considers other characteristics like sex, disability, sexual orientation and gender identity. This should include access to mental health services and should also be adopted to support ethnic minority staff within the NHS who possess more than one protected characteristic. Health organisations (n = 3) also highlighted that awareness needs to be raised within local ethnic minority groups of the Putting Things Right process, the process of dealing with concerns raised about the NHS by patients, with literature available in local minority languages.
199. One trade union (n = 1) stated that sufficient staff time should be resourced so that groups representing ethnic minority staff, including those representing the intersection between those from ethnic minorities and those with other protected characteristics, can be appropriately consulted and engaged in the implementation of actions derived from the Plan. The voices of ethnic minority staff must be appropriately heard throughout the processes undertaken towards achieving the Plan's goals and actions.
200. One health organisation (n = 1) stated that there is a need for more discussions with health boards for the health section of the Plan to be a success.

201. One health organisation (n = 1) stated that when considering the action point, *“Welsh Government will explore ways to improve early access to mental health and Dementia services for ethnic minority populations,”* they asserted that consultation should take place with the health and social care workforce, including members of the Royal college of Psychiatrists.

Mental health:

202. One individual respondent (n = 1) and third sector organisations and networks (n = 2+) were concerned at the lack of specific actions in the Plan on mental health and stated that the Plan needed to emphasise mental health within the health section of the Plan, to ensure that there is equality between consideration between physical and mental health. One health organisation (n = 1) and one third sector organisation (n = 1) stated that it should be made clearer that equitable access to mental health services and mental health outcomes are a key part of the goals and actions under the health section. For instance, there was concern about the following statement that uses the term “consider”: *“Welsh Government will consider what more needs to...”* suggesting this term needed to be strengthened and the Plan needed to outline concrete actions rather than areas for further consideration and exploration, given many services will be focused on coronavirus recovery and may not prioritise them without clear instructions and language that makes the Welsh Government’s intentions clear. One health organisation (n = 1) also highlighted that the approach the Plan takes regarding mental health conditions is not particularly focused on recovery.

203. One public sector organisation (n = 1), community organisations (n = 1+) and third sector organisations and networks (n = 2+) asserted that mental health outcomes for ethnic minorities, including refugees and asylum seekers must be improved and sufficient support must be available for these groups. Few asylum seekers and refugees in particular, have access to the internet and many struggle to access sources of social connections, support and advice. Additionally, awaiting decisions on their asylum claims, has a significant detrimental impact on mental health. The Plan must ensure there are sufficiently funded, high quality and appropriate mental health services to meet the needs of all ethnic groups and migrant populations, based on a robust assessment of need.

204. One third sector network (n = 1+) stated that tangible resources for young people and families to help address mental health problems which stem from racism and can be linked to identity are needed. One health organisation (n = 1) stated that Ethnic Minority Service User Groups within Mental Health Services must be established to co-produce strategies and actions. One third sector organisation (n = 1) stated that investment is required in community mental health services located in areas where these services are most needed, offering culturally appropriate services and a wide range of other services such as housing advice, employment support etc.

205. One health organisation (n = 1) highlighted that people from ethnic minority backgrounds are at increased risk of involuntary psychiatric detention. One third

sector organisation (n = 1) highlighted that Black people are four times more likely to be detained under the Mental Health Act than White people. There is a need to develop a new mental health service model for ethnic minority people which reflects their community in terms of staffing, management and culture and which transforms the experience of patients with recovery-based support in place of routine compulsion. The Plan needs to prioritise ethnic minority mental health patients with the highest needs - those who are currently most likely to be subject to the Mental Health Act and have their rights taken away. Patients with high needs should be prioritised by specialist mental health services so that they receive the appropriate treatment as soon as possible. This means ensuring the referral system allows quick access to specialist support services for those with serious mental illness while also ensuring a positive referral for everyone experiencing lower-level mental health problems. It was also suggested that the Welsh Government should develop its own Mental Health Act with a target of legislating in the next two years – equality needs to be at the core of this Welsh law. This would provide an opportunity to directly address the inequalities facing mental health patients from ethnic minority groups within the Welsh context.

Timescales and Targets:

206. One health organisation (n = 1) stated that the specification criteria and time commitment for Independent Members may need to be re-considered if it is to do this initiative justice.
207. One health organisation (n = 1) stated that the timescale of three years for the action on the Citizen Voice Body should be reduced to a short-term action as this work should be undertaken with pace and momentum. Some parts of the Plan, the target of short term is left open and sometimes it says, “within 18 months”. It would be helpful for all targets to be as explicit.
208. One health organisation (n = 1) stated that an estimated timescale for when other Welsh Government funded bodies might be expected to meet the requirements would also be helpful to enable forward planning.

Barriers to achieving the goals and actions and outcomes in Health:

209. One health organisation (n = 1) and one trade union (n = 1) stated that the ongoing pandemic / aftermath may act as a barrier to achieving the goals and actions in this section of the Plan as health services remain under immense pressure.
210. One health organisation (n = 1) stated that the biggest issue for the NHS will be conflicting demands on the organisation and buy in from all concerned. Funding will then need to be put in place to allow staff to be appointed to apply and implement the Plan, with resources made available to meet the costs of implementation. Funding will also be required for areas such as access to support and advocacy services.

211. One health organisation (n = 1) also highlighted that escalating translation costs, education / understanding – recognising and addressing that this is a two-way process, and time – i.e., recognition is needed that it takes longer to assess / diagnose / explain treatments when English is not a patient’s first language.
212. One public sector organisation (n = 1) highlighted that the unavailability of suitably rich data sources poses a challenge as there is a complacency within many public bodies in Wales arising from the small numbers of individuals affected by these issues in some parts of the country that are overwhelmingly White. This culture will need to be explicitly tackled and called out, and we need to recognise the geographical and demographic differences across the country. It was highlighted that current inflexible NHS-wide systems, procedures, policies and attitudes reflect an ingrained culture and a lack of appetite for change.

Amendments and Additional Considerations:

213. Health organisations (n = 2) stated that this section does not go far enough in comparison with actions identified in other areas.
214. One health organisation (n = 1) highlighted that the Plan refers to the NHS Wales Informatics Service (NWIS), however this organisation no longer exists and has been replaced on the 1st of April 2021 by Digital Health and Care Wales (DHCW).
215. Health organisations (n = 2) noted that a statement is required for healthcare for those who are very vulnerable and lack capacity or need additional support to make decisions and consent to treatment.
216. One health organisation (n = 1) stated that the action to promote better uptake and outcomes in relation to health inequalities needs to be defined as SMART. Currently it does not provide any measurable definition. One health organisation (n = 1) stated that several of the goals in this section are very difficult to measure or quantify e.g., working environments that enable staff to fulfil their full potential. Also, the goal around actively collecting and using data, may not be achievable given the current position and time available. One public sector organisation (n = 1) stated, in relation to the outcomes for the first goal within the health section: *“To ensure that NHS Wales is anti-racist...”* that this section of the Plan should discuss embedding more levers, appointing Equality Champions, and evaluating programmes. This respondent asked how will it be measured whether or not any of this has had an effect? This respondent also asked what does “anti-racist” look like? One public sector organisation (n = 1) stated that the action to significantly improve the collection and analysis of health and social care data in relation to race should be given greater priority.
217. Health organisations (n = 2), community organisations (n = 1+) and third sector organisations (n = 2) made comments indicating that many of the actions in this section of the Plan were vague. One health organisation (n = 1) stated that there needs to be more clarity and detail in regard to the Plan’s actions and outcomes

intended for reach and recruitment. One health organisation (n = 1) highlighted that the actions under Tackling Health Inequalities are stated in vague terms, for example, one action reads: *“Welsh Government will explore ways to improve early access to mental health and Dementia services for ethnic minority populations.”* Clarification is needed on who will take this action forward. The focus should be on practice focused actions rather than considering, exploring, yet more consultation and yet more strategies. There is already enough research and strategy on health inequalities.

218. Third sector organisations (n = 2) provided comments on the following:
- a. The goal: *“Welsh Government will explore ways to improve early access to mental health and Dementia services for ethnic minority populations. Medium term – within three years. Reduction in variation of proportion of ethnic minority populations’ access to diagnostics and treatment,”* is vague and needs more elaboration. The first two actions on leadership and accountability in the health section are also very vague. These organisations also commented on the following goals:
 - b. Access to health Services:
 - i. More explicit and urgent actions must be applied to this goal.
 - ii. There must be specific actions relating to effective, consistent provision of interpretation and resources in languages other than English and Welsh.
 - iii. *“Language problems,”* should be referred to as *“Language support needs.”* There must be a shift in thinking and recognising that there is a diverse population as a starting point; instead of thinking of it as the (White) Welsh population and then the Black, Asian and Minority Ethnic population.
 - c. Tackling Health Inequalities:
 - iv. The actions need to be more specific and have greater urgency, especially actions and outcomes in relation to early access to mental health and dementia care. This point was also made by other third sector organisations (n = 2) and one public sector organisation (n = 1).
 - v. There is urgent need for a more effective complaints system and that will require actions beyond more awareness of putting things right. Participants noted that complaints systems in their current form are not working for Black, Asian and Minority Ethnic people (even when they do complain) and called for Black, Asian and Minority Ethnic Specific Advocacy Services funded by Welsh Government.
 - vi. Queried the proposed action that, *“Senior Directors in Welsh Government Health and Social Services Group will establish an internal Challenge Board to include external challenge to monitor progress against actions to improve access to services for ethnic minority people,”* and what it means in practice. They also questioned the composition of those challenge boards and would welcome the inclusion of individuals external to Welsh Government as well as ethnic minority community members.
 - vii. The action on maternal health should be included in tackling health inequalities rather than access to services, as it encompasses not only

access to services but also clinical outcomes and equitable care within a service.

- viii. The action, *“Welsh Government will develop strategies to determine whether the short term and medium term actions have led to improvements in issues such as diversity of the volunteer base for the Citizen Voice Body, and the number of people who feel supported if they consider that they have a race related complaint which they wish to make to the NHS or a Local Authority,”* is very vague, and the timescale ‘long-term’ lacks the urgency which should be afforded especially to people making a race-related complaint.
- ix. The action, *“Welsh Government will develop sustainable mechanisms to engage with young people from Black, Asian and Minority Ethnic communities to understand issues of access to health service,”* is very vague and it is not clear what exactly is meant by this, or what is meant by ‘short-term.’ Engagement with ethnic minority young people cannot happen in a vacuum and if this action is to have substance, there needs to be commitment to resourcing community groups which already engage with ethnic minority young people.
- x. An additional action is needed around undertaking a review of commissioning procedures and commissioned health services, bearing in mind the current under-resourcing of specific health conditions which disproportionately affect ethnic minority people – for example Sickle Cell and Thalassaemia.

219. Health organisations (n = 3) stated that the action to convene a task and finish group with the Wales Alliance for Mental Health should be strengthened because the pandemic has taken a huge toll on the population’s mental health and wellbeing.

220. Health organisations (n = 2) stated that more clarity is needed on the action for development of strategies to explore actions for the Citizen Voice Body – the voices and needs raised through the Citizen Voice Body must be actively heard and acted upon.

221. One health organisation (n = 1) and one third sector organisation (n = 1) stated that more detail should be provided on how differential outcomes for ethnic minority women in maternity services will be improved. The singular goal that raises the issue of maternity care (Policy outcome C, p.52) does not outline any specific actions to be taken, nor does it mention any stakeholders responsible for ensuring improvements in outcomes. In the absence of detailed actions to support this achievement, we risk the Plan becoming ‘just another strategy.’

222. One health organisation (n = 1) highlighted those definitions of ‘access’ that are limited to service uptake or receipt of care are clearly inadequate unless they also consider the process of accessing care and the quality of care received. The Plan must contain specific actions that address equal access to appropriate information; access to services that are relevant, timely and sensitive; being able to

use the health service with ease and having confidence you will be treated with respect.

223. One health organisation (n = 1) stated that Goal C requires an enhanced action Plan with specific, measurable targets and needs to address the following:
- a. Transparency on who will drive this action forward.
 - b. How authentic consultation with users will be achieved.
 - c. Specific targets and measurements.
 - d. Information on how work to improve outcomes will be shared with stakeholders.
 - e. Anti-racist training for maternity workforce.
 - f. Implementation of recommendations of the Birthrights Inquiry into Racial Injustice in Maternity Care (2021).
 - g. Ongoing reflective practice.
 - h. Collection and collation of maternity data including specific data around sanctuary seekers, women on spousal visas, other groups with no recourse to public funds; use of interpreters, including barriers and facilitators to using interpreters from the perspective of service users and providers.
 - i. Workforce recruitment targets to ensure representative workforce and targets for recruitment into undergraduate education of healthcare professionals and those who educate HCPs.
 - j. Ongoing engagement between WG, NHS and Home Office regarding asylum seeker dispersal and refugee resettlement. Acknowledging that anti-racist maternity care is influenced by factors beyond the Welsh border.
224. One individual respondent (n = 1) highlighted that the Plan is heavy on implementation within / by health boards with little or no external scrutiny or accountability to the Welsh Government. More accountability is needed.
225. One third sector organisation (n = 1) asked if the learning from the health goals and the data will be shared and used as best practice across other health services that are non-NHS.
226. One third sector organisation (n = 1) stated that the following goal / action is vague: *“Welsh Government will explore ways to improve early access to mental health and Dementia services for ethnic minority populations. Medium term – within 3 years. Reduction in variation of proportion of ethnic minority populations’ access to diagnostics and treatment.”* To understand more of what is meant by the above, this respondent has identified the below areas in relation to how positive or negative effects could be increased or mitigated:
- a. Mapping and piloting pathways to diagnostic assessment for Black, Asian and Minority Ethnic people with dementia and their carers.
 - b. Capturing the experiences, and perceptions of care and support management from a range of perspectives, with a focus on those least seldom heard as meaningful as forms of evidence.
 - c. Capture the support provided by first-tier community and voluntary sector organisations, with a focus on Black, Asian and Minority Ethnic-led groups.

- d. Studies that focus on life in closed institutions such as hospital wards and care homes
 - e. Exploring bilingualism in dementia care, as it relates to people with dementia as well as health and care professionals.
 - f. Scoping and enhancing the competencies of key dementia services.
 - g. Service delivery studies that explore and test how best to embed and evaluate culturally informed personal care and support services e.g., personal grooming, diet, health activities, spirituality, leisure and social activities.
 - h. Piloting effective dementia messaging to people from Black, Asian and Minority Ethnic backgrounds.
 - i. Participatory studies that focus on the Gypsy, Roma and Traveller communities in Wales
 - j. Studies exploring how best to provide culturally appropriate end of life care (Diverse Cymru). Organisations like Alzheimer's Society and Age Concern are best placed to deliver on these particular actions.
 - k. Improve access to dementia services – this point was also made in a response from one public sector organisation (n = 1).
227. One health organisation (n = 1) asserted that targeted investment for infrastructure & services offering sustainable solutions to underlying causes of health inequalities, ensuring access for all is needed.
228. One third sector network (n = 1+) identified the following priorities for action:
- a. Ensure effective screening and onward referral for newly arrived people for vulnerabilities including mental health issues, trauma and underlying health conditions.
 - b. Ensure that all people seeking sanctuary are registered with GPs and dentists and are included in vaccination programmes.
 - c. Remove barriers to access health services by improving staff awareness and understanding through training.
 - d. Ensure that people seeking sanctuary understand their rights when accessing services, particularly healthcare.
 - e. Develop and fund high quality specialist mental health and trauma services.
 - f. Increase funding and capacity for specialist mental health services to support refugees and people seeking asylum, including for survivors of torture, trafficking and children and young people.
 - g. Ensure effective safeguarding at the strategic and practical level, with greater understanding of safeguarding concerns for vulnerable groups and clear guidance and processes for raising and responding to concerns.
229. One health organisation (n = 1) stated that NHS Wales and Welsh Government should share examples of good practice, where ethnic minority individuals and groups have experienced equity of access and good health and mental health outcomes as a result of treatment, so that the infrastructure and culture to achieving this can be understood more widely.
230. One third sector organisation (n = 1) recognised the work proposed to make NHS Wales more receptive to complaints, but the lived experience of many people is

that complaints are not welcomed, not understood and not acted upon. However, experience shows that the support of a third-party at the time of the incident or advocates, youth workers, and community workers later often encouraged people to report incidents they would not otherwise have reported. They proposed Welsh Government consider advocacy support for staff, volunteers, and the public when making a complaint.

231. One health organisation (n = 1) asserted that opportunities should also be maximised to learn from international examples on how to deliver culturally appropriate healthcare.

What's missing from this section of the Plan:

232. One public sector organisation (n = 1) and one third sector organisation (n = 1) stated that actions on dementia need to be embedded throughout the goals and actions on health. On page 18 'Rapid Evidence Reviews' it lists the themes and under Health (physical and mental) and social care, 'Dementia' should be listed separately as a heading. They noted that in many ways, mental illness can manifest the same symptoms of dementia, and vice versa. While there are a lot of similarities between the two, there are also some critical differences. This is missing in the priority areas, and this is an illness that is not only huge in the minority communities but will increase 7-fold in the next 30 years and only 2-fold in the White British population.

233. One third sector organisation (n = 1) stated that there is insufficient focus on, and acknowledgement of children as recipients of health services, including mental health services, which is disappointing in light of the overrepresentation of children in relation to health inequalities data. Reference to children in this section on health must be made more explicit, as indeed it is in some of the other sections in this Plan (the Section on Welsh Language is a good example in this regard). It was also suggested that more detail is provided in relation to monitoring arrangements – who and how – to ensure that actions are achieved. This would help strengthen the section on outcomes with more of a focus on the impact of the activity and what difference people can expect to see as a result of the activity being completed (to avoid any tick box exercise).

234. One public sector network (n = 1+) noted that the Plan does not reference the key support role of school nurses, there is no mention of health services going into prisons or those in prison accessing other health services. This is important because there is evidence that there are disproportionately high numbers of Black, Asian and Minority Ethnic people within the prison system. Prison nurses for example are provided through primary care. There are also no actions in regard to carers or young carers. This needs to be addressed because the additional burden or lack of access to services could result in increased use of illegal substances, increased anger and frustration of young people resulting in anti-social behaviour or being more susceptible to County Lines and other forms of exploitation. The Plan also lacks a public health approach around prevention, using information on ACEs and Trauma Informed Approaches.

235. One third sector organisation (n = 1) highlighted that the Plan should include specific actions around supporting ethnic minority people to gain equal access to drug, alcohol and addiction treatment. Mainstream service providers can often lack the training, cultural understanding and sensitivity needed to work effectively with these client groups and are therefore unable to provide tailored, culturally appropriate support for individual needs.
236. One trade union (n = 1) stated that the Plan needs to do more about access to health services – and more needs to be done to understand the barriers some ethnic groups face in accessing certain services and identifying what steps could be taken to overcome them. For instance, it may be identified that more needs to be done to overcome cultural and language barriers for certain communities. The Plan could include a commitment for such work to be undertaken and for progress against it to be monitored.
237. One health organisation (n = 1) highlighted that pharmacy teams are a key resource to reducing health inequalities. This role needs to be recognised and supported. Tackling health inequalities can be embedded in all of the services already provided by community pharmacies.
238. Health organisations (n = 3) and third sector organisations and networks (n = 2+) stated that the Plan should consider the specific challenges experienced by asylum seekers and refugees accessing healthcare.
239. Third sector organisations (n = 2) highlighted that there is no mention in the Plan that Gypsy, Roma and Traveller populations face distinct barriers to accessing health services and still have the poorest health outcomes of any ethnic group. Poor access to health provision combined with a mistrust of health professionals has compounded the health and wellness of these populations. Issues relating to accessing GP services, such as discrimination from receptionists and issues with literacy, were identified as the main barriers. Welsh Government should engage Gypsy, Roma and Traveller individuals in meaningful consultation on their health needs and ensure that all healthcare professionals receive training on Gypsy, Roma and Traveller needs and are aware that they are required to provide healthcare to those with no fixed address.
240. One third sector organisation (n = 1) highlighted that the Plan does not acknowledge the work of a coalition of 36 health, social care, transport, and housing charities on eliminating health inequalities which calls on Welsh Government to commit to a cross-governmental strategy to eliminate health inequalities. The Plan should acknowledge this work and commit to working towards a specific plan focusing on health inequalities, rather than including health and social care as smaller subsections of a larger plan.
241. Health organisations (n = 2), one LA (n = 1) and one trade union (n = 1) stated that there is a lack of focus on primary and community care. Respondents stated that to deal with inequalities in health and care there will need to be an equal focus on

these areas. The Plan should be inclusive of this sector or any provider that is performing a public function.

242. One health organisation (n = 1) and one trade union (n = 1) stated that the ongoing pandemic / aftermath may act as a barrier to achieving the goals and actions in this section of the Plan as health services remain under immense pressure. The Plan fails to highlight the impact of the pandemic and the rapid change to digital services which has exacerbated inequalities by services being delivered exclusively by virtual means. The Plan should have this as a stronger element of its actions to address the pandemic's impact. This should include actions to collect the evidence of digital exclusion and the relationship with inequality, and targeted interventions to address these.
243. The Plan does not focus on the inequalities exacerbated by services exclusively delivered by virtual means. This includes language barriers, gender equality, and poverty issues, being barriers to access health services. The Plan should have this as a stronger element of its actions to address, in light of the pandemic's impact
244. One health organisation (n = 1) stated that the Plan should include a specific action for health boards to establish clinical governance environments that reduces and eliminates difference in disciplinary processes and regulatory referrals. There should also be an additional action for the NHS in Wales to work with the General Medical Council on a joint (UK-wide) framework and standards for induction and providing feedback.

Additional comments on this section of the Plan:

245. One individual respondent (n = 1) commented: *“overall, in my opinion the chapter on Health Services and Health Outcomes is at best an attempt not to appear racist and a long way from being anti-racist.”*
246. One health organisation (n = 1) stated that health inequalities should be framed as an issue of justice and that doing nothing is a decision that will be met with consequences.
247. One individual respondent (n = 1) stated that the REAP appears to make an attempt at local regulation when local governance has repeatedly failed on this front. This respondent also added the following comment: *“The utter fear of reprisal that exists in healthcare workers is a staunch reflection in the deafening silence to the point that doctors feel that Wales is a graveyard of all ambitions.”*
248. LAs (n = 2) made the point that this section of the Plan chiefly relates to the health boards and acknowledges that public bodies should be the main drivers behind change, but that it is important to allow an easy access channel for private and third sector organisations to follow. One third sector organisation (n = 1) stated that there needs to be clear referral routes, particularly for Health, for different community groups, and these routes involve building relationships and trust. Third

sector organisations (n = 2) further stated that a guide to the type of support available and how to access this is a simple and effective first step to ensure everyone knows what is on offer and that gaps are identified quickly, and new service solutions are developed which meet the cultural sensitivity of those who seek to use them.

249. One LA (n = 1) highlighted that inequalities can be found in how people access help in many areas of health and social care, for example, access to dementia support, mental health services and support available to parent / carers of disabled children. It is important to deepen our public service's understanding of citizens, including carers, direct experience when accessing information, advice and assistance on the range of help available.
250. Only 32 per cent of respondents from one community organisation's consultations (n = 1+) think ethnic minorities are treated fairly by health care service providers. Comments from participants of this community organisation's consultations expressed great disappointment in the service. It was highlighted that it is extremely difficult to get a timely appointment with the GP. Many participants stressed on how GPs failed to treat them. They were misdiagnosed and had to visit the GP several times with the same issue before the GP took any serious action and undertook medical tests. One participant shared that a Do Not Resuscitate (DNR) notation had been added to their medical record without their knowledge and consent. The participant felt helpless when it comes to the removal of this notation. No help or explanation has been offered by Health Board.
251. Participants of third sector organisation consultations (n = 1+) also shared their experience of waiting for a long time to register with the dentist and the frustration that you could have a serious illness that needs to be seen to, but you have to wait for a long time to be seen. Some consultees suggested that private surgeries should accept NHS patients. Consultees mentioned the importance of auditing and accountability to achieving the goals, actions and outcomes.

Social Care:

252. Third sector organisations and networks (n = 15+) LAs, (n = 5), trade unions (n = 2), individual respondents (n = 5), public sector organisations and networks (n = 6+) and one health organisation (n = 1) have provided comments on the social care section of the Plan.

Existing policy and resources and the importance of joined-up working:

253. One public sector organisation (n = 1) and third sector organisations (n = 2) stated that this section of the Plan must align with all the principal legislation that focuses on social care and public service delivery in Wales – for instance, the Equality Act 2010, the Social Services and Wellbeing Act 2014 and the Well-being of Future Generations (Wales) Act 2015 to avoid duplication. Commenting on the

REAP's commitment to tracking Black, Asian and Minority Ethnic leadership on relevant boards such as Care Inspectorate Wales and taking action where it is needed, respondents expressed surprise that this has not already taken place considering the Reflecting Wales in Running Wales strategy has been in place since 2019. They noted that this raises the real possibility that the REAP will become another strategy on a shelf which then lacks any meaningful implementation.

254. One third sector network (n = 1+) challenges on to what extent the REAP has anything new in it and how it will be any different to previous plans / strategies. They expressed concern that the REAP is regurgitating the same goals and actions, in a different guise and will become another paper exercise. They queried why there has not been any assessment of why previous plans / strategies have not worked before.

255. One public sector organisation (n = 1) stated, in relation to Goal 4, that it will be important that the actions set out in this section of the Plan are embedded within the Workforce Strategy going forward, rather than creating alternative planning structures.

256. One public sector organisation (n = 1) highlighted that '*Travelling to Better Health*' intended to support health practitioners in closing the health inequality gap for Gypsies and Travellers but has not resulted in any appreciable closing of that gap.

257. One third sector organisation (n = 1) highlighted that there is an opportunity within Goal 2 to establish links with the new Strategy for Unpaid Carers (Feb 2021) and the delivery plan which is currently being coproduced. One public sector organisation (n = 1) stated that the low pay and the low social value attached to social care work makes it vulnerable to high levels of turnover. This needs to be addressed nationally with other partners through the delivery of the Integrated Workforce Plan. It is essential that work is joined up to maximise impact and avoid any gaps or duplication.

258. One LA (n = 1) stated the deployment of the national Welsh Community Care Information systems (WCCIS) system can only help towards the better integration of health and social care and a fairer, more equal approach.

259. One third sector organisation (n = 1) explained that under the Social Services and Wellbeing (Wales) Act 2014, those who work in childcare come under the definition of the social care workforce, however the main body of the Act and the duty does not apply to those working in childcare. The Child Minding and Day Care (Wales) Regulations 2010 is the legislation that childcare and play settings are registered, regulated and inspected against with the associated National Minimum Standards (NMS) supporting this rather than against the Social Services and Wellbeing (Wales) Act 2014.

260. One third sector organisation (n = 1) suggested that managers are made familiar, as part of any training, with Social Care Wales's principles of [Compassionate Leadership](#). There is huge merit to be found in collaborative training, examples include Academi Wales and One Welsh Public Service programmes.

261. One trade union (n = 1) stressed the need for there to be consistent policies across the whole of the social care sector, so each employer is operating according to an industry standard. This should be rolled out from the Social Care Forum at Welsh Government level. There must be an industry standard on which all social care providers are expected to adhere, or they cannot bid for contracts and will be ruled out of the commissioning process. They also advocated that public services should be publicly delivered and social care services should be brought back in-house because this would allow services to be better managed and more accountable.

262. One LA (n = 1) stated strongly that only with health and social care working together with other partners such as the third sector, will the potential to improve healthy life expectancy be created and persistent health inequalities reduced. It was asserted that it is paramount to recognise that social care has to be flexible and responsive to the needs of all citizens. Strengthening local and regional networks to make connections, across health and social care and the wider economy will contribute to better and fairer outcomes.

Workforce development and support, criticism and the need to increase representation:

263. Two third sector organisations and networks (n = 2+) agreed that the ethnic minority workforce needs to increase to help service users feel like this is a service for them because there are people who look like them that are service providers. There must be a clear commitment to a diverse workforce at senior level and provision must be made to support ethnic minorities' in-career progression and moving through the workplace channels, because ethnic minority people face barriers to career progression, e.g., they are regularly told, "*you're not quite ready yet,*" by a management team which is entirely White; so, decisions are made for Black, Asian and Minority Ethnic people by White people. Alongside this, organisations need to address why Black, Asian and Minority Ethnic people leave organisations or the profession. There is a strong argument for positive action in recruitment around race, gender, and disability.

264. One public sector organisation (n = 1) highlighted that 83 per cent of their survey respondents said they had experienced racism either in their workplace, in education (whilst undertaking qualifying programmes in social work) or during social work placements. 33 per cent of respondents said they had "*no support,*" 17 per cent said they had "*some support,*" 17 per cent said the response was "*very supportive.*" Examples of lived experience of racism within the social care sector workforce were provided:

- a. "*At placement ID cards were given to us, but while my White colleagues were given two years ID, I was given less than the period of my placement, I felt like I was expected to fail.*"
- b. "*It feels like there are fewer overt examples as people are now less obviously using racist language or actions. Sometimes that's worse, it feels*

uncomfortable, and you know when the micro-aggressions are happening, just finding the words to name them is hard and you don't bother because it's too tiring, you just internalise it."

- c. *"Comments about immigrants taking over and sharing of racist social media memes were my last experience of overt racism in the workplace. These are easy to draw attention to and for the most part, action was taken, although the perpetrators were not punished, an email was circulated to say sharing such media and emails is not acceptable, but beyond that, nothing. How do you draw attention to the myriad of slights, lack of promotions / access to the same opportunities or same support as your White colleagues? These things happen with great regularity but 'proving' it is racism is nigh on impossible and I have been told not to 'play the race card' by a senior manager in the past, so it remains difficult."*

265. Public sector organisations (n = 2) and third sector organisations and networks (n = 3+) all identified that covert racism / microaggressions are hard to prove and emphasised that social workers from Black, Asian and minoritised communities must not be expected to resolve racism, exclusion or discrimination on their own. It was highlighted that many ethnic minority people are afraid to complain about racism they have experienced at work in fear that complaining would threaten their own employment. This means the Plan should commit to eradicating micro-aggressions in the workplace and the current culture of disbelief around allegations of racism. A robust, transparent and speedy complaints system is needed. Resources are also needed for dedicated advocacy services for people to be heard better and a commitment to spreading the word about the powers of the Public Service Ombudsman for Wales and encouraging people to use that office when possible. There was a need to address organisational culture and culture of disbelief of Black, Asian and Minority Ethnic experiences in the social care sector and under representation of Black, Asian and Minority Ethnic people in Equality, Diversity and Inclusion roles and as evaluators in complaints. Most often the people who judge complaints about racism are White, and do not understand what racism is and are unable to understand an experience as racism, more often taking the side of the social care worker or organisation. There also needs to be more mandatory checks on public care homes and private care homes to ensure policies and practices are in line with guidance and regulations. Private homes in particular should be under more scrutiny.

266. One public sector organisation (n = 1) highlighted that there is also a huge amount of work that Welsh Government needs to undertake to close the attainment gap for Gypsies and Travellers to improve life chances and choices, and the lack of trust in social workers within these communities, who have referred to social services as the 'cruelty' because of the association with removal of children from parental and kinship care, although this will not support increasing numbers into social work or in other social care roles, in the short-term.

267. One third sector organisation (n = 1) stated that the counselling 'industry' is dominated by White, middle-class females and wanted to see provision under social care or health to promote counselling jobs and training for ethnic minority

communities. This should be supported by funding for individuals / training providers to subsidise these training costs etc.

268. One third sector network (n = 1+) explained that there is a huge lack of understanding of culture within the social care sector. Service providers must understand the culture of service users to ensure everyone feels confident using social care, especially those who are more vulnerable, like asylum seekers and refugees.
269. One third sector network (n = 1+), one trade union (n = 1), one public sector organisation (n = 1) and individual respondents (n = 3) asserted that it is very important that staff in social care have the right skills to work with people from different ethnic minority groups. Comments made included that Social Care Wales should be a key player in anti-racist training both at qualifying stages and as part of continuous professional development and maintaining fitness to practice registration. Training for the social care workforce must be mandatory and on a recurring basis with refresher training to ensure cultural diversity remains at the forefront of practice. Cultural competence training must be quality assured co-designed and co-delivered by Black, Asian and Minority Ethnic people. Clear evaluation mechanisms must be designed to evidence impact of such training on those receiving care and support and unpaid carers. Cultural competence should be seen as gateway training and continuing education and learning, which deepens knowledge and understanding in anti-racism / intersectionality, must be made mandatory on all social work programmes and in post qualifying education and training. Evidencing having undertaken cultural competence and anti-racist education (to include the difference it makes to practice) should be made a mandatory requirement for social work registration, in order to have the greatest impact. It was stated that for too long the teaching of anti-racism on social work curricula has been ad hoc at best and non-existent at worst. Social work students and practitioners will rarely encounter any education or learning on anti-Gypsy, Traveller or Roma racism when being taught anti-racism, Welsh Government must change this.
270. One third sector organisation (n = 1) stated that in parts of Wales, many organisations have a policy that speaking Welsh is a prerequisite for employment (or to hold certain roles), which impacts on diversity in workforce and representation in leadership. There should therefore be an action to encourage and support ethnic minority individuals to learn Welsh.
271. One public sector organisation (n = 1) was deeply concerned about Part 4 of the Policing Bill and how it will act as a significant barrier to their work (improving understanding between social workers and Gypsy, Traveller and Roma people), because social workers will be at risk of being involved in enforcement action and not support.
272. One trade union (n = 1) were extremely concerned by the recommendation made by EHRC (Equality and Human Rights Commission) for 'guardians' to be established in the social care sector to operate as a quasi-union rep for Black, Asian and Ethnic Minority workers. They felt this is inappropriate, given the accountability of

guardians to either the employer or the State. In their view these roles are often introduced as an anti-union measure ([such as in Swansea Bay Health Board](#)). Such a role would be appropriate if the post holders were trade union reps or officers, and therefore accountable to the workforce.

Challenges facing the sector:

273. One individual respondent (n = 1), one public sector organisation (n = 1) and LAs (n = 2) made the point that the Plan needed to recognise resource implications and highlight that the amount of work necessary to undertake the actions within this section will require additional resources such as funding. They queried whether funding will be allocated on launch of the final REAP. This will be needed for the sector to respond to growing pressures on social services to change; these include increasing demand for complex services, demographic and social change, the impact of Covid-19 plus workforce fragility in the provider sector (recruitment, retention, reward and recognition).
274. One public sector organisation (n = 1) explained that bespoke development and application of commissioning methodologies across Wales has been, at best, costly and, at worst, haphazard in design of service and delivery of specified outcomes of satisfactory quality. They stated that it is important for Welsh Government to be mindful that the ability to recruit and retain staff in the social care workforce from any racial background at the present time is very challenging. Only by professionalising the social care workforce and ensuring it has the same pay, conditions, responsibility differentials and long-term career pathway as colleagues have in the NHS, will we secure the same respect and recognition within the public and employment arenas that members deserve.
275. One public sector network (n = 1+) highlighted an issue around the academic courses to professionalise social care – additional safeguards and qualifications are so academic that they are not suitable for many people who had learnt English via an ESOL course. The Social Services and Wellbeing (Wales) Act 2014 includes the requirement for provision to be made in the language of choice. If social care workers cannot be registered, due to the qualifications, then the only option is for Direct Payments to be used and for provision to be through the unregulated Personal Assistants route, potentially opening routes for abuse, exploitation and crime through the lack of oversight and regulation. It is also likely to impact on the amount of data that is available around the social care workforce from Black, Asian and Minority Ethnic communities. It also reduces the pool of Black, Asian and Minority Ethnic social care workforce who can progress into management.

Access to services:

276. Third sector organisations and networks (n = 4+) explained that equitable access to health, social care and well-being support services has been an issue routinely reported and magnified during the pandemic. Health and social care provision should be available, reachable and consider cultural needs and language form the first point of contact. Citizen engagement in service design through to

service delivery and evaluation of services is also needed. The Social Services and Wellbeing Act 2014 guarantees a carer needs assessment, but organisations like Carers Wales cannot fully engage with ethnic minority carers and there are many bridges to build – this needs to be addressed within the Plan. Respondents explained that young people feel very uncomfortable accessing social services from statutory bodies like the government. They feel more comfortable with NGOs and Third Sector organisations, where they feel confident. It was also explained that some people are not aware that they can access social care and social services. Language is a barrier for individuals to access social services. More information and awareness of how to contact social services is needed so that everyone is confident in accessing it and particularly those who are more vulnerable, e.g., asylum seekers and refugees.

Amendments to this section:

277. One third sector organisation (n = 1) and one public sector organisation (n = 1) noted that many of the associated actions are vague and need targets and deadlines for change. Focus should be on equality of outcome as well as equality of service. Equality of service does not, in itself, mean equality of outcome. It should be the day job to go that extra mile where it is needed to work towards equality of outcome for the individual. It was noted that lots of the goals are linked and that a diverse social care workforce (at senior levels too) is needed to make services more accessible and to ensure people feel treated with equality and dignity. Additionally, the actions related to goal 1 are too vague and more detail is needed – to be successful, the people examining the reasons for people’s fears need to be representative of Black, Asian and Minority Ethnic people and more detail on how it will be done and the financial support available is needed.
278. Third sector organisations and networks (n = 3+) asserted strongly that childcare should sit more clearly in the revised plan. Children and young people’s use of social care needs to be more explicitly named in the Plan and consideration should be given to how children from ethnic minority communities will access that support. An intersectional approach to the different needs of ethnic minority service users should be taken. The Plan should ensure work is done with organisations to specifically consider the needs of children and young people from ethnic minority groups, especially those accessing support for abuse and neglect.
279. One public sector organisation (n = 1) stated, in relation to Goal 3A and 3B, that greater clarity is needed on the specific action set out for Social Care Wales in relation to complaints across the sector. In relation to Goal 5, the second action is significantly ambitious and that it may be necessary to focus its lens more narrowly than it is currently set out. It is also unclear how the Social Care Staff Governance Framework can be used in the way described in the third action. In relation to Goal 6, the Plan could be strengthened here - The Plan is mostly silent on the use of evidence beyond its collection. To be meaningful, the Plan should acknowledge the importance not just of producing evidence but developing the workforce and systems to effectively translate it into meaningful change.

280. One public sector organisation (n = 1) stated in relation to the goal: *“To ensure that all Black, Asian and Minority Ethnic people who access social care services are provided with the highest quality support that is accessible, dignified and culturally appropriate,”* where the outcome states: *“Unpaid carers from Black, Asian and Minority Ethnic backgrounds feel better supported by the statutory, independent, private and third sectors,”* all of the other outcomes are written adopting an aspirational position – the word “better” in this sentence appears to read significantly less aspirational than the others. The outcome should therefore read as follows: *“Unpaid carers from Black, Asian and Minority Ethnic backgrounds feel fully supported by the statutory, independent, private and third sectors.”* Also, in relation to Social Care – Workforce – Goal 3A, Pg. 59, the goal should be expanded to include well-being provisions within the workforce and workplace which empowers people who may have experienced racism to seek the right support regarding their trauma. Trauma is also essential to be voiced throughout as we must not deny our history but work as a collective to improve together.
281. One LA (n = 1) and one individual respondent (n = 1) asserted that more needs to be said on the roll out of funding to ensure staff are all trained at the same level, which should include lived experience of people within training.
282. One health organisation (n = 1) stated that within the social care section (p.55 onwards) a statement is required around health care and treatment for those who are very vulnerable and lack capacity or need additional support to make decisions. If people who lack capacity are not supported for their voice to be heard, then we will not have information to gather. The Plan could be further strengthened with greater recognition of the important role that Primary Care and Community can play in improving access, promoting inclusion and reducing inequality.
283. One LA (n = 1) and third sector organisations (n = 2) suggest changing the wording of the aim, *“safety when cared for in whatever sectors because standards are foremost in the minds of providers, commissioners and regulators.”* The term ‘culturally competent’ should be used and normalised to describe the results of the actions. It is also important to clearly define this term to ensure quality and consistency. A lot of the statements that are being termed as ‘Outcomes’ just re-affirm completion / implementation of ‘Actions’ and do not outline the actual outcome / impact for minority ethnic groups.
284. One third sector organisation (n = 1) stated that there are two references to a Citizen’s Voice Body to ensure development of its Black, Asian and Minority Ethnic membership but that it is not made clear who and what this is, and whether this is a structure which will involve children and young people as part of its remit.

What’s missing from this section of the Plan:

285. Third sector organisations (n = 2) queried whether auditing bodies will be in place because accountability is important. They felt this was important because, in their experience, social services seemed to be a law unto themselves, and additional structures were needed to support users to hold them accountable.

286. One third sector organisation (n = 1) queried in relation to the goal: “*develop mechanisms for better engagement with Black, Asian and Minority Ethnic people to better understand how lived experience determines service access and levels of use,*” whether the ‘Cultural Competency Toolkit’ for social care services would be disseminated to non-statutory services and would it be at a cost.
287. One third sector organisation (n = 1) stated, that in order for the Plan to be effective, services should be delivered by people with lived experience from those communities with appropriate training who will have a greater understanding of the specific needs of their communities.
288. One third sector organisation (n = 1) stated that a mentorship programme specific for the Black, Asian and Minority Ethnic workforce should be created which takes into account their cultural norms and differences and how they can be engaged to thrive in an anti-racist workspace. Health boards should have such a scheme in place and those mentors should be adequately trained and resourced to make them sensitive and effective in supporting their mentees.
289. One individual respondent (n = 1) would like to see foster carers included within the social care workforce element, inclusive of the encouragement / recruitment drive of Black, Asian and Minority Ethnic people to foster. This will need to include understanding of potential barriers that may be faced.
290. One third sector organisation (n = 1) highlighted that the Plan did not recognise the significant number of Black, Asian and Minority Ethnic providers in the private sector.
291. One individual respondent (n = 1) and third sector organisations (n = 2) highlighted that the Social Care Workforce outlined within the Plan does not include the childcare sector. There was concern that the important role childcare plays as part of the foundational economy is not being recognised within the Plan.
292. One third sector organisation (n = 1) highlighted that Welsh Government have also appointed a Chief Social Care Officer for Wales which should now be referenced in this section because this new role should be critical in driving forward some of this work at a strategic level, alongside that of Social Care Wales and other partners referenced in this section.
293. One third sector organisation (n = 1) asserted that more needs to be said within this section of the Plan about better support for unpaid Black, Asian and Minority Ethnic carers from public, private and third sector. Even though this is mentioned as a desired outcome in Goal 2, there is no mention of training and support being provided to voluntary sector organisations to achieve this under ‘actions’. It could be an oversight, but equal training and support must be provided to voluntary sector social care service providers, alongside public ones, in order to ensure the completion of this goal in a way that does not put voluntary / charity organisations under enormous amounts of pressure to figure it out on their own.

294. One public sector organisation (n = 1) and third sector organisations and networks (n = 2+) were frustrated that this section of the Plan contains no reference to actions in early years and childcare. It was stated that this is a significant oversight because these early formative experiences have been acknowledged by the Welsh Government as crucial to the future development of the individual. Services must embrace diversity, inclusion and equality. Staff who deliver early years and childcare services must be culturally aware, and fully and demonstrably competent, to ensure the environment and activities for young individuals promote the principles and values of an anti-racist Wales. This was strongly felt to be a significant gap in the Plan. There was also concern that little of the Plan draws out specific actions for vulnerable children. The experiences of children from Black, Asian and Minority Ethnic communities on the edge of, or in care, will shape their lives.

Education, including Higher Education:

295. Third sector organisations and networks (n = 22+), trade unions (n = 6), public sector organisations and networks (n = 6+), LAs (n = 9), education boards, networks and associations (n = 8), community organisations (n = 2+), one individual respondent (n = 1) and one health organisation (n = 1) have provided comments on the Education (including Higher Education) section of the Plan.

Comments on the new curriculum:

296. Third sector organisations and networks (n = 9+), trade unions (n = 5), LAs (n = 5), community organisations (n = 1+), education boards, networks and associations (n = 2) and one public sector organisation (n = 1) commented about the need for the curriculum to be decolonised at all levels of education, from Key Stage 1 through to higher and further education. It was noted that the Plan makes little to no reference to decolonisation in either higher education or further education and this has to be addressed to achieve anti-racism and prevent established narratives remaining dominant and one system of knowledge being privileged over another. Racism cannot be tackled if the intellectual and philosophical basis of institutions remain exclusively 'White' or Eurocentric. Most students in British universities would be led to think that all the important intellectual work in human history had been done by Europeans and that is not true. In relation to promoting a culture of curiosity and challenge, Welsh Government must take steps to establish staff's individual right to academic freedom. Although the positive ambition of decolonisation will not be achieved overnight, it is unlikely to be achieved at all if institutions place 'efficiency' ahead of free thinking and investigation.

297. Third sector organisations and networks (n = 7+), trade unions (n = 5), LAs (n = 5), community organisations (n = 1+), education boards, networks and associations (n = 2) and one public sector organisation (n = 1) asserted that human rights education should be embedded in the new curriculum to ensure that schools give priority to human rights education when designing, planning and delivering the curriculum; Welsh Government will need to fund this work sufficiently to achieve this. The new curriculum must tackle the issue of racism and discrimination and for

general education (starting from pre-school, and into primary / secondary) a greater focus should be on international cultural education and building skills as part of decolonising the curriculum, rather than on grades. Teaching and celebrations of non-Eurocentric culture must go beyond tokenism or lip service – rather than one-off, isolated events and awareness months celebrating the contribution of ethnic minorities in terms of their history, culture and lived experiences, this should be incorporated into the delivery of the curriculum across the school year, for example Black History Month, Gypsy, Roma and Traveller History Month, Chinese New Year, Ramadan and Eid. Gypsy Roma and Traveller histories must too be incorporated into the new curriculum, referencing resources such as *Gwyl Hanes Cymru i Blant*. Schools should teach pupils about different hairs and cultures including expanding uniform policy to take account of the diverse experiences of racialised students and their cultural and ethnic needs, e.g., hair braiding, long hair for Sikh men and henna, and this should involve children, families and communities as much as possible. Other ideas included encouraging pupils to TikTok, Instagram and Snapchat their trips to Amgueddfa Cymru, captioning it with “*Black History Lesson Wales*” or “*#BHL Wales*” to raise awareness of the curriculum.

298. Third sector organisations and networks (n = 7+), trade unions (n = 5), LAs (n = 5), community organisations (n = 1+), education boards, networks and associations (n = 2) and one public sector organisation (n = 1) asserted that the Plan should include examples of good practice in relation to curriculum delivery and should address the resources, particularly funding that will be needed to support curriculum change and training in cultural awareness for the wider education workforce. It is crucial that Welsh Government support the workforce to achieve the anti-racist curriculum, through funding training, and allowing extra time both inside and outside the classroom for education practitioners to learn how to embed these principles in all aspects of learning. Delivering the new curriculum will require addressing the lack of resources in both languages that support the teaching of the History of Wales and document the invaluable contributions made to Wales as a nation by ethnically diverse communities.

299. Third sector organisations and networks (n = 7+), trade unions (n = 5), LAs (n = 5), community organisations (n = 1+), education boards, networks and associations (n = 2) and one public sector organisation (n = 1) commented on how the new curriculum gives schools more autonomy in deciding the relevant curriculum and asserted that this should require an appropriate, informed assessment of the equality impacts of the decisions, as otherwise, they risk impacting negatively on institutional racism and disadvantage. It is unclear what sort of scope of education will be taught in the classroom for the Goals for Education – Black, Asian and Minority Ethnic people are not a uniform group and learning must be reflective of this. It must be ensured that ‘stories’ of a range of different ethnic groups are included and that this does not just become tokenistic. Teachers will need advice and guidance in the language of delivery – avoiding language that portrays an ‘us’ and ‘them.’ The Plan should make clear how the plans to give schools more autonomy and independence in deciding the relevant curriculum will not increase disadvantage.

300. Third sector organisations and networks (n = 2+) highlight that Somali people feel that the Somali community and their contributions to Welsh society still lacks recognition particularly in the history books.

301. One third sector network (n = 1+) stated that the Plan should be updated to reflect the recommendations made in Professor Charlotte Williams's report.

Attainment gap:

302. One trade union (n = 1), one health organisation (n = 1), one public sector organisation (n = 1), one third sector organisation (n = 1), one LA (n = 1) and education boards, networks and associations (n = 2) have commented on attainment gaps. The reference to closing attainment gaps in the Plan implies that minority ethnic learners are under attaining which is not accurate for all minority ethnic groups. Some comments suggested that the Plan should focus on the minority groups that are falling behind rather than providing a blanket response. The Plan should contain actions to analyse and address attainment gaps related to ethnicity, particularly in relation to Black and Gypsy, Roma and Traveller pupils including through improved identification of Special Educational Needs (SEN) and Additional Learning Needs (ALN). It was also queried how Gypsy, Roma and Traveller people would be consulted in the Plan to raise their attainment.

303. One trade union (n = 1), one health organisation (n = 1), one public sector organisation (n = 1), one third sector organisation (n = 1), one LA (n = 1) and education boards, networks and associations (n = 2) stated that actions are needed to address the impact of Covid-19 and subsequent school closures and online learning on attainment. Sufficient funding should be provided for schools to develop individualised support plans including to meet the needs of particular ethnic minority children and young people to address the impact of Covid-19 on learners. Any assessments of the impact on attainment gaps of school closures and cancellation of examinations as a result of Covid-19, must be disaggregated by ethnic minority group and other protected characteristics and socio-economic background.

304. One trade union (n = 1), one health organisation (n = 1), one public sector organisation (n = 1), one third sector organisation (n = 1), one LA (n = 1) and education boards, networks and associations (n = 2) have stated that the attainment gap amongst the Black, Asian and Minority Ethnic students in higher and further education must be monitored, reduced and eliminated. The Higher Education Funding Council for Wales (HEFCW) and the forthcoming Commission for Tertiary Education and Research will need to monitor and evaluate the effectiveness of programmes aimed at addressing attainment gaps affecting certain ethnicities, in line with their responsibilities under the Public Sector Equality Duty. It was also suggested that the Plan should also make more reference to the links between the attainment and ambition gap, the latter having a significant impact.

Racist bullying – Recording, Accountability and Governance:

305. LAs (n = 5), third sector organisations and networks (n = 9+), education boards, networks and associations (n = 3), trade unions (n = 5) community organisations (n = 2+), public sector organisations (n = 3) and one individual respondent (n = 1) stated strongly that Welsh Government must ensure that any incidences of racist bullying, discrimination and hate crime are dealt with adequately, recorded and procedures followed. Welsh Government must ensure that, in accordance with the UN International Convention on the Elimination of all forms of Racial Discrimination recommendations in their last review of the United Kingdom in 2016, all schools in Wales are required to collect qualitative and quantitative data on bullying and exclusions from school on the grounds of race. It was suggested that there needs to be a single centralised reporting system across education to fully grasp the scale of the problem, to ensure consistent recording and to ensure all incidents are recorded, even if they are deemed as 'minor.' Data collection should also adopt an intersectional approach and this information must be used to take action and to evaluate anti-bullying strategies. It is important for the Plan to also recognise that most racial bullying, harassment and hate crime takes place off the school grounds, on the walk home or on the school bus. The Plan needs to deal with this because parents have been told those bullying incidents that take place outside of the school grounds by pupils are then the parent's responsibility to report to the police. Welsh Government must also ensure LAs analyse bullying data gathered by schools, including racist bullying, to identify trends and help establish solutions in line with their responsibilities under the Public Sector Equality Duty. Universities should also be required to report on issues surrounding discrimination and reports should be made available to the public. There should be a clearer framework in place to address racism, as well as a stronger regulatory framework including HEFCW, ESTYN and other public bodies. In relation to the action around improving the diversity of experiences reflected in the curriculum and improving diversity of the workforce, this should be expanded to the support services such as Education Consortia, and commitment to the principles of race equality becoming one of the criteria that ESTYN measures schools and colleges against. Many of the goals will require monitoring and accountability arrangements being put in place, alongside practice guidance, training, publicity and awareness raising, with the involvement of community groups. For instance, in relation to the commitment to publish a statutory Gypsies, Roma and Travellers' guidance to support educational outcomes, this will only have the desired outcomes if it is resourced – otherwise, it is in danger of becoming another strategy. Being explicit about Estyn's role in this would be helpful and Welsh Government should work with inspection bodies e.g., Estyn to see how they can aid achieving the vision through their remit.

306. LAs (n = 5), third sector organisations (n = 7), education boards, networks and associations (n = 3), trade unions (n = 4) community organisations (n = 2+), public sector organisations (n = 3) and one individual respondent (n = 1) stated strongly that the development of a model of an anti-racist school in the 21st century should be provided as an exemplar for all schools to work towards across Wales to ensure standards are raised / procedures are followed. Welsh Government should promote a zero-tolerance policy towards racism that adopts a defined, accepted definition of

bullying and racial bullying and ensure all Welsh schools are legally required to adopt this policy and communicate it to every pupil, parent and staff member.

307. LAs (n = 5), third sector organisations and networks (n = 8+), education boards, networks and associations (n = 3), trade unions (n = 4) community organisations (n = 2+), public sector organisations (n = 3) and one individual respondent (n = 1) felt that it is important this section of the Plan acknowledges how hard it is for children to come forward to report racist bullying and underlined the importance of robust and safe mechanisms to report bullying in the school structure, which needs to become mandated by the Welsh Government, and schools must be held accountable if they fail to do this. There was concern that the Plan does not mention how schools will be held accountable if they do not respond to complaints appropriately or record identity-based bullying; or to detail what mechanisms are in place for making complaints against schools. It was felt that, without that accountability and a clear, accessible route to raise concerns when action has not occurred, it is unlikely whether any meaningful change will occur. There is a need for safe spaces where pupils can go for help and a need to make sure that children know who to go to and how to get help. Anti-racism and anti-bullying education in the classroom and bystander training are needed to help bullied children who are scared to talk. Parents also need to be informed on reporting and complaints procedures and on what action will be taken by the school in the event of a complaint, because data collection is meaningless unless parents know how to report and are confident that such issues will be dealt with robustly and appropriately. An independent body should be created which can support both schools and pupils or parents when cases need to be escalated. There were strong views that more needs to be done to ensure that experiences of discrimination and racism are not labelled as teasing, or regular bullying. There should be specific guidance for racist incidents, separate from the bullying guidance. Schools need to introduce safety and protection to students, because racism and discrimination makes them feel dismissed, ignored and unsafe. One suggestion was that such safe spaces should be facilitated by youth workers instead of teachers, because these relationships need to be based on trust. It is paramount that victims of racism are adequately supported, especially as Black, Asian and Minority Ethnic pupils are less likely to access mainstream counselling services. School Senior Leadership Teams and relevant staff members should receive training in this area to be able to provide immediate support to those experiencing racism. They should also have access to local external bodies who specialise in this kind of support for young people.

308. LAs (n = 5), third sector organisations and networks (n = 8+), education boards, networks and associations (n = 3), trade unions (n = 4) community organisations (n = 2+), public sector organisations (n = 3) and one individual respondent (n = 1) stated strongly that the Plan needs to acknowledge that various minority groups are treated differently in society and that teachers, schools and inspectors need to understand that all Black, Asian and Minority Ethnic groups have distinct cultures and might experience racial and religious discrimination in different ways. Members of the smaller minority groups tend to be overlooked and lumped together with more prominent groups, ignoring the fact that their experiences are distinct, and their children might feel more isolated. The final REAP must reflect the

diversity within different ethnic and religious groups and must involve parents, carers and children at every stage, including planning, delivery and inspection. Welsh Government must ensure that schools work with families and not in a tokenistic way, more needs to be said in the Plan about families and parents because education does not stop at the school gates. More could be said in the Plan to recognise parents and community groups as a resource for schools, i.e., involve them more in education, welcome them into schools and allow them to participate as a way of naturally demonstrating diversity and how different communities can live together and learn from each other.

309. LAs (n = 5), third sector organisations (n = 7), education boards, networks and associations (n = 3), trade unions (n = 4) community organisations (n = 2+), public sector organisations (n = 3) and one individual respondent (n = 1) asserted that Welsh Government should ensure that all children, of all ages should be heard before being excluded and all children should have the right to appeal against exclusions and to be given support when doing so. Such children should also be provided with age-appropriate legal advice and assistance throughout the appeal or claim process. In relation to the use of restraint: Welsh Government should set a national priority with the aim of minimising restraint and reducing its disproportionate use. This should be based on national data about the use of restraint in schools in Wales. The data must be made available by adopting the recommendations about recording, monitoring and reporting. Schools should include an objective in their Strategic Equality Plans in accordance with this national priority with the aim of minimising restraint and reducing disproportionate use.

310. Welsh Government should undertake a separate inquiry into racism in Welsh schools to improve its understanding of racism in schools and to look into disproportionately high exclusion rates for ethnic minority pupils and analyse the reasons for children displaying such behaviour to warrant an exclusion and whether their behaviour was a reaction to racism.

311. LAs (n = 5), third sector organisations (n = 7), education boards, networks and associations (n = 3), trade unions (n = 5) community organisations (n = 2+), public sector organisations (n = 3) and one individual respondent (n = 1) explored some of the challenges to implementing an anti-racism approach. For example, if a child is racist towards a teacher, how is this dealt with by the school and by authorities? Is there a difference in how racism is treated when it comes from a child? Is there a difference between racism which arises from ignorance or racism arising out of malicious intent when both are equally able to impact the recipient negatively? How would teachers and school workers deal with this and how could Welsh Government strengthen the school's position in dealing with racism? There are comparable questions in other workplace sectors, but these practical questions are not addressed in the Plan. One trade union (n = 1) detailed lived experience, stating that at the '2020 BME Teachers' Consultation Conference', many teachers reported experiences of racist bullying, harassment. Micro insults, micro invalidations and other forms of covert racism featured in the daily lives of many Black, Asian and Minority Ethnic teachers. Sixty per cent of Black, Asian and Minority Ethnic teachers reported receiving racist verbal abuse from pupils; 16 per cent had received racist

abuse from a parent or carer; 60 per cent reported not receiving support from senior leaders when reporting this behaviour; 59 per cent reported that they had experienced attempts by others to exclude or deny the validity of their identity, thoughts, feelings or experiences.

312. LAs (n = 5), third sector organisations (n = 7), education boards, networks and associations (n = 3), trade unions (n = 4) community organisations (n = 2+), public sector organisations (n = 3) and one individual respondent (n = 1) highlighted, with respect to the wider university community, that a number of Black staff felt that institutions require meaningful forums in which Black students can raise their voice. Crucially where this occurs, a decision maker must be in the room to actively listen. It was suggested that reporting systems were broken in at least one HE institution, as a lack of processing capacity means that some complaints are not addressed or recorded which has led to severe underreporting. In another example, a Black college lecturer described their difficulty in obtaining a copy of his college equality strategy, neither being able to obtain an online or paper version despite multiple requests. Feedback made clear that Black staff will only raise their voice where they see a real possibility of wide-ranging structural transformation and, as it stands, many younger academics are reluctant to place their heads above the parapet: *“because BME people are a minority in these institutions, I have seen staff and students literally walking down the concourse with their heads down.”* In both Further Education and Higher Education, there is an urgent need to raise the profile and standing of Black staff as informal power networks within Higher Education have been described as not always welcoming of Black staff.

Diversifying the teaching workforce, governors, leaders and regulatory authorities:

313. Trade unions (n = 6), one health organisation (n = 1), third sector organisations and networks (n = 4+), community organisations (n = 1+) and education boards, networks and associations (n = 2) asserted that academia and academic institutions in Wales must better represent the student bodies they deliver learning and teaching to. There is a need for a Welsh Government strategy to increase the number of new entrants to the teaching profession and to make it significantly more diverse. It was suggested that the creation of mentoring programmes and scholarships could encourage ethnic minority people into teaching. Successful school's education and environments rely on the entire school workforce so, although it is obviously important to increase the ethnic diversity of teaching staff, it is also important to improve proportional ethnic diversity of the entire school workforce and ensure there are good career development structures in place. This same principle applies across the whole education workforce, whether in schools, further, or higher education. This is important as a relatively high rate of school support staff workers are Black, Asian, and Minority Ethnic people – an occupation group which is often overlooked in discussions about the education workforce. Respondents further asserted that, staff in the wider education sector, including ESTYN staff, should also become more diverse through positive action in recruitment if necessary and the Plan should also include an action around recruiting more Black, Asian and Minority Ethnic governors, as recommended by Brentnall in his 2017 research into improving engagement and achievement among ethnic minority

learners in Wales. More voices of the communities are needed as governors to highlight cultural needs and it will be important to ensure the policy to increase numbers of Black, Asian and Minority Ethnic governors is implemented rigorously by organisations. Additionally, many parents are not clear on how to become a governor, therefore more information on this is needed. In relation to Goal 3, the final bullet point lacks ambition in involving ethnic minority people in governance. The action to include ethnic minority people on boards can be viewed as tokenistic and should consider the realities of ensuring that those board members representing ethnic minority communities feel comfortable and supported in their roles and do not feel like a lone voice in a crowd. It was strongly recommended that there should be regular reporting on teaching staff (including the wider teaching workforce) diversity and recruitment and student recruitment.

314. Trade unions (n = 5), one health organisation (n = 1), one third sector organisation (n = 1), community organisations (n = 1+) and education boards, networks and associations (n = 2) highlighted that ethnic minority teaching staff are less likely to be awarded permanent contracts and are more likely to work in supply teacher roles. Writing progress into senior performance objectives and remuneration as it is felt that HEFCW's closed-doors approach to resolving poor practices, described as 'meetings without coffee,' does not carry sufficient force or visibility to support a culture of change.

315. One public sector organisation (n = 1) highlighted the importance of embedding anti-racist training and practice into teaching qualifications, including assessment of how students incorporate such training into their practice. Respondents want to see actions in the Plan around consultation and participation with pupils to prevent and tackle racism in school, as if pupils see racism and experience racism in school and see that it is dismissed or swept under the carpet, they are less likely to see a future for themselves as part of that system. One third sector network (n = 1+) asserted that there needs to be more ethnic minority role models in education.

Teacher training:

316. Third sector organisations and networks (n = 5+), one public sector organisation (n = 1), one trade union (n = 1) and LAs (n = 2) stated strongly that teachers must be better educated, trained and have better understanding regarding race and racism as well as current issues, with culturally competent teachers. All teachers must receive anti-racism training and must be able to evidence this at point of entry into the profession. Initial Teacher Education and professional teaching standards would need to have this embedded, together with Cultural Awareness and Cultural Competency training, to provide new trainee teachers training with a good basis and understanding as they launch out in their career working with children and young people. Cultural diversity training should be an integral component of Initial Teacher Education courses and the curriculum and should be delivered by those who have lived experience. Such training must also form a part of teacher's continued professional development, and the Education Workforce Council should be responsible for overseeing this. All teachers must be trained appropriately on how to

recognise and respond to racism effectively and robustly ensuring those providing education are equipped to tackle the subject of anti-racism in an effective way and are trained appropriately so they feel fully equipped to teach ethnic minority histories across all areas of learning and experience. Teachers must also be equipped to challenge unconscious bias and training should also extend to dealing appropriately and constructively with complaints and the person making the complaint. Such training must include clear timelines for development and implementation of this training. Such training should include talks around micro-aggressions; also, gaslighting is a common issue in the classroom, this too needs to be addressed in training because it makes the classroom experience for Black, Asian and Minority Ethnic students tiring and uncomfortable.

317. Third sector organisations and networks (n = 5+), one public sector organisation (n = 1), one trade union (n = 1) and LAs (n = 2) stated strongly that anti-racist training is not just for schools but for leaders, Local Authority officers and Welsh Government – the people who make decisions and hold the budget. It was noted that Wales’s Education Consortia need to be involved in training and must be actively engaged. The Plan needs to spell out how the training is going to be done, as we require whole system / culture change – not just a tick box exercise. A constant rolling programme is needed as one-off training is tokenistic and racist in itself. There should be a commitment from all levels – national and local government. Respondents asserted that inspectorates such as Estyn also need to be included in this training because Estyn need to have a good understanding of racist bullying reporting by schools and the knowledge and expertise to support schools in this. Estyn inspectors require Cultural Awareness and Cultural Competency training as well.
318. Third sector organisations and networks (n = 4+), one public sector organisation (n = 1), one trade union (n = 1) and LAs (n = 2) asserted that funding is needed for a comprehensive training programme for existing staff in schools. The time staff require to do this training must also be considered so that the whole approach can be completely embedded within the curriculum.
319. Respondents also asserted that a resource bank of materials for all teachers is needed (e.g., on Hwb) so that there is a common approach throughout Wales e.g., lesson plans and ideas; ideas for involving parents and the community for cultural enrichment and giving the opportunity for learners to experience diverse cultures, religion, languages etc.

Funding and resources needed:

320. One trade union (n = 1), education boards, networks and associations (n = 3), third sector organisations (n = 3) and LAs (n = 2) asserted that appropriate funding and engagement structures are paramount to achieving the goals and actions in the Plan. Schools must be given sufficient funding to provide mandatory training for all – governors, head teachers, teachers and other school staff should undertake training to reinforce a whole school ethos of anti-racism and diversity. To change teachers’

and children's views, this must be embedded into the school curriculum and not be seen as one-off sessions. There has to be a meaning behind the delivery and children and schools must understand why they are delivering it and what they want to achieve, as opposed to just an awareness exercise. Higher education institutions will also require more support to deliver on anti-racism effectively through Higher Education Funding Council for Wales and AdvanceHE. The Advance HE project that has been administered on this has been helpful, but there needs to be more to assist large scale HE institutions to effectively deliver on the tough challenge of changing outcomes for Black, Asian and Minority Ethnic people, which is a significant and complex challenge and requires assistance. Ring fenced funding for an explicit purpose will be a more meaningful means through which to provide targeted interventions as it is necessary for all learners to have access to provision on all historically marginalised groups and that this should not depend on the Local Authorities deeming this an area of focus for them. This important education should be consistent for all learners rather than with regional differences in commitments in this area.

321. One trade union (n = 1), education boards, networks and associations (n = 3), third sector organisations (n = 2) and LAs (n = 2) highlighted reductions in funds for the most disadvantaged pupils, including those in receipt of the Minority Ethnic Achievement Service (MEAS) and through the Education Improvement Grant. Welsh Government will need to reverse the cuts made to the Minority Ethnic Achievement Support (MEAS) and Education Improvement grant in order to achieve the outcomes in the Plan.

Asylum seeker, Refugee and Migrant access to education:

322. Third sector organisations and networks (n = 3+) stated that the Plan needs to provide more support and quick routes to assist refugees into jobs that they are qualified for in their home countries. Lived experience: *"I have my bachelor's degree back home and I have a nursing certificate, but to become a nurse in this country, I have to go back to school, after spending many years in my country studying and working, and I think that is not fair. I will not spend my life going to school, I want to do something I love. If you are qualified as a nurse, you should be able to do a refresher course that would enable you to take up a position here without having to start all over again. There should be a fast track for nurses and doctors who are qualified in their own countries."* Welsh Government should implement a holistic employment support strategy for people seeking sanctuary, with career pathways for key sectors, including initial access to work and job progression, with recognition of prior qualifications and learning and steps to professional registration. This should build on expanding the Wales Asylum Seeker and Refugee Doctors programme and draw on Welsh Government Skills and Employment and ReStart reports.
323. Third sector organisations and networks (n = 3+) stated that refugees require more information and support, including greater ESOL support, more social groups and peer support for integration. The review into the ESOL provision was welcomed and there were calls for diversity in how ESOL is taught. People from the Roma community who have faced abuse and marginalisation from education in their home

country are not able to participate in classroom-based reading and writing forms of ESOL classes. This means conversational classes, driven by practical means of improving language, will in turn allow for greater accessibility to the employment market and better outcomes for people. The value of ESOL provision being given in home language to facilitate English learning was highlighted.

324. Third sector organisations and networks (n = 5+) stated that refugees required more targeted support for refugee children in schools. Lived experience: *“Some parents do not speak English at all, which impacts on children in school. They may not be confident to engage in school activities. Children who arrived in this country with little English are struggling to catch up. We need to teach parents as well. It is heart-breaking that children need to translate for their parents. Parents need to be educated as well. There should be mechanisms in the Plan to assist these parents.”* Welsh Government should fund free Welsh and English lessons for all people seeking sanctuary, including digital and face to face methods and sufficient support for progression to higher levels and include cultural awareness and orientation as part of language learning. It was also highlighted that Black, Asian and Minority Ethnic parents also need educating about their rights if their child experiences racism or bullying and the steps they can take to address this.
325. Third sector organisations and networks (n = 3+) stated that eligibility for educational grants to migrant, refugee and asylum-seeking children and young people in Wales, including those with No Recourse to Public Funds, should be expanded. This should include the Educational Maintenance Allowance, Financial Contingency Fund, Free School Meals and the Pupil Development Grant. It was suggested that this was an excellent opportunity to put any future plan on a firm footing by securing from Cabinet, including the First Minister and Finance Ministers, the necessary longer-term commitments. A cross-cutting commitment on access to all Welsh public services for everyone who needs them would be a crucial step in driving forward implementation of an Anti-Racist Wales.
326. Third sector organisations and networks (n = 3+) proposed a number of areas for action:
- a. Expand advocacy services to ensure that all children in asylum seeking families are entitled to an independent advocate and are supported through active participation.
 - b. Increase support for existing Unaccompanied Asylum-Seeking Children including greater advocacy resources for those challenging age assessments and a recruitment and training programme for appropriate adults to independently participate in the age assessment process.
 - c. Provide clear guidance to schools and LAs to ensure that children and young people from refugee backgrounds are not disadvantaged in access to school places and are supported if starting school midway through the academic year.
 - d. Fund free school meals for children from families on section 4 support and those with NRPF, including those who have been refused asylum.
 - e. Expand the provision of the Government’s free childcare offer to all families, including those seeking asylum and those with No Recourse to Public Funds.

- f. Waive fees for higher and tertiary tuition for refugees and people seeking asylum. Respondents also highlight that, under the policy of the EU Settlement Scheme, access to funding for Higher Education is different for people with Pre-Settled Status and Settled Status. This inequality should be addressed in order to ensure that all EEA migrants have equal access to Higher / further / tertiary education and are not blocked from this provision by unreasonably high costs to study.

327. Third sector organisations and networks (n = 3+) welcomed the understanding in the Plan of adverse past experiences of Asylum Seeker and Refugee children and how these can affect school life and educational performance and outcome. It was proposed that this understanding should be extended to Roma and migrant children who experience severe hardship in home countries and whose parents struggle to adapt to life in the UK.

Existing strategy:

328. Third sector organisations (n = 2), one public sector organisation (n = 1), trade unions (n = 2), community organisations (n = 1+) and one education board / network / association (n = 1) asserted that the best way to support institutions is to ensure that the Plan aligns with all active streams of government. In post-compulsory education and training, this will include the planned Commission for Tertiary Education and Research, the Additional Learning Needs Regulations, Social Partnership and Procurement Bill and the Renew and Reform Plan. Thought should also be given to Corporate Joint Committees which touch upon skills planning as well as qualification reform (Qualified for Life), both in terms of assessment content and impact. For instance, there is evidence that high stakes summative testing such as GCSEs and A Levels combine with background disadvantage to negatively impact outcomes for some Black, Asian and Minority Ethnic students. It was suggested that leaders will be less likely to depend upon arguments around institutional autonomy if it is clear that the Plan touches upon every aspect of their planning and operations. In relation to the Commission for Tertiary Education and Research, Social Partnership and Public Procurement Bill and Corporate Joint Committees, alignment can be achieved either through ministerial remit, the appointment of a dedicated board member and / or convening a dedicated subcommittee to report back to the board. The importance of this was stressed in the light of the University College Union's assessment – there is a tendency for organisations to recuse themselves from obligations (such as the Equality Act's Socio-Economic Duty) on the basis that they are 'insufficiently strategic.'

329. One trade union (n = 1) explained that the Public Sector Equality Duty has made little impact in schools to date, and NASUWT research shows that the majority of schools are unaware of their duties and obligations under the duty; as a result, race and other equalities issues have often been approached in a 'tick box' manner. Third sector organisations (n = 2) added that schools in Wales must comply with their Public Sector Equality Duty obligations, in particular, the requirement to publish Strategic Equality Plans and equality objectives. Such plans should focus on

addressing the most significant inequalities, including identity-based bullying related to race and attainment gaps.

330. Third sector organisations (n = 2), one public sector organisation (n = 1), trade unions (n = 2), community organisations (n = 1+) and one education board / network / association (n = 1) asserted that Welsh Government must consult on how best to enable Higher Education Funding Council for Wales and the forthcoming Commission for Tertiary Education and Research, to effectively assess and measure progress on whether Higher Education providers have taken sufficient steps to tackle racial harassment and impose conditions of funding or registration where they have not, by improving their powers or increasing the use of their existing powers. Welsh Government should make HE accountable through its fee and access plan by setting out key principles for the way people should work which would guide all work referenced in the document. Any organisation in receipt of significant amounts of public funding should be expected to have to adhere to the Plan.
331. Third sector organisations (n = 2), one public sector organisation (n = 1), trade unions (n = 2), community organisations (n = 1+) and one education board / network / association (n = 1) stated strongly that the manner in which ESTYN evaluates diversity, inclusion and equalities in schools must be overhauled. It was reported that, to date, ESTYN inspections have had limited focus on equalities considerations, even though it has been a field they should have been evaluating. The Plan should contain more detail about Estyn's refreshed inspection framework and how it will support Black, Asian, and Minority Ethnic educators. Targets, assigned responsibilities and effective evaluating and monitoring mechanisms, including ESTYN inspections, will make or break the realisation of education related goals in this action Plan. All institutional processes should be audited to ensure parity across the piece to ensure that race is brought up to the level of other equality streams. Including ESTYN in anti-racism inspection is very welcome, but inspection should not be judged only on what the school presents but should involve discussion with parents as well.
332. Third sector organisations (n = 2), one public sector organisation (n = 1), trade unions (n = 2), community organisations (n = 1+) and one education board / network / association (n = 1) highlighted the opportunity to reference alignment to the All-Wales School Liaison Core Programme known as Schoolbeat Cymru. Respondents refer to page 67 of the Plan which reads: "*we will strengthen data collection and reporting of racist incidents and harassment in schools in Wales.*" It was felt that this goal will not be achieved without making the recording of identity-based bullying a legal duty for schools rather than just an expectation, as it currently is. It was also noted that the Education and Youth Services section lacks detail and needs to be more focussed on the role of youth engagement services in supporting the Plan. Many of the actions refer to additional / supplementary action plans and strategies needing to be developed to achieve the actions in this Plan, resulting in a lack of clarity and specificity in relation to future actions and measurable outcomes.
333. Third sector organisations (n = 2), one public sector organisation (n = 1), trade unions (n = 2), community organisations (n = 1+) and one education board / network

/ association (n = 1) have also commented on the following goal: “to ensure that ethnic minority staff are enabled and supported to access, succeed and progress in employment in higher education regardless of their racial background,” stating that this goal should also be aligned to a wider education strategy. Respondents stated that the actions within this goal such as securing information on an ethnicity pay gap and staff support should be coherent and cooperative.

334. One trade union (n = 1) suggested Welsh Government consider the existing resources from unions such as NEU (National Education Union) and NASUWT.

Missing actions / suggested amendments / other comments:

335. Third sector organisations and networks (n = 10+), education boards, networks and associations (n = 5), LAs (n = 3), community organisations (n = 2+), trade unions (n = 2) and public sector organisations and networks (n = 4+) were disappointed that this section of the Plan misses out the early years settings – consideration should be given to this in the Plan and how the Plan can link to the Early Childhood Education and Care (ECEC agenda), especially as training should start at foundation stage / early years education. The actions associated to education and schools are not clear or operationally grounded to be useful to schools. It was felt that a much broader range of actions were required to deliver the desired outcomes. An additional action is required for public bodies and education institutions to conduct reviews on school and education-related policies, with a requirement to amend policies which result in direct or indirect racism for pupils according to their ethnic and cultural needs and identity. For instance, some schools in Wales have had uniform policies that unfavourably impact Black pupils, particularly in banning specific hairstyles.

336. One public sector organisation (n = 1) stated that Welsh Government should encourage higher education institutions to develop initiatives such as the [New Buckinghamshire University Pledge](#) as a vehicle for positively ensuring inclusion. The Pledge is not onerous and can be integrated into higher education equality, diversity and inclusion strategies. Welsh Government could consider making such initiatives mandatory for higher education institutions if they are serious about removing the practical barriers to inclusion in higher education and the professions. One education board / network / association (n = 1) recommended, in respect of the Skills Gateway, using tried and tested methods of delivery, drawing on the experience of those in the adult education sector. The Open University’s free online learning platform OpenLearn has the potential to provide a route for delivery of online courses and resources to support this work. Lifelong learning does not appear to be considered in the draft Plan, the only reference to adult community learning is in respect of ESOL provision. Consideration should be given to the role of adult community learning, lifelong learning, and flexible / part-time learning in ending race inequality.

337. Third sector organisations (n = 9), education boards, networks and associations (n = 5), LAs (n = 3), community organisations (n = 2+), trade unions (n = 2) and public sector organisations and networks (n = 4+) felt that the language in

which the document has been written was not accessible and reflects unhelpful policy speak. The Plan needed to be re-written in a style that is accessible to all who might have an interest in anti-racism, including staff, parents, governors and councillors. Parents, families, guardians, carers (not just School / Staff / Learners) must be involved and reflected in the goals for education and the Plan should provide a basis for engagement.

338. Third sector organisations (n = 9), education boards, networks and associations (n = 5), LAs (n = 3), community organisations (n = 2+), trade unions (n = 2) and public sector organisations and networks (n = 4+) proposed that the words: *“We will encourage,”* be changed to, *“We will require,”* in the actions for universities. Welsh Government should also consider changing the wording, *“irrespective / regardless,”* of racial background to, *“ensuring minority ethnic students / staff have an equivalent experience to staff not from a minority ethnic group.”* Also: *“staff from minority ethnic groups are able to succeed,”* consider changing to just, *“staff from minority ethnic groups succeed,”* to reinforce the commitment to change. In relation to Goal 2: *“To ensure that anti-racist practice in all policies and procedures enables ethnic minority students can access, progress and succeed in higher education regardless of their racial background,”* it was highlighted that there is a grammatical error and suggest the sentence be revised. It was also pointed out the actions in relation to Goal 2 are not specific enough and that the language used is vague. It would be useful to expand on who the stakeholders are. It was also pointed out that, *“Higher Education in Wales becomes a more anti-racist, positive and inclusive place for staff and students,”* is vague and the word *“becomes”* does not provide clarity on clear and quantifiable change. Respondents recommend the Plan includes more KPIs for example around graduate outcomes, access to placements etc., which will evidence the improvements in the experiences and outcomes of minority ethnic students.

339. One trade union (n = 1) has commented on the following goals: Goal 1 should be to improve the experiences of learners and the school workforce, not just teachers (as it currently does). Goal 2 is to improve diversity of the teaching workforce and embed anti-racist professional learning. It is not clear if the phrase ‘teaching workforce’ is intended to include learning support assistants and others, as most of the associated actions appear to apply specifically to teachers. More clarification is needed here. Other wording was highlighted as being ambiguous. For example, what is meant by, *“Further Education in Wales is diverse, in particular for ethnic minorities”?* (FE Goal 2, Action 2). Rephrasing is required to establish what is diverse: standards of education within institutions, racism across different FE institutions or something else. Propose rephrasing in the Youth Work section (Education: Goal 1, Action 4) so that it is clear who the *“Sector Partners,” “Board”* and *“Workforce”* referred to include. For example, do these encompass school staff and officers or do they refer purely to the Youth Service?

340. Third sector organisations (n = 9), education boards, networks and associations (n = 5), LAs (n = 3), community organisations (n = 2+), trade unions (n = 2) and public sector organisations and networks (n = 4+) highlighted that the outcomes need to be SMART, with clear measures of success. At present, because

the timescales are not clear, it is hard to understand if the actions are achievable. It would help if the Plan were more consistent, i.e., the housing section has more clear timescales and contains a lot more detail within the actions.

341. One public sector organisation (n = 1) wants to see action to ensure that all children and young people have access to the resources they need for education including digital resources such as reliable broadband and technology. It will be important to see clear evidence of pupil involvement in the work that will be undertaken on exclusion guidance for schools and pupil referral units. It will be important for any renewed guidance to reflect the lived experiences of those who have been subject to exclusion and whose insights about the process could provide insights into what changes need to be made. The Plan should say more about investigating the low numbers of Black, Asian and Minority Ethnic pupils in SEN settings. It is felt that further work is needed to explore this issue, as it could be indicative of bias operating at a local authority or setting level.
342. Third sector organisations (n = 9), education boards, networks and associations (n = 5), LAs (n = 3), community organisations (n = 2+), trade unions (n = 2) and public sector organisations and networks (n = 4+) asserted that, in the context of higher education there could be more consideration of the intersectionality of race with culture and religion. It was also noted that there does not seem to be consideration of sexual orientation within the document and LGBTQ+ inclusion and race equity should be dealt with interdependently, rather than as separate priorities. The implementation of the new curriculum for Wales should take a whole-school approach to inclusivity which uses each Area of Learning and Experience as a vessel through which all people can see themselves in what they learn.
343. Third sector organisations (n = 9), education boards, networks and associations (n = 5), LAs (n = 3), community organisations (n = 2+), trade unions (n = 2) and public sector organisations and networks (n = 4+) stated that the Welsh Government's commitment to looking at the wider education sector is welcomed but that this must include consideration of factors beyond individual schools that affect children and young people's outcomes, for example, the availability of vocational subjects. The expertise of the Black Further Education Leadership Group should be sought on a variety of goals and actions but in particular on the issue of data.
344. Third sector organisations and networks (n = 3+) highlight that rural schools have less experience of working with Black, Asian and Minority Ethnic communities so targeted support will be needed for them to deliver on the goals in the Plan. The good practice of schools should be highlighted and celebrated so other schools can see a benchmark. It was also suggested that the Plan needs to recognise how education systems are currently designed to maintain whiteness and privilege.

Crime and Justice:

345. Third sector organisations and networks (n = 17+), trade unions (n = 2), criminal justice agencies (n = 3+), one health organisation (n = 1), LAs (n = 8), individual respondents (n = 11), community organisations (n = 2+), public sector organisations and networks (n = 4+) and one education board / network / association (n = 1) have provided comments on the Crime and Justice section of the Plan.

Improving hate crime reporting and criminal justice systems:

346. Trade unions (n = 2), third sector organisations (n = 3), criminal justice agencies (n = 1+) and one public sector organisation (n = 1) highlighted that this section of the Plan should include actions to improve the reporting of hate crime in England and Wales, by strengthening the initial handling and recording of hate crime reports, improving the quality of support to victims and improving the effectiveness of hate crime training for police forces. All victims should be informed about, and regularly updated on, the investigation and / or prosecution. It was suggested, to address the high levels of under-reporting, police forces in Wales develop and deliver a system or portal that can make it easier to report and monitor hate incidents and hate crimes, including those which are racially motivated, so they can then be dealt with more swiftly and in a time-bound manner. Initial police response, CPS and the Judiciary's role in dealing with hate crimes and incidents should be examined and strengthened.

347. Trade unions (n = 2), third sector organisations (n = 3), criminal justice agencies (n = 1+) and one public sector organisation (n = 1) suggested Welsh Government work more closely with all Criminal Justice partners and not just Victim Support – perhaps through the Hate Crime Board Cymru – to examine and understand the experience of victims of hate crime and how it can be improved. It was suggested that links between the criminal justice sector and the race sector are weak and underdeveloped. There should be stronger and sustained structures through which communication and feedback loops happens, and existing groups such as the Hate Crime Board Cymru and the Criminal Justice in Wales Group should be widened to include at least two community / race sector representatives – one Black, Asian and Minority Ethnic group should not be expected to represent the diversity of the sector.

348. Trade unions (n = 2), third sector organisations (n = 3), criminal justice agencies (n = 1+) and one public sector organisation (n = 1) expressed concern about the over saturation of White presenting people in Equality, Diversity, and Inclusion roles. This impacts people of colour because White people are then responsible for determining if racism has occurred – there needs to be a process to let Black, Asian and Minority Ethnic people decide if an incident is racist or not. It was important to encourage workers from ethnic minority communities to report any workplace experience to Crown Prosecution Services and for them to treat these cases as quickly and as seriously as they would any assault allegations, rather than for them to be dismissed so soon. It was also suggested that Welsh Government must work to ensure that the Independent Office of Police Conduct is robustly

working towards justice and will treat claims of racism and police brutality with the utmost earnestness.

349. Criminal justice agencies (n = 1+) highlighted that some criminal justice partners feel that the increased representation of certain groups within the criminal justice system is due to failures with other social, community and economic policy and structures and that if they were fixed there would be fewer people falling into the criminal justice system. To that extent it could be helpful to consider what failures in policy lead to more offending and reverse engineer policy back from the problem to fix it. There should be an opportunity for the leaders of all the key chapters / strands to come together and discuss key issues at a strategic level.

Resources (training, funding, services) needed to achieve these actions:

350. Third sector organisations and networks (n = 7+), one health organisation (n = 1), one LA (n = 1), community organisations (n = 1+), one public sector organisation (n = 1) and one individual respondent (n = 1) suggested that race equity support and advice measures are integrated into a single advice system with appropriate levels of investment. It was noted that third sector organisations are crucial in raising awareness of hate crime, supporting victims and encouraging reporting – Welsh Government must thus ensure they are adequately funded to continue this work and to support the Plan. There are limited staff resources in local council, police and other authorities with short term funding which makes longer term planning challenging – sustainable change needs sustainable funding, otherwise it will be difficult to drive this work forward and ensure its success.
351. Third sector organisations and networks (n = 7+), one health organisation (n = 1), one LA (n = 1), community organisations (n = 1+), one public sector organisation (n = 1) and one individual respondent (n = 1) stated, in relation to the question around the purpose and potential impact of providing specialist services, a more effective solution might be for increased funding to provide general provision that would release pressure on over-burdened staff teams. This would enable a greater focus on ensuring that support services can upskill their workforces to provide the best service to all victims (Black and Minority Ethnic, street workers, disabled victims or any other groups).
352. Third sector organisations and networks (n = 7+), one health organisation (n = 1), one LA (n = 1), community organisations (n = 1+), one public sector organisation (n = 1) and one individual respondent (n = 1) highlighted that there is a need for greater investment in hate crime prevention programmes and preventative action around racism by embedding anti-racist education and positive representation of ethnic diversity throughout the school curriculum. There are a limited number of face-to-face hate crime specific services to support children and references to children in this section of the Plan must be more explicit as it is in other sections of the Plan. There is a need for a concerted programme to equip individuals in how not to be a bystander, because it will not happen without it. Upskilling of the workforce and further workforce development is key to ensuring that workforces can embed into their practices the principles that guarantee that race equality is an unconscious

norm; funding will be required to provide the necessary training. Therapeutic practitioners also need to be educated in cultural and religious awareness when supporting victims, in line with treating each minority community equally, with their own beliefs and values. Education is a key factor in combatting hate crime and there is a need for community education around sexual violence also because there are often cultural, historical and religious reasons why some sexual violence (within marriages for example) is not always recognised as that.

353. Third sector organisations and networks (n = 7+), one health organisation (n = 1), one LA (n = 1), community organisations (n = 1+), one public sector organisation (n = 1) and one individual respondent (n = 1) asserted that the Plan should ensure that training for professionals on the Prevent Duty is anti-racist to tackle the deliberate or ignorant misuse of Prevent to further marginalise minoritised communities, and for Prevent to recognise, respond to and voice the extent of far-right radicalisation. Embedding a culture of zero tolerance and countering institutional racism should include defining the need to act on reports of racial hate crime and injustice as a matter of social policy.

Address the lack of discrimination support services:

354. Criminal justice agencies (n = 1+), one health organisation (n = 1) and third sector organisations and networks (n = 4+) highlighted the lack of support in Wales for organisations to take on cases to challenge discrimination. Within the overarching area of 'crime, justice, hateful attitudes and community cohesion,' there is a deficit in detail covering the intersection of race with other protected characteristics. Welsh Government should work to increase awareness across all the protected characteristics and address some of the underlying core issues behind repeated instances of discrimination. The proposed action to ensure racial harassment and discrimination is addressed must be properly resourced through additional ring-fenced funding, training and staff time.

Hate crime / policing is not devolved – are these actions achievable?

355. Criminal justice agencies (n = 2+), one trade union (n = 1), one public sector network (n = 1+), individual respondents (n = 2), one third sector network (n = 1+) and one education board / network / association (n = 1) were concerned that because hate crime legislation is not devolved, the proposed actions around hate crime may not be straightforward to support or implement because they contravene national policy / directions from Westminster. Any monitoring group would need to be aware of where devolved competence lay and be careful that it does not attempt to hold those non-devolved bodies to account if they do not have the power to implement the actions of the Plan. Welsh Government must actively aim to obtain more devolved powers in regard to the criminal justice system. Welsh Government should also strongly lobby the UK Government (perhaps with the support of the other devolved administrations) to address through legislation the "hate pit" of social media and the platform it provides racists. Respondents highlighted the need to combat cyber racial hate and discrimination which is still so frequently posted on social media and is one of the most common means of hate crime. One trade union (n = 1)

asserted that Welsh Government should pursue the devolution of policing and justice as recommended by the Thomas Commission.

356. Criminal justice agencies (n = 2+), one trade union (n = 1), one public sector network (n = 1+), individual respondents (n = 2) and one education board / network / association (n = 1) stated in relation to the action, *“Identify and propose improvements to hate crime law and processes through the Hate Crime Board Cymru,”* that the fact that justice and policing is not devolved, would be a major restraint on implementation. A change to the wording is required for this action in case it gives the impression that Welsh Government has the power to change hate crime law. Alternative wording suggestion: *“Identify and propose improvements to the UK Government on non-devolved hate crime law and processes, through the Hate Crime Board Cymru.”*

Existing strategies / initiatives / plans & potential link ups:

357. LAs (n = 5), criminal justice agencies (n = 3+), third sector organisations and networks (n = 4+), one public sector network (n = 1+) and individual respondents (n = 3) stated that streamlining is important because there is already a lot of similar work and multi-agency groups that meet to discuss hate crime and racism across Wales. In relation to provision of guidance, much written guidance is already in existence. The focus of the Plan should be on amplifying awareness of existing resources and provision of guidance or whether different solutions are needed and should be explored. Respondents highlight that specific housing actions should focus on reflecting and joining the actions and initiatives in the specific hate crime section to uphold all tenants’ rights for instance. Criminal justice agencies (n = 1+) stated that the information and actions in the ‘Crime, Justice, Hateful Attitudes and Community Cohesion’ section on ensuring that hate incidents and racist views are tackled should be cross-referenced with the actions in the Education section. There are actions in the Education section around ensuring mandatory learning of understanding anti-racism and how to challenge cultural norms. These actions also form part of the overall aims of the section on hateful attitudes. Questions were raised to how the hate crime campaigns committed to in this section will be different from what has been conducted before, e.g., hate crime awareness week. There was a need to look at whether these campaigns have changed anything and, if not, what will this Plan look to do differently and what will it expect from the Criminal Justice System? Making this clearer will strengthen the actions and their likely impact.
358. LAs (n = 5), criminal justice agencies (n = 3+), third sector organisations and networks (n = 4+), one public sector network (n = 1+) and individual respondents (n = 3) suggested Welsh Government change the actions against Community Cohesion Teams to medium to long term from short term to facilitate sustained improvements in cohesion. Longer funding periods for the Community Cohesion programme would allow for longer term strategic planning and further opportunity to embed good practice. The rationale for not mentioning other partnerships involved in the criminal justice system, including the Policing and Partnership Board, Contest Cymru Board, Safer Communities Board, Community Safety Partnerships, Youth Justice Advisory Panel, Public Service Boards, was queried. All partners need to work together to

promote an anti-racist Wales. The full range of partnerships involved in community safety need to be acknowledged in the Plan and engaged with at high strategic to operational levels. Third sector organisations should have a voice at the Criminal Justice in Wales Board and Local Criminal Justice Boards to drive strategy and ensure that new Victim Code of Practice entitlements are met. Welsh Government should interlink the REAP into the community cohesion plans and stated that the role of Police Community Support Officers funded by Welsh Government should also be considered for inclusion in this section. The role of Safer Communities Partnerships / CONTEST in supporting the delivery of the REAP should also be considered in this section because these multi agency groups play a significant role in enhancing community cohesion. There was more to do to ensure the Plan works with / links together existing strategies minimising the risk of duplication and also of leaving gaps.

359. LAs (n = 5), criminal justice agencies (n = 3+), third sector organisations and networks (n = 4+), one public sector network (n = 1+) and individual respondents (n = 3) highlighted a number of things which should be included in the Plan: the proposed Welsh Government led Strategic / Gold Group to direct race equality work across the public sector; the Wales Schools Police Officer Programme and the addition of Black History to this programme; proposed Wales wide training package on race equality for public services across Wales to access and a Welsh Government co-ordinated communications campaign to attract, retain and seek the progression of Black, Asian and Minority Ethnic people to work in the Welsh public sector.
360. LAs (n = 5), criminal justice agencies (n = 3+), third sector organisations and networks (n = 4+), one public sector network (n = 1+) and individual respondents (n = 3) stated that the actions laid out in the Plan should also explore existing programmes which tackle racist and discriminatory behaviour and adapt to suit, e.g., programme on de-radicalisation, Community Rehabilitation Company owned Erase work which tackles racially motivated behaviour. There does not appear to be any specific reference to the Youth Justice Advisory Panel for Wales or the Youth Offending Team Managers Cymru group within the Plan. Welsh Government's ability to influence actions in relation to youth justice, through the delivery of the Promoting Positive Engagement element of the Children's and Communities Grant, appears to have been over-looked.
361. Criminal justice agencies (n = 1+) suggested that Welsh Government review the function and operating model of the All Wales Hate Crime Criminal Justice Board in conjunction with criminal justice partners and consider how it sits within wider Welsh Government and policing governance. It was suggested that the group currently feels like a 'stand-alone' group that is not necessarily linked to other Welsh Government / national groups that it could influence.
362. LAs (n = 5), criminal justice agencies (n = 3+), third sector organisations and networks (n = 4+), one public sector network (n = 1+) and individual respondents (n = 3) asserted that victims' legal rights under the Victims Code of Practice must be met, and criminal justice agencies must ensure that they meet their obligations to victims. Providing a pan-Wales hate crime support service that focusses on assessing

individual needs, is embedded with local support networks and is experienced in delivering quality tailored support is absolutely vital. Only 40 per cent of crime is actually reported to the police, which means that in the majority of cases, victims are not coming into contact with the justice system. For those that do, there is evidence that their rights under the Victims' Code are not always met and that criminal justice agencies are too often not meeting their obligations to victims. Therefore, the availability of independent support is vital to ensure those who do not report to the police can access independent support. In order for there to be equity in crime and justice, the police and legal professionals must be engaged, educated and take ownership over their own role and responsibility in achieving the vision. Prevention of hate crime will only be achieved if organisations work together in partnership to consistently implement the Action Plan. One third sector organisation (n = 1) highlighted that the Hate Crime Charter and Trustmark has been a success and needs to be expanded and built upon using existing relationships forged over the last four years. Funded services should work closely together to ensure that messaging and pathways to support are clear and consistent: supported by the network of community cohesion coordinators, some key messages could be disseminated across regions in Wales.

363. Criminal justice agencies (n = 2+), one trade union (n = 1), one public sector network (n = 1+), individual respondents (n = 2) and one education board / network / association (n = 1) highlighted that there are a number of co-dependent and cross-cutting themes that impact on more than one area. For example, investment in youth community services can have a direct impact on youth offending. Whilst respecting the devolved / non-devolved split in terms of service delivery, there may be merit in making the partnership working links between policing and Welsh Government more explicit.

364. Third sector organisations and networks (n = 2+) highlighted that the Equality Act 2010 does not work as intended because people are not prosecuted for what they do.

Amendments and missing actions:

365. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 7+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) asserted that the envisaged scale or timescale of the proposed work should also be clarified. Actions need to be more clearly time focused because a lack of targeted evaluation points and opportunity to modify or change things that are not working will result in ineffectual outcomes and a reduction in the willingness to report and consequently resolve issues. Measuring racism can be particularly difficult. For example, using hate crime as an indicator of community tensions is problematic because of the levels of hate incidents which go unreported – would an increase in reporting be seen as a success because of greater awareness of hate crime or would it indicate a rise in racist abuse and violence? The final Plan must set out clearly the indicators to be used to measure success and how these will be interpreted.

366. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 6+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) commented to the effect that this section is weak and the content is wordy yet vague. There seems to be some lack of consistency between the 'Key considerations in developing the Goals' section, which says on page 22 that the key principles for policy officials developing the goals include: *"Focus on anti-racist actions, not multiculturalism or other approaches,"* and the narrative in the 'Crime, justice, hateful attitudes and community cohesion' area on page 110, which says: *"In equal measure we will seek to promote and celebrate diversity, educate and celebrate kindness and respect with the aim these positive behaviours will always win over hate and injustice."* There were also comments on, *"counter online racist hateful attitudes,"* and how Welsh Government will achieve this - more detail is required. There was confusion about the use of the term 'zero tolerance' because it is not practical in real life and people should be held accountable for what they have done. It was proposed that perpetrators should be suspended from their job until investigations have finished and be removed immediately if found guilty. It was suggested that this should apply to politicians, those in the Army, Police etc., if they are racist online on social media, in print (magazines / newspapers / books etc.), on the TV or radio or any online forums where comments can be left. Schools need to do more to challenge and prevent hateful attitudes as the norm in schools is to ignore or deny racism. It was suggested that the REAP will fail unless people at the very top take action. The Plan could set out how people in positions of influence show through their actions that they are an ally, how do they actively show that they are an anti-racist. While public sector leaders do not have the reach and influence of footballers e.g., taking the knee, they do have some. Requirements to avoid hateful narratives should specifically apply to people holding public roles and they need to be held accountable if they do foster division or hate as leaders have a strong responsibility to lead by example.

367. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 6+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) drew attention to the fact that there is no mention in the Plan of the hate that East Asians have faced as a result of the coronavirus pandemic and there being no actions in the Plan to address this. It is important that the impact of Covid-19 on hate crime and the increase in hate crime towards Chinese people and, more recently Indian communities, as a result of the pandemic, be recognised. It was also highlighted that 10 per cent of reported race hate crimes in 2020 in North Wales were English-Welsh or Welsh-English hate crimes and that these should be referenced in the Plan to consider what the effects will be on hate crime that does not relate to people who are Black, Asian or Minority Ethnic, in particular the hate crime that has been increasing between Welsh and English nationalities. Respondents also highlighted that anti-social behaviour related hate has increased as a result of the pandemic and has increased issues around mental health for people, partly due to the restrictions and partly due to hate crime. This has brought to the fore gaps in mental health provision for victims of hate crime,

and this should be added to the Plan, therefore. Criminal justice agencies (n = 1+) highlighted that the Plan should refer to racial trauma and how this impacts on individual life experiences and on ethnic minority communities in terms of mental and physical health, and in terms of feelings about accessing public services. There was no mention of prison services in Wales, beyond the new blueprint for female and youth offending. Similarly, probation and the rehabilitation of offenders, a disproportionate number of whom come from Black, Asian and Ethnic Minority communities, are also not mentioned. If these are not addressed this could result in further disruption to the plans around community cohesion.

368. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 6+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) felt there is a lack of focus on community safety, which is important for community cohesion. Wellbeing and reducing crime and anti-social behaviour is not mentioned once in the REAP suggesting silo working is likely to be the case with policy teams all working in their own spaces rather than working holistically. In relation to Community Cohesion messaging – effective public communication and awareness raising is essential, to improve general understanding and support for the sanctuary seeking community and not least to counter at times highly misleading language and statements from the UK Government and elsewhere. It should dispel misconceptions and highlight the positive contributions that this community can make to our society. The local reaction to the Home Office’s short-lived accommodation centre in Penally showed the huge sympathy and potential for support from the Welsh public. Racist rhetoric and behaviour have an increasing anti-immigrant focus which needs to be effectively challenged through policy and practice. Local community groups and befriending projects that are engaged in work to welcome people seeking sanctuary, facilitate opportunities for social contact and increase social cohesion, need to be supported; Welsh Government should seek to learn lessons from these projects to strengthen existing work on community cohesion in partnership with local services. There should be a specific strand within the Crime and Justice part of the Plan relating to the particular issues asylum seeker, refugees and migrants face.

369. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 8+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) highlighted that growing discontent with, and lack of trust in, police amongst Black and Minority Ethnic people presents a real threat to community cohesion longer term and should therefore be addressed more strongly in the Plan.

370. Criminal justice agencies (n = 2+), one trade union (n = 1), one public sector network (n = 1+), individual respondents (n = 2), third sector organisations and networks (n = 2+) and one education board / network / association (n = 1) asserted that it is not the job of the community to ensure that the people they represent do not end up brutalised by the police or attacked by people with racist views. There needs to be dialogue about policing and Welsh Government need to be brave in this regard.

Specific actions that are centred on the criminal justice system from policing, judiciary and prison system are needed. There were strong views that this section of the Plan is not radical enough and fails to offer enough security for people from marginalised communities. The lack of mention of the police was extremely worrisome for some of those responding, especially in light of the deaths of Moyied Bashir and Mohamud Mohammed Hassan. Direct attention should be paid to the treatment of individuals as they come into contact with the police, and any further contact that ensues. One third sector network (n = 1+) highlighted that the gap between South Wales police and members of the youth community in particular must be bridged. Specific examples where people have witnessed police targeting young Black boys for no reason were provided. It was suggested more thorough background checks on officers were needed and officers should face repercussions for abusing their power. The Plan should emphasise the fair treatment of Black, Asian and Ethnic Minority prisoners in comparison with their White counterparts. Feedback from Bridgend County Borough Council Youth Council suggests a target for 2030 should be to improve the trust Black, Asian and Minority Ethnic people have in institutions like the police. One third sector network (n = 1+) also stated that the Plan should say more about recruiting and retaining ethnic minority people to work in the criminal justice system.

371. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 6+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) made comments about the significance of intersectionality, in particular the intersection between race and age, when it comes to crime and justice and individuals possessing these protected characteristics suffering more discrimination than others within the criminal justice system. The Plan could include specific action on this intersectionality – also, an added gender element too to that intersectionality example should be considered, with males being the focus. Additionally, socio-economic factors are also relevant. All these factors affect the trust of people to engage with police and with services and this is amplified when it is intersectional. There is a need for a better description on how hate crime can work intersectionally, highlighting that the reported LGBTQ+ hate crimes in Wales have risen in recent years alongside hate crimes based on race. The manner in which hate crimes are tackled must address it as it impacts on all marginalised groups as well as at the intersection of these groups. It appears that this complexity may have been overlooked but may also fall out of the scope of the Plan, and this needs to be addressed. The narrative should speak to the distinct experiences of LGBTQ+ Black, Asian and Minority Ethnic people. It is also important to incorporate intersectionality within formal partnerships, service user panels, advisory boards, critical friend assessments of resources and campaigns and coproduction focussing on specific issues and projects.

372. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 6+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) made specific comments on the following goals:

- a. In relation to Goal 1 in this section, *“for Wales to be an anti-racist country which feels a safe place to live by eliminating hateful attitudes and supporting victims of racially motivated hate crime,”* a more rehabilitative approach is required, as opposed to an investigative one.
- b. In relation to goal 2: *“tackle racism through building cohesive and integrated communities,”* clear guidance on how the criminal justice system will link in and be a part of local work is needed – how will the community cohesion team link in with relevant staff across the criminal justice system? What are the specific criminal justice system outcomes required in order to fulfil this objective?
- c. In relation to goal 3 in this section, there is a lack of robust description of how future work will be implemented, reviewed and monitored. There also needs to be an integrated approach for staff across the organisation to address the reasons behind a person’s bias and more work is required within the education sector to promote careers in the criminal justice system.
- d. In relation to goal 5: *“We will ensure members of the Black, Asian and Minority Ethnic communities access the advice they need to resolve social welfare problems,”* criminal justice agencies (n = 1+) queried how will this be reviewed, and success monitored. They posed a number of questions about the detail needed here and how impact could be achieved and measured:
 - I. How do organisations become aware of the grants available?
 - II. How can we be sure we are reaching all services – not just the services with the loudest voices or broadest financial scope.
 - III. Is there evidence that shows there is disparity or disproportionately in accessing this service for minority groups?
 - IV. If so that needs to be transparent to demonstrate when / if the gap closes.
 - V. How do you make the service more accessible to vulnerable communities if there is need?
 - VI. What is stopping them from accessing those services? There needs to be improved data capture of the existing workforce and this data needs to be publicised to invite public scrutiny.
 - VII. All criminal justice system staff must be culturally competent. To achieve this, one-off training events should be avoided, there needs to be a consistent feature of a person’s work capability.

373. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 6+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) suggested this section of the Plan should include actions that:

- a. Ensure long term solutions to the provision of discrimination and human rights advice are found.
- b. Ensure barriers faced by ethnic minorities in accessing discrimination advice are understood and removed so that all communities in Wales are able to access discrimination and human rights advice tailored to meet their needs.
- c. Ensure an analysis of the impact of the national hate crime Report and Support Centre and its framework for action on hate crime is conducted and

the findings published to develop a long-term strategy for reducing hate crime in Wales.

- d. Provide greater clarification on what constitutes hate crime and systems for reporting them.

374. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 6+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) asserted that the Welsh Government should work with the Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) sector in Wales to:

- a. Evaluate the impact of the National Strategy on VAWDASV 2016-2021.
- b. Develop a sustainable and long-term funding strategy for specialist support services in Wales, during, and beyond the Coronavirus pandemic with ring-fenced specific provision made for specialist services provided 'by and for' ethnic minority women, including women with no recourse to public funds (NRPF).
- c. Fund specialist organisations to carry out research to better understand the experiences of ethnic minority and migrant violence against women and girls victims, and the barriers they face to reporting abuse, accessing support services, and to engaging with the criminal justice system.
- d. Take steps to protect and support all violence against women and girls victims, regardless of their immigration status, and ensure all migrant victims who need services have equal access to them, including women with No Recourse to Public Funds.
- e. Ensure the needs of older women are seen in the context of discussions on domestic abuse within Black, Asian and Minority Ethnic communities. These needs may vary within differing ethnic communities. Services available for older women experiencing domestic abuse are limited, so action is needed in the REAP to address this gap to meet the Plan's goal of ensuring specialist support services for Black, Asian and Minority Ethnic women experiencing abuse.

375. Public sector organisations and networks (n = 3+), trade unions (n = 2), third sector organisations and networks (n = 6+), criminal justice agencies (n = 2+), individual respondents (n = 8), LAs (n = 6), one education board / network / association (n = 1) and community organisations (n = 1+) asserted that regular disaggregated data held by national and regional organisations, such as Victim Support, should be made available at a local level to inform meaningful interventions. Data that would be beneficial includes trends, profiles of perpetrators, victims and the nature of incidents. There was concern that the Plan appears to suggest that VAWDASV data is not being collected. A requirement for regional VAWDASV strategies has been in place following the VAWDASV (Wales) Act. These are still in their early stages and so should be given an opportunity to deliver ahead of other actions being taken which may skew the focus away from local knowledge and information. It was noted that Goal 4 – "*To secure meaningful, robust and useable data on ethnicity,*" does not make reference or any commitment to improving the availability of data collection in relation to children and young people. This should be

prioritised as part of the actions listed to implement this goal. The outcome should be refreshed as – *“Data on ethnicity includes separation by (add age), gender, disability and all other protected characteristics.”* This is required given the considerable gap in Welsh data for this cohort of children.

Arts, Culture, Heritage and Sport:

376. Third sector organisations and networks (n = 10+) LAs, (n = 3), one trade union (n = 1), individual respondents (n = 10), public sector organisations (n = 2), one funding body (n = 1), community organisations (n = 2+), education boards, networks and associations (n = 2) and one other organisation (n = 1) have provided comments on the Arts, Culture, Heritage and Sport section of the Plan. A

Celebrations and more representation of Welsh historical diversity:

377. Third sector organisations (n = 3), community organisations (n = 1+), individual respondents (n = 2) and one public sector organisation (n = 1) asserted that more should be done to promote the history and legacy of Tiger Bay and other historical legacies emerging from Black communities in Wales. There should be emphasis on the point that Wales has always been diverse; public bodies have the responsibility to represent and promote knowledge about this, as well as the racial tensions that have existed in Wales, for instance in Cardiff Docks and Butetown, Newport and Swansea. There is also opportunity for the wider cultural sector to work together for Wales and to share knowledge and learnings, rather than following their own trajectory.

378. Third sector organisations (n = 3), community organisations (n = 2+), individual respondents (n = 2) and one public sector organisation (n = 1) asserted that there should be recognition of Carnival Culture as a medium for introducing Black and Asian culture and music to Welsh communities and there must be pride in Welsh Black music – there needs to be greater recognition, support and promotion for this to change. Lived experience from respondents: *“As a Black person, being from Wales always seems to have a stigma, and artists in particular are not always recognised as being credible from a UK and International perspective.”* One third sector organisation (n = 1) stated that Wales always seems to be excluded from big international tours, with agents having little or no confidence in selling to Welsh audiences. Too many times Black people born and living in Wales are told they are not recognised as Welsh and do not belong. There is awareness that institutionally 'Welsh media' is very intimidating, and this has become a real issue. Welsh media tend not to focus on emerging Black artists and show little to no interest when Welsh language is not a prominent feature.

379. Third sector organisations and networks (n = 6+), community organisations (n = 1+), individual respondents (n = 2), one education board / network / association (n = 1) and one public sector organisation (n = 1) asserted that national events are needed to encourage Black, Asian and Minority Ethnic participation in Welsh culture, e.g., the national Eisteddfod should encourage diverse interpretations of what it

means to be Welsh. Black, Asian and Minority Ethnic people need to feel a part of the public in Wales, they need to be involved in decision making, and in the production and presence of culture, arts, heritage and sport in Wales. More diverse arts, culture and sports are needed to reflect ethnic minority contribution to Welsh life and culture. Lived experience from respondents include: *“I didn’t really see anyone Black or Asian represented from our school at the Eisteddfod. It was the same people picked year after year,”* and, *“No one assumes I’m Welsh just by looking at me. I’m judged to be a foreigner because of my Islamic clothing and the colour of my skin. No one assumes I understand Welsh even though I am fluent and actually studied Welsh at A Level. They see my religion first then they see my skin they hear my voice; I’m judged at every opportunity as not being Welsh enough. This is why I feel I won’t ever be accepted as Welsh as hard as I try, I’m fluent in Welsh, I’ve been to school here, I tried my best to diversify the Eisteddfod in school, but it was side-lined by my teachers because they I don’t see my Somali-Welsh identity fitting in with Welsh culture.”*

380. Third sector organisations and networks (n = 6+), community organisations (n =1+), individual respondents (n = 2), one education board / network / association (n = 1) and one public sector organisation (n = 1) asserted that there is a need for intersectional community hubs / events that redefine what it means to be ‘Welsh and X’. A number of suggestions were made including establishing an annual celebration and acknowledgement of the contribution of ethnically diverse communities in sport, heritage, culture and arts, profiling role models. There needs to be more visibility of ethnic minorities in films, where they play the lead roles, play scientists, lawyers and are not portrayed as the lower class. More inclusion of Black, Asian and Minority Ethnic people on TV and in theatre is needed – BAFTA Wales could showcase upcoming Black, Asian and Minority Ethnic talent at national awards so the public are aware of their contributions. Diverse sporting and cultural heroes must be celebrated also – young people need to see the achievements of people who look like them. Diverse stories need to be weaved into the fabric of Welsh culture. This will stop Welsh identity being solely about whiteness. This work needs to start in schools. There also needs to be greater emphasis on entry routes into careers within the culture and heritage sector for ethnic minority groups. Public life should be accessible to everyone including things such as cultural holidays, uniform policy, and access to cultural foods. The creation of non-alcohol-based spaces and events for older young people would help Black, Asian and Minority Ethnic people feel more involved in Welsh life and allow them to take part in Welsh culture. Using lived experience is important to ensure representation and interpretation that recognises and celebrates the rich and diverse culture of society. More needs to be said within this section of the Plan on how lived experience will be captured and how grassroots organisations will be involved. One third sector network (n = 1+) stated that funding bodies should engage with ethnic minority grassroots groups to pinpoint the community needs in relation to celebrating culture and diversity and preserving heritage. This should be elaborated on in the Plan.

381. Third sector organisations (n = 3), community organisations (n =1+), individual respondents (n = 2) and one public sector organisation (n = 1) expressed the need to decolonise and represent authentic accounts of historic monuments, heritage sites,

museums and public spaces in Wales. In relation to slavery and colonialism and the re-assessment of those histories, it was suggested that the celebration of Welsh historical diversity is also included as an action. This could include for example early historical connections such as the diversity of the Roman legions in Wales, or the international communities involved with shipping and trade. One trade union (n = 1) asserted that Welsh Government consider the inclusion of museum and history site visits into the new Black History curriculum.

382. Third sector organisations and networks (n = 5+), one trade union (n = 1), one LA (n = 1), community organisations (n = 1+), one individual respondent (n = 1) and one public sector organisation (n = 1) stated that although, media and broadcasting companies do not come under the auspices of the Welsh Government, they should be included in the REAP's provisions as they are key players in the creative sector. There should be a conversation with BBC Wales commissioners to discuss a way forward for new content that reflects the need for greater diversity and support of artists from the Black / Asian diaspora. Research needs to be conducted in collaboration with Welsh venues regarding the promotion of Black music and curating / programming festivals to platform the music and culture of the Black / Asian diaspora.

Funding and Resources:

383. Third sector organisations (n = 3), one LA, (n = 1), one trade union (n = 1), community organisations (n = 1+) and one individual respondent (n = 1) asserted that resources – particularly time and funding – need to be allocated to enable effective engagement with Black, Asian and Minority Ethnic communities. Training in engagement and facilitation and unconscious bias training should be required for the staff of public bodies to ensure racism is not being reproduced in new spaces. Information about access to resources must be provided in different languages. Grant-assessing panels must be diverse and reflect the population, and resources should be available for grant funders to promote schemes to Black, Asian and Minority Ethnic communities. Ring-fenced funding needs to recognise that specific groups within an ethnic or religious group may be particularly disadvantaged (e.g., women). It is important to distinguish between specific Black, Asian and Minority Ethnic groups and target specific actions towards specific racial groups.

384. Third sector organisations (n = 3), one LA, (n = 1), one trade union (n = 1), community organisations (n = 1+) and one individual respondent (n = 1) highlight that funding is vital and asserted that funding should be given to support small projects run by small organisations, rather than always awarding funding to larger established organisations. Financial impact assessments must report on how they support grassroots organisations / communities as well as large organisations. The ability for minority ethnic communities and practitioners to access financial support to produce or present their art forms should have equal parity as their participation in the arts. There should be more opportunities for sponsored exhibitions to be held (sponsorship for training and access to expert coaching and mentoring). There was a need for Welsh Government to resource the museum and archive sectors to allow facilitation / leadership and project support, this should include dedicated funding for

re-interpretation projects and dedicated funding at local government level for data collection, policy review and change management to address the contentious nature of historical review.

385. Third sector organisations (n = 2), one LA (n = 1), individual respondents (n = 3), community organisations (n = 1+) and one funding body (n = 1) welcomed the references across this section of the Plan to involve and engage Black and Minority Ethnic community groups, but this requires dedicated and sustainable resourcing. Without resourcing, community groups are overwhelmed with ad-hoc requests to engage and contribute, but lack the funded staff posts to take up these opportunities.

386. Third sector organisations (n = 2), one LA (n = 1), individual respondents (n = 3) and community organisations (n = 1+) stated that a review of Sports Wales should be undertaken including its funding, staffing, leadership and programmes to assess the extent to which it can meet the needs of Wales's diverse population and to embed anti-racist objectives into its ways of working and business plans.

Combatting racism in Arts, Culture, Heritage and Sports:

387. Third sector organisations and networks (n = 5+), one LA (n = 1), community organisations (n = 1+), one individual respondent (n = 1), one trade union (n = 1) and one public sector organisation (n = 1) asserted that the Plan should include an action around maintaining anti-racist language in advertising and public spaces, and an additional action around ensuring a social media presence and marketing which is anti-racist would also be welcomed.

388. Third sector organisations and networks (n = 5+), one LAs (n = 1), community organisations (n = 1+), one individual respondent (n = 1), one trade union (n = 1) and one public sector organisation (n = 1) asserted that an industry wide body should be established which can both gather reports of racism from all the major industry bodies as well as being a body that people in the industry can go to, to report incidents of racism including anonymous reporting. The body should be able to initiate investigations into issues of systemic racism that would be unlikely to be raised by individual complainants. The body should be able to offer advice and assistance to people who believe they are the victims of racism, and / or feel they have experienced unequal treatment due to their race, on how to process a complaint and the resources available to them to pursue a complaint. The body should publish an annual report on the state of racism in the industry to measure progress, build on best practice and learn from mistakes. The annual report should be complete with policy suggestions for industry stakeholders on how to tackle racism.

389. Third sector organisations and networks (n = 5+), one LA (n = 1), community organisations (n = 1+), one individual respondent (n = 1), one trade union (n = 1) and one public sector organisation (n = 1) proposed Welsh Government establish formal sectoral collective consultation / bargaining arrangements for creative unions, with an aim to monitor the implementation of the 'Culture Contract', fair work practices and actively addressing long-standing equality and diversity matters within the sector.

Good practice and learning in sport:

390. Third sector organisations (n = 2), one LA (n = 1), individual respondents (n = 3), community organisations (n = 1+) and one funding body (n = 1) stated that racism is still rife in sport and the Plan needs to include an action around improving the legal response to those experiencing racial harassment in sports, as well as making cyber bullying and online harassment an offence. Racists should have a lifetime ban on all events in sports, arts, culture and heritage and that should include local sports days along with professional events such as Welsh Premier league and would also apply to all events such as dancing, world cups of all sports, international game's such as friendly matches, qualifying matches for all tournaments in all sports including winter and summer Olympics regardless of where it is being hosted.
391. Third sector organisations (n = 2), one LA (n = 1), individual respondents (n = 3), community organisations (n = 1+) and one funding body (n = 1) asserted that initiatives that encourage Black, Asian and Minority Ethnic women and girls to join sports are needed and should be included in the Plan. Individual respondents stated that more facilities are needed in Wales, particularly in Adamsdown and Butetown, because people do not feel that the facilities that already exist are for them.
392. Third sector organisations (n = 2), one LA (n = 1), individual respondents (n = 3), community organisations (n = 1+) and one funding body (n = 1) stated that ethnic minority representation in sport needs to be improved, there are no Asians in mainstream sport groups, nor any representing Wales's national teams, especially East Asians. It was suggested that the issues in each sport are distinguished and tackled from early years with mature teachers and the positive points and lessons from one discipline should be cross referenced with others.
393. Third sector organisations (n = 2), one LA (n = 1), individual respondents (n = 3) and community organisations (n = 1+) expressed frustration that rural Wales has not been included in national schemes, which means that people from ethnic minorities have not benefitted from programmes such as Sport Wales's Black, Asian Minority Ethnic Sport Cymru project. This needs to be addressed so that people from ethnic minorities can also benefit from increased participation in sport along with the positive impacts on health and well-being
394. Third sector organisations (n = 2), one LA (n = 1), individual respondents (n = 3) and community organisations (n = 1+) stated that the Plan should state what is required of public bodies in relation to the point: "*Publish what success would look like,*" (Goal 1. Arts, Culture, Heritage and Sport) and additionally, which metric measures of success would be required. Respondents also stated that the key roles that LAs play in terms of sport, leisure centres and tourism could also be mentioned in the narrative.
395. Third sector organisations (n = 2), one LA (n = 1), individual respondents (n = 3) and community organisations (n = 1+) stated that in relation to Goal 5, as well as structured volunteering programmes, paid internships and apprenticeships should be

considered as a way to involve people from Black, Asian and Minority Ethnic Communities in cultural and sporting activities.

What's missing from this section:

396. Third sector organisations (n = 6), one LA (n = 1), one education board / network / association (n = 1), one public sector organisation (n = 1), individual respondents (n = 2), community organisations (n = 1+) and one other organisation (n = 1) were frustrated at the lack of SMART targets within the Plan because this makes it difficult to measure progress. Concerns were expressed that the arts and culture area of the Plan could be advanced further to go beyond the us / them narrative where minority cultures are pitted against Welsh cultural tradition. One third sector network (n = 1+) expressed frustration that art, culture, heritage and sport have been 'lumped' together in the Plan and asserted that these areas should be looked at separately.
397. Third sector organisations (n = 6) and one public sector organisation (n = 1) are frustrated at the background and narrative of the Culture, Heritage and Sport chapter, which has missed the significant contribution that culture and leisure trusts make to the culture and sporting landscape in Wales, and with that the role they play in addressing inequalities. Excluding culture and leisure trusts will make it difficult for Welsh Government to achieve their action of increasing ethnic diversity in the workforce at all levels. Similarly, if providers are not involved in agreeing what data is needed to understand ethnic diversity in the workforce and how this will be monitored, the collected data for the sector will be inaccurate. The Plan does not contain enough information on the role that arts institutions and organisations need to play in anti-racism. Respondents also stated that to ensure the action to, *"increase ethnic diversity in the workforce at all levels, and specifically in leadership teams and on boards, as well as in paid and unpaid planning, design, curation and decision-making roles,"* it will be necessary to make sure there is systemic monitoring of progression of paid roles, ensuring there is no discrimination in terms of promotions and available opportunities for employees from ethnically diverse communities.
398. Third sector organisations (n = 6), one LA (n = 1), one education board / network / association (n = 1), one public sector organisation (n = 1), individual respondents (n = 2), community organisations (n = 1+) and one other organisation (n = 1) asserted that targeted action is needed for inclusion of women and girls, Gypsies, Roma and Travellers, refugees and asylum seekers and people with intersecting disadvantages.
399. Third sector organisations (n = 6), one LA (n = 1), one education board / network / association (n = 1), one public sector organisation (n = 1), individual respondents (n = 2) and community organisations (n = 1+) noted there is no outcome for the second action under the Historical Narrative. This could include: a toolkit for decolonising collections developed in partnership with diverse communities across Wales for the Welsh museum sector; methodologies of co-curation are developed that celebrate Black, Asian, and Minority Ethnic consciousness across the museum

sector; voices of those neglected in the historical narratives of the past are amplified and celebrated.

400. Third sector organisations (n = 6), one LA (n = 1), one education board / network / association (n = 1), one public sector organisation (n = 1), individual respondents (n = 2) and community organisations (n = 1+) asserted that, “*working with all appropriate partners, including the creative industries and arts bodies, to support, promote and cultivate the visual and performing arts of ethnic minority groups (...) and connecting with culture, heritage and sport organisations internationally,*” should also include Black-led culture and arts organisations or diaspora groups in Wales. Otherwise, there is a risk of this being a model where existing cultural organisations look outward to international partners, and existing groups in Wales are once again overlooked.

401. Third sector organisations (n = 6), one LA (n = 1), one education board / network / association (n = 1), one public sector organisation (n = 1), individual respondents (n = 2) and community organisations (n = 1+) wanted to see next steps in relation to the Welsh Government audit of statues, street and building names in the Plan.

402. Third sector organisations (n = 6), one LA (n = 1), one education board / network / association (n = 1), one public sector organisation (n = 1), individual respondents (n = 2) and community organisations (n = 1+) stated that appropriate guidance will be required to ensure all LAs are addressing approaches and reviews of museums and galleries etc. There were questions as to whether the performance indicators would be an ‘all-Wales’ approach or tailored to each LA demographic? It was suggested that any monitoring system deployed should incorporate data on the number of individuals from ethnic minority backgrounds who access apprenticeships in the creative industries where there is underrepresentation.

Local Government:

403. Third sector organisations and networks (n = 6+), LAs (n = 9), one trade union (n = 1), individual respondents (n = 4), public sector organisations (n = 2), and community organisations (n = 1+) have provided comments on the local government section of the Plan.

Resources required for this section:

404. One trade union (n = 1), third sector organisations (n = 3), LAs (n = 7), individual respondents (n = 4) and public sector organisations (n = 2) raised their concerns at the lack of diversity across LAs being a barrier to the implementation of this section of the Plan. LAs have raised the point that in some areas, there is not enough demographic locally to implement and make a real difference. Not enough consideration has been given in the Plan regarding areas that do not have diverse communities but need to address generational and cultural issues to eradicate racism.

405. LAs (n = 5) and third sector organisations (n = 2) stated that equality training is already in place for Elected Members, however, it would be timely to review such training. Comments included strong views that LAs require fully funded and standardised training programmes that are compulsory for all staff, especially at induction. Training is initially required in the following areas: how to use positive action in recruitment; unconscious bias; and equalities awareness. The data collected during this training should be reported back to Welsh Government, either directly, or via the Strategic Equality Plan Annual Reports. Annual reports should also highlight any issues around breaches of code of conduct which need to be addressed.
406. LAs (n = 5) stated that it is vital that appropriate training, support, and resources are made available to elected members and council to fully implement and monitor that goal that requires all councillors to sign up to being Anti-racist from 2022. Respondents suggest Welsh Government consider a standardised approach with training for councillor, e.g., a workshop delivered consistently across Wales. A single-country wide approach is needed to bring about sustainable improvement.
407. LAs (n = 5) and one third sector organisation (n = 1) recognised the importance of ensuring all LAs place the same emphasis on the delivery of the Plan and priority to how it is scrutinised. Guidance should be given to scrutiny members on race equality. There is a strong role for Welsh Government to play in helping the public sector operationalise the key concepts of equality and anti-racism and what these look like in practice.
408. LAs (n = 5) and one third sector organisation (n = 1) stated strongly that investment, data and training is need for LAs to progress the actions outlined in the REAP. Funding is needed to successfully run and deliver projects locally, investment from a funding perspective will enable LAs to employ staff who would be the link between the LA and communities. The gathering of equalities data must improve and be used to identify local populations which will then inform LA's services. Response from LAs indicate they agree that data should inform policies and performance frameworks for improvement. However, changes to frameworks will impact LAs and the requirement to obtain additional data. LAs stated that advance notice of this is required to ensure data is captured, and, if new processes or mechanisms for obtaining the data are required, ensuring they are implemented.
409. LAs (n = 5) highlighted that it would be of great assistance if funding were made available to the public sector for the purchase of land to provide for Gypsy and Traveller sites if there are no suitable sites in the Council's land portfolio.

Incorporation of existing plans & governance arrangements:

410. LAs (n = 5) have raised concerns surrounding the proposed Accountability Group – that will be holding LAs to account – on how local scrutiny and governance arrangements will be incorporated into the already existing governance and scrutiny arrangements within LAs. Clarification on how the Accountability Group is likely to function is needed– the group must make clear what statutory levers it is utilising to

hold authorities to account. LAs stated that the actions in this section of the Plan need to be outcome focussed and facilitate true integration of actions / objectives within other internal strategies. Welsh Government should look at how the REAP can enhance the existing Equality Objectives and SEP Action Plan and inform the revision of the next SEP.

411. LAs (n = 5) suggest for a race equality approach to be written into the framework for Local Government Legislation and Guidance and in the Democracy Handbook. LAs also suggest Welsh Government reinstate specific funding for WLGA employed Equality Officers who used to provide an excellent level of support and advice to Local Government, e.g., guidance and training on Gypsy and Traveller needs and issues for elected members and officers.

Missing / additional actions:

412. LAs (n = 5) and third sector organisations and networks (n = 3+) have expressed concern at the lack of goals or actions focused on education in this section of the Plan. EYST's experience delivering the Make Your Mark 2021 campaign to enlist young ethnic minority voters in the 2021 Senedd elections highlighted the huge gap in young people's awareness and understanding of local and national democratic structures in Wales.

413. One trade union (n = 1), third sector organisations and networks (n = 3+), LAs (n = 5), individual respondents (n = 4) and public sector organisations (n = 2) noted that the Plan talks about working with WLGA, One Voice Wales and Academi Wales to strengthen mentoring schemes. Respondents suggest an action on supporting and expanding existing ethnic minority-focused mentoring schemes would be beneficial, such as EYST's Black, Asian and Minority Ethnic routes to public life mentoring scheme.

414. One trade union (n = 1) was frustrated that there is no mention in the Plan around local government of Trade Unions. Additional facility time must be granted across all LAs in Wales for Equality Reps – this will allow better scrutiny of policies and procedures in the workplace. Trade unions can provide huge support in tackling racism in LAs and this needs to be recognised in the Plan. Respondents note many incidents where managers approach Black staff members to seek support on matters of race that have arisen in the workplace. This is unfair and unreasonable and has sometimes entailed a manager sharing confidential information about a potentially racist incident with more junior Black staff to seek advice. There is an urgent need to address this which goes beyond 'exploring the option for quotas' or 'reviewing processes.'

415. One trade union (n = 1), third sector organisations and networks (n = 4+), LAs (n = 5), individual respondents (n = 4), community organisations (n = 1+) and public sector organisations (n = 2) asserted the need to increase diversity within local government and have highlighted specifically the under-representation of East Asians, Somali, Polish and Eastern European populations in local councils and government. More engagement is needed with these communities to give them a

voice and to allow relationships to be built between these communities and those in power. It was stated in some responses that there is a resistance to hire ethnic minority people in government to progress race equality work, resulting in the same conversations being had over and over. There were calls for the introduction of quotas for ethnic minorities in political parties as recommended by the Diverse 50/50 Coalition. Some respondents, however, did not support quotas / lists because they see them as undemocratic. It was noted by some that the equalities agenda must be addressed holistically not individually, to ensure that intersectionality is considered, and equality of outcome for all, especially those with multiple identities, is achieved, as focus on one particular protected characteristic may cause disparity in the delivery of the equalities agenda. The need for the introduction of advertising campaigns aimed at young ethnic minority people to understand local democratic processes and for community-based education to take place was identified. This section of the Plan also needs to recognise the significant number of care providers who are Black, Asian Minority Ethnic who are not treated fairly by LA service commissioners.

Questions on specific goals & actions in this section:

416. One third sector organisation (n = 1) posed questions about the specific goals and actions in this section of the Plan and how they would be enforced. They also suggested that the Democracy Handbook should be available in different languages as standard.

Welsh Language:

417. Third sector organisations and networks (n = 17+), LAs (n = 13), education boards, networks and associations (n = 7), individual respondents (n = 25), health organisations (n = 5), community organisations (n = 4+), public sector organisations and networks (n = 7+), criminal justice agencies (n = 1+), trade unions (n = 2), one funding body (n = 1) and other organisations (n = 2) have provided comments on the Welsh Language section of the Plan. A range of comments have been received detailing the need for positive role modelling of Black, Asian and Minority Ethnic Welsh speakers, more encouragement for ethnic minority people to learn Welsh and the importance of other minority languages being respected and celebrated alongside Welsh.

Existing policy and strategy:

418. One third sector network (n = 1+), one public sector organisation (n = 1), LAs (n = 5), one individual respondent (n = 1), one education board / network / association (n = 1) and health organisations (n = 2) have asserted that the Plan should reinforce already existing legislation designed to protect and promote the use of the Welsh language. Welsh Government should consider how Welsh language legislation and requirements could be more closely aligned with equality legislation to ensure approaches used to promote anti-racism take account of the need to promote the Welsh language. (Respondents recognised that the Welsh language is not a

protected characteristic as such but highlight that this approach serves well towards the goal of a Wales where there is equality for all.)

419. LAs (n = 5) and one individual respondent (n = 1) have stated that this section of the Plan needs to link to existing strategies such as Cymraeg 2050 and that the REAP should work alongside Cymraeg 2050. One individual respondent (n = 1) asks how the following action: “*A review to be undertaken by relevant education stakeholders in the first instance to gather detailed information on the current picture and the barriers to accessing Welsh medium education amongst the ethnic minority populations,*” will fit with Cymraeg 2050?
420. LAs (n = 3), one public sector organisation (n = 1) and one health organisation (n = 1) asserted that this section of the Plan must link to existing strategies such as Welsh Education Strategic Plan (WESP), Five Year Strategies, and Well-being of Future Generations Goals, particularly, “*A Wales of vibrant culture and thriving Welsh Language.*” It was strongly suggested that investigating barriers to the take up of the Welsh language by the Black, Asian and Minority Ethnic communities is a key first step. It will be important to link up the goals in the Plan with existing strategy and plans to assist in mainstreaming the goals to help lead to a positive impact. Work needs to be coordinated so that the national and local messages reinforce each other.
421. One public sector organisation (n = 1) highlighted the need to increase the number of Black, Asian and Minority Ethnic teachers who speak Welsh and for this to be integrated into the Welsh Government’s 10-year Plan for increasing the number of Welsh and Welsh-medium teachers and improving the linguistic skills of the education workforce.
422. One education board / network / association (n = 1) stated that within this section of the Plan, there could be more substantive recognition on key issues. For instance, there should be recognition that in many cases relevant communities have historically been denied access to Welsh language education. This respondent also highlights that Cardiff University has a newly framed Welsh Language Strategy (conceived in tune with wider EDI commitments) which is being implemented.

Challenging prejudices and misconceptions:

423. One public sector organisation (n = 1), health organisations (n = 3) and community organisations (n = 1+) asserted the importance of the Welsh Government working to explicitly show that those who have Welsh as a first language are not exclusively White. Respondents asserted that positive role modelling of Black, Asian and Minority Ethnic Welsh speakers (those with Welsh as a first language, those who have learned Welsh and those who have acquired Welsh as a workplace skill) and celebrating the diversity of Welsh speakers would go a long way to countering some prejudices and misconceptions. One education board / network / association (n = 1) asserted that Welsh Government need to support and encourage Welsh speaking members of minority ethnic communities to enter teaching in order to give positive role models that these communities can identify with. This can be achieved by

working with initial teacher education providers in Wales on how they are targeting potential students from these communities. Additionally, individual respondents (n = 2) asserted that more Welsh Black and Minority Ethnic people (particularly women) should have a voice in the Welsh media – the Plan should look at how it can raise the profile of the diverse populations in Wales and how they contribute to our society today so that Wales's history is not whitewashed. One third sector network (n = 1+) stated that more Muslim Somalis who speak Welsh need to be encouraged and supported into positions of power to increase visibility and relatability which in turn will decrease ignorance and ultimately racism in Wales.

424. One LA (n = 1) and one health organisation (n = 1) asserted that Welsh Government should work with partners that promote and provide Welsh-medium education, from pre-school through to post-16 and further education to promote the opportunities and benefits of bilingualism / multilingualism, ensuring a consistent message and approach in order to dispel assumptions that Welsh-medium education is not an option from Black, Asian and Minority Ethnic homes where English may not be spoken. One funding body (n = 1) stated that positive impacts on the Welsh language could be increased by encouraging the creation of multi-language partnerships, with Welsh spoken together with other languages in Wales.

425. One LA (n = 1) highlighted the importance of the Welsh language and culture being considered in the same way as other languages and cultures, ensuring a more robust approach to belonging in a diverse Wales can be achieved.

426. One public sector organisation (n = 1), third sector organisations (n = 4) and one trade union (n = 1) asserted that Welsh Government should support minority dialects. One public sector organisation (n = 1) proposed Welsh Government support other minority Welsh dialects, such as the Romani Welsh Kale dialect, which is unique to Wales and saved by the determination of two Welsh Gypsy families who have preserved what remains of the dialect, for future generations with no recognition or support from Welsh Government. Respondents propose that this dialect is taught on the school curriculum as part of the commitment to teaching Black, Asian and Minority Ethnic history and taught to Welsh Gypsy children, as a fundamental human right in accessing one's indigenous language. Third sector organisations (n = 2) reiterate that there is a need here to respect not only the Welsh language but also the diverse range of first languages spoken by Black, Asian and Minority Ethnic populations in Wales. The opportunity to promote the Welsh language should not come at the expense of eradicating other languages. One trade union (n = 1) asserted that Welsh Government need to distinguish between the legal obligations to primarily operate as a bilingual state, and the reality that Wales is a multi-lingual nation, where people who live in Wales communicate with their friends, family, and colleagues, do business, and receive public services (like GP consultations) in many different languages. It was noted that continually describing Wales as a bilingual country reinforces many Black, Asian, and Minority Ethnic people's feelings of being overlooked and inferior to the mainstream culture and class. One third sector organisation (n = 1) added that it is key for Welsh Government to understand the importance and value of multilingualism in a future where there is no racism or inequality in our multicultural, equal and fairer Wales. Additionally, 55 per cent of

those surveyed by one third sector organisation (n = 1) agree that the effects of policies, strategies and government actions on speakers of the Welsh language, or other minority languages spoken in Wales (such as Romani Language or Romanës) should be positive.

Issues, concerns, and challenges raised in this section:

427. Individual respondents (n = 4) highlighted that some anti-racist activists view the Welsh language as a nuisance and feel that there is a fine line between encouraging the use of Welsh and indirect discrimination. They commented that it is not practical to expect non-Welsh speakers to have time to devote to learning a new language and feel the emphasis on Welsh language skills to obtain public sector jobs is a racist discriminatory policy, hindering non-Welsh speakers from being able to apply for certain roles.
428. Third sector organisations (n = 2) and individual respondents (n = 6) have raised concerns surrounding the requirement for Welsh Language in employment, particularly the public sector, continuing to disadvantage racialised people who have not had the opportunity to develop their Welsh language skills to the level desired. One LA (n = 1) anticipates potential tension within a workplace that requires Welsh and diversity. Individual respondents (n = 6) stated that having the Welsh language should be considered as an extra skill, not indirect discrimination for those who don't speak it fluently. Roles should be awarded on skill and those who do not speak Welsh should not be excluded.
429. Individual respondents (n = 2) and one public sector organisation (n = 1) highlighted that the number of Black, Asian and Minority Ethnic students in Welsh Medium schools is very low, so the requirement for Welsh Language in employment will create an additional barrier for Black, Asian and Minority Ethnic individuals to access wider employment if no additional support is made available to bridge the gap in learning and experience. Barriers may also include lack of information or incorrect information about Welsh-medium education. Barriers should be recognised in the Plan alongside how experiences and barriers differ from one area to another. Lived experience: *"I go to a Welsh-medium school in Cardiff. Even though Cardiff is a diverse city I can only think of 9-10 Black, Asian or ethnic minority people in my year group (Yr7). I think there should be more effort to make sure other Black, Asian and minority groups consider and hopefully choose to learn in Welsh schools. I don't know if everybody knows the benefits of learning another language or Welsh specifically. I also don't know if all know that you do learn English at a Welsh school, in Cardiff it is taught well and people do well in their GCSEs in English as well as all of their other subjects taught in Welsh, I'm not sure all people realise that which might put some people off?"* One LA (n = 1) highlighted that Welsh Government has identified a 'lack of clarity about the Welsh language support' currently provided to Black, Asian and Minority Ethnic pupils in Welsh-medium and bilingual schools. This issue needs to be addressed on a local and national level to mitigate additional barriers ethnic minority children face in Welsh-medium and bilingual schools. There is a need for a defined Welsh as an Additional Language service in Welsh-medium

education settings similar to the English Additional Language service that is already well established in English-medium schools. Councils need to promote the benefit of Welsh medium education within ethnic minority communities. Also, any resources developed in relation to the curriculum would need to be developed bilingually to meet the Welsh language standards. Additionally, third sector organisations and networks (n = 2+) asserted that Welsh Government should provide immersive, applicable Welsh Language classes for all students in every statutory education institution, ensuring that those who do not have Welsh or English as a first language are given bespoke support to learn a third+ language at school. They made a number of other suggestions for Welsh Government action:

- a. Mandate statutory education institutions to use positive action to increase the number of Welsh Language teachers that represent the varying racial, ethnic and religious identities of children and young people in Wales today.
- b. Mandate Welsh Medium schools to ensure representation across their pupil body and provide additional Welsh Language classes to support students who do not come from first language Welsh homes.
- c. Remove prior Welsh Language eligibility requirements for children and young people to attend Welsh Language Medium schools or extracurricular activities.
- d. Ensure English or other language translation and interpretation is available for parents / guardians of pupils at Welsh Language Medium schools who do not speak Welsh so they may be able to engage with the school and their child's education as fruitfully as other parents would.
- e. Collect and publish clear data on the uptake and progression of learners of Welsh in statutory and post-16 settings.
- f. Collect and publish clear data on the number of Welsh Language Teachers from racialised backgrounds. Welsh Government should collect and publish clear data on the number of racialised people who apply for Welsh Language Essential, and while still in place, Welsh Language Desirable Roles, and compare to the number of racialised people successful in obtaining those positions.

430. Third sector organisations and networks (n = 2+) highlighted how the focus on language inclusivity in the Plan being solely focused on the Welsh language risks feeding into a hierarchy of need, with the needs of minoritised groups, in this case language, again being relegated to lower tiers. Respondents have stated that it is not clear on the merit of the Welsh language being in the Plan – respondents are concerned that this is a top-down priority, rather than reflecting lived needs and priorities.

431. Individual respondents (n = 2) and community organisations (n = 1+) suggested that promoting the Welsh language may be seen as xenophobic because most people who are not from Wales usually do not speak Welsh and usually do speak English. Lack of Welsh speaking ability is a barrier to people from outside Wales moving to Wales.

432. One third sector organisation (n = 1) and one health organisation (n = 1) stated that parents should be consulted about the awareness of choice and barriers they face or understand attitudes to Welsh education by Black, Asian and Minority Ethnic Welsh speakers as well as people who have not had the opportunity to be Black,

Asian and Minority Ethnic Welsh speakers; both perspectives would be valuable in understanding the barriers and what we can do to change / improve experiences. LAs also need to consider whether their Welsh-medium education strategic plans are anti-racist and include the aim of increasing diversity. LAs should also see Welsh-medium education as an integral part of their anti-racist action in their counties. Welsh in Education Strategic Plans need to consider support services in Welsh-medium education settings for disadvantaged minority groups, e.g., refugee, asylum seekers and Gypsy, Roma and Traveller learners, in order to make the placements more inclusive for these groups who are entitled to Welsh medium education. Welsh Government has to map where Black, Asian and Minority Ethnic communities are in Wales and plan to start or expand Welsh-medium education closer to those communities to ensure more of these individuals have access to education from early years education upwards.

433. One individual respondent (n = 1) asserted that the Welsh language should be protected. One LA (n = 1) stated that there is a danger of treating Welsh less favourably than English unless the Plan recognises the role of the Welsh language beyond education and the additional discrimination faced by language. Another LA (n = 1) conversely stated that the Plan does not appear to treat the Welsh Language less favourably than the English language; the Plan is actively encouraging parents from Black, Asian, and Minority Ethnic communities to enrol their children in Welsh Medium education which is positive and supports the Welsh Language Commissioner's target of reaching one million Welsh speakers by 2050. Another LA (n = 1) recognises the importance of all LAs ensuring that the Welsh language is treated no less favourably than the English language. One third sector organisation (n = 1) explained that the Welsh language may be seen as an additional complicating factor and therefore not fully embedded from the outset. The intersectionality of language versus ethnic diversity can be fraught with difficulty especially where resources are limited. The Plan should recognise that Welsh speakers are limited in their consumption choices of Welsh language content, a fact that cannot be changed due to the global nature of the English language. It is therefore essential that what is available is not only safeguarded but extended where possible and it should not be allowed to be curtailed in support of other priorities.

434. One LA (n = 1) highlights that currently in PLASC there is no facility for recording stages of Welsh as an additional language (WAL) i.e., those learners who have home languages other than English or Welsh, (EAL). This is a point of contention, and this has been discussed at length through the Minority Ethnic Achievement Local Authority group. This issue needs resolution so that stages for EAL and WAL can be recorded for such learners so there is parity between English and Welsh medium education in respect of recording progress in additional language acquisition. One individual respondent (n = 1) supported this, stating that there needs to be recognition that Welsh is the third or fourth language for many Black, Asian and Minority Ethnic people and appropriate schemes are needed for this.

435. One third sector organisation (n = 1) anticipated that challenges may arise in identifying ongoing support for learners with additional ESOL needs to practice their Welsh Language skills; sourcing supportive employers to recruit from a Welsh

speaking minority ethnic pool; ensuring there is a pathway towards a positive employment outcome. One third sector network (n = 1+) strongly wanted to see support for all people from an ethnic minority background, particularly those in North-east Wales where a whole segment of people is excluded from complementing the workforce because of the Welsh language, particularly in early years education.

436. One third sector organisation (n = 1) were concerned that the Welsh language is not being introduced as an option for immigrants. There were concerns that the Welsh language is peripheral to this scheme rather than being scheme-wide and an integral part of the action to create an anti-racist and inclusive Wales.

437. One LA (n = 1) also highlighted that it should not be assumed that ethnic minority groups or individuals are not interested in speaking Welsh.

What needs amending in this section:

438. LAs (n = 2), one individual respondent (n = 1) and one public sector organisation (n = 1) stated that it is not clear what a 'revised trading order' is. Respondents stated that the phrase does not appear in the Plan and that the trading order seems to refer to another consultation.

439. LAs (n = 3), one education board / network / association (n = 1) and public sector organisations (n = 2) asserted that the REAP is delivered bilingually, with equal opportunities in English and Welsh. This includes national programmes ensuring that communications are available bi-lingually so that information can be disseminated publicly. Any training organised, and service delivery would also need to be bi-lingual, and it is also important to include the need for services and information to be available in other languages. One public sector organisation (n = 1) stated that delivery of the goals and actions through the medium of Welsh should be encouraged, including the meetings of the Accountability Group. Criminal justice agencies (n = 1+) also highlighted that it is important to ensure that communities that find it difficult to gain Welsh language skills are not left to feel disadvantaged.

440. LAs (n = 2) stated that it would have been beneficial if further research on the Welsh language and ethnic minority communities had already taken place so the Plan could offer more concrete and ambitious actions in respect of the Welsh language. LAs (n = 2), one education board / network / association (n = 1) and one third sector organisation (n = 1) stated strongly that a more radical Plan or strategy is needed that will increase the number of ethnic minority people who speak Welsh; this section on Welsh language and its intersections with race equality could be much strengthened. There were questions from LAs about who will lead the review to gather detailed information on the current picture and to get a better understanding of the opportunities and removing of barriers to accessing Welsh Language in education. A standard approach to this will be good to ensure the same questions are asked and warn that the outcome will be different in each local authority due to the population.

441. One education board / network / association (n = 1) asserted that Welsh language data should be collected as part of any audits and considered as part of discussions on intersectionality. This is reiterated by one public sector organisation (n = 1) who state the important of adequate additional research and insight on specifically Welsh citizens who identify as Black, Asian and Minority Ethnic and their own experiences of the barriers and or challenges in relation to the use of the Welsh language.
442. One public sector organisation (n = 1) stated that it is not clear to whom the actions regarding Welsh for adults relate – they feel greater clarity is needed. This respondent stated that an internal review by the National Centre for Learning Welsh into the current uptake of provision amongst Black, Asian and Minority Ethnic people is needed. The Centre should also look at current strategies in place to promote access, collecting data on ethnicity and setting specific targets as part of grant funding and an action plan to improve representation of those from Black, Asian and Minority Ethnic backgrounds. In response to the action in the Plan to commission research into the barriers to accessing the Welsh language for ethnic minority people, this respondent stated that this should take place as a matter of urgency so that it can feed into the work of the Centre in reviewing its strategies and producing an action plan and setting targets.
443. Third sector organisations and networks (n = 2+) responded in relation to the point made on p.69 of the Plan, where Welsh Government stated they will “challenge” grant partners, such as the Urdd, Mentrau Iaith, Mudiad Meithrin and RhAG to, *“consider their role in articulating positive attitudes around race, ethnicity, equality in addition to Welsh language and culture heritage.”* Respondents stated that this action is important as Welsh-medium environments are overwhelmingly White. It is crucial to bring anti-racism into these environments and to combine anti-racism with the Welsh language, especially in North-east Wales. It was noted that organisations such as those mentioned above may well need additional support to undertake activity such as this. One public sector organisation (n = 1) stated that this action is unclear, and that clarity is needed about grant-funding partners in relation to the action plans they are intended to produce and the difference between the two activities. One LA (n = 1) reiterated that it would be beneficial for the action on grant funding partners to be clearer about the expectations made of grant partners.
444. One public sector organisation (n = 1) stated that it is not clear who the 'grant recipients' and 'establishing a Community of Learning' action refers to and clarity is needed on this to understand the intention of the action.
445. One LA (n = 1) stated strongly that organisations sponsored by Welsh Government or who are provided with grants should promote the Welsh language and provide services. One third sector organisation (n = 1) asserted that Welsh Government should implement clear sanctions for public bodies that do not adhere to Welsh language regulations, or the recommendations put to them by the Welsh Language Commissioner upon review. Welsh Government should implement process to ensure organisations receiving funding from Welsh Government for Welsh Language provision are acting in up most compliance with equality law.

446. LAs (n = 3), one individual respondent (n = 1) and one education board / network / association (n = 1) stated that further consideration needs to be given to how the Welsh language could be mainstreamed into the whole action plan, and consideration given to where the Welsh language would contribute and complement other actions.
447. Third sector organisations (n = 2) asserted that the accessibility of opportunities to learn the Welsh language should be approached from an anti-racist perspective. Opportunities for people from ethnic minority backgrounds to learn Welsh should be increased. One trade union (n = 1) highlighted that the National Centre for Learning Welsh should ensure that Black, Asian and Minority Ethnic adults and workers have an equal opportunity to learn Welsh as others.
448. One public sector organisation (n = 1) and one LA (n = 1) stated that the actions in this section of the Plan in relation to education need to be strengthened and should be more ambitious. The Plan is not ambitious enough to increase the number of people from Black, Asian and Minority Ethnic backgrounds choosing opportunities to access the Welsh language either through education, language learning, the workplace and community activities. More detail on how more children from minority ethnic communities can be encouraged to undertake Welsh medium education should have been incorporated in the Plan in the first place. It was not clear why the intention is to focus specifically on ESOL teachers rather than attracting Welsh speaking Black, Asian and Minority Ethnic teachers to work throughout the education sector. The intention to, *“develop a strategy and action plan by September 2021 to increase the numbers in the teaching workforce from Black, Asian and Minority Ethnic groups and including other under-represented groups,”* needs to be strengthened to increase the number of Black, Asian and Minority Ethnic Welsh speakers.
449. One health organisation (n = 1) stated strongly that achievement goals within early years, statutory education period, post 16 and further education as well as Welsh for adults in relation to the Welsh language should be set. One education board / network / association (n = 1) stated that within education, more support could be offered to all learners to improve their Welsh language skills alongside their studies. Such support could include supporting and encouraging teachers to use Welsh phrases in the classroom and offering free Welsh language courses.
450. One LA (n = 1) asserted that Welsh Government should work with and involve Welsh speakers at the very start of the Plan to ensure that their views, comments and input is captured.
451. One education board / network / association (n = 1) stated that the Plan could speak to more imaginative ways of bridging and blurring the language gap through use of new technologies (both socially and in the workplace), through projects that promote allyship and mutual language learning and exchange using the full range of media, social media etc. Additionally, one health organisation (n = 1) stated that the Plan should push to encourage Black, Asian and Minority Ethnic communities to

become actively involved and participate in national artistic, cultural and sporting events. One third sector organisation (n = 1) asserted that Welsh Government's approach to promoting the Welsh Language should be widened to one of promoting multi-lingualism recognising the range of mother tongues which are spoken within Wales.

452. One health organisation (n = 1) stated that the Plan should set out how Welsh Language skills can improve career and life opportunities. The Plan should also include cooperation with local and national organisations that value or attract Welsh-speaking employees to encourage recruits from Black, Asian and Minority Ethnic communities to apply for jobs and use their Welsh language skills. One trade union (n = 1) stated that Welsh Government must be cautious about the way it implements its proposed policy approach for Black, Asian and Minority Ethnic inclusivity. If employers require basic Welsh language skills as essential for a role, particularly when there are moves to introduce this for a whole organisation (i.e., the Senedd) it could make it harder for some people to get better paid jobs or deter people from applying, if they cannot speak any Welsh. Many ethnic minority individuals often speak more than one language. The implication of mandating basic Welsh is counterproductive to Wales declaring itself as a Nation of Sanctuary for refugees because some of the policy ambitions around language could prohibit these refugees from succeeding to the highest positions of Welsh society. Community organisations (n = 1+) stated that their members have highlighted barriers to career choices due to language barriers and stated that they needed to learn Welsh to dissolve these barriers. One third sector organisation (n = 1) stated that Welsh Government should remove Welsh Language Skills as 'desirable' from any Public Sector job roles and instead ask applicants to commit to undertaking concerted Welsh Language lessons as part of their role. Welsh Government should promote this in other sectors as well. When Welsh Language skills are essential for a public sector role, Welsh Government should allow provision for job share arrangements, to allow for someone who does not have Welsh language Skills to share the role with someone who does. This suggestion is supported by individual respondents (n = 3) who highlighted that the Welsh language in employment should be considered as an additional skill and an added value and those who do not speak Welsh should not be indirectly discriminated against for not speaking the language. Individual respondents (n = 3) and one third sector organisation (n = 1) asserted that Welsh language learning should be offered as standard with Welsh Government as an employer and time should be allocated for this, so it does not come out of people's own time. Other responses made similar points, one LA (n = 1) and one public sector organisation (n = 1) stated that individuals should be supported to learn or improve their Welsh language skills in the work environment as part of their continual professional development. One trade Union (n = 1) suggested that Welsh Government must create opportunities to facilitate Welsh language learning and these opportunities must be well advertised and promoted and easily accessible and available at convenient times. Individual respondents (n = 4) and one public sector network (n = 1+) stated that Welsh lessons should be free to all. One education board / network / association (n = 1) highlighted those opportunities should be afforded for people to learn Welsh from other languages not just English and where appropriate, key Welsh phrases should be taught through other languages to aid understanding of concepts

and words. Criminal justice agencies (n = 1+) stated that employers / organisations should receive additional support (i.e., access to Welsh tutors / courses) with the running of Welsh classes within their workplace. Incentives should be utilised here for staff, as with extremely high workloads, staff may be reluctant to progress. Respondents suggested that organisational awards could be awarded to highlight ongoing support / promotion of the Welsh Language work and additional courses could be offered for members of the community, specifically those who have children attending Welsh-speaking schools. One individual respondent (n = 1) also stated that more opportunities should be provided for families to learn Welsh together. Welsh Government should also encourage staff who can speak Welsh but lack confidence and ensure people are aware of Welsh Government's ambition to reach one million Welsh speakers by 2050 and the benefits of speaking Welsh. Furthermore, one third sector organisation (n = 1) stated that Welsh Government should mandate that all public bodies offer ongoing, high quality, combo-style Welsh Language learning opportunities to all of their staff, taking into account varied learning and working styles, and offering without condition and to the choice of the employee, the provision of 1-1 lessons, online learning, classroom-based learning, language exchange, residential learning and immersed learning opportunities. These should be offered within working time, without detriment to undertaking the rest of the role, i.e., one working day for all public body staff to be dedicated to learning Welsh. Welsh Government should provide sliding scale grants for residents of Wales, dependent not only on income but on geographical location, digital poverty and migration status, to undertake the above style of Welsh Language learning opportunities even if they are not yet employed by a public body. Welsh Government should ensure that all public Welsh Language learning opportunities are centring positive action to increase the uptake of Welsh Language classes by racialised people. Community organisations (n = 1+) asserted that if Welsh language is a condition of employment, then mentoring to help people upskill in it must be provided.

453. One third sector organisation (n = 1) highlighted that additional goals are needed for the Welsh Language, with an emphasis on creating and supporting networks for professional contacts and services, best practice and learning opportunities for organisations. Respondents would welcome if Welsh Government could support unconscious bias and other race equality training to be developed in the Welsh Language as a priority in support of Welsh speakers willing to decolonise their mother tongue.

454. One third sector organisation (n = 1) and one education board / network / association (n = 1) stated that the Plan would be further enhanced by an action which requires organisations that support and represent Black, Asian and Minority Ethnic communities to develop their own Welsh language services and provisions including the promotion of their services through the medium of Welsh. It is felt that these further actions would support the development of a strong link between the Welsh language and our Black, Asian and Minority Ethnic communities.

455. One public sector organisation (n = 1) stated that more clarity is needed around the discussions that are intended and what their output will be. It is also not

clear who will take the lead and share the findings between local authorities and other relevant bodies.

456. There was confusion from third sector organisations and networks (n = 2+) with the £600k budget allocated in the Plan for teachers to be out for a year learning Welsh, given the limited reach of that level of funding. They also voiced strong concerns about the lack of clarity about funding for the Plan as a whole.

What's missing from this section:

457. One public sector organisation (n = 1) felt the Plan did not demonstrate an understanding of the barriers to Welsh-medium education or set out actions to overcome them. One LA (n = 1) asserted that the Welsh language must be recognised throughout the different policy areas and not treated as a separate entity. There is a key role for the language in particular in the areas of education and Arts, Culture, Heritage and Sport but the Plan does not currently make that clear enough. One LA (n = 1) further stated that the language is an essential part of the country's diverse culture, and so in order to treat the Welsh language fairly and recognise the official status that has been given to it through the Welsh Language Measure 2011, language should constantly punctuate the other areas of the Plan as well, without the Government being concerned about dealing with the complex and difficult issue of the relationship of different cohorts of people with the language.
458. One third sector organisation (n = 1) and one public sector organisation (n = 1) highlighted that intersectionality must be considered when challenging the views that presume who can receive Welsh-medium education. It was highlighted that there is little mention of the Welsh language other than the aims of education policy and the Welsh language.
459. One third sector organisation (n = 1) asserted that the Plan must emphasise the need to statistically increase the number of Welsh speakers who are Black, Asian and Minority Ethnic. The Plan should also take into account that children from Black, Asian and Minority Ethnic homes may also experience micro-interferences for speaking or studying through the medium of Welsh in addition to their race. One LA (n = 1) highlighted that although the Plan refers to the number of Welsh speakers who come from ethnic minority communities in Wales it does not specify what average this 10,000 of the ethnic minority population is in Wales. Respondents stated that in order to understand the context both figures need to be identified. How much progress does the government wish to see in the context of these figures? One third sector organisation (n = 1) stated that to connect in the fullest possible way with those 10,000 people who identified as ethnically diverse Welsh speakers in the last census, Welsh Government must support and create networks and to give them paid for opportunities to act as ambassadors, community connectors or trainers. Targeted specialist recruitment to support private and public sector to recruit Welsh speakers from ethnically diverse backgrounds is needed, as is sabbatical arrangements for organisations willing to support new staff learning and improving their Welsh. Financial welcome incentives for ethnically diverse staff considering working within a Welsh language setting should also be provided.

460. One education board / network / association (n = 1) asserted that there should be recognition in the Plan, that in many cases, relevant communities have historically been denied access to Welsh language education. There should be a greater commitment to ensure the expansion of Welsh-medium education and schools in those communities (in this context training on the intersection between the Welsh language and Black, Asian and Minority Ethnic people would be helpful for LAs, which could be potentially rolled out to other institutions). Such educational opportunities are especially important where the Welsh language can function as social capital and a vocational skill that can increase the social mobility of citizens who face numerous intersecting, structural barriers. Respondents highlight a significant role for Welsh Higher Education Institutions in helping Welsh-speaking Black, Asian and Minority Ethnic people develop their skills so that they are confident in become part of a bilingual workforce (especially relevant to the need for Welsh speaking teachers from minority groups). The Plan should specify therefore how Higher Education Institutions can work more closely with key partners to ensure those from minority groups in particular benefit from Welsh language provision in universities. One other organisation (n = 1) asserted that Welsh Government should provide more opportunities for Black, Asian and Minority Ethnic learners to access Welsh medium education. All young people should have the opportunity to learn Welsh, more incidental Welsh should be used in schools and Welsh TV programmes should be broadcast on mainstream channels.
461. One third sector network (n = 1+) asserted that there should be an initiative within the Plan detailing the opportunity for Somali language classes to join the Welsh language classes – respondents suggest the creation of a swap of languages day to celebrate various different languages, faiths and backgrounds each month in schools.
462. Individual respondents (n = 3), one LA (n = 1), community organisations (n = 1+), one third sector organisation (n = 1) and criminal justice agencies (n = 1+) suggested the Welsh language be promoted with events, free lessons and affordable courses. Respondents would like the Plan to detail more opportunities to promote the language. Welsh Government should ensure that all efforts made at promoting the Welsh language including via media channels, include racialised people from different backgrounds in their work, to break down the ‘Welsh = White’ stereotype.
463. One third sector organisation (n = 1) stated that Welsh Government should consider the impact this section of the Plan could have on people who do not speak English or are learning the language. Respondents detail those parents with limited English need reassurance that their children will not be disadvantaged if attending a Welsh medium school due to limited capacity to support education from home.
464. One public sector organisation (n = 1) suggest that the role of Amgueddfa Cymru’s Natural History collections, research and programmes are also highlighted in this section.

465. One public sector organisation (n = 1) was disappointed at the Plan's intention to, "*conduct a review to consider the operational issues raised around adult community learning, particularly how ESOL training is aligned with vocational training,*" with no intention of considering Welsh for Speakers of Other Languages in this context. This runs counter to the objective in the section on education in schools which states the intention to increase provision, and the number of people undertaking Welsh-medium education. The Welsh Language Commissioner has previously corresponded with the Welsh Government highlighting the importance of Welsh for Speakers of Other Languages as an opportunity to promote integration and increase work opportunities.
466. One LA (n = 1) stated the Plan points at the introduction of working with Welsh partners and only details who those partners are in the Education section. Respondents stated that any requirements will have to be communicated effectively and in a timely manner to allow these partners to make the best use of their time and resources to increase opportunities to use Welsh in their activities. The Welsh partners will require appropriate training with appropriate terminology to reduce the risk of unintended discrimination.
467. One LA (n = 1) stated that the Welsh language should be part of the proposed review of English for the speakers of other languages.
468. One third sector organisation (n = 1) highlighted how establishing Welsh language networks of people representing racial justice groups to scrutinise policies would help Welsh partners to have a network to turn to to consider potential impacts that they might not have noticed or considered.
469. One third sector organisation (n = 1) asserted that survivor engagement work should be undertaken in Welsh and English, and commissioning of services should ensure that service delivery is in Welsh where the need is evidenced for this. Access to information in other languages must be available for women with English and Welsh as a second language, especially for migrant women. Whilst Welsh should be available and treated equally to English, a wide range of language provision should be funded, ensuring language is not a barrier to support.
470. One education board / network / association (n = 1) highlighted that there is limited funding to resource the medium of Welsh, and this can come at a cost to organisations in terms of translation services and recruiting personal who are Welsh speakers, so further incentives would be useful.
471. One third sector organisation (n = 1) asserted that Welsh Government should provide Welsh language translation and interpretation services at a sliding scale for organisations not mandated to provide services in Welsh, and those who have not factored into their budgets provision for translation, where non-governmental organisations receive funding for service provision from Welsh.

Other comments in this section include:

472. One education board / network / association (n = 1) asserted that raising awareness and encouraging take up of Welsh medium education will not make a difference to racism. It is part of a separate government agenda, as is challenging Welsh Education Planning Forums.
473. One public sector organisation (n = 1) stated that although they endorse the actions in the Plan, they are not convinced that they will succeed in closing the gap and redressing the inequality that has led to a situation where there are so few people from minority ethnic communities who can speak Welsh.
474. One third sector organisation (n = 1) stated that the proposals should not have any effect on the Welsh language – it should be possible to work towards an anti-racist Wales as well as being a nation that values the Welsh language, they are not mutually exclusive.
475. One third sector organisation (n = 1) asserted that it is important to standardise terminology in relation to other identities, such as LGBTQ+. This is in order to ensure that there is an intersectional approach to the standardisation of terminology and use of language in relation to people's identities in the Welsh language. For example, what would be an acceptable Welsh translation of the acronym QTIPOC (Queer, Transgender and Intersex People)?
476. One trade Union (n = 1) explained how for many of their Black, Asian and Minority Ethnic members within the passenger transport sector, particularly the taxi trade, neither Welsh nor English is a first language. This impacted heavily recently on some members' ability to apply for Welsh Government financial assistance, made available due to Covid-19. Online applications were turned down due to errors made due to a misunderstanding or incorrect interpretation of questions set in English. Respondents highlighted that there is no standardisation of applications within local authorities either and this must be addressed going forward.

Environment:

477. Third sector organisations and networks (n = 7+), LAs (n = 2), one health organisation (n = 1), one trade union (n = 1), individual respondents (n = 7) and one other organisation (n = 1) have provided comments on the environment section of the Plan.

The brevity of this section of the Plan:

478. Third sector organisations and networks (n = 5+), one health organisation (n = 1) and LAs (n = 2) were disappointed at the length of this section of the Plan stating that this indicates that environmental issues were seen as being of lesser importance. It was felt this section of the Plan did not focus on empowerment around

the cause and is disconnected from the rest of the Plan. Respondents stated that the brevity of this section was illustrative of the wider problem – the gulf between the environmental sector and the race sector. This section of the Plan needs strengthening, and more tangible measures need to be added.

479. Third sector organisations and networks (n = 5+), one health organisation (n = 1) and LAs (n = 2) thought that this section of the Plan should mention the climate and nature emergency and how the environmental crisis is exacerbating poverty. More needs to be said in this section of the Plan on specifically addressing climate change and the disproportionate effects it has on socio-economically disadvantaged people and those from an ethnic minority background (for instance, on the links between pollution and asthma). More also needs to be said on how Black, Asian and Minority Ethnic communities will be involved in contributing ideas to battling the climate emergency and being involved in community environmental initiatives, from taking part in community litter picks to running community energy schemes.

What's missing from this section of the Plan in relation to housing:

480. Third sector organisations (n = 3), individual respondents (n = 3), LAs (n = 2) and one trade union (n = 1) want to see this section of the Plan link up with social housing goals / actions, (where there are high levels of ethnic minority tenants). There is a need for an additional environmental consideration for housing to improve planning to ensure better access to green spaces. Welsh Government should ensure large polluters are capped and ensure housing areas near polluted areas are protected so that low housing prices do not require Black, Asian and Minority Ethnic people to live there. As many reports and articles stress that the countryside remains a distinctly White and often intimidating place for Black, Asian and Minority Ethnic communities (Natural England found that only 26 per cent of Black people spent time in the countryside compared to almost 45 per cent of White people), the Plan should contain actions and outcomes to address this.

481. Third sector organisations (n = 2) asserted that the Plan should commission more research on the impact of environmental racism to provide better data on disproportionate health impacts of environmental factors including air pollutants, (in)access to green spaces, proximity to brown sites, waste treatment plants, industrial areas, and motorways.

What's missing from this section of the Plan in relation to employment:

482. Third sector organisations (n = 2), one trade union (n = 1), individual respondents (n = 3) and LAs (n = 2) suggested the Plan needs to include a funded job guarantee scheme which delivers good quality jobs and includes decarbonisation as part of its criteria. This should be managed and delivered by Welsh Government in social partnership with trade unions and employers. New jobs created within the green economy should also be targeted at those from under-represented groups, and there should be a focus on attracting more diverse applicants to this sector including through apprenticeships.

483. Third sector organisations (n = 2), one trade union (n = 1), individual respondents (n = 3) and LAs (n = 2) suggested Welsh Government focus on the development and integration of local supply chains to benefit communities and the environment, securing better jobs closer to home. It was suggested there was learning to take from the new ways of working that have developed as a necessity because of the lockdown. Where these have co-benefits for workers and the environment, these should be able to continue. For example, more widespread homeworking could help people save time on commuting, have a better work-life balance, and reduce harmful air pollution.

484. Third sector organisations (n = 2), one trade union (n = 1), individual respondents (n = 3) and LAs (n = 2) stated that this section of the Plan should contain the following actions on funding and investment:

- a. Investment to support industries that need to transition to lower-carbon models (e.g., support for research and development for greener steel).
- b. Investment to maximise Wales's opportunities to develop new and emerging green industries (e.g., tidal, marine and hydrogen energy).
- c. Investment to fast-track low carbon travel infrastructure development (e.g., rail improvements like the Metro and active travel, including pop-up cycling and walking routes in towns and cities).
- d. Funding to improve access to broadband, digital hardware, software and digital skills to increase capacity for home working and reduce the need for work-related travel.

Existing environmental projects / initiatives / acts this section of the Plan should refer to / consider:

485. Third sector organisations (n = 2) individual respondents (n = 2) and one other organisation (n = 1) asserted that Welsh Government should support the existing environmentally focussed ethnic minority diverse organisations and networks to have more impact / reach and look for ongoing ways to discover and amplify good practice implemented by other organisations. The role and expectations of Welsh public bodies, in particular Natural Resources Wales, should be incorporated as a number of their duties are relevant to this section of the Plan. This section of the Plan is also consistent with the expectations placed on other Welsh public bodies such as Sports Wales, Arts Council and National Museum. Third sector organisations including Size of Wales, who have a youth ambassadors' group and expertise in this area, and Children in Wales and their Young Wales programme, who were recently engaged by Welsh Government to consult children on the First Ministers national forest programmes, should also be incorporated into this part of the Plan. Welsh Government should also scrutinise the work of Natural Resources Wales and that of the Wales Public Body Equality Partnership to identify opportunities to integrate anti-racist objectives into their respective work programmes and regulatory framework. There also needs to be a conversation with people from ethnic minority communities on what they want in terms of the environment and how to meet their needs – inclusion and input from Natural Resources Wales, National Parks and Countryside and Conservation Organisations would be of benefit to this goal.

486. Third sector organisations (n = 2), individual respondents (n = 2) and one other organisation (n = 1) stated that Welsh Government should review the functions of its own Future Generations Unit to identify ways in which ethnic minority people can become more involved in the green and future generations agenda – including through paid work.

487. One LA (n = 1), third sector organisations (n = 2), individual respondents (n = 2), one other organisation (n = 1) and one trade union (n = 1) highlighted that the Plan does not mention engaging LAs to plan public green events (such as river and beach cleaning) to bring people together and build engagement. There is an opportunity to develop community leaders to work co-productively with LAs and Welsh Government to greatly improve our urban environments, from making use of empty town centre properties to running local market stalls. They could also help with the Future Generations Commissioner's request for Welsh Government to ensure everyone lives within minutes of green space. This section should use the principles of co-design wherever programmes or ways of working are developed to ensure anti-racist practice (a similar approach to the d/Deaf and disabled #NothingAboutUsWithoutUs Methodology could be adopted).

Other comments in this section include:

488. There were concerns from one LA (n = 1), one third sector organisation (n = 1), individual respondents (n = 3) and one other organisation (n = 1) that the Plan does not acknowledge the issue of rurality and race equality, and the intersection between disability and race and assisting disabled people to access Wales's natural open spaces.

489. One third sector organisation (n = 1), individual respondents (n = 3), one LA (n = 1) and one other organisation (n = 1) asserted that marketing for rural and green destinations across Wales needs to be made more welcoming and inclusive to people from ethnic minority backgrounds. It was suggested Welsh Government identify Black, Asian and Minority Ethnic communities already engaged in environmental projects and reach out to them to participate in and lead projects. Welsh Government should engage Black, Asian and Minority Ethnic communities in environmental planning and to make more effective decisions in the allocation of resources for environmental projects: for instance, Black, Asian and Minority Ethnic communities enjoy growing their own food – innovative projects to set-up co-operatives to grow and share food could be good examples of building community cohesion and integration.

Cross-Cutting Goals:

490. LAs (n = 6), individual respondents (n = 3), third sector organisations and networks (n = 11+), health organisations (n = 4), trade unions (n = 2), one education board / network / association (n = 1) and public sector organisations (n = 3) have provided comments on the cross-cutting goals section of the Plan.

Data:

491. One LA (n = 1), third sector organisations and networks (n = 2+) and health organisations (n = 2) explain that progress can only be measured with data, and Wales has been very poor at collecting appropriate data; respondents suggested that data is a particular problem in North Wales, given the relative sparsity of the minority population. The collection and analysis of data needs to be a key feature across all policy areas. Ensuring there are robust systems to record, analyse and present data will be the cornerstone of achieving the REAP's vision. Welsh Government need to ensure there is a good mix of data collected e.g., from surveys, lived experience etc. It would be important to triangulate the data to produce an analysis of the key themes cross-referenced across all data sets so data from one group of people / data from one part of the county does not dominate data sets.
492. One individual respondent (n = 1) and third sector organisations and networks (n = 2+) asserted that the Plan lacked clarity on important matters, such as definitions and baselines and does not make sufficient reference to the need for data to make the case for change – which is the language that many in public authorities understand. The move towards valuing lived experiences as much as statistical data is welcomed, but more should be said about how data should be used to support effective delivery, the raising of standards and to monitor and support the achievement of the outcomes. To strengthen data collection and analysis further, Welsh Government should consult with specialists who understand the narrative behind the statistical information.
493. One LA (n = 1) stated the need for census data to be disaggregated and available locally to support their understanding of local population demographics. Identifying which services should be collecting equality data should be set out within the Plan alongside actions to provide guidance. Public bodies are required to publish employment data under the Equality Act 2010. Systems for publication, as set out in the Plan need to be cognisant of this, to avoid duplication and additional work. If public bodies need to change their systems to meet the requirements of this Plan, there may well be financial costs to change electronic systems as well as capacity and training issues. These will affect the time frames for achievement of actions. It would be beneficial if data captured across Wales is made available and disaggregated by local authority area. This would support public bodies complete impact assessments, focus action and contribute to objective setting, such as equality objectives. Third sector organisations (n = 2) and one trade union (n = 1) also stated that there is an urgent need to improve data collection, including disaggregating data by race, age and gender in particular. There is presently insufficient data on Black, Asian and Minority Ethnic children across a range of thematic areas. This was highlighted in the Wales UNCRC Monitoring Group's report (developed by Children in Wales) to the UN last year. One public sector organisation (n = 1) also stated that disaggregated data, is central to deeply knowing the needs of Black, Asian and Minority Ethnic people in Wales. This is especially an issue when it comes to understanding the most basic information about Gypsy, Roma and

Traveller people; Gypsy and Traveller people who were only able to self-identify in the census in 2011 - Roma for the first time in 2021. Many Gypsy, Traveller and Roma people do not feel confident to self-identify due to persecution, both current and historic, with the Police, Crime, Sentencing and Courts Bill providing a particularly challenging environment at this time, in which to self-identify. It is not clear what measures Welsh Government will take to increase confidence in self-identifying.

494. Health organisations (n = 2) stated that from a service perspective, data may be routinely collected upon registration with GP Practices, however when an individual is referred into secondary care or mental health services, this information does not routinely travel with the patient. Therefore, the analysis of waiting lists by longest waits, urgent / routine ratios, 'did not attend' etc., is not feasible on the basis of race, but could provide a strong evidence base for the identification of unseen, unidentified or unintended barriers. A simple approach to review equality monitoring information held at a range of points of contact could be adopted. Additional public health data is required to better understand the health inequalities experienced by some Black, Asian and Minority Ethnic people to establish a baseline and track progress. Consideration should also be given to embedding intersectionality within the approach to disaggregation of data. The strengthening of data collection and reporting should be driven centrally by NHS Wales. There are system issues and the need for consistent and agreed data sets. There should be clear measures aligned to the WRES to enable benchmarking and all-Wales aggregation / disaggregation to monitor progress. There is a training need and resource implications for individual organisations to report, disaggregate and analyse this information. Furthermore, the Covid-19 Vaccination Dashboard does not currently capture data by the protected characteristics with the exception of age and gender. Public Health Wales produce monthly Enhanced Surveillance Reports which include all-Wales data on ethnicity. There is no local data with a breakdown on the take up of the vaccination by ethnic group. The 2020 NHS Wales Staff Survey asked a general question about bullying, harassment and abuse. Future surveys will need to include questions specifically about racism to measure progress with the Action Plan.

495. One education board / network / association (n = 1) stated that Welsh Government's efforts to address the way data is collected and also the ambitious action of, "*commissioning of a one-off external audit, of all Welsh Government policies and processes; from Interest to Exit for recruitment, selection, progression, exit and related policies and of lived experience of ethnic minority staff and a sample of managers,*" is very welcome. It is an example of leading from the front and findings of this should be shared more widely to show transparency, encourage a conversation, and public sector organisations should be expected to follow suit.

496. One third sector organisation (n = 1) stated that in relation to collecting useful and accurate data on access to services and on staff in the VAWDASV sector, more needs to be said in the Plan on whether these goals will apply to all areas of work, or only those directly Welsh Government funded?

497. One public sector organisation (n = 1) support reporting on the ethnicity pay gap in principle, but stated that it would be useful if any future analysis was conducted at an appropriate level to the size of the organisation, as otherwise, it could risk individual people being identified, depending on the level of disaggregation into different ethnic groups that is required to be reported on.
498. One trade union (n = 1) stated that the use of algorithms in decision making processes based on big data can lead to direct or indirect discrimination; thus, much more research and work needs to be developed to ensure that this does not happen and that safeguards are considered going forward.

Engaging and Funding Communities:

499. One third sector organisation (n = 1) asserted that any full versions of materials published in English, should also be published in Welsh at the same time. English and Welsh Easy read versions of the document should also be published at the same time as the full versions.
500. One third sector organisation (n = 1) stated in relation to Cross cutting goal 1a: *“To ensure that the way the Welsh Government communicates and engages is in keeping with lessons learnt, best practice, and as agreed through dialogue with Black, Asian and Minority Ethnic peoples,”* the main action under this goal is to identify and map ethnic minority’s community groups and key activists and to keep a database and liaise regularly with these groups / individuals. There are already organisations with this remit, and it becomes redundant and counterproductive to do it twice. A better approach is for Welsh Government to liaise, invest in and support these organisations to improve in their role, which often also has the remit to consult and give a voice to diverse communities.
501. Third sector organisations and networks (n = 2+) stated, in relation to goal 1b: *“To review and co-design better approaches to funding ethnic minority organisations,”* the Plan should reinforce the importance of infrastructure support organisations in supporting local ethnic minority community groups increase capacity and skills to be involved in community action, form and steer community organisations, so they can thrive as an organisation and work in partnership.
502. One third sector organisation (n = 1) stated in relation to reviewing funding approaches, that there is a body of expertise within the Wales Funders Forum, Welsh Government’s Grants Centre of Excellence and the Third Sector Partnership Council Funding and Compliance Subgroup which should all be accessed with a view to undertaking a Wales wide review of funding for the race sector.

Impact Assessment for Better Policy Design:

503. Health organisations (n = 2) stated that the goal to significantly improve the process for undertaking impact assessment is welcomed. This is a crucial tool to check if all groups are covered, identify gaps and agreed the actions to work towards addressing them. This has to be seen as an effective tool and not an added burden.

Robust health impact assessment, socio-economic and equality impact assessment, training, processes and scrutiny are essential mechanisms in developing evidenced base policy and designing out potential adverse impact in decision making. There are opportunities to strengthen engagement with ethnic minority communities to inform this process. An all-Wales approach to Equality Impact Assessments (EqIA) training and policy / process would drive the quality of impact assessment across the public sector and also address consistency in partnership decision making i.e., RPBs and PSBs are not listed within the Equality Act, the responsibility for impact assessment rests with individual partners. It is necessary to build capacity across the public sector and strengthen organisational accountability in this regard.

504. One third sector organisation (n = 1) stated that any EqIA approach should incorporate Covid-19 risk assessments for staff from minority ethnic communities returning to the workplace and those working from home and in particular for those in front line occupations.

505. One third sector organisation (n = 1) stated that a Child Rights Impact Assessment (CRIA) should be undertaken by all public bodies when policy and decisions are being made which will have a direct or indirect impact on children. This would include Welsh Government in line with the due regard duty prescribed under the Rights of Children and Young Persons Measure 2011.

506. One LA (n = 1) stated that there is reference to existing mechanisms not being fully utilised to combat racism (such as Integrated Impact Assessments). This needs to be understood within the context of successive years of austerity, which have seen public service resources severely depleted.

507. LAs (n = 2) stated that developing exemplar impact assessments that can be shared with the public sector would be appreciated and would contribute to improving standards. LAs suggested that Welsh Government share its learning on improving the outcomes of equality impact assessments so that other public bodies may benefit from this knowledge. One other organisation (n = 1) stated that Welsh Government should identify, share and champion good practice across the board and have co-design and shared lived experience as an ongoing commitment across and throughout delivery (with the value of that lived experience acknowledged and paid for).

Services for Individuals experiencing Racism:

508. One third sector organisation (n = 1) asserted that people who experience racism, need the right support to feel confident to share their experiences as part of the process of changing attitudes to stamp out racism.

509. One third sector organisation (n = 1) stated that the goal around improving support for complainants and victims of racism should include undertaking a wholesale review of Welsh Government commissioned Advocacy services including Children and Young People's Advocacy services for their appropriateness and ability to support ethnic minority complaints and victims of racism. A similar review should

also take place of Welsh Government-funded Advice Services. The point is money is already spent by Welsh Government for these services, but they are not accessible or effective when it comes to ethnic minority people.

510. One public sector organisation (n = 1) has stated that any action that results in a more effective complaints system is supported, but it is not clear in the Plan what the scope is of the action that relates to complaints systems, and under whose jurisdiction these complaints fall under.

511. One third sector organisation (n = 1) stated that although access to advocacy and support is noted in introductory bullet point 2 in this section of the Plan, this has not transferred to the language in Goal 2. This is important as many children will benefit from an adult advocate who can support and advocate for / with them to report a hate crime and provide some after-care support. Goal 2 should therefore be revised.

Role of Informal Volunteering:

512. One third sector organisation (n = 1) welcomed the inclusion of informal volunteering as a cross-cutting theme and the aspiration to reflect the additional and often unrecognised efforts by volunteers from minority groups. This is of notable importance in regard to the goals for social care, education and community cohesion.

513. Third sector organisations (n = 2) expressed disappointment at how little recognition is given in the Plan on the informal volunteering work done by Black, Asian and Minority Ethnic individuals for their respective communities – just a few sentences on page 102 and the final goal tables. Respondents stated strongly that engagement with voluntary services and opportunities to volunteer are crucial. Volunteering, both formal and informal, should have been highlighted within the section, 'the case for change,' alongside workforce experience under 'governance for implementation,' and either given its own heading or be strongly intertwined with other relevant policy goals. Investing in volunteers should be referenced by Welsh Government in the final strategy as a tool for embedding best practice in equality and diversity in volunteering. There were suggestions for ways in which the contribution of volunteers could be recognised for example through time credits and a reward system which would need to be co-created or consideration could be given to linking receiving an award with eligibility for funding (as mentioned on page 102) to formalise volunteering efforts?

514. One third sector organisation (n = 1) was disappointed at the lack information in the Plan about working with the voluntary sector (the only mention is about the Whole School Approach to Mental Health Task and Finish Group, which is only involved in mental health and not other aspects of life.

515. One public sector network (n = 1+) stated that time-credits involve ongoing costs and are not allowed for asylum seekers or those without NRPF. Therefore, potentially leaving people further excluded. Where time-credits have been used in the community there have been issues, with an amnesty by one organisation resulting in

thousands being returned by people saying they volunteered for the community and had just been putting them in a drawer. There need to be opportunities to spend that work for both the community and businesses. Covid-19 stopped almost all opportunity to spend with at least one Council discussing no longer proceeding with their time-credits scheme as it was not meeting the needs of the local community.

516. One third sector organisation (n = 1) asserted that the goal on volunteering should include an action to review the impact and scope of the Welsh Government funded Volunteering in Wales Grant programme managed by WCVA, and how it can be better shaped and focused on the future to increase support to ethnic minority volunteers.

General Comments:

517. LAs (n = 2) stated that the Plan is extensive and to increase it further may further reduce the ability to deliver on already identified actions. Further identification of other cross-cutting themes in the Plan could be identified, which would help to streamline and shorten the Plan. For example, there are multiple actions within the Plan relating to diversity in the workforce in different disciplines and this could be covered by one single over-arching action.

518. One individual respondent (n = 1) stated that the Plan should ensure that interventions should seek to integrate economic, social and environmental outcomes, consistent with the Welsh Government's central organising principle of sustainable development and contributing to the outcomes of the cross-cutting themes for the Plan, through vertical and horizontal integration.

519. One third sector network (n = 1+) stated that the Plan should include a cross-cutting commitment on access to all Welsh public services for everyone who needs them, regardless of immigration status.

520. Third sector organisations and networks (n = 2+) asserted that a communications strategy that considers protocols around sharing sensitive information across sectors and policy areas is needed. As is mandatory cross-sector training for those involved in public sector delivery and minority ethnic led organisations involved in providing the essential support services for their respective communities focussing on cultural awareness and policymaking, respectively. This training should also cover the rights and entitlements of refugees and migrants to public services.

521. One third sector organisation (n = 1) stated in relation to the action about having a single 'map' of ethnic minority communities and groups, that the online map has already been created by EYST via their All-Wales BAME Engagement programme and is currently in the process of being updated (completion date August 2021). It is important to note that any such maps need to have an annual refresh to ensure they remain current – and this needs to be appropriately resourced.

522. One LA (n = 1) and one third sector organisation (n = 1) stated that the lived experiences of Black, Asian and Minority Ethnic communities in rural areas will be different to those in city areas and so this should be reflected in the Plan. Each authority needs to take into consideration and consult with local groups in developing council Race Equality Action Plans for a more localised response.
523. One public sector organisation (n = 1) was concerned at the use of sanctions as a mode to drive changes that may be symptomatic of wider systemic issues outside of the control of an individual or single organisation.

Q3. Are there any goals and actions that you can think of that are missing? Who should deliver them and what actions would help to deliver them?

524. For missing goals and actions, please see the comments under the policy area headings within question 2, each of which have a '*What's missing*' sub-section. Any goals and actions that respondents stated were missing from the Plan have been listed under the policy area which they refer to. Any missing priorities within the Plan are listed below.
525. Third sector organisations and networks (n = 5+), LAs (n = 3), public sector organisations and networks (n = 4+), one individual respondent (n = 1), community organisations (n = 1+), health organisations (n = 2), and one religious representational body (n = 1) provided comments on question 3.
526. One third sector organisation (n = 1) and one public sector organisation (n = 1) asserted that digital inclusion is largely missing from the Plan. Since Covid-19 exposed that those that are digitally excluded include a disproportionate number of those from Black, Asian and Minority Ethnic communities as well as older people and those suffering with poverty and health issues, the Plan should be inclusive of those issues.
527. One third sector organisation (n = 1) was disappointed that bereavement support and services are not mentioned explicitly, particularly with the ongoing work on a National Bereavement Framework – a direct link with the final bereavement framework should be made.
528. One LA (n = 1), one individual respondent (n = 1), one public sector organisation (n = 1) and third sector organisations and networks (n = 2+) highlight that the issue of rurality and specifically, the extra layer it can add to isolation issues, is missing throughout the Plan.
529. One public sector organisation (n = 1) and one third sector organisation (n = 1) asserted that more is needed in the Plan to understand the specific needs of children and young people from minority ethnic backgrounds and how racism and bias can impact on their access to appropriate support. The Plan focuses on barriers, such as honour, within the community, but the Plan makes no mention of the racist bias that exists in wider society which can impact on the support children and young people of colour might receive.

530. One public sector network (n = 1+) and one health organisation (n = 1) felt reference to community safety was missing, which could bring together a number of the areas. Respondents highlighted that this seems to be a continuing trend within Welsh Government and UK Government not to view community safety in a holistic manner and therefore not to see it as a priority. Leading to funding for only the areas that are most in the spotlight and therefore missing many of the preventative elements for lower-level actions that increases community safety and prevents and reduces some of the more costly elements of community safety. Background information should recognise the historic inequalities that communities have faced for many years.
531. One public sector network (n = 1+), one education board / network / association (n = 1), one individual respondent (n = 1) and third sector organisations and networks (n = 5+) indicated that the Plan does not propose an explicit definition of anti-racism that applies to the whole Plan. The penultimate paragraph on p.25 talks about what anti-racism is about but does not provide an exact definition. The following definition was proposed: *“Anti-racism is about taking proactive steps to fight racial inequity. It’s different from other approaches that focus on multiculturalism or diversity because it acknowledges that systemic racism exists and actively confronts the unequal power dynamic between groups and the structures that sustain it. Anti-racism involves consistently assessing structures, policies and programmes, and through monitoring outcomes, ensuring they are fair and equitable for everyone.”* One third sector organisation (n = 1) stated that it is bold to say anti-racism will be achieved by 2025 or even 2030 without defining it.
532. One third sector organisation (n = 1) asserted that any Plan of this nature must take account of the challenges faced by the apparent growth of racist abuse through social media. There are almost weekly accounts through the media which if not tackled, will undermine the ambition of this Plan. Welsh Government and other bodies in positions of power have to do more to speak out, and take action against this growing trend, and challenge racism and discrimination channelled through this medium.
533. One third sector organisation (n = 1) asserted that aside from the provisions within the Equality Act 2010 which allow for positive action to be taken, to deal with particular disadvantages affecting one group because of a protected characteristic, it should be noted that delivery partners can also take positive action in respect of other groups facing disadvantage but not included in the Act. In this regard, Young Carers and Care-Experienced Children (looked after children as defined by the Social Services and Well-Being Act 2016) and pupils from low-income backgrounds in this category, many of whom are from Black, Asian and Minority Ethnic communities, should be also included.
534. One LA (n = 1) stated that it would be useful for the Plan to outline diagrammatically how policy areas have been chosen.

535. One LA (n = 1) and community organisations (n = 1+) stated that it is not clear how much of this Plan is relevant to the Gypsy and Traveller communities. The barriers to employment, access to services and underlying health needs are documented but there is no action plan to address these specific needs.
536. One individual respondent (n = 1) feels that Pembrokeshire has not been given adequate consideration in the development of this Plan.
537. Community organisations (n = 1+) highlighted that there needs to be more focus and deep dives with global south communities on what the core priorities are.
538. One third sector organisation (n = 1) and one health organisation (n = 1) stated that the early stages of the REAP's implementation will require the creation of a Welsh Government-driven timeline, identifying key roles and milestones leading to the 2030 vision of an anti-racist Wales.
539. One religious representational body (n = 1) and health organisations (n = 2) were concerned that the Plan fails to mention the Jewish communities. Highlighting that being Jewish is a mixture of both religion and ethnicity and asserted that the Plan could be strengthened by explicitly acknowledging anti-Semitism as a serious issue and the distinct challenges of anti-Semitism. It was questioned whether there has been explicit engagement with the Jewish communities regarding their view on the particular forms of racism they experience.
540. One religious representational body (n = 1) stated that it should be understood that the term 'racism' refers to phenomena in society which sometimes manifest in different ways – anti-Semitism, or anti-Jewish racism is rooted in common forms of xenophobia that 'punch down' but also in conspiracy theories about malign and shadowy Jewish power and wealth that purport to 'punch up'. The idea that anti-Semitism is, in fact, 'punching up' is a fiction as Jews remain a vulnerable minority whose individual economic means are as diverse as the society around them. Respondents highlight that during the recent escalation of violence between Gaza and Israel, Jewish families in Wales told the Board of Deputies how their children were suddenly accused by their peers of being 'baby killers' having rarely experienced anti-Semitism in schools previously. It was also highlighted that the Jewish Community can struggle when decision-makers are not aware of the relevant cultural competencies. For instance, requirements for flexible working to enable the observance of the Jewish Sabbath, Shabbat, high days and holy days. While employers and service providers may be aware of the need to respect an individual's protected characteristics under the Equality Act 2010, they may not be aware – in an increasingly secular society – of the obligations that a person's faith places on the observant believer.
541. It was felt that it was important for Welsh Government to acknowledge that in the absence of their vulnerability being noted, anti-Semitic notions of Jewish 'power' or 'privilege' can fester. Respondents stated that they have seen when anti-Semitism training is delivered through a postcolonial view of racism, economic analyses of the

Jewish community are given. In the context of traditional anti-Semitic tropes around Jews, wealth and power, this can do active damage.

542. For Wales to continue to be a hospitable environment for the Jewish Community, one religious representational body (n = 1) recommended:
- a. The mainstreaming of the [International Holocaust Remembrance Alliance's Definition of Antisemitism](#) (IHRA) into the policies and practices of public bodies, including law enforcement, local government and universities. Such public organisations should receive training in anti-Semitism as appropriate.
 - b. The Welsh Government should encourage public institutions to adopt the IHRA definition. We understand that Cardiff University, for example, has objected to adoption on the basis that they cannot adopt definitions for all groups. The Welsh Government, having adopted the IHRA definition, should press upon those who make objections such as this. However, that case can be strengthened if the Welsh Government ensures that its Race Equality Action Plan can be engaged in by public and third sector organisations, and it has similar initiatives for other potentially marginalised groups, so that public and third sector actors can be reassured they can engage with the equalities agenda in a comprehensive way.
 - c. Public bodies should work with the Jewish community's third-party reporting organisation, the Community Security Trust, to ensure Jewish safety.
 - d. Any schools that have experienced a spike in anti-Semitism, in particular in connection with the Israeli-Palestinian conflict, should engage with organisations such as the Board of Deputies, Solutions Not Sides and Stand Up! to detoxify the discourse within schools.
 - e. When the conflict in the Middle East does escalate, public figures should be careful in their rhetoric and associations to avoid amplifying other more extreme voices, however unwittingly, which can threaten violence against Jews.
 - f. For employers and employee organisations to promote the Board of Deputies [Employers' Guide to Judaism](#) so that they understand the needs of Jewish employees.
 - g. The Welsh Government should engage with the UK Government, social media companies and minority communities to challenge and defeat online hatred, ensuring that regulation is in the right place.

Q4. What are the key challenges that could stop the goals and actions achieving anti-racism by 2025?

543. Public sector organisations (n = 6), health organisations (n = 3), LAs (n = 10), individual respondents (n = 10), third sector organisations and networks (n = 10+), one funding body (n = 1), trade unions (n = 2), education boards, networks and associations (n = 3), criminal justice agencies (n = 2+) and community organisations (n = 2+) have provided comments on question 4.
544. One third sector organisation (n = 1), one public sector organisation (n = 1), one education board / network / association (n = 1) and one individual respondent (n = 1)

= 1) queried whether question four contains a typo – is the question supposed to state by 2030, not 2025?

545. Third sector organisations and networks (n = 2+), one individual respondent (n = 1), community organisations (n = 1+), one LA (n = 1) and one funding body (n = 1) highlighted that the length and complexity of the Plan makes it inaccessible and could provide a challenge for organisations wanting to enact core actions. This could bring challenges in terms of implementation and monitoring. Greater consideration should be given to the accessibility and readability of the final versions of the Plan. One third sector organisation (n = 1) added that the use of complicated language and jargon, such as ‘systemic racism’ and ‘microaggressions’ will prove a further challenge as they will not be understood by many – it is important that the language used in the REAP is kept simple for all to understand.

546. One third sector organisation (n = 1) highlighted those organisations led by Black, Asian and Minority Ethnic groups suffer from institutional racism and this is a key challenge, especially as the Plan relies heavily on these organisations and their expertise. Respondents highlight that there are between 9,000 and 10,000 Black, Asian and Minority Ethnic charities and community groups operating nationally, 65 per cent with a turnover less than £10,000 annually, average income for Black, Asian and Minority Ethnic charities is £78,000 compared with the overall average of £142,439. In the picture of Covid-19, 87 per cent of the charities working for and led by people from Black, Asian and Minority Ethnic communities were at risk of permanent closure – this is higher than for the rest of the charities. In addition, following the pandemic Black, Asian and Minority Ethnic led groups are more likely to: be experiencing an increase of demand post-Covid; seeing their resources reduced; less likely to have a 6-month income in reserve; more likely to have made staff redundant since the start of the pandemic. This is a key challenge – the Plan needs to provide adequate, sustainable and ringfenced resources, particularly funding.

547. One funding body (n = 1) stated that in driving the change required to create a truly anti-racist Wales, public sector bodies do not always have the answers or the expertise. Without the tireless work of third sector core organisations in Wales, Wales would not have been able to advance in the ways in which it has on issues pertaining to intersectional discrimination. The dependency on these organisations to guide others in enacting this Plan will be challenging and require additional resource to be allocated for this work, therefore.

548. One third sector organisation (n = 1), one education board / network / association (n = 1), one public sector organisation (n = 1), one health organisation (n = 1) and LAs (n = 2) highlighted that the lack of collaboration between organisations and agencies is a challenge, as the role of the third sector in disseminating messages and accessing communities cannot be underestimated and this needs to be explored to a greater degree. The ability to access expert advice and maintaining engagement of partner agencies over an extended period may be a challenge when advocacy groups’ resources may be scarce due to demands from Welsh Government and all public bodies. One education board / network / association (n =

1), one public sector organisation (n = 1), community organisations (n = 1+), one LA (n = 1) and one individual respondent (n = 1) asserted that the relevant agencies must receive the necessary support and Welsh Government must support cross-sectoral working in partnership and collaboration, otherwise the Plan will fail. Criminal justice agencies (n = 1+) and one LA (n = 1) highlighted that continuity and sustained commitment to action is important, so the Plan is not regarded as 'just another initiative'. Welsh Government must consider what their long-term Plan is for keeping the REAP as a priority, particularly in their engagement with criminal justice partners. One education board / network / association (n = 1) highlighted that it is also important to ensure that the REAP does not compete / become lost amongst other educational initiatives resulting in little practical progress on any area.

549. Comments about the lack of adequate resources being a key challenge that could stop the goals and actions achieving anti-racism⁴ have been made by one health organisation (n = 1), third sector organisations and networks (n = 2+), public sector organisations (n = 2), one individual respondent (n = 1), one education board / network / association (n = 1) and LAs (n = 5). LAs (n = 5) stated that resources and capacity to deliver the actions within the Plan will be a challenge as resources and funding are not consistent across all authorities, and this is a concern as the Plan is very ambitious spanning across a number of key areas. Respondents further stated that with additional workloads, there may be challenges experienced with additional pressures to deliver the actions within the Plan, and to ensure all authorities are working towards the same goal. The Plan needs more measurable outcomes, clear actions and responsibilities assigned to organisations and individuals together with an understanding of the consequences if actions are not fulfilled.

550. One health organisation (n = 1) highlighted that a key challenge for health is around strategic support and the centralised coordination of actions to embed anti-racism and develop consistent good practice across Wales. Furthermore, following the disbanding of the Centre for Equality and Human Rights (CEHR) there is no longer a central strategic equality resource supporting and connecting NHS Wales. This has created a void for large complex organisations working to address the theory / evidence to practice gap independently.

551. Third sector organisations (n = 9), public sector organisations (n = 4), one education board / network / association (n = 1), criminal justice agencies (n = 1+), one trade union (n = 1) and individual respondents (n = 4) asserted that the main challenge that *will* stop the goals and actions achieving anti-racism by 2025 is if the Plan is implemented without underpinning the actions and recommendations in the action Plan with a legal duty. There must also be clear paths of accountability. The final Plan must cover monitoring and accountability. Having dedicated evaluation periods, monitorable actions and specific actions with named responsible people / organisations to complete them, will help to achieve the goals and actions. Furthermore, interaction, review and feedback must be consistent. It is not fully clear what the measures of success are, and the timescales should be further defined

⁴ Comments about the lack of adequate resources being a key challenge that could stop the goals and actions achieving anti-racism have been outlined in more detail in the summary response to question 5.

because they are currently vague. Welsh Government need to provide absolute clarity on the forward agenda and plan. The consultation document itself presents different timelines for action, for example, and these inconsistencies will need to be addressed by the final Plan.

552. Third sector organisations and networks (n = 4+), one public sector organisation (n = 1), criminal justice agencies (n = 1+) and one individual respondent (n = 1) highlighted Brexit, institutional / systemic racism, unconscious bias, lack of implementation, lack of baseline data to measure progress, all as challenges to the Plan achieving its outcomes. The lack of baseline data will prevent Welsh Government from knowing if they have stayed the same, gone backwards, or moved forwards. The Plan thus needs to include baseline data (in dementia, mental health, housing etc.) in order for the measurement of progress. Welsh Government must provide clarity on how organisations will benchmark where they are now and how they will make improvements.
553. One public sector organisation (n = 1) highlighted that the Plan has a transactional nature, which is a concern as a culture shifting transformation is required. An explicit theory of change underpinning this Plan is needed. One third sector organisation (n = 1) highlighted that one of the main challenges that could stop the goals and actions achieving anti-racism by 2025 would be missing key opportunities to utilise these powers to their full potential and truly permeate culture change. There is a need to fund smaller, community-based groups and organisations that will be critical in informing and monitoring the Plan.
554. One trade union (n = 1), community organisations (n = 1+), public sector organisations (n = 2) and third sector organisations (n = 2) were concerned that a future change of government may impact the priority and work involved. Respondents stated that having buy in from all sectors and communities in Wales is thus critical. Individual respondents (n = 3), one LA (n = 1) and community organisations (n = 1+) are concerned at the lack of commitment of the people responsible for delivering the Plan and the lack of willingness to engage and change – highlighting ignorance as a challenge and non-compliance with current legislation like the Equality Act 2010.
555. One education board / network / association (n = 1) and one public sector organisation (n = 1) highlighted that the lack of representation and visible role models could be a significant barrier to achieving anti-racism by 2025. Greater representation will help to break down perceptions that only certain people from privileged backgrounds can achieve their potential in society.
556. Criminal justice agencies (n = 1+) stated that decisions taken by the UK Government could also lead to ongoing challenges, e.g., the UK Government's most recent proposals to change immigration law and current proposals around the new Police, Crime and Sentencing Bill. Any potential changes around stop and search and drugs and knife crime should also be considered as these are issues that currently disproportionately impact Black and Minority Ethnic people. One third sector organisation (n = 1) highlighted that austerity could also be a challenge.

557. Criminal justice agencies (n = 1+) stated that lack of innovation may prove a challenge, respondents stated that a move to more imaginative and impactful ways of addressing the underlying causes of racism are needed to ensure fundamental changes are made.
558. Third sector organisations (n = 2), one LA (n = 1), one individual respondent (n = 1) and one public sector organisation (n = 1) highlighted that the ongoing pandemic could impact on timely implementation of the Plan.
559. One public sector organisation (n = 1) highlighted that the Plan does not introduce differences in implementation on local, regional and national platforms. Different types of organisations and / or sectors may well determine different actions and therefore apply different thresholds of what is an acceptable measure in achieving the outcome of the goal. Further consideration is therefore required setting clear expectations about the desired outcomes so there are agreed thresholds across Wales.
560. One education board / network / association (n = 1), third sector organisations (n = 2), community organisations (n = 1+), one trade union (n = 1) and LAs (n = 2) highlighted that lack of understanding across the population more widely of the vital importance of the Plan could also inhibit progress. Unconscious racism and bias may also inhibit progress on the goals and actions. A particular challenge could be those who view Black Lives Matter and anti-racism as, 'gesture politics,' or, 'virtue signalling,' not valuing social justice issues in their community. There is also a risk that insufficient numbers of Black, Asian and Minority Ethnic people are inclined to put themselves forward for senior positions across the range of sectors due to historic bias. Similarly, there is potential for a small group of Black, Asian and Minority Ethnic people to be repeatedly asked to contribute their expertise leading to overloading and burnout. One trade union (n = 1), one health organisation (n = 1), one individual respondent (n = 1) and third sector organisations (n = 2) further add that the media, especially the right-wing media, will influence those who read and listen to it and that this will especially influence people's attitudes towards immigration and asylum seekers. The growth of racist abuse on social media was also highlighted. This could therefore impact negatively on the Plan. More attention needs to be paid of how immigration policy fuels racism in society. The available evidence shows that current immigration and border policies lead to racial profiling and exclusion in society. Therefore, Welsh Government must challenge national policy or seek devolution in immigration matters in order for the Plan to succeed.
561. Community organisations (n = 1+) asserted that clear guidance is needed on how to support people to share their experiences as there may be anxiety about how views will be received. Respondents highlighted that language barriers will be a key challenge here as they have been during the vaccine roll out, as misinformation was available in many languages at first
562. One public sector organisation (n = 1) stated that the following could stop the goals and actions achieving anti-racism:

- a. Deeply embedded bureaucracy in key services – for example, this Plan is clear about student attainment however, higher education is deeply embedded with systemic racial discrimination, furthermore, the workforce including lecturers, do not represent the cohorts they teach – students want change.
- b. Power and leadership remaining within the dominant culture, characterised by White Privilege (White ethnic minorities are excluded from this term).
- c. Class not being considered when considering race.
- d. A legal system and unfair social policies that do not acknowledge oppression and marginalisation but widens them.
- e. No focus or lack of focus on the benefits to the wider society as a whole in Wales – more education is required in this area to expel the ongoing myths about certain communities.
- f. Not adopting a clear and robust intersectional approach to racism which considers all aspects of identity will not produce sustainable long-term change and achieve the desired goals.
- g. Avoidance of tokenistic measures which do more harm than good and will create lack of trust at every stage.
- h. An over-reliance on data or lack of it. Data should not hinder or prevent action in key areas – trust the stories of those with lived experience and do not wait for data to justify action.
- i. There must be clear due process to deal with matters when they do not go as planned. Being able to make mistakes and learn from these and make the appropriate changes and improvements to action points.
- j. Without creative freedom and some flexibility for wriggle room when implementing the action plan, the process is likely to become rigid and not evolve with societal changes which is fundamental for the long-term impact and its sustainability.
- k. Social care must be adequately funded and resourced. Social Workers must be based within those communities they serve to build trust, greater understanding, and meaningful relationships with those they serve. This worked well before the centralised systems were introduced. Furthermore, we should not be relying on charities to undertake what the State should be providing to all citizens.
- l. Social workers must be given more recognition and positive publicity. They should be trained to build alliances with people from all backgrounds. This should be seen as a valuable bridge to the success of this plan.

Q5. What resources (this could include funding, staff time, training, access to support or advocacy services among other things) do you think will be necessary in achieving the goals and actions outlined?

563. Third sector organisations and networks (n = 28+), one religious representational body (n = 1), health organisations (n = 7), trade unions (n = 6), education boards, networks and associations (n = 6), LAs (n = 14), individual respondents (n = 11), public sector organisations and networks (n = 11+), criminal

justice agencies (n = 3+), community organisations (n = 1+) and other organisations (n = 2) have provided comments on question 5.⁵

564. Third sector organisations and networks (n = 13+), one religious representational body (n = 1), LAs (n = 7), health organisations (n = 4), public sector organisations (n = 7), trade unions (n = 5), individual respondents (n = 9), criminal justice agencies (n = 2+), one education board / network / association (n = 1), community organisations (n = 1+) and other organisations (n = 2) stated very strongly that the Plan must be resourced adequately for the actions to be implemented as those delivering on the actions in the Plan must be adequately supported. The Plan does not adequately detail the resources that will be provided to progress anti-racism work in Wales and there were concerns that, given the Plan is very ambitious, without the necessary additional, sustainable resources, the Plan is unachievable and the actions in the Plan may join the list of other existing mechanisms which are not being fully utilised. This needs to be addressed in the final Plan.

Resources needed:

565. Third sector organisations and networks (n = 6+) and individual respondents (n = 3) stated that resources are needed to support community groups, grassroots organisations and the voluntary and third sector in general to support delivery and engage with people with lived experience of race inequality, including working with 'hard-to-reach' people and encouraging them to participate in community life. This will require funding. One health organisation (n = 1) asserted that funding should be open for public sector organisations to apply for as well as race equality organisations.

566. One third sector organisation (n = 1) asserted that public bodies need to be supported to co-produce and co-design services to create a shared understanding and respect with their service users. Training will likely be necessary to support them in this, and in mainstreaming the values of the Plan into organisations all across the country. LAs (n = 2) stated that support for all LAs in delivering the actions is necessary, LAs must know where to go for support, and such support must be available and consistent. Respondents also stated that joined up approaches to delivery, networking and working together will also be helpful. One third sector organisation (n = 1) called for the continued and increased commissioning of 'by and for' services, which will require a sustainable funding model, and stated that the voice of survivors must be central to any and all work to end violence against women.

567. One LA (n = 1) asserted that capacity-building within Health and Social Care Regional Partnerships is also needed to improve how we address race equality

⁵ N.b., Across almost all policy areas, many respondents highlighted existing policies / strategies / plans / initiatives that already exist and have not been fully utilised. Respondents are frustrated that the REAP does not refer to and link up with these existing strategies. Please note that the comments received on existing strategy are detailed in their respective policy areas in this Report.

through Area Plans, population assessment and regional as well as local commissioning plans.

568. One third sector organisation (n = 1) suggested Welsh Government make use of the Diverse Cymru Certification Scheme.

569. One LA (n = 1) felt the Plan should make reference to public libraries highlighting that they are an essential service for the implementation of this Plan as they are uniquely equipped to offer community engagement and human contact thereby supporting a broad range of people. Libraries support and, in some instances, provide direct services that cover a broad number of the themes discussed in this document including 'Employability and Skills,' 'Culture and Heritage' and the Welsh language. They should therefore not only be considered as a key resource but provided with resources including funding, staff time and training.

570. One trade union (n = 1) stated that the Equality and Human Rights Commission, must be sufficiently resourced to undertake the regulatory role that they were set up to do.

Training:

571. Public sector organisations (n = 5), one trade union (n = 1), third sector organisations (n = 3), LAs (n = 2), community organisations (n = 1+) and one individual respondent (n = 1) stated that meaningful and interpersonal training in unconscious bias and anti-racism is needed as a minimum for all stakeholders / decision makers across all sectors on an ongoing basis, delivered by skilled facilitators and those with lived experience and should incorporate intersectionality. This is echoed by one education board / network / association (n = 1) who also highlighted the importance of training being delivered by those from the groups this Plan aims to support. This requires funding. The current model of one-off passive and generic mandatory training is inadequate for effecting real change in attitudes and cultures. Such training should also ensure all stakeholders have a clear understanding of the Equality Act 2010 and other rights and responsibilities associated. Training for leaders must be a priority because they do not necessarily have the skills to progress anti-racism work. Nonetheless, training is needed for all staff, not just leaders.

572. LAs (n = 2) and trade unions (n = 3) highlighted that staff time, along with funding, must be ringfenced for research, review of policy, process and procedures, consultation, monitoring, evaluation and continuous improvements. One LA (n = 1) pointed out that the availability to commission suitable training providers might be scarce if all public bodies have the same goals. All authority areas will be seeking expertise from organisations such as EYST, Race Council Cymru and Race Equality First; respondents thus question whether their limited resources be in a position to support all public bodies in Wales? One public sector organisation (n = 1) further highlighted that protected time for those advancing this Plan should be provided and that it should not be seen as an 'add on' to existing role responsibilities. Criminal justice agencies (n = 1+) added that staff will require time to attend training, access

support and promote work amongst partners. Data management is required to collate ongoing practices / progress against the Plan objectives.

573. One public sector organisation (n = 1) stated that a shared training programme operating across organisational divides and across Wales would work best. Similarly, it would make sense for those from audit and regulatory bodies, inspectorates and ombudsmen to have a common training and support programme. It would be helpful to have some form of ongoing mentoring support and / or peer support programme for leaders of organisations responsible for implementing change. Respondents stated that this would help to embed change.
574. Criminal justice agencies (n = 2+) also asserted that alignment of training provision across services and the provision of funding to provide for enhanced training of Hate Crime Support Officers, including training in a trauma informed way will be of great benefit to victims of hate crime. This will require additional resources in the form of time, money and access to psychologically informed data / practices to strengthen capacity to fulfil the actions.
575. One third sector organisation (n = 1) highlighted that any guidance, training, and involvement in schemes that Welsh Government makes available to public bodies to support with anti-racist action and tackling inequalities will also need to be made available to the contracted operators that public bodies work with. It was also highlighted that more resources will be needed to facilitate conversations between public culture and leisure providers, and ethnically diverse communities. Welsh Government should make training and resources available to help any organisation in the public, private or voluntary sector to develop their own Equality, Diversity and Inclusion Action Plan that considers the goal, mission and vision of the organisation, the context in which they operate, and their beneficiaries.
576. One third sector organisation (n = 1) asserted that training is needed for staff across all sectors on how to effectively use translators and interpreters. Sometimes a victim of crime, or someone with a medical condition, can feel left out of their own conversation as people will address the questions at the interpreter. There are also things to look out for when finding interpreters, such as dialects etc., which can be barriers, and most people do not know to look out for this. Also, how services are communicated is really important. There needs to be access for written materials in multiple languages, or audio-visual information. Where messages are sent and how also needs to be looked at. For example, mainstream TV advertisements / news broadcasts to encourage people to get their Covid-19 vaccinations, did not resonate with some Muslim communities who receive their information from their family elders and religious leaders, as these are sources they trust. Working with the community mentors, and grassroots organisations for communication, discourse and messaging is thus crucial.
577. One public sector organisation (n = 1), third sector organisations and networks (n = 4+), one education board / network / association (n = 1) and one LA (n = 1) stated that all education staff must be trained in anti-racist education, personal bias, racial trauma and how to respond and support, and inclusive leadership, including

teachers, non-teaching staff, trainee teachers, governors and pupils. Such training must begin at foundation stage and must be included in Estyn inspections and be a compulsory part of teacher training. Such training must be ongoing and not a one-off, and outside providers (with expertise in race equality and lived experience) must provide this training. The LA should be provided with the funding for training and supply cover in order to coordinate the training at a local level or at a regional level through the regional consortium. Schools and LAs must be required to produce annual equality reports detailing the training and this information should be used to improve the experiences of ethnic minority children. This will all have a significant impact on funding, which should be ring-fenced so that it is used only for the specific purpose for which it is intended. One education board / network / association (n = 1) added that there are several relevant charters which can help support organisations. Within Higher Education, Advance HE provides some excellent examples of best practice in the sector. Organisations such as Business in the Community can also help support this. One trade union (n = 1) also highlighted, in relation to the new school curriculum, that the appropriate resources are not currently available in many subject areas and what materials do exist are often inaccessible due to the lack of clear organisation on Hwb. The Plan needs to specify the timelines for such training and when such training will be delivered.

578. LAs (n = 2) stated that LAs require fully funded and standardised training programmes and that these must be compulsory for all staff, especially at induction. The data collected during this training should be reported back either directly to Welsh Government or via the Strategic Equality Plan Annual Reports. Training is required initially in the following areas; *How to use Positive Action in recruitment? Unconscious Bias; Equalities Awareness*. LAs should make anti-racism training mandatory and ensure there are clear processes in place for complaints against councillors when there are complaints of racism as well as processes to support councillors when this happens.

579. One LA (n = 1) asserted that anti-racism training should be included within professional training courses for roles such as Human Resources, Planning Officers, Psychologists, Counsellors, Registrars, Customer Services Officers, Complaints Officers, Environmental Health Officers. Resources for hate crime training should be consistent across Wales to ensure we are cascading the same messages. In relation to data, agreed standardisation of equality monitoring categories are needed to ensure that consistent data is published by specified services and comparisons can be made across Wales.

580. One LA (n = 1), one trade union (n = 1) and health organisations (n = 2) stated strongly that training to health, social care workforce and housing employees should also be mandatory and an integral part of professional training programmes and a requirement of continuous professional development. In the context of health, respondents asserted that the 'Treat me Fairly' e-learning module, must include lived experience and scenario-based questions to provoke thought and insight. One trade union (n = 1) asserted that there is a need for a 'stand-alone' anti-racism training module as it is unlikely that inclusion of anti-racism within the 'Treat Me Fairly' module will be sufficient. Anti-racism training principles should also be mainstreamed

within other relevant training, i.e., safeguarding, workforce policy etc. LAs (n = 2), health organisations (n = 2), one public sector organisation (n = 1) and one education board / network / association (n = 1) asserted that clinical staff must also be trained to provide culturally appropriate services.

581. One trade union (n = 1) suggested that the Welsh Government publish a Plan of implementation by March 2022. Implementation takes many forms, including but not limited to; an Anti-Racism Bill, mandatory anti-racism training for bosses and workers, as well as embedding anti-racism work into the curriculum alongside the Black History curriculum.

582. Community organisations (n = 1+) highlighted that technological resources will be an important resource within anti-racism training. One trade union (n = 1) asserted that there must be adequate and appropriate systems and databases to capture meaningful data that will allow us to build actions and outcomes. Investment must be made in the right people to deliver on this plan, and they must have the right tools to be able to take this Plan forward, including physical tools such as buildings or office space, software and systems, and tools to deliver on educational elements.

Funding:

583. Health organisations (n = 4), LAs (n = 8), public sector organisations (n = 5), third sector organisations and networks (n = 7+), community organisations (n = 1+), education boards, networks and associations (n = 4), trade unions (n = 4) and individual respondents (n = 4) asserted that long term, sustainable and ringfenced funding is required to progress the actions and goals in the Plan. There were questions about where the money will come from and how Welsh Government plans to finance the Plan. This is something that must be established and addressed from the start to ensure that the Plan has the best chance of achieving its desired aims.

584. Health organisations (n = 2), one trade union (n = 1) and one third sector network (n = 1+) stated that they require funding for staff, training, interpretation services and accessible versions of all documents available to the public including board papers. Health organisations require additional NHS Wales wide strategic equality resource to both support and connect Health Boards and trusts in embedding anti-racism actions consistently and to address barriers to implementation strategically i.e., data collection and reporting. There is also a need to improve existing systems and processes for data collection. Support for additional education and training resources across the organisation are also required to drive awareness raising via anti-racism training.

585. One health organisation (n = 1) stated that there is a need to target recruitment efforts through community networks and that Health Boards need resources, such as the Black, Asian and Minority Ethnic Outreach Lead to cement this work. Requiring each Health Board to have such a role on a continued basis would be a massive help and would contribute to addressing inequalities. There is also the need for better organised, high quality and consistent access to interpretation and translation services. Financial investment is needed to deliver

active bystanders training across the organisation. The requirement for additional funding is highlighted within the report '[Ethnic Health Inequalities and the NHS](#)' (June 2021). This was edited and published by the NHS Race and Health Observatory and commissioned as an independent report from The King's Fund. The report's key messages included the need for:

- a. Increased investment in community engagement work with Black and Minority Ethnic communities to develop and deliver culturally competent services - to build sustained and trusting relationships between services and communities.
- b. The NHS must also invest in measures that identify and target communities at higher risk of poor health. Critically, this must include a significant increase in culturally competent primary prevention activity that targets risk factors such as obesity, diet, exercise and smoking, in national and local strategies that reflect the structural and environmental drivers of these risk factors, such as deprivation and discrimination.

586. One education board / network / association (n = 1) highlighted that significant investment will be needed in staff training. Work will need to be undertaken with Further Education management information system managers to ensure that baseline data on issues relevant to the Plan is as easy to identify and collect as possible and consistent and comparable across the sector. Any additional work should be funded and not be expected to be absorbed by the Further Education sector in order to make sure that there is genuine capacity to undertake this important aspect of the Plan. To effectively communicate and embed the Plan across Public Sector organisations more widely, there would need to be front loaded resource investment in identified staff to communicate the vision and goals of the Plan and work with others (staff, learners and stakeholders) within each of the organisations to effectively embed the Plan in existing culture, policies, systems, plans and procedures.

587. One third sector organisation (n = 1) stated that each public and political body will need concerted capacity to deliver on the aims in the Plan. This capacity must include initially time to learn how to implement the actions and what the Plan means in practice, together with paid staff time, then time and money to ensure the implementation of all the actions. There should be at least one staff member in each department tasked with oversight of this.

588. One third sector network (n = 1+) asserted that funding bodies should engage with the ethnic minority grassroots groups because they do not have experience of how to write funding bids in a Western approach. Additionally, one LA (n = 1) highlighted that LAs should ensure funding extends to marginalised groups that do not usually receive funding. One other organisation (n = 1) further stated that there should be target-setting and transparency across any publicly funded body in accounting for how funding is spent (all funding, not just the allocation of specific pots for targeted interventions) relative to ethnic minority people. Not to do so would run the risk of only dealing with under-representation through targeted schemes or interventions. They have their place and value but should not replace broader accountability and equality of access to all programmes / funding streams / work

opportunities etc.

589. One trade union (n = 1) would like consideration to be paid to a Race Equality Commissioner – highlighting that the profile of other Commissioner roles funded by Welsh Government has allowed status and scrutiny of key issues, as well as expertise specific to the Commissioner role. It is essential the right people undertake the appointment of such a position and further discussion would be necessary on the remit of the role. The Commissioner role should have similar powers to the Older Person's and Children's Commissioners. It is important to listen to Black communities about who should be considered for such a position, and we would call for the role to be 'for the people, by the people.' Some communities have well recognised and respected elders who would be naturally suited to such a role.
590. One third sector network (n = 1+) asserted that Welsh Government should fund more advice centres, youth clubs and legal aid as well as funding the immigration service to attend advice centres to help. It is important for Welsh Government to have its own approach to legislation from the Home Office and to do something to offset the impact of legislation coming from Westminster.
591. One public sector organisation (n = 1) stated that Welsh Government must ensure the history and culture of our Black, Asian and Minority Ethnic communities are properly represented by investing further in our cultural sector and museum network.
592. One other organisation (n = 1) asked what funding is available for businesses and community organisations that will assist with this Plan. They posed a challenge about the fairness of a government that is made up of predominantly White males making decisions on behalf of people of colour. They also questioned whether Welsh Government has a comprehensive directory of all community organisations and charities that are owned or led by people of colour, already undertaking the work identified in this Plan. One LA (n = 1) questioned whether an assessment of the financial implications of delivering the Plan had been undertaken. One LA (n = 1) also asked whether additional resources would be made available, or will there be an expectation that training and support is to come from within existing budgets.
593. One LAs (n = 1) stated that in order to support the longer term aims of the REAP, funding for the work of the Cohesion team should be longer term, as currently, this funding is short term and due to run out at the end of March 2022. There were questions as to whether there was scope to embed this work further by having a Co-ordinator / Officer within each LA rather than one small team covering four LA areas. The Plan needs to provide assurance that the funding and services made available through the 'Equality and Inclusion future funding' are accessible to the rural areas of Powys.

Q6. Do you feel the Race Equality Action Plan adequately covers the intersection of race with other protected characteristics, such as religion or belief, disability, age, sexual orientation, gender reassignment, sex, and marriage and civil partnership? If not, how can we improve this?

594. Third sector organisations and networks (n = 14+), health organisations (n = 3), public sector organisations (n = 9), one funding body (n = 1), trade unions (n = 4), education boards, networks and associations (n = 3), LAs (n = 7), criminal justice agencies (n = 3+), individual respondents (n = 9) and community organisations (n = 2+) have provided comments on question 6. The majority of respondents stated that the Plan does not adequately cover the intersection of race with other protected characteristics. Respondents strongly feel that the Plan fails to detail the experiences of ethnic minority people who possess more than one protected characteristic. Respondents have highlighted how the Plan fails to explore the intersections between race and sex, race and religion, race and age, race and sexual orientation and / or gender identity and race and disability. Respondents highlight specific areas within the Plan where intersectional discussions are missing and asserted that these areas must be elaborated from an intersectional perspective. Respondents also feel strongly that intersectionality must be embedded throughout the Plan and not kept exclusively within one section.

595. One third sector organisation (n = 1) stated that the Plan strongly acknowledges the importance of intersectional approaches. Public sector organisations (n = 7), third sector organisations and networks (n = 10+), criminal justice agencies (n = 3+), community organisations (n = 2+), health organisations (n = 3), one funding body (n = 1), trade unions (n = 3), education boards, networks and associations (n = 3), LAs (n = 5) and individual respondents (n = 7) stated that the Plan does not adequately cover the intersection of race with other protected characteristics. Identity is not tied up in race alone and the experiences of a Black woman, a Black disabled person, or a Black LGBTQ+ person, for example, will vary immensely. Tackling racial disparities without focussing on other aspects of identity only brings about surface level change and will risk the danger of ongoing silo ways of working. People should not have to choose to prioritise one area of their identity above another – they should be able to be their whole selves. Welsh Government must adopt a clear and robust intersectional approach to racism which considers all aspects of identity to produce sustainable long-term change and achieve the desired goals in the Plan. One individual respondent (n = 1) and one LA (n = 1) noted the risk of creating further gaps in communities by using resources for one particular protected characteristic instead of adopting a holistic approach.

596. Community organisations (n = 1+) asked why the Plan is called “anti-racism”, rather than “anti-discrimination”, given the latter term is more intersectional and inclusive and does not place race as the determining factor for disadvantage. One third sector organisation (n = 1) noted the Plan does not provide a comprehensive definition of what is meant by intersectionality and how it has and will impact the drafting and implementation of the Plan. Considering how important this principle is for ensuring the success of the Plan, it is important that this is included in the beginning. Where intersectionality is mentioned later on in the Plan, the principle is

described, but this should be done at the outset, when setting out the values, goals and vision of the Plan at large, because without this, it does not feel like intersectionality has truly impacted the whole Plan.

597. One public sector organisation (n = 1) stated that the Plan seems somewhat light on intersectionality. For example, the Leadership & Representation and Local Government policy areas do not explicitly mention intersectionality in their actions, despite the one action (out of 39) in Leadership & Representation referring to, "...y per cent of the people we recruit will be ethnic minority, with an appropriate gender balance," and two actions (out of 18) in Local Government mentioning gender, alongside one mentioning age in relation to analysis and consultation. One third sector organisation (n = 1) asserted that for every action throughout the Plan where Black, Asian and Minority Ethnic people are mentioned, the question needs to be asked: "what does this mean for intersectionality?" For example, the action on page 61 relating to Social Care: "*We will proactively design leadership development support and opportunities to encourage the Black, Asian and Minority Ethnic social care workforce into middle management...*" for this action to be meaningful, acknowledging the intersectionality within the workforce is necessary to lead to more lasting change.

598. Third sector organisations and networks (n = 2+) also stated that there are additional places in the Plan where intersectionality, particularly between minoritised racial and religious groups, needs to be considered. For example, there is no mention of the impact of the Prevent agenda on minoritised religious groups and the intersection with ethnic minoritisation. It is acknowledged that Prevent is a reserved matter, but referrals to Prevent largely come from devolved institutions (particularly education and health). The Plan should therefore ensure that training for professionals on the Prevent Duty is anti-racist to tackle the deliberate or ignorant misuse of Prevent to further marginalise minoritised populations, and for Prevent to recognise, respond to, and voice the extent of far-right radicalisation. Embedding a culture of zero tolerance and countering institutional racism should include defining the need to act on reports of racial hate crime and injustice as a matter of social policy. Additionally, there were concerns that much of the integrated Impact Assessment has not been published, making it difficult to see how (for instance) minority ethnic religious groups, who are often greatly affected by intersectionality, were represented on the steering group and in engagement. Additionally, one public sector organisation (n = 1) also stated that the ethnicity and religion intersection need to be better addressed, for instance, particular religious needs, such as the need for additional flexible working arrangements during Ramadan.

599. Third sector organisations (n = 2) and one individual respondent (n = 1) stated that the Plan should acknowledge the ways in which the experiences of LGBTQ+ asylum seekers are compounded by racial and sexual orientation inequalities intersecting with one another. For instance, some LGBTQ+ asylum seekers have been housed in unsuitable accommodation, sharing with people who are not accepting of their identity, some incidences have resulted in hate crime, physical violence and intimidation. Also, the Plan should acknowledge further the impact of intersectionality in the health care section: Black women are five times more likely to

suffer maternal death and Asian women twice as likely, compared to White women in the UK. Welsh specific data on this does not appear to exist, however. Welsh Government should thus ensure disaggregated data by ethnic group and health board on this is collected and made publicly available.

600. Health organisations (n = 3), one public sector organisation (n = 1), community organisations (n = 1+) and third sector organisations (n = 3) stated that consideration should be given to embedding intersectionality within the approach to disaggregation of data to ensure research and data gathering is able to inform practice. Data collection should be addressed as a priority both at the workforce and at the population level. Eighty-two per cent of those asked by Ethnic Minority Women in Welsh Healthcare stated that data on ethnicity race and other protected characteristics should be collected and used for service development.
601. Health organisations (n = 2), public sector organisations (n = 2), one third sector organisation (n = 1) and one LA (n = 1) stated strongly that intersectionality should be a part of training and that such training must take place periodically, not as a one-off and should be delivered by those with lived experience.
602. One education board / network / association (n = 1) and one LA (n = 1) asserted that the Plan should seek to ensure that all protected characteristics are given equal weighting. There is need for greater emphasis on intersectionality across different protected characteristics in-line with national equality objectives; this would mitigate there being an imbalance of support for one protected characteristic over another, rather than addressing issues holistically.
603. Third sector organisations and networks (n = 2+) and one health organisation (n = 1) asserted that the Plan needs to consider the intersection between race and disability more fully. If someone does not speak English, and also has an impairment that affects hearing or speech, there will be additional needs. Fifty-six per cent of those surveyed by Romani Cultural and Arts Company do not feel that the REAP properly includes race and other legally protected characteristics; 57 per cent do not feel the REAP properly includes disability, age, sexual orientation and gender.
604. Community organisations (n = 1+) were disappointed that the Plan fails to empower ethnic minority women. One trade union (n = 1) provided examples of intersectionality based on member experience, which included the undervaluing of the work in sectors where women, including ethnic minority women, are more likely to be found working in low paid and casualised employment. Furthermore, ethnic minority and migrant women experience higher rates of domestic abuse and violence (the lockdown has exacerbated the situation), also, ethnic minority members who also identify as LGBTQ+ and / or disabled, face additional barriers and increased levels of discrimination. Criminal justice agencies (n = 1+) further stated that disability was noted as a specific area to better understand given the additional vulnerability noted specifically around sexual offences and how that intersects with race. Individual respondents (n = 3) also highlighted that the Plan does not cover those who are deaf and those who use British Sign Language (BSL). Respondents also felt that the Plan mentions very little about the needs of LGBTQ+ people who are also

Black, Asian and Minority Ethnic and asserted that the Plan must give more consideration to people who possess more than one protected characteristic – e.g., those who are from an ethnic minority background and are also neurodivergent / deaf / disabled / identify as LGBTQ+.

605. One third sector organisation (n = 1) felt that the means through which intersectionality is approached in the Plan is piecemeal, rather than an approach which feeds through the whole Plan. For example, LGBTQ+ identities are mentioned briefly in the education and housing section of the Plan. Respondents stated that it is unclear how, or whether, the experiences of LGBTQ+ Black, Asian and Minority Ethnic people were consulted in the development of the Plan. Assuming that this engagement has not happened yet, respondents recommend that this engagement work is undertaken to ensure that the recommendations as well as the lived experiences highlighted in the Plan represent these individuals. This engagement would also help to bridge the research gap when it comes to understanding the experiences of LGBTQ+ Black, Asian and Minority Ethnic people in Wales. Respondents further asserted that to be truly intersectional, the way in which the cross-sections of a person's identity are accounted for in public, these plans cannot afford to sit in their own silos.
606. Third sector organisations (n = 2), one public sector organisation (n = 1) and one trade union (n = 1) acknowledged that Welsh Government is also in the process of developing both an LGBTQ+ action Plan and the new VAWDASV Strategy for Wales and asserted that alignment between these plans and strategies will be vital for capturing intersecting characteristics and the barriers these create, as well as identifying cross working support and solutions. One public sector organisation (n = 1) also highlighted that it will be important for these initiatives to follow the same mechanisms for ensuring accountability and measuring success. One trade union (n = 1) welcomed further exploration of intersectionality within the upcoming Welsh Government LGBTQ+ Action Plan as well as the opportunities for further engagement with disabled, younger, older, pregnant, LGBTQ+ Black, Asian, and Minority Ethnic people and groups to explore ways in which the Plan can address the specific issues that arise from their intersections. One third sector organisation (n = 1) also asserted that training within VAWDASV, both for practitioners and for communities, also needs to (gently and led by the communities themselves wherever possible), include considerations of LGBTQ+ relationships, as well as marriage and religion.
607. One LA (n = 1) asserted that there is a need for the Plan to recognise that women from a Black, Asian and Minority Ethnic background can be greatly disadvantaged if entering the country on spousal visas and having no recourse to public funds in their own right. They often have children and therefore do not build up enough time in the workplace to acquire the right to public sector support and this leaves them highly vulnerable to abuse. It is essential that women are seen as equal, regardless of their immigration status, as it can affect their rights when it comes to social care, health etc. It can also make it difficult if they are seeking support from social services for their children.

608. One education board / network / association (n = 1) stated that more clarity is needed in terms of how race intersects within the other protected characteristics. With the focus on tackling health inequalities and mental health there needs to be more of a focus on the needs of different groups. Mental health stigma is more prevalent in minority ethnic communities, even more so when you add in other characteristics such as sexual orientation etc.
609. One LA (n = 1) and one public sector organisation (n = 1) stated that the Plan does not sufficiently cover intersectionality around education and that there is no reference to the Additional Learning Needs and Education Tribunal (Wales) Act within the section on Education. More examples of lived experience, information and evidence is needed to raise awareness of intersectional impact.
610. Criminal justice agencies (n = 3+) stated that age and race are particularly important factors when it comes to over-representation in the criminal justice system, as Black Asian and Minority Ethnic young people make up 52 per cent of children in custody. There is a need for greater emphasis on intersections between race and age and that more could be included around young people within the criminal justice section – e.g., requiring partners to take a children’s rights approach to involving young people in engagement. The Children’s Commissioner should be involved in consultation around the criminal justice section if not already. Addressing disproportionality and the response to children and young people within the criminal justice system should cut across the Welsh Government Plan and the Criminal Justice in Wales Race Equality Delivery Plan holistically. There are distinct issues for Women with the justice system, and the opportunities through the Female Offender Blueprint to drive change in support of Black, Asian, and Minority Ethnic women at risk of entering or who have entered the criminal justice system.
611. One public sector organisation (n = 1) highlighted that for older people from Black, Asian and Minority Ethnic communities, ageism and age discrimination will also be a factor that negatively impacts their lives. As such, a greater emphasis on addressing racism and ageism must be included within the stated actions against the specific goals within the Plan as well as reflected throughout the REAP more broadly.
612. One individual respondent (n = 1) stated that the Plan should include other alternative ways of living – e.g., goth and humanism as a belief.
613. One individual respondent (n = 1) highlighted that there are a lot of plans being developed by the Welsh Government across different protected characteristic groups, which is a positive thing, but that these need to be articulated as a joined-up narrative and commitment to equality and human rights across the government. For example, the implementation of the recommendations from the Gender Equality Review appear to have been paused but this is key to the delivery of the REAP too as many issues are intersectional.

Q7. Please see the section on Governance. What suggestions can you provide for measuring success in creating an anti-racist Wales and for strengthening the accountability for implementation?

614. Public sector organisations and networks (n = 10+), criminal justice agencies (n = 2+), health organisations (n = 7), third sector organisations and networks (n = 16+), one funding body (n = 1), trade unions (n = 5), LAs (n = 4), education boards, networks and associations (n = 4), individual respondents (n = 9), community organisations (n = 2+) and other organisations (n = 2) have provided comments on question 7.

What's missing from this section:

615. Third sector organisations (n = 8), health organisations (n = 4), individual respondents (n = 3), one education board / network / association (n = 1), community organisations (n = 2+), public sector organisations and networks (n = 3+) and one other organisation (n = 1) highlighted that there is limited detail on governance and accountability structures for scrutiny of implementation of the REAP. The content in the draft Plan was very vague. There were concerns that the Plan does not sufficiently place responsibility and accountability on statutory authorities rather than on ethnically minoritised people and groups. Without a framework for regulation, appropriate responsibility, and the use of data to evidence, inform, create and drive a culture of change, it is not clear that the Plan will bring meaningful change. Culture change needs to be brought about – how Welsh Government will measure this? It was suggested that, for the Plan to have the most chance of success, the actions must have the foundations of a legal duty, with clear paths of accountability, otherwise it is too easy for the actions and recommendations to be ignored. There is a need for genuine accountability from the very top to be incorporated in this honest discussion about racial inequality in Wales and how things can improve – only then can we achieve an ‘anti-racist’ Wales. Welsh Government must develop clear governance structures and resources to ensure robust oversight and successful delivery of the actions in the REAP. This must include adequate monitoring information, including the collection of monitoring data on the implementation of the REAP and its impact in the short, medium and longer term. Data is needed to establish starting points so progress can be measured, and appropriate record keeping is essential to the success of the Plan. This will be essential to building confidence in the data on which policy is developed and against which it is measured. The Plan should set out what success looks like and how it will be measured and assessed, as in order for organisations to be held accountable, they need to know what is expected of them, what successful implementation will look like, and that the accountability will take place in a public way. The governance and management arrangements that sit below this Plan will be absolutely key, and this will require careful consideration, or the Plan may become yet another strategic plan that looks great on paper but does not deliver.

616. Third sector organisations and networks (n = 2+), one health organisation (n = 1) and public sector organisations (n = 2) further stated that this Plan must be a continuous and ongoing Plan that becomes incorporated into institutions, rather than

being a means of a tick box. Accountability must be based on outcomes and significant / meaningful changes rather than the number of procedures and / or boxes simply ticked. Respondents asserted that impact assessments should be undertaken at an early stage with a view to prioritising positive impacts as opposed to mitigating negative impacts.

617. Health organisations (n = 4), one public sector organisation (n = 1) and one individual respondent (n = 1) stated strongly that there should be a SMART approach with quarterly milestones and evidence-based targets to allow for clear accountability and reporting lines, as currently, too many of the actions in the Plan are loosely phrased or worded. The approach to accountability should be based on a framework that includes the objectives set out in the Plan. Such an accountability framework and measures should be launched concurrently with the Plan to provide clarity from the outset. It will be necessary to align the accountability framework with sector specific governance and accountability frameworks including inspectorate bodies. Respondents asserted that such accountability frameworks must have a set of realistic and measurable outcomes, and that these must be realistic to the local demographic and must be developed in conjunction with those required to deliver on the actions, e.g., LAs. Welsh Government should work with LAs from a governance perspective to understand what is within their capabilities to ensure effective delivery of the actions in the Plan. One third sector organisation (n = 1) stated that organisations would benefit from an agreed framework by which to benchmark their services and to ensure there is a degree of national consistency, whilst taking account of a need for a degree of flexibility to enable tailored solutions and processes to be delivered. One public sector organisation (n = 1) asserted that the 'Stonewall' model of benchmarking rather than standards / assessment, along with meaningful feedback and support on an organisation's actions and progress would be more effective. The element of competition in such a scheme would also drive the appetite for change.

618. LAs (n = 2), one health organisation (n = 1), one public sector organisation (n = 1) and third sector organisations and networks (n = 4+) explained that there are a range of indicators that demonstrate the collective effective of the levels of racial disadvantage that exist. These include levels of poverty, health inequality, death in childbirth, educational attainment, representation in workforces and on boards / at senior levels, levels of unemployment, levels of incarceration, poorer outcomes in criminal justice systems including death following interactions with the police, service user feedback, demonstrating higher levels of unsatisfactory experience of services provided, victims of hate crime. Decreases in the trends in these measures will evidence that the lived experience of minoritised groups is improving.

619. Health organisations (n = 2), one LA (n = 1), one third sector organisation (n = 1), community organisations (n = 1+), one public sector organisation (n = 1) and one individual respondent (n = 1) highlights that the broad nature of the REAP and its current wide timescales make it difficult to monitor implementation effectively. The Plan must hold organisations to account in relation to their equality and employment data, including their ethnicity recruitment and progression rates and ethnicity pay gap, however, currently the Plan gives employers, statutory authorities etc., too much

scope to take the Plan forward without effective accountability. Policy means nothing without implementation and Welsh Government must avoid a situation where employers and statutory authorities are monitored against this Plan in five years' time, only to find little to no progress has been made. The current lack of timescales outlined in the Plan was noted with disappointment in some responses.

Accountability measures must be in place early on and reinforced by audit and Welsh Government must be transparent about how far and how rapidly it is prepared to go to make Wales anti-racist as the impact of racism on Black and Minority Ethnic lives is at emergency and crisis level. Every employer and statutory authority should have race accountability managers and hold a race accountability database as a part of the protocol. It was suggested Welsh Government build accountability into job descriptions and performance measures of senior civil servants to ensure delivery of the actions in this Plan. Welsh Government should recognise these infrastructures and tools as urgent requirements and should support these through appropriate investments. Respondents highlight the key role of regulatory / inspectorate bodies in all of this – e.g., Estyn should measure the performance of schools in decolonising the curriculum, the provision of relevant training for teachers, effectively handling and documenting racist incidents; housing bodies should be scrutinised on the actions and progress of social landlords in diversifying their workforce and boards and progressing Black, Asian and Minority Ethnic employees to senior positions.

620. Health organisations (n = 2), one third sector organisation (n = 1), community organisations (n = 2+), one public sector organisation (n = 1) and one individual respondent (n = 1) expressed concern that the Plan does not outline what the consequences will be if the actions set out are not achieved, and what, if any, sanctions would be imposed upon organisations failing to achieve their actions or inducements offered to those organisation who meet their targets. There were suggestions to establish a stand-alone independent organisation (which could be hosted by an established body) to ensure independent scrutiny and accountability. In addition, positives and progress need to be highlighted through case studies on social media and at community events etc.
621. One public sector organisation (n = 1) stated that the governance section should clarify the Welsh Government's strategic approach to co-ordination of work on all plans that relate to equality and human rights, in order to ensure synergy, alignment and recognition of intersectionality and to avoid any risk or perception of a hierarchy of equalities. It was suggested that Welsh Government should establish a National Mechanism for Implementation, Reporting and Follow-up (NMIRF) – a standing cross-government mechanism to ensure a coordinated, efficient approach to engaging with human rights reviews and provide stronger accountability for overseeing implementation of human rights obligations. This is similar to the EHRC's online human rights tracker, established to improve accountability, transparency and understanding of the UK and Welsh Governments' human rights obligations, including under CERD.
622. One public sector organisation (n = 1) and third sector organisations (n = 2) stated that while Value 2 – Rights based (p.25) is welcome, this section should be strengthened with an acknowledgement of, and commitment to the realisation of the

United Nations Convention on the Elimination of Racial Discrimination (CERD) which has been ratified by the government and subject to periodic reporting. The new Programme of Government sets out a commitment to implement two complementary UN treaties focused on women (CEDAW) and disabled people (CRPD) to progress its human rights and equalities agenda, but there is no reference to CERD in this section of the Plan (despite it featuring elsewhere). The [2021 Joint NGO Shadow Report on Racial Inequality in Wales](#) to be submitted to the UN Committee for the Elimination of Racial Discrimination must be used to measure Welsh Government's progress in achieving its aim of ensuring an anti-racist Wales by 2030, as the Shadow Report provides a real-time snapshot of racial inequality in Wales in 2021.

623. One education board / network / association (n = 1) added that the Plan should work alongside existing legislation, stating that the review of the Public Sector Equality Duty and compliance with the socio-economic duty (March 2021) could also be used to help support accountability. One third sector organisation (n = 1) further asserted that processes and procedures should be kept simple and to a minimum: Welsh Government should avoid duplication and unnecessary administrative procedures but share best practices across departments and public services and ensure reports on progress are easily accessible and understood by community members, e.g., we said, we did, we achieved. Additionally, one trade union (n = 1) stated that clear expectations must be built into the Commission for Tertiary Education and Research legislation, Renew and Reform Plan and Additional Learning Needs regulations to ensure a seamless line of sight across all areas of government activity. The Race Equality Action Plan cannot be allowed to sit in its own silo. Change would only be possible if people of colour are 1: in the room, 2: enabled to speak freely and 3: enjoy parity of credentials with other committee members. All of this points to a need to adapt corporate governance structures and processes towards delivery of the Plan.

624. One third sector organisation (n = 1) stated that effective strategic governance and accountability at national and regional levels will be essential for the success of this Plan and recommended the following:

- a. Create a national strategy and delivery plan which includes cross-government action, developed, implemented, and monitored in partnership with survivors and the sector.
- b. The new strategy must be ambitious, and include measurable actions cross-government, and set out how it will work with devolved public body duties of local authorities and health boards.
- c. Respondents fully support the Plan's commitment to 'social partnership' through plans to place a 'Social Partnership Duty' on all public bodies and establish a ministerial led social partnership council. Respondents strongly recommend VAWDASV sector and survivor representation on this group.
- d. Implement the requirement for regional strategic VAWDASV boards to build collaborative governance of strategies at local levels in line with Welsh Government [Local Strategies Guidance](#). This with the goal of embedding 'by and for' provision within a sustainable funding model and having national oversight of the varied needs within all communities.

625. Third sector organisations (n = 2) and one public sector organisation (n = 1) stated that Welsh Government must adequately fund and resource the governance arrangements for the Plan so that people can afford to attend and so that they can participate on equal terms no matter what their background. For example, some community members may need to be briefed in advance of the Group's formal meetings to participate on an equal basis; Welsh Government should compensate members of the Group appropriately. Some members will be attending as part of their paid work, but we often expect community members to give their time, expertise and efforts for free - this practice discriminates against community members.

Comments on the proposed Accountability Group:

626. Public sector organisations (n = 4), one individual respondent (n = 1), one trade union (n = 1), third sector organisations (n = 4), one LA (n = 1), one funding body (n = 1) and one other organisation (n = 1) highlighted that it is not clear within the Plan whether the Steering Group (which will monitor implementation of the Plan) is part of Welsh Government nor what power it has to undertake the governance roles outlined in the Plan. Respondents stated that it is not clear what the Group will be looking at to assess if progress has been made, how membership of this group will be decided, how it will be democratic, and how people of diverse backgrounds and intersections will be represented – especially people from lower income groups. Setting out clearly the responsibilities and reporting lines, together with clarity on the legal basis for these, is needed to ensure strong accountability for implementation. All documentation relating to the work of the Accountability Group should be easily accessed. The Race Disparity Unit and Equality Data and Evidence Unit will be critical to the success of this Plan. Nonetheless, respondents point out that there needs to be a balance of accountability between public and private sector organisations, especially in the area of employment and social care. There needs to be a regular check-in structure with lived experience policy groups in order to have real-life accountability with Black and Minority Ethnic members of the public.

627. Individual respondents (n = 2), one public sector organisation (n = 1) and one education board / network / association (n = 1) stated that it is important for Welsh Government to interact with the public to see what is working. An approach that pairs life experience with research and statistics but also ensures the voices of people are heard will be crucial in moving things forward. Periodic surveys should take place in schools and workplaces to help spot situations that people find it difficult to talk about and to collect opinions. One education board / network / association (n = 1) would welcome an Annual Survey to gather feedback, to inform an Annual Report and to update on progress towards creating an anti-racist Wales that should be publicly available. One individual respondent (n = 1) also asserted that Welsh Government should ensure that complaints from ethnic minority people are taken seriously.

628. Criminal justice agencies (n = 1+) stated strongly that progress must be monitored and scrutinised closely through audit and review at regular intervals. Welsh Government should commission work to understand and examine the progress made within the criminal justice system and also the barriers to progress. The actual lived experience of Black and Minority Ethnic communities should be

tracked through the lifetime of this Plan, supplemented by specific survey data from a wider cohort.

629. One LA (n = 1) also highlighted that there appears to be duplication of roles and responsibilities between the EHRC and the Accountability Group. One public sector organisation (n = 1) stated that it is vital that membership of the Accountability Group is considered fully, and consideration be given to the role of the EHRC, and regulators across Wales in both audit, health and social care and workforce. It is essential the success of the Plan is also combined with external scrutiny of the Plan, for example the role of EHRC. It would be beneficial to further understand the escalation process above the Accountability Group but equally the other governance arrangements at the heart of operationalising aspects of the Plan. Is the intention to regionalise, nationalise and localise the delivery? What and how will this be monitored and reported on (outside of the Race Disparity Unit and Equality Data Evidence Unit)? The use of compelling language needs to be considered if the Plan is to lead to improvements across Wales. For example, the use of 'should' and 'must' imply very different requirements, 'should', implying there is a choice – 'must' must be used.
630. One public sector organisation (n = 1) and one third sector organisation (n = 1) asserted that the Accountability Group must be adequately resourced and maintain transparent independence from those it is effectively overseeing, but the Group must also embody the principles of co-production and ensure that those who deliver change are sitting alongside those that will see the impact of that change. Education boards, networks and associations (n = 2) and one trade union (n = 1) echoed this, stating that a representative of the further education sector should be included as a member of the Accountability Group. One individual respondent (n = 1) asserted that the Accountability Group should also include representation from WLGA or some of the devolved regional bodies reporting in. One trade union (n = 1) also asserted that places on the Accountability Group should be reserved for trade unions members. One third sector organisation (n = 1) asserted that Welsh Government also need to invest in providing training and support to staff that have the responsibility to deliver and report on the Plan.
631. One health organisation (n = 1) stated that targets must be monitored and reported at a Ministerial Level or even in the Senedd Cymru itself. Action plans have also failed in the past because the message gets too diluted by the time it gets to the middle managers in operational settings in the various organisations funded by Welsh Government. If we were to expect the senior managers of organisations such as each Health Board, College Principals, Local Authority Chief Executives to respond to a request by a UK Parliamentary style Select Committee on racial equality, they would be much more inclined to implement racial equality within their organisations, in line with the Welsh Government's Plan. An annual conference of interested parties to highlight achievements of the Welsh Action Plan will also be beneficial in measuring success.
632. One LA (n = 1) highlighted that LAs are already held accountable through their own Scrutiny Committees and queried whether the 'Accountability Group' will sit

within the Local Authority framework? Similarly, one funding body (n = 1) was concerned that a mandatory governance model could create challenges for public bodies. The implementation of the Plan should be a collaborative endeavour between organisations, communities, groups and individuals.

633. One public sector organisation's (n = 1) concerns surrounding the Accountability Group include the following:
- a. It seems unlikely that a single, national Group can offer the level of challenge, scrutiny and guidance that will be needed across public services if we are to achieve its ambitions.
 - b. The structural proposals (new Race Disparity Unit and Equality Data & Evidence Unit) must avoid a risk that the oversight of progress is delegated by mainstream policy and delivery bodies to the new structures. If change is to be meaningful and sustainable, then individuals and organisations must incorporate the aims of this Plan into their everyday work. Tackling racism, and assessing one's performance in doing so, cannot be outsourced.
 - c. The single Accountability Framework must not replace the centrality of cultural change across public services in Wales, driven by the values set out at the start of the Plan. Tackling racism must be through a sustainable and permanent change, and whilst performance measures can be helpful, they do not offer the same, long-term transformation that is achieved by changing how we think about these matters.

Other comments:

634. Trade unions (n = 2) stated that Welsh Government should highlight its governance [and distinguish] between the illegal act (illegal under UK law and enforced by the police) and the wider issue of racism within the public sector. Respondents stated that the Accountability Group should look at wilful non-compliance or negligence also.
635. One trade union (n = 1) was concerned at the length of the Plan. The Plan is an exceptionally large document, written in high level policy language that is inaccessible to many, including those who have basic literacy skills or who are disabled. This language may have alienated some respondents, or potential respondents. The Plan has been developed in other shorter formats to ensure accessibility; the content is often unclear. The Plan has crosscutting issues which are not reflected in the accessible format. To strengthen the accountability for implementation, respondents suggests that a cross-party Accountability Group is set up to oversee the Plan. This cross-party Accountability Group should sit within the Government to publish an Annual Report every October which comes before the Senedd to report back on each of the findings and success in achieving the goals of the Plan. The meetings will allow for accountability and transparency regarding updates on progress and implementation of goals.
636. One public sector organisation (n = 1) stated that some of the success of this Plan in certain areas shall rely on some systems being completely overhauled and re-invented. Working within existing discriminatory systems and trying to adapt them

will go right against the ethos of this Plan and what Welsh Government seems to be promising – paradigmatic shift. They posed a number of questions, for example, is Welsh Government prepared to do this and how do they seek to do this? How will priorities in this Plan be decided and by whom? The Plan refers frequently to accountability and mechanisms to ensure this must be clear, transparent, and open to challenge. How will Welsh Government ensure that those that are currently the most vulnerable in our communities, are viewed as priority in regard to the actions in this Plan? For example, Gypsy, Roma and Traveller communities having better access to health services, employment, education, and social care; Black women having better outcomes within maternity services?

Q8. We would like to know your views on the effects that these proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

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

637. Please see the comments under the ‘Welsh Language’ heading under question 2.

Q9. Please also explain how you believe the proposed policy approach could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

638. *Ibid.*

Q10. This Plan has been developed in co-construction, and discussions around language and identity have shown that many people do not consider the term ‘BAME’ to be appropriate. As a result, we refer to Black, Asian and Minority Ethnic people or particular ethnic minority people in the Plan. However, we recognise that this term is also problematic and, where possible, being more specific to the particular race or ethnicity an individual or community identifies with is generally preferred. However, there are times where it is necessary to make reference to all those people who share the experience of being subject to racism.

We have used the term Black, Asian and Minority Ethnic people for this purpose. What are your views on this term and is there an alternative you would prefer? Welsh speakers may wish to consider suitable terminology in both languages.

639. Individual respondents (n = 11), LAs (n = 10), health organisations (n = 4), education boards, networks and associations (n = 3), criminal justice agencies (n = 1+), third sector organisations and networks (n = 20+), trade unions (n = 4), public sector organisations (n = 8), one funding body (n = 1), community organisations (n = 3+) and one other organisation (n = 1) have provided comments on question 10. Many respondents have detailed their disdain for the term 'BAME', and many respondents have provided alternative suggestions to this term. Some respondents do not provide alternative suggestions because they feel a term that is liked and accepted by all who experience racism will not be sought. Others stated we should not get caught up in endless discussions about terminology at the expense the work that needs to be done to combat racism in our society.

Comments on the term 'BAME':

640. One individual respondent (n = 1) and one LA (n = 1) stated that BAME is appropriate and Black, Asian and Minority Ethnic is an acceptable and inoffensive term. One health organisation (n = 1) stated that the term Black, Asian and Minority Ethnic people, 'ethnic minority people' for short, is supported by their staff network.

641. Individual respondents (n = 3), health organisations (n = 2), one education board / network / association (n = 1), criminal justice agencies (n = 1+), third sector organisations and networks (n = 9+), LAs (n = 4), trade unions (n = 2), one funding body (n = 1), community organisations (n = 2+) and public sector organisations (n = 3) have expressed their dislike of the term 'BAME'. Respondents stated that the term 'BAME' should be avoided as it is an outdated, unhelpful, and problematic term; it is divisive and hostile and is 'othering' by grouping everyone who is non-White into one category. BAME further leads to the lack of appreciation for the diversity that exists within non-White groups and generalises too many communities into one word / term; it erases people's identity and also disregards intersectional differences. It is also felt that this term keeps people under a glass ceiling and leaves little room for distinction or individuality. Respondents also felt that BAME is not an inclusive term as it excludes Gypsy, Roma and Traveller people. Sixty-five per cent of those surveyed by Romani Cultural and Arts Company do not feel that the term Black, Asian and Minority Ethnic people or BAME applies appropriately to their communities.

642. Third sector organisations and networks (n = 3+), one public sector organisation (n = 1) and one LA (n = 1) stated that umbrella / blanket terms such as: 'BAME', 'BME', 'ethnic minorities' and 'GRT' [referring to Gypsy, Roma and Traveller people] are contested terms as they can be perceived as impersonal and 'othering' and as grouping a number of populations together whose experiences and culture all differ greatly from one another, which is problematic. Blanket terms fail to adequately reflect the experiences of different ethnic minority groups and further highlight the importance of there being a consistent message on terminology. It is important to be specific where possible and to avoid using blanket terms. Community organisations (n = 1+) stated that labels bring stigma.

643. One public sector organisation (n = 1) and one third sector network (n = 1+) explain that people who experience racism are not a homogenous group. As such there is no-one word or phrase to describe them. Just as 'White' does not adequately describe the myriad of variations in origin and backgrounds of people who might be racialised as such, neither do frequently used terms such as 'BAME' or 'people of colour'. It is impossible to have any umbrella term that describes the collective of ethnic minorities within one heading, and any aggregate term will therefore have this limitation.
644. Third sector organisations and networks (n = 3+), community organisations (n = 1+), one public sector organisation (n = 1) and one health organisation (n = 1) stated that the use of the initials is marginally acceptable but pronouncing the acronym as though it is one word is reductive and marginalising. This also goes for the term 'GRT.' BAME has become overused and inappropriately used and the population of the UK and Wales has become more ethnically diverse since the term was first introduced. It is also not inclusive of those who identify as having mixed ethnicity. Abbreviations should not be used and the terms 'Black, Asian and Minority Ethnic' and 'Gypsies, Roma and Travellers' should be written and spoken in full.
645. One public sector organisation (n = 1) and community organisations (n = 1+) explained that the use of BAME may be operationally helpful when exploring the overarching effects of all things racist, however, it misses so much nuance and subtlety that it can be seized upon by those who may wish to deny racism as a White issue. It should be recognised that if commenting at an individual level, the persons preferred identity should be used. Lived experience: *"The term BAME doesn't serve me, it serves them. If something has been created for me then it needs to serve me."*
646. Only 27 per cent of those surveyed by the Romani Cultural and Arts Company agree that one term for describing all people who experience racism on the basis of perceived differences associated with ideas about 'race' is better than lots of different descriptions for each community (i.e., Romani & Traveller, Asian, Black, etc.).
647. Community organisations (n = 1+) also explained the term 'disadvantaged' was not supported. Lived experience: *"Stop calling me disadvantaged. I just want the ability for a fair fight. This business of saying I didn't turn up to the fight and so I've lost is a weak argument and we have allowed them and enabled them to get away with this argument because they are not creating a level playing ground. If you give me a name that reflects disadvantage, I can never move away from it."*

Suggested alternatives to 'BAME':

648. LAs (n = 4), public sector organisations (n = 3), one health organisation (n = 1), one individual respondent (n = 1) and one funding body (n = 1) stated that if BAME is offensive, an alternative term to refer to Black, Asian and Minority Ethnic people must be decided by people from the Black and ethnic minority communities. Time should be invested in agreeing a term that everyone is comfortable with – there should be a Wales-wide consultation to ensure an informed decision on terminology is made. It is important people feel confident in using the decided terminology about

themselves, and about others in order to promote informed, respectful and constructive discussions about race and ethnicity. It is then important to standardise the English and Welsh words and terms used across public bodies. Consideration should be given to the most effective means of communicating the standard terms and words, noting contextual differences and any changes in their use over time.

649. Nearly half of those surveyed by one public sector organisation (n = 1) (47 percent) agree that there should be some alternative used to describe people who are most likely to experience racism. Twenty-one per cent were not sure about the right term which could be used instead. Some suggested simple solutions like correct pronunciation of different nationalities. Others would prefer to use / be called 'Friends of the Global Village,' 'Other races or ethnic groups,' or 'Overseas / foreign friends.'
650. Third sector organisations and networks (n = 8+), LAs (n = 2), one trade union (n = 1) and individual respondents (n = 2) asserted that individuals should have the option to self-ascribe where possible. An effort should be made to ask individuals specifically what they identify as. Addressing each person with their ethnic or race group individually is most appropriate.
651. Third sector organisations and networks (n = 3+), one trade union (n = 1), LAs (n = 2), individual respondents (n = 2), one health organisation (n = 1) and one education board / network / association (n = 1) agreed that specific people and communities of people should be referred to wherever possible. However, this is not always possible – there are times where it is necessary to make reference to everyone who experiences racism. In this case, several respondents suggest using the term 'ethnic minorities' as an alternative to 'BAME.' 'Ethnic minorities' is more inclusive and has the advantage of being easy to pronounce, and of not being an acronym (and therefore describing what it refers to).
652. One LA (n = 1) stated that 'ethnic minority people' is the best approach as the word 'people' helps to avoid othering or de-humanisation. One individual respondent (n = 1) stated, assuming that it is agreed that the following definition of ethnicity applies to everyone: "*the fact or state of belonging to a social group that has a common national or cultural tradition,*" it is suggested to refer to all those who experience racism as 'minority ethnic groups.' Community organisations (n = 1+) suggest Welsh ethnic minorities as an alternative, but express dislike for the word 'minority'. Multicultural / diverse, rather than being addressed by ethnicity is another suggestion.
653. One trade union (n = 1) uses the term 'Black, Asian and Ethnic Minority' (BAEM) as agreed by members at the 2019 Rules Conference and suggest this as an alternative.
654. One third sector organisation (n = 1), one public sector organisation (n = 1) and one health organisation (n = 1) suggest the term 'ethnic minority' is replaced with the term 'minority ethnic' as minority ethnic better reflects the fact that everyone has an ethnicity and the issues being referred to relate to minority groups in Wales. One

education board / network / association (n = 1) suggest 'minority ethnic' because it recognises that it is an issue to do with minorities who can be of any race. One LA (n = 1) stated that minority ethnic is not ideal but is preferable to BAME. One education board / network / association (n = 1) suggest using the term 'UK minority ethnic' in some areas, but ethnicities should be specified where appropriate. One third sector network (n = 1+) felt that the terms 'UK minority ethnic' or 'British minority ethnic' was whitewashing. One third sector network (n = 1+) stated that minority ethnic seems clumsy and preferred something more generic like 'ethnic minority communities.' 'Diverse communities' was also deemed as acceptable. Other suggestions included racially diverse and culturally diverse. One third sector organisation (n = 1) supported the use of the terms 'racialised people,' 'ethnic minorities,' 'minority ethnic,' 'ethnic minority people,' and, 'people from ethnic minority backgrounds'. However, respondents from one third sector network (n = 1+) felt that the word 'minority' was problematic because it made them feel as if they were lesser than / less important. One individual respondent (n = 1) also felt that the word 'minority' has negative connotations. They also stated, that, in a world context, White Welsh people are an ethnic minority. Therefore, using the phrase 'minority' does not encourage Welsh people to see themselves as part of a diverse society.

655. Third sector organisations (n = 2) and one LA (n = 1) suggested using the term 'racialised' ('racialised people' / 'racialised individuals / groups') not as a term of self- or community-identification, but as a socio-political categorisation applied by White-led systems and society to people based on individual differences and characteristics such as skin colour, hair type, name, dress, religion, nationality, migration status or ethnic heritage, to justify oppression. 'BAME' (Black, Asian and Minority Ethnic) is the most used term in professional arenas to describe people who are not White British. It is recognised that this is a contested term and that others prefer to use 'BME,' 'Black,' 'People of Colour,' 'racially minoritised,' or 'ethnic minority.'

656. Trade unions (n = 2) use 'Black' to indicate people with a shared history. Black with a capital 'B' is used in its broad political and inclusive sense to describe people in Britain that have suffered colonialism and enslavement in the past and continue to experience racism and diminished opportunities today. The terms 'minority ethnic' and 'ethnic minority' are in widespread official use today. However, these terms have clear disadvantages in terms of the connotations of marginal or less important and in many neighbourhoods, towns, and cities in Britain, it is statistically inaccurate or misleading to describe Black groups as a minority. Using 'Black' is about creating unity in the fight against deep-rooted racism that sees Black people disadvantaged in housing, education, employment and the criminal justice and health systems. One LA (n = 1) suggest the term 'Black, Indigenous, and people of colour' (BIPOC) is used because it separates certain ethnicities and steers away from marginalisation. The term 'Black' is supported by one third sector organisation (n = 1), however they highlighted that 'Black,' as a term, it is not inclusive of the Gypsy, Roma and Traveller populations, the White Irish or Eastern European populations. There is not a one size fits all answer; terminology is personal. One public sector organisation (n = 1) stated that using the single term 'Black' is not ideal as it further suppresses other minoritised ethnicities creating more oppression. There is no accepted way to describe

minoritised communities. Race is a social construct and within the UK brings much negative connotations as difference if often not celebrated within British culture. Respondents felt that there are no word / words that would be preferred and that any term will be problematic and that it is best taking the time to respectfully state to whom you are specifically referring.

657. Third sector organisations and networks (n = 3+), individual respondents (n = 2), one public sector organisation (n = 1) and one other organisation (n = 1) suggest other alternatives to 'BAME' as 'people of colour,' 'non-Black people of colour,' and, 'racialised individuals or groups'. Feedback also suggests that 'minority ethnic communities' is a more inclusive term than 'Black Asian and Minority Ethnic' and making reference to the ethnic group such as 'Welsh Hindu,' 'Welsh Caribbean' etc., should be considered.
658. One public sector organisation (n = 1) stated that consultation on suitable Welsh terminology was not conclusive, but they are using 'pobl o liw' / 'awduron o liw' for people of colour / writers of colour, which is dubious in its grammar, but seems to be the best option currently. There was opposition to the use of outdated terms 'croenliw' (of colour) and 'croenddu' (Black), and again, against grammatical rules would suggest using 'pobl ddu' instead of 'pobl dduon.'
659. 'People of colour' and 'Non-Black person of colour' (NBPOC) are contested terms. Third sector organisations and networks (n = 3+) acknowledged issues with these terms, particularly as it has taken a long time to move away from the use of the term 'coloured' in the UK; adopting this terminology could confuse people. One individual respondent (n = 1) explained that these terms also exclude Gypsy, Roma and Traveller people who are White, but too endure racism.
660. Third sector organisations and networks (n = 2+) stated that the terms 'minoritised ethnic,' or 'racially minoritised' are preferred in other parts of the UK, reflecting that people are actively minoritised by others, rather than naturally existing as a minority. However, it would be difficult to use these terms because they do not easily translate into Welsh – not only linguistically, but also culturally, because Welsh speakers themselves are minoritised. Instead, people's personal preferences should be respected and, where possible, individuals should have the option to self-ascribe.
661. Third sector organisations and networks (n = 3+) and one individual respondent (n = 1) suggested the following alternatives to 'BAME': 'racial diversity' / 'racially diverse,' 'PERI' – People Experiencing Racial Inequality, 'CERI' – Communities Experiencing Racial Inequality, 'multi-heritage,' / 'mixed heritage,' 'ethnically diverse,' and, 'marginalised communities'.
662. One public sector organisation (n = 1) and one health organisation (n = 1) stated that no suitable alternative term to BAME has yet been decided on within their organisations.

663. One third sector organisation (n = 1) stated that it is essential to look beyond labels and recognise the people. As individuals, we may identify ourselves as Gypsies, as Roma, as Black people or Asians. But we are unlikely to describe ourselves according to a social policy label, and people should not use it to define us individually. We also need to be conscious of the many different cultures and experiences within this term and avoid using it to imply a homogenous group. There is also a risk that the term 'BAME' evokes an image of visible minority ethnic communities and a chance that we will forget White minority ethnic people. Anecdotal evidence suggests that very few White minority ethnic people recognise that this term also addresses the racism they experience.
664. One third sector organisation (n = 1) stated that it is important to be transparent about the historic and current systems, structures, institutions and cultures that racialise and marginalise certain people and communities, and counter to that privilege the majority of White people and communities, who are not racialised or marginalised. This is reflected through language, so it is important to be explicit and transformative in the use of terminology.
665. Third sector organisations (n = 2+) and criminal justice agencies (n = 1+) asserted that Welsh Government should avoid getting overwhelmed in endless discussions around terminology as this is distracting from the task at hand. A lot of time can be wasted on labelling people and not enough action on the steps that need to be taken to progress the work on combatting racism. It was also highlighted that language changes all the time, so what language is acceptable and what language is not will also change.
666. One individual respondent (n = 1) stated that in the interests of the Public Sector Equality Duty (PSED), which requires us to foster good relations between protected characteristics, the description 'White Privilege,' and, 'White Superiority,' could be regarded as potentially provocative or antagonistic and could have a negative impact on the REAP. Instead, it was suggested that 'privilege' was used on its own, as privilege can be about cultural or socio-economic class too. Whilst it is appreciated this terminology has probably been used as a 'hard-hitting' tactic, this could alienate some who have worked long and tirelessly to tackle and remove discriminatory practices and behaviours and some White people would not regard themselves or be regarded as privileged either.

Q11. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

667. Third sector organisations and networks (n = 2+), public sector organisations (n = 2), LAs (n = 2), one individual respondent (n = 1) and community organisations (n = 1+) have provided comments on Question 11. A range of comments have been received which did not directly relate to any of the other questions in the consultation.
668. One third sector network (n = 1+) recommended Welsh Government:

- a. Maintain and increase investment in asylum seeker support services, including legal advice, advocacy and information services.
 - b. Building on the extended franchise in 2021 for residents with leave to remain, extend the right to vote in Welsh elections to people seeking asylum.
 - c. Roll out free internet access in asylum accommodation.
 - d. Extend free public transport concession passes to all people seeking asylum and remove any barriers to accessing passes for eligible refugees.
 - e. Ensure effective initial orientation on arrival so that individuals are better prepared, understand their rights and are able to access services and support.
 - f. Ensure that everyone has access to high quality, supportive interpretation when accessing public services. Provide training, support and oversight to interpreters.
669. One public sector organisation (n = 1) was surprised to see the following comment in the plan: *“As we continue to respond to the very real threat posed by Covid-19, it is understandable that our Public Health partners including Public Health Wales and NHS Wales Informatics Service (NWIS) have been necessarily focussed and continue to prioritise our response to Covid-19. The pace of developing this Plan has limited the input of delivery partners to our actions for Health and Health Outcomes at this time.”* Respondents stated that they were not aware of any requests for input before the consultation request that was sent in May 2021; members of their staff had volunteered to be part of the work (on a personal basis), but their offer was not taken up. Tackling racism is a priority for them, from a public health as well as a rights perspective, and given the disproportionate impact of the pandemic on Black, Asian and Minority Ethnic communities this would have been considered part of our response work.
670. One LA (n = 1) does not address ‘access to or provision of translation services’ – highlighting difficulties they have had trying to arrange provision of translation services when they do not know the required language.
671. Many of the Community Employment Programmes referred to under Employment and Skills are grant funded (ESF and others) and are due to end in 2022 and it is not clear what will be in place later. This is something that Welsh Government must address as the REAP is due to last to 2030. The short-term nature of some of the funding received to date has undermined sustainable developments and the ability of residents to access fairly the support required – e.g., **Residents with Learning Disabilities into Community Volunteering**. Respondents also highlight that ESOL is also grant-funded, and it can be difficult to plan ahead, if the funding is not committed to for the longer term.
672. One third sector organisation (n = 1) stated that they found it difficult to see where their organisation fits into the Plan and that it was difficult to see any specific actions for them to implement, or initiatives that relate directly to their work.
673. One individual respondent (n = 1) stated that more equality and justice for fathers is needed, especially during and after separation / divorce.

674. LAs (n = 6), third sector organisations and networks (n = 3+), public sector organisations and networks (n = 5+), criminal justice agencies (n = 1+), community organisations (n = 1+), health organisations (n = 2), individual respondents (n = 4), and one funding body (n = 1) highlighted that the experiences of people from a Black, Asian and Minority Ethnic background may be different in rural areas compared to urban areas. Welsh Government should ensure that actions which include engagement and consultation with Black, Asian and Minority Ethnic people includes people from rural areas.
675. One public sector organisation (n = 1) has commented on the co-chairs foreword on page 5, where they make the statement that, “most people in society are generally non-racist.” It would be useful to include the source of this information because it sets the whole tone for the consultation on the Race Equality Action Plan. There were some concerns about the wording on page 10 – “*Yet for ethnic minority groups, these rights have long-since been earned,*” – why do the rights for minority ethnic groups have to be ‘earned’? Isn’t a ‘right’ by its definition something that does not have to be earned? Later in the values section on page 26, it states that, “*We believe that we are asking “only for our rights, as opposed to favours” in all you do.*” We agree with this statement, but it appears to contradict the wording on page 10 about earning their rights.

Other comments:

676. This section provides an overview of the 66 responses that were not related to the substance of the consultation and / or contained racist / offensive remarks. These were mostly from individual respondents who wished to remain anonymous (n = 62). One third sector organisation (n = 1), one LA (n = 1), one community organisation (n = 1+) and one education board / network / association (n = 1) submitted a response that was not related to the substance of this consultation.
677. Comments within these responses either did not relate to the consultation questions or were racist and / or offensive. Analysis of comments indicates these were opposed to the proposals in the consultation with the following themes able to be identified:
- That ethnic majority White people experience forms of racism that should be addressed.
 - That the Plan suggests all White people are racist.
 - That racism is not present at a level that requires action from Welsh Government.
 - That there is racism against English speakers in Wales.

Annex A: List of Respondents:

Responses were received from the following:

001	Race Council Cymru	040	MEDIC Student Race Equality Task Group
002	Sub-Sahara Advisory Panel	041	Welsh Ambulance Trust
002	Sub-Sahara Advisory Panel	042	Chartered Society of Physiotherapy
003	Bevan Foundation	043	Allied Health Professionals Policy Officers
004	Sheila Hendrickson-Brown	044	Carmarthenshire County Council
005	BMHS	045	Butetown Community Centre
006	MELA Cymru	046	Welsh Government Responses
007	KIRAN Cymru	047	Cardiff University
008	The Polish School	048	Swansea Council
009	Future Generations Commissioner	049	Welsh Language Commissioner
010	North Wales Africa Society	050	Care Inspectorate Wales
011	Action for Arts	051	Open University Wales
013	University of South Wales	052	Books Council of Wales
014i	BAPIO	053	Public Services Ombudsman for Wales
014ii	BAPIO (Video)	054	Royal College of Psychiatrists Wales
015	Welsh Refugee Coalition	055	Stonewall Cymru
016	Solicitors Regulation Authority	056	Wales Safer Communities Network
017	EYST	057	Health Education and Improvement Wales
018i	TGP Asylum Seeker and Refugee Group	058	Response from an individual
018ii	TGP Asylum Seeker and Refugee Group – Individual notes	059	Mudiad Meithrin
019	University and College Union	060	Children's Commissioner for Wales
020	Age Cymru Wales	061	National Training Federation Wales
021	BAWSO	062	UNISON
022	Wales TUC	063	British Medical Association Cymru Wales
023	Response from an individual	064	WCVA
024	Response from an individual	065	Youth Justice Board for England and Wales
025	Response from an individual	066	Unite the Union
027	Children in Wales	067	Welsh Refugee Council
028	WLGA	068	British Association of Social Workers
029	Community Leisure UK	069	Criminal Justice in Wales
030	Opinion8	070	Royal College of Nursing Wales
031	Assoc. Directors of Social Services Cymru	071	Board of Community Health Councils
032	Inclusive Educational Curriculum Consultancy	072	Newport City Council
033	Audit Wales	073	Literature Wales
034	Newport Council - All People First	074	WAPACO
035	Llyfrgell Genedlaethol Cymru		
035	National Museum Cymru Wales		
037	Response from an individual		
038	New Pathways		
039	Archive and Records Association		

075	Equality and Human Rights Coalition	110	St Joseph's Roman Catholic High School
076	Swansea Bay Health board	111	Adferiad Recovery
077	Various Individual responses - Swansea Bay Health Board	112	National Midwifery Council
078	Race Equality First	113	Anti-racist Wales Youth Network - Innovate Project
079	C3SC	114	Colegau Cymru
080	National Lottery Heritage Fund	115	Welsh Women's Aid
081	Welsh NHS Confederation	116	Response from an individual
082	TGP Cymru Travelling Ahead	117	Clybiau Plant Cymru
083	NSPCC	118	Velindre University NHS Trust Consultation
084	Race Alliance Wales	119	Response from an individual
085i	Tai Pawb, CIH Cymru, Community Housing - Joint Housing Response	120	Social Media Comments - Welsh Gov Digital Team (Social Justice Communications Team)
085ii	Tai Pawb, CIH Cymru, Community Housing - Joint Housing Response	121	Hate Crime Criminal Justice Board
086	Cardiff Metropolitan University	122	Cardiff and Vale Health Board
087	South Wales Jewish Representative Council/Board of Deputies of British Jews	123	Professor Charlotte Williams
088	Swansea University	124	Betsi Cadwaladr Health Board
089	General Medical Council	125	Merthyr Tydfil County Borough Council
090	Catholic Education Service	126	The Royal College of Speech and Language Therapists
091	Equalities and Human Rights Commission	127	Socialist Health Association Cymru
092	Flintshire County Council	128	Response from an individual
093	Response from an individual	129	Response from an individual
094	MESN, Welsh Government	130	Cllr Lesley Walton - Gors Ward
095	British Dental Association	131	Blaenau Gwent Council
096	Sikhs of Wales	132	Sport Wales
097	Citizens Advice Cymru	133	Ceredigion County Council
098	Ysgol Glantaf Pupils	134	Denbighshire County Council
099	Vale of Glamorgan Council	135	Neath Port Talbot Council
100	Denbighshire County Council & Conwy County Borough Council Education Service	136	Public Health Wales
101	Hywel Dda University Health Board	137	National Trust Cymru
102	NASUWT	138	Bangor Back Lane Residents
103	Rhondda Cynon Taf Council	139	Caerphilly Council
104	Sikhs of Wales	140	Marie Curie Cancer Care
105	Aneurin Bevan University Health Board	141	Response from an individual
106	Victim Support Cymru	142	Llandough Community Council
107	Response from an individual	143	Older Person's Commissioner Wales
108	Powys County Council	144	Social Care Consultation Events - Welsh Government
109	Swansea Council for Voluntary Services	145	Powys Teaching Health Board
		146	National Education Union
		147	National Residential Landlords Association

148	Response from individuals	D031	Anonymous
149	Platform	D032	Anonymous
150	The Mentor Ring	D033	Anonymous
151	Youth Work Board	D034	Office of the Police and Crime Commissioner, Gwent
152	National Advice Network	D035	Anonymous
153	Response from an individual	D036	W
154	Prof Charlotte Williams (Video)	D037	Tom Benjamin
155	ESTYN	D038	Anonymous
156	Diverse Cymru	D039	Sion
157	PACEY Cymru	D040	Unnamed
158	Women Connect First, Hayaat Women's Trust, Henna Foundation	D041	Callum Darragh
159	Privilege Café	D042	Unnamed
160	Response from an individual	D043	Anonymous
161	Opinion8 (Audio interviews)	D044	Charlie Rogers
316	Romani Cultural & Arts Company	D045	Anonymous
317	EHRC	D046	Anonymous
318	Cardiff Health Access Practice	D047	Anonymous
D001	Anonymous	D048	Anonymous
D002	Anonymous	D049	Anonymous
D003	Anonymous	D050	Ella Hill
D004	Anonymous	D051	Anonymous
D005	Cardiff Health Access Practice	D052	Michael Walters
D006	Anonymous	D053	Anonymous
D007	Anonymous	D054	Anonymous
D008	Anonymous	D055	Steph Morgan
D009	Julie Davies	D056	Councillor Paul Dowson, Pembrokeshire
D010	Anonymous	D057	Unnamed
D011	Gareth Payne	D058	Anonymous
D012	Dr David Tuthill	D059	Anonymous
D013	Anonymous	D060	Anonymous
D014	Penny Owen	D061	MD Asrar Ferdous Chowdhury
D015	Anonymous	D062	Anonymous
D016	Dr Richard G Evans	D063	Unnamed
D017	Anonymous	D064	Anonymous
D018	Show Racism the Red Card	D065	Anonymous
D019	The Wallich	D066	Anonymous
D020	Early Years Wales	D067	Unnamed
D021	Raymond Greenwood	D068	Anonymous
D022	Anonymous	D069	Anonymous
D023	Anonymous	D070	Unnamed
D024	G Turner	D071	Patients Not Passports
D025	Anonymous	D072	Anonymous
D026	Anonymous	D073	Anonymous
D027	Transition Holywell & District	D074	Darren Britton
D028	Anonymous	D075	Anonymous
D029	Anonymous	D076	Nick Morse
D030	Jill Duarte		

D077	No Name	D118	Anonymous
D078	Anonymous	D119	Anonymous
D079	Anonymous	D120	Higher Education Funding Council for Wales
D080	Anonymous	D121	Anonymous
D081	Anonymous	D122	Llenyddiaeth Cymru / Literature Wales
D082	Anonymous	D123	Anonymous
D083	Anonymous	D124	Anonymous
D084	Anonymous	D125	Birth Partner Project
D085	Anonymous	D126	Union of Jewish Students
D086	Pembrokeshire County Council	D127	Dr, Diana Beljaars, Swansea University
D087	Ana Kusmarsewa	D128	Bridgend County Borough Council
D088	Unnamed	D129	Anonymous
D089	Anonymous	D130	Cyngor Gwynedd
D090	Lauren Cawley	D131	Anonymous
D091	Hawliau	D132	Anonymous
D092	Jenny Jones	D133	Anonymous
D093	Helen Cooper	D134	Royal Pharmaceutical Society
D094	Anonymous	D135	Ffilm Cymru Wales
D095	Anonymous	D136	Indu Deglurkar
D096	Anonymous	D137	Anonymous
D097	Fred Wildgust	D138	Anonymous
D098	Anonymous	D139	Anonymous
D099	Anonymous	D140	Anonymous
D100	Anonymous	D141	Care Forum Wales
D101	Anonymous	D142	Rhondda Cynon Taf Council - Spotlight Members
D102	Don't Forget the Normal People Ltd	D143	Anonymous
D103	Anonymous	D144	Anonymous
D104	Nicky Hamza	D145	Anonymous
D105	Anonymous	D146	Patients Not Passports Wales
D106	Anonymous	D147	Anonymous
D107	Anonymous	D148	Anonymous
D108	Elis Halliday	D149	Ryan Ellis
D109	Arts Council of Wales	D150	Sue Pellew-James
D110	Social Care Wales	D151	Voice of Wales
D111	Black Further Education Leadership Group	D152	Anonymous
D112	Planning Aid Wales	D153	Dr Leslie S Lewis
D113	ACC		
D114	Evangelical Alliance Wales		
D115	Anonymous		
D116	Welsh Government Minority Ethnic Staff Network		
D117	Anonymous		

82 number of respondents wished to remain anonymous.

