

Lynne Neagle AS/MS  
Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education



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Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref: MA/LN/5029/24

Rocio Cifuentes MBE  
Children's Commissioner for Wales

19 July 2024

Dear Rocio

In December 2023 my predecessor, the then Minister for Education and Welsh Language, wrote to thank you for your report into racism in secondary schools, "[Take it Seriously](#)". I also wish to thank you for this important report and the evidence it contains, and to set out our response to your recommendations.

You will be aware that there is significant interaction between your recommendations and the education commitments in the Anti-racist Wales Action Plan. There was also some read across to the recommendations of the Senedd's Equality and Social Justice Committee inquiry into the Anti-racist Wales Action Plan. Both my predecessor and I wanted to ensure that in responding to your report we were able to fully reflect those interactions and ensure clarity on commitments for current and future action. As a consequence it has taken a little longer to respond to your report than usual, for which I apologise.

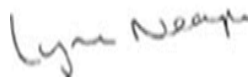
I do also need to highlight that over this period the outcome of the [Review of roles and responsibilities of education partners in Wales and delivery of school improvement arrangements](#) has been published. My predecessor issued a [statement](#) on this in January, and you will be aware that the landscape in respect of education partners is moving, particularly in respect of school improvement. This means that some of your recommendations directed to regional education consortia have been, to some extent, superseded. I am however committed to ensuring that anti-racism is central to our wider work with schools, and that all partners engaged in these activities on an ongoing basis prioritise supporting children and young people experiencing racism in schools.

The anti-racism work with schools and the education sector continues to be driven by the Anti-Racist Wales Action Plan and our ambition for creating an anti-racist Wales by 2030. You may also have seen the [response](#) to the Equality and Social Justice Committee Inquiry published by my colleague, the then [Cabinet Secretary for Culture and Social Justice](#).

I have considered your report and recommendations carefully. There is much in your report, particularly in the experiences of our children and young people, that concerns me greatly. However, in responding I can only comment on those recommendations that fall to the Welsh Government for action. I cannot make commitments on behalf of other organisations.

My response to those recommendations is attached in an annex to this letter. I also want to provide you with an assurance that I am fully committed to ensuring our education system is anti-racist, and that all children feel safe, valued and supported. Our work on anti-racism in schools will build on your findings.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Lynne Neagle'.

**Lynne Neagle AS/MS**

Ysgrifennydd y Cabinet dros Addysg

Cabinet Secretary for Education

## Welsh Government Response

1. ***Welsh Government should clarify within its forthcoming refreshed anti-bullying guidance how it expects schools to respond to, record and address racist incidents.***

**Accept** - The Welsh government will be strengthening the existing '[Rights, respect, equality](#)' statutory anti-bullying guidance for schools. This will be done by updating the current guidance to advise education settings on effectively addressing prejudice-related bullying and harassment, and how to effectively monitor incidents, including racist incidents, and the use of data. Preparatory work has commenced, and the Welsh Government intends to carry out a full public consultation for the refreshed guidance in autumn 2024.

We will also be exploring the mechanisms needed to produce a consistent reporting format of racist incidents and harassment in schools and colleges. This will be done through strengthened data collection, including information on how incidents were dealt with, action taken in response and whether the incident was resolved successfully for the victim. This work will involve consulting with a wide range of stakeholders, including schools and learners, in the coming year.

Currently, our statutory anti-bullying guidance advises schools to collect data and respond effectively to reports of bullying and/or harassment, including racist incidents. We also advise that schools share this data with their local authority and that it is collected at authority level.

2. ***Welsh Government should create supplementary guidance to clearly stipulate expectations around the wider school response to racism, in line with the Anti-racist Wales Action Plan (ARWAP), making clear its relevance to all schools, not only those with higher ethnic diversity.***

**Accept in principle** – The need for greater clarity will form part of our review and update of our Rights, Respect, Equality (RRE) anti-bullying guidance. Once we have completed that review we will consider whether any additional resources or toolkits are required and if so will ensure they are bilingual and applicable to all schools in Wales.

8. ***Welsh Government, in its refreshed anti-bullying guidance, should direct schools to deal with and record racist incidents as equivalent to safeguarding incidents ensuring the visibility and accessibility of school-based and regional systems for raising concerns.***

**Accept in principle** - Governing bodies must have regard to the RRE guidance when exercising their functions relating to the conduct of a school, and making arrangements for safeguarding and promoting the welfare of children and young people who are learners at the school.

We will be updating our statutory "[Keeping Learners Safe](#)" guidance to reflect the importance of responding appropriately to racist incidents, and ensure children marginalised by race are kept safe. Officials will be working on this update and that

of the RRE anti-bullying guidance in the coming months and ensuring appropriate links are made. However, it is important to be mindful of the statutory basis for recording cases as raising safeguarding concerns, and taking forward responses appropriately. In undertaking updates to our guidance we will seek to raise the status of racist incidents in school reporting, whilst also respecting the distinct arrangements required in respect of safeguarding concerns where a child is at risk.

***9. Training on racism and anti-racism and recognising and responding to racist incidents should be made mandatory for all education leaders, teachers and support staff, refreshed on a minimum 3 year cycle, similar to safeguarding training. To ensure quality and consistency, this should be coordinated via the Welsh Government funded DARPL network and linked to the work of the National Academy for Educational Leadership (NAEL).***

**Reject** - The Welsh Government does not mandate professional learning in relation to specific areas of professional practice. This is because of the need for discretion to allow education providers to ensure the learning their staff undertake reflects the needs within their communities and demonstrated by their learners. The only exceptions apply to professional qualifications and specific training stipulated by employers e.g. UK GDPR.

The Welsh Government provides guidance on the use of INSET, which sets out that we expect schools to use the equivalent of 4 INSET days to address national education priorities to implement Curriculum for Wales, ALN reforms, Equity in Education and Cymraeg 2050, and to enable all staff to engage with professional learning and collaboration. Schools can use their remaining INSET days to address the priorities set out in their individual School Development Plans, and this could include anti-racism.

We have committed to the Diversity and Anti-racism Professional Training (DARPL) project, which is a cornerstone of our approach to embedding anti-racist practices within the education system in Wales. DARPL and its partners support education professionals to understand and develop anti-racist and non-racist practice. Resources, training, and guidance are available in one place through the DARPL virtual campus. Work to continually update this repository is ongoing. Schools can make use of these resources during INSET days, and we would encourage them to do so.

Bespoke training is available in relation to responding to anti-racist incidents. To ensure quality and consistency, DARPL provision for senior leaders and governors was endorsed by the National Academy for Educational Leadership in 2023. Wider DARPL provision will be quality assured under the Welsh Government's new professional learning endorsement process.

***10. More training and professional learning resources should be developed which cover different types of racism which are prevalent in Wales including faith-based racism (particularly Islamophobia and Antisemitism), racism against white Europeans, racism against Gypsy, Traveller and Roma communities, and racism against refugees and asylum-seekers***

**Accept** – The Welsh Government’s Diversity and anti-racist professional learning professional (DARPL) project launched in autumn 2022 and is crucial to realising the Curriculum for Wales and achieving high standards and aspirations for all. Over 27,000 education professionals have engaged with DARPL through live events, consultations and asynchronous resources at the start of 2024.

The (DARPL) project resources will be continually reviewed, refreshed and extended as appropriate. The first phase of a project to extensively review and refresh anti-racist professional learning resources accessible via the DARPL virtual campus has taken place from January to July 2024.

In December 2023 we published our new Gypsy, Roma, and Traveller guidance for schools. The purpose of the new non-statutory guidance “[Celebrate and Participate: education guidance to support Gypsy, Roma and Traveller learners](#)” is to provide schools and education settings with up-to-date examples of effective practice. Officials will be discussing with stakeholders from different communities the opportunities to develop more resources to support schools and education practitioners in delivering the curriculum. DARPL has also hosted a workshop highlighting the issues facing Gypsy, Roma and Traveller communities and learners.

***11. Welsh Government should update their guidance on school governors to make training on race awareness and recognising and responding to racism and racist incidents mandatory for all governors as part of their induction. This training should be delivered via Local Authorities.***

**Accept** – We are in the process of updating our guidance on induction training for school governors in Wales. Race awareness and recognising and responding to racism will be included in the new version due to be published in July 2024.

***13. Ongoing work to support school governors to increase their racial literacy should be considered building on the findings of Esytyn’s thematic review on School Governors and incorporating work underway by NAEL in supporting Governors, as well as by DARPL.***

**Accept** (in respect of the work Welsh Government is leading) - We will continue to provide signposting to school governors to support through DARPL and the Anti Racist Wales Action Plan. Through our bulletin for school governors we will spotlight anti-racism and invite key speakers to present at our various networks. The first phase of a project to extensively review and refresh professional learning resources accessible via the DARPL virtual campus is scheduled from January - July 2024. This will include a review of resources specifically targeted at school governors.

***15. There should be a dedicated space on Hwb for teachers to access information on racism and anti-racism including anti-racist resources, collate frequently asked questions and share up to date information including on terminology.***

**Accept in part** - Taxonomy filtering on Hwb allows teachers to see all resources and information on racism and anti-racism including anti-racist resources. Each subject under the “Humanities” Curriculum Area can be filtered by “Diversity” and “Cynefin”.

“Cynefin” is a Welsh word, defined in the Curriculum for Wales framework as “the place where we feel we belong, where the people and landscape around us are familiar, and the sights and sounds are reassuringly recognisable. Cynefin is the historic, cultural and social place which has shaped, and continues to shape the community which inhabits it.”

The resources on Hwb aim towards a more holistic approach to teaching topics. While it is important to make these available through the Resources section, we must also avoid isolating such resources from the broader curriculum context. Diversity is a cross-cutting theme and we want to ensure that the practice is embedded across all areas of the curriculum. Isolating the resource could lead to them being used less frequently in the wider curriculum. Resources also have tags, which are gradually added as new resources are reviewed. Relevant tags currently include:

- anti-racism
- Commonwealth
- Communities
- cultural diversity
- cynefin
- diversity
- minority communities
- minority ethnic communities
- minority histories
- racism

Dysg, the weekly education and skills email newsletter which goes to all schools in Wales, allows the Welsh Government to highlight up-to-date resources and share case studies linked to areas requested by practitioners.

Hwb is also a repository of resources for Professional Learning, with a dedicated category of “Well-Being, Equity and Inclusion”. The new Diversity and Anti-Racist Professional Learning (DARPL) virtual platform was launched in October 2022, which is a learning and resource hub for those working in education and childcare to develop an understanding and development of anti-racist practice. This will ensure that those working within education, childcare and play develop the tools and carry out anti-racist practice that supports the aim of being an anti-racist Wales by 2030.

***16. In line with the new Curriculum for Wales, Children and young pupils should have access to regular and effective opportunities to learn about race and diversity, including through learning experientially from visits and external providers with lived experience of racism. This would support and complement the diverse school curriculum.***

**Accept** - experiential learning takes many forms within a school or setting and will be integral to realising curriculum. The Curriculum for Wales guidance aims to help each school develop its own curriculum. We would expect practitioners to collaborate and draw on a range of appropriate stakeholders to provide learners with enriching, authentic experiences. Meaningful experiences are rooted in real-life contexts and drawing in those with lived experiences will help deepen learners understanding. When considering experiential learning practitioners should reflect diversity of culture in local, national and international contexts and offer this in sensitive and meaningful ways giving purpose to learning whilst also developing breadth and depth of understanding. How a setting or school approaches this will be dependent on meeting its own learners needs.

The Welsh Government, through Hwb, Dysg and other networks will continue to promote the use of Hwb and the DARPL virtual campus to ensure that we are providing practitioners with a sustainable supply of supporting materials relating to Black, Asian and Minority Ethnic contributions and experiences past and present.

To assist schools in developing their curriculum, the Welsh Government has worked with external providers to create resources that create regular and effective opportunities to learn about race and diversity.

Peniarth, University of Wales Trinity Saint David, recently launched a poster and online resource 'Brethyn Cymru', a Welsh Government funded resource that contains information about 25 key individuals and events within Welsh history. Five copies of the poster have been delivered to each primary and secondary school in Wales, giving Welsh teachers and learners the opportunity to explore their multicultural history as a nation. The poster has a QR code, which will give access to wider information digitally on Hwb, and both parts can be used as a trigger for discussion and to stimulate further work.

The resource was developed following Professor Charlotte Williams' report commissioned by the Welsh Government. It was recommended in the report that cross-cutting resources and materials should be created to match Curriculum for Wales, in order to learn and teach about diversity in Wales past and present.

The [Interactive Community Map \(Cymuned\)](#) is available on Hwb. Created by Atebol, the resource highlights Black, Asian and other diverse ethnic Welsh communities. The map is designed specifically for the Curriculum in Wales, working closely with teachers, educational experts and members of the map's communities. This supports schools in planning visits to local areas of significance and opportunities to learn of lived experience of racism. Atebol will update the map each December until 2029.

We are continuing to monitor the impact and progress of Professor Charlotte Williams' Report. Officials have established a process to review of all existing resources on Hwb to support the implementation of the Curriculum for Wales which includes a review of the tagging and taxonomy to enable practitioners to easily navigate resources relating to these key themes. This will ensure that teachers have access to evaluated resources related to Black, Asian and Minority Ethnic contributions and experiences past and present.

The Formative Evaluation of the Curriculum for Wales is underway. This is a large-scale, mixed methods, research programme examining the perspectives and experiences of senior leaders, practitioners, learners and their parents / carers, through representative quantitative surveys, as well as qualitative studies. A deep dive is planned for the academic year 2024/25 to understand the extent to which, and in what ways, Black, Asian and Minority Ethnic communities and contributions are being implemented as expected.

***17. Welsh Government should urgently progress its planned work to develop a Wales-wide system of recording and reporting of racist incidents in schools, ensuring there is a legal basis for this data collection, and clarifying the distinct roles and responsibilities of schools, local authorities and other bodies within this system.***

**Accept** – as indicated in my answer to recommendation one, we will be exploring the mechanisms needed to produce a consistent reporting format of racist incidents and harassment in schools and colleges. This will be done through strengthened data collection, including information on how incidents were dealt with, action taken in response and whether the incident was resolved successfully for the victim. This work will involve consulting with a wide range of stakeholders, including schools and learners, in the coming year.

***18. This work (No 17) by Welsh Government should include working with schools to agree clear and practical definitions of racism and racist incidents to enable consistent and meaningful data to be gathered.***

**Accept** - As indicated in my response to number 17, my officials will be considering the evidence already being collected by schools, the responses and outcomes for learners, both those who were the victim of the racist incident as well as individual/s who carried it out.

***20. Welsh Government should direct Estyn to revise their Common Inspection Framework to place a stronger focus on how schools respond to, record and address racist incidents, ensuring that pupil voice and views on this are heard through their inspections.***

**Reject.** Estyn is independent of government and as such the Chief Inspector is responsible for Estyn's inspection framework and arrangements. However, I am aware that Estyn's current approach to school inspection provide opportunities for inspectors to evaluate schools and PRUs approach to safeguarding, and the degree to which leaders promote and support a culture of safety and wellbeing within the school and PRU community. Inspectors will consider how well schools and PRUs respond to, record and address any alleged incident relating to bullying, including those involving protected characteristics, prejudice related bullying, harassment and discrimination.

Estyn's pre-inspection questionnaires for learners ask specific questions relating to whether they feel safe in school and how they are treated by others. If responses indicate any inappropriate behaviour of any kind including racism, concerns around a



school's curriculum or the way school staff respond to incidents may be an issue, inspectors will pick up on this during inspection. Inspectors meet with groups of pupils during inspection and ask specific questions about whether they feel safe, behaviour of others, any incidents of bullying and schools' response to them. The formal focus groups provide an opportunity to explore issues raised in pre-inspection questionnaires.

Estyn has revised its inspection arrangements and have recently been trialling these arrangements with schools in readiness for implementation from September 2024. As part of these arrangements, Estyn has piloted revised pre-inspection questionnaires for learners to capture demographic information nationally, to allow them to analyse any trends in survey responses based on race across a national sample of schools.

Through Estyn's new inspection arrangements inspections will also continue to include a focus on how well schools:

- design and deliver a **curriculum** that:
  - develops an understanding of the history, cultural and linguistic heritage, ethnic diversity, identities, experiences and perspectives of their local area, Wales, and the wider world.
  - enables pupils to develop an understanding of the complex nature of societies through exposure to stories past and present of their local area, Wales and the wider world spanning different communities as well as in particular the stories of Black, Asian, and Minority Ethnic people.
  - fosters positive and respectful attitudes to diversity (RSE).
  - develops pupils' awareness and understanding of different identities, views and values.
  
- and supports positive behaviour, and accurately record, report and respond to all types of bullying and harassment.

Estyn also provides ongoing training for staff, including inspectors, for example through their recent staff conference in January 2024 which focused on 'belonging' and in particular anti-racist practice.

***21. Welsh Government should commission Estyn to undertake a good practice review to identify existing good practice in responding to racism and racist incidents amongst schools.***

**Accept in principle** - We will discuss with Estyn the potential of a good practice review in responding to racism and racist incidents amongst schools as part of our future annual remit discussions.

Within Estyn's 2024-25 annual remit, we have commissioned Estyn to undertake thematic reviews on promoting positive behaviour in both secondary schools and FE colleges. These reviews will include research questions that focus on schools' and colleges' approaches to addressing poor behaviour, including bullying of pupils with protected characteristics.

Through the 2024-25 Estyn remit, based on evidence gathered from inspections, engagement work and other activity, Estyn will provide Welsh Government with updates and advice on a range of areas including anti-racism.

Estyn also plan to consider anti-racist practices as a cross-cutting theme in their 2023-24 Annual Report.

***22. Welsh Government should establish a task force involving education, community safety and youth justice representatives to explore and develop appropriate interventions for working with children and young people who express discriminatory views or behaviour.***

**Reject** – Youth Justice Services already work with schools and stakeholders, and through the Children and Communities Grant and the Positive Engagement to those at risk of offending funding, deliver prevention and diversionary projects which includes ones on discriminatory behaviour. Officials will explore via these existing mechanisms and forums how to best engage with children and young people to understand the different forms of language, as well as working through a preventative approach.

In 2019, the Welsh Government commissioned research to assess the level of support available for children and young people who experience hate crime, which may include racist incidents and attacks. The report, [Children and young people affected by hate crime in Wales: Current provision of services](#)”, was published in March 2020, and identified a number of gaps in provision across Wales. A second report, [“It’s soul destroying” Conversations with children and young people affected by hate crime in Wales](#)” was published in September 2021. The report captured conversations with children and young people affected by hate crime in Wales, which again highlighted gaps in provision. Based on these findings, the Welsh Government has funded the Wales Hate Support Centre since April 2022 to deliver a tailored support service for children and young people in Wales.