



# EYST Wales Consultation Form: A Response to Welsh Government's Race Equality Action Plan

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# Introduction

**This response collectively draws on the feedback and learning from several consultation events held by EYST Wales between May and June 2021. A total of 6 separate consultation events were hosted, focusing on gauging feedback on the proposed Race Equality Action Plan from distinct sections of the black and minority ethnic population in Wales. A total of 183 people took part in these consultation events. With additional intelligence from EYST's wider programme of work, this paper was established as a means to understand and collate comments on the focus areas that still needs much work and development.**

We welcomed the opportunity for young people, older people and community members to focus and respond to priority areas mentioned in the plan. These include: leadership and representation, local government, health services and health outcomes as well as social care. It is important to note that this list is not exhaustive and themes are more than likely to be cross-cutting, making it near impossible to comment on one area exclusively without commenting on another area.

## **1. 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?**

### **Response from our Consultation**

- The overall response to this question from consultees was that yes, broadly, the vision purpose and values to reflect what they would like to see achieved.
- However, the main feeling was the plan lacked clarity and specifics on how to get there. Secondly, there was thought to be a lack of accountability in the plan. Consultees in our General Consultation noted that the unclear on who would be held accountable – especially as it is not a bill or an Act, and that consequently sanctions are important.
- Consultees felt that the Action Plan would be better if it were to be enshrined in law and have clear links to relevant sections of the law to uphold and reinforce its points.
- One of EYST’s consultation sessions for young people specifically addressed this question, with one young person commenting “Although it is a big goal to achieve, the measures they are planning to do will help achieve the goal.”

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### **EYST Organisational Response:**

We welcome the proposed vision, purpose, values and imagined future presented within the Race Equality Action Plan. However overall, we believe the following barriers may prevent their realisation:

- Lack of clarity of proposed goals and actions.
- Lack of accountability, democratic structures and scrutiny over its governance and implementation.
- Lack of resources to implement actions.
- Lack of commitment and buy in at all levels from senior civil servants to middle managers and front-line workers.
- Passive and active resistance to the REAP’s vision, values and imagined future from some sections of the public including some civil servants and public sector workers.

These risks to progress may be mitigated by:

- Creating a clear framework for action with SMART (Specific, Measurable, Achievable, Realistic and Time-bound) goals, actions and priorities.
- Creating a clear and democratic governance framework for scrutiny of implementation of the REAP and building accountability into Job Descriptions and Performance Measures of Senior Civil Servants to ensure its delivery.
- Ring-fenced budget for implementation of the REAP for at least the current WG term.
- A sensitive and ongoing process of engaging across WG (and from 'top' to 'bottom'), hearing concerns and responding to critique and feedback.
- Ongoing training and dialogue about 'race' and equality issues within a clear social justice framework, supported by an effective public communications campaign.

**2. 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:**

**(a) Does the explanation (narrative / background) make clear why we have chosen the goals and actions in this policy area?**

**(b) Is it missing any priorities, background or other information?**

**(c) Do you agree with the selected goals and actions? What would you add or take away in relation the actions?**

**(d) 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?**

**(e) How could the positive or negative effect be increased, or mitigated?**

## **Response from our Consultation**

- In general, attendees to EYST's consultation sessions viewed the goals as ambitious and worthy, but critiqued the associated actions as being too vague, and in need of more specific commitments, exact timelines and measurements, and the need for 'SMART' (specific, measurable, achievable, realistic and timebound) targets.
- In addition, there was an overarching question of whether and how the action plan

would be properly resourced? Many of the goals will require significant resources for learning and development, including EDI training. Provisions for organisations/ departments to be able to access additional funds to act on the plan needs to be made so that finances do not become a barrier to execution.

## **EYST Organisational Response:**

- Many of the actions seem to be initiatives that are already underway, with some having been in process for quite some time. To be transparent, we recommend that the action plan differentiates between established initiatives which Welsh Government commits to continuing or improving and new initiatives within the action plan.

We will now comment specifically on each the Policy Themes contained within the plan below:

# Leadership and Representation

## Response from our Community Consultation:

**GOAL: The public sector workforce in Wales at least properly represents the population it serves.**

- Relating to the first action point in the leadership and representation section there was consensus that there must be resourced programs to support transition into public/ political life in order to help represent the Welsh population. There should be something to ensure processes to being on boards are accessible. Commitments, provisions, and direct support for individuals through mentoring would also be helpful in the career progression and support of BAME professionals in the public sector.
- Participants lamented however that the action plan is too broad and vague. They commented that, there must be sufficient diversity at all levels, but especially a focus on tackling diversity in the middle tier.
- Additionally, it was noted that there is no clear definition on the scope of positive action – it seems to be seen as just target setting in the ways the actions are written. It was further suggested that the action should go further than seeking key heads/ CEOs to ‘understand positive action’ to mandated implementation.
- Participants noted the action regarding high quality learning and development for up-skilling and empowering under-represented groups to be very vague and not specific.
- Anti-racism training is specified for Ministers and Cabinet members, however, why not for everyone? The point should be expanded to include all staff and made mandatory, it needs to be equally valued to Health and Safety/ Confidentiality training.
- Referencing the commitment to eliciting role models, there must be cautions taken to prevent and avoid the interplay of tokenism and saviourism.
- Furthermore, the action plan comments on appropriate gender balance but does not have consideration of LGBTQ+/ disabled people.

## **GOAL: Senior leadership is representative and inclusive, as are all Boards of public bodies.**

- Senior leaders should also have anti-racism in their performance management as stated for board members.
- Regarding change in corporate culture, it is disappointing that it is seen acceptable that CEOs only need to identify one inclusion and diversity objective with focus on anti-racism – if CEOs, as leaders, are to be held responsible for delivery, then more than one objective is needed.
- 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.
- Regarding resources, it should be made compulsory that a certain percentage of the board be from ethnic minority backgrounds.

## **GOAL: People in public bodies in Wales are anti-racist, with zero tolerance of any form of discrimination or inequality (in the workplace, in the provision of services etc) and provide a safe and inclusive environment for ethnic minority people.**

- The proposed Action Plan learning points needs to be directed at middle managers in addition to senior leaders above and board members. In fact, why not expand it to make it be mandatory for all staff?

## **GOAL: Public bodies use their spending power to improve leadership and representation across the public, private and third sectors.**

- Conditions of grants and public procurement should go beyond incentivising equity by mandating it and making it a clear eligibility criterion that if not met, means the contract cannot be given.
- The action in here about data collection for ethnicity pay gap reporting is not clear in what it has to do with procurement and needs to be expanded and clearer.

**GOAL: Ethnic minority community leadership in Wales is supported by enabling the development of Black, Asian and Minority Ethnic community leaders in Wales, with the intention of creating a wider offer for community leaders from ethnic minority groups.**

- There needs to be a concerted effort to engage with people from communities (not just via leaders), to support into positions to ensure that mandatory positions are taken up. Additionally, they should ensure access to community intelligence for where communities are meeting, where to promote positions.
- Also, there should be an expansion of provision for increased opportunities beyond community leaders to community members.
- Lastly, organisations need to ensure direct clear promotion of opportunities to and for BAME candidates and employees.
- 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. There may need to be stronger commitment from or requirement for public body chairs and appointment panels to taking people in from that pipeline.

**EYST Organisational Response:**

- Overall, we welcome the focus on and foregrounding of the Leadership and Representation Theme, as we view it as pivotal to the success of all other actions and outcomes. Although it is referenced as a cross-cutting theme, we would welcome the inclusion of specific goals and actions on achieving a more representative workforce and leadership to be included in each policy section – currently it is in some sections but not all.
- Furthermore, the focus should be 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 engaging with communities. Many leaders are self-appointed and don’t represent the interests of a whole group. For instance, many of the self-appointed leaders are male and don’t convey the interests of women from that community, disabled people, LGBTQ+ and so on.

- To truly achieve representation at all levels we believe that WG 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.

## Local Government

### Response from our Consultation

*Our community consultations did not focus or comment on this theme Local Government.*

### EYST Organisational Response:

- Overall, we welcome all the goals and actions in this section, however while the introduction to this section notes the important role of education in informing young people to be active citizens in our democracy, there are no associated goals or actions focused on education. 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.
- Furthermore, we note that while the plan mentions working with WLGA, One Voice Wales and Academi Wales to strengthen mentoring schemes, it does not say anything about working with and supporting existing successful mentoring schemes such as EYST's BAME routes to public life mentoring scheme which has run successfully for the last 3 years and will shortly launch as a new intersectional mentoring programme in collaboration with WEN Wales, Disability Wales and Stonewall. We would suggest a specific action on supporting and expanding existing ethnic minority-focused mentoring schemes would be beneficial.
- We would also reference Race Alliance Wales' in-depth report 'Do the Right Thing'<sup>1</sup> on experiences of racialised people in public and political life which gives a range of further specific recommendations including the recommendation to introduce quotas for ethnic minorities in political parties, as also recommended by the Diverse 50/50 Coalition partners which include EYST, WEN Wales, Electoral Reform Society Cymru and Race Council Cymru.

1 <https://racealliance.wales/wp-content/uploads/2021/01/RAW-Research-paper-160121.pdf>

# Health Services and Health Outcomes

Health and Social Care Goals were discussed in three of EYST's six consultation sessions: General session, Older People, and North/West/Mid Wales. As with many policy areas, attendees generally agreed with the goals, often describing them as ambitious, but are critical that the accompanying actions are vague and without specific targets. Also noted, the opening text makes several references to improving policy design, but "you can have 100 policies" which "mean nothing" without effective practice. Participants also noted a challenge to align BME specific policies with those for Wales' general population. The following comments relate to specific health-related goals and actions:

## **GOAL: Leadership and Accountability:**

- There was agreement that people need to identify with their leaders and agreement that achieving goals hinges on leadership at the highest levels but critique that the first two actions are very vague.
- Appointing 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.

## **GOAL: Workforce:**

- Participants recognised the importance of a diverse workforce at all levels but criticised that "things are changing very slowly." One attendee working in healthcare in North Wales referred to "representative workforce" as a buzz word in fashion with many sectors, but with little to show for. They added, "As with Police, it's ticking a box. The communities don't have any belief in what these campaigns are doing."

## **GOAL: Data & Intelligence:**

- There was critique of actions that referred to measuring targets as there is no starting baseline in health boards and organisations. Data collection relating to ethnicity has been poor or non-existent, and without a baseline, how can an organisation measure progress?

- One attendee noted two distinct challenges: 1) data isn't transferred between different health organisations – i.e. GP to acute care to hospital, making analysis difficult and 2) with data gaps on a mass scale, how do health organisations know who they are treating?

## Access to Health Services:

- Participants agreed that accessibility needs to be at the forefront of the action plan but stressed that more explicit and urgent actions must be applied to this goal.
- There must be specific actions relating to effective, consistent provision of interpretation and resources in languages other than English and Welsh.
- '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 BME population.

## Tackling Health Inequalities

- The actions relating to access to services must be more specific with greater urgency.
- Consultation attendees especially called for more explicit actions and outcomes in relation to early access to mental health and dementia care.
- Participants in the Older Person's session stressed the urgent need for a more effective complaints systems 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 BAME people (even when they do complain) and called for BAME Specific Advocacy Services funded by Welsh Government as permanent fixtures in the public/ third sector.
- Participants also noted that tackling health inequalities will require effective engagement with specific communities, e.g. Gypsy, Roma, Traveller communities. One participant referred to 'Unknown unknowns', stressing that to identify the gaps, they need to ask the right people. A representative noted that Hywel Da and other Health boards are now employing outreach workers for engagement work with ethnic minority communities, and she sees initial promise in this approach.

## **EYST Organisational Response:**

### **The five goals do encompass the key priority areas required for transformation. We bring attention to these following points about specific goals and actions:**

#### *Leadership and accountability:*

- First action – “review accountability frameworks for the NHS to make clear the requirements to address racism in all its forms” with an outcome that “there are more levers” – it’s impossible to evaluate the potential impact of a review that hasn’t taken place.
- Re: Action on building a robust pipeline for public appointments by working with Academi Wales and Public Bodies Unit. WG must also work on this with established and previously successful public life mentoring programmes, most especially the “Equal Power, Equal Voice” collaboration between EYST, WEN Wales, Stonewall Cymru and Disability Wales.

#### *Data:*

- The actions around workforce data and intelligence seem quite sound, and we appreciate plans to use both statistical and qualitative data. We also welcome action on the established Workforce Race Equality Standard (WRES) which some reports say has been effective in England.
- However, the actions around service user data and intelligence are very vague and undefined, especially given the scale of the problem. As such, it is difficult to access this action or comment on whether it is deliverable or will be effective in its current form. We would argue that a project to combine qualitative data based on lived experience and quantitative data may go some way to filling gaps. Certainly, there will need to be training of staff around data collection and also building of community trust to provide data.

#### *Access to services:*

- The first action “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” is very unclear as to what it actually means. We would also question the composition of those challenge boards and would welcome the inclusion of individuals external to WG as well as ethnic minority community members.
- 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. Likewise, relevant health authorities should pay close attention to the current Birthrights Inquiry, implementing relevant recommendations which come out of it and to the extent still possible, ensure Wales practitioners and service users are represented in that inquiry. If not already done, 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.

#### *Health Inequalities:*

- We appreciate the actions relating to the MH task and finish group and the Time to Change Wales work. However, the action relating to early entry to mental health and dementia must be more specific and carry urgency. “Exploring ways for earlier entry to mental health and dementia care” is undefined and vague with a timescale of medium term to three years. In addition to a medium to longer term review, immediate and informed stop-gap actions must take place in the interim.
- 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 CVB, 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.
- 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 services’ 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.
- 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.

# Social Care

Social Care Goals were discussed in three of EYST's six consultation sessions: General session, Older People, and North/West/Mid Wales. As with many policy areas, attendees described the goals as ambitious and agreed they encompassed key areas. However, they found many of the associated actions and to be vague and called for set targets and strict deadlines for change. Participants said the following about specific goals and actions and target oriented outcomes in the plan:

## **GOALS 1 and 2 - Access to and provision of social care services:**

- There was consensus throughout the forums that unpaid carers need more explicit action points. "Unpaid carers are left to deal with minor to serious matters on their own, even young carers." The Social Services and Wellbeing Act 2014 guarantees a carer needs assessment, but participants reflected that organisations like Carers Wales cannot fully engage with ethnic minority carers and there are many bridges to build.
- Participants in the older person's forum called for a review of quality of care in outsourced private care homes which they deemed to generally "put profit over people." Some asserted that ideally, Local Authorities should reclaim outsourced private care, but at the very least there should be strong oversight and monitoring of this.
- Attendees agreed that cultural competency is essential to providing person centred care. A few attendees noted that for many BAME people, they may only get positive experiences if staff or service provider is willing to go "above and beyond", as their needs may be complex, or the service provider may need to take extra steps or put in extra effort to understand or meet their needs. Service providers who are willing to do that are the exception rather than the rule. They noted that this does put pressure on service providers who are already stretched. However, participants argued that "going the extra mile" should be ingrained in organisational culture and expected of every worker.
- Focus should be on equality of outcome as well as equality of service. "Equality of service does not 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."

## GOAL 3 - Workforce:

- Must be clear about a commitment to a diverse workforce at the senior level and make provisions to support ethnic minorities' in-career progression and moving through the workplace channels.
- Must require a commitment to eradicating micro-aggressions in the workplace and the current culture of disbelief around allegations of racism.
- Lot of the goals are linked - we need diverse social care workforce (at senior levels too) to make services more accessible and people feeling treated with equality and dignity.
- 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. "It's lacking and it's not representative ... there's no representation at board level." There should therefore be an action to encourage and support ethnic minority individuals to learn Welsh.
- There is a strong argument for positive action in recruitment around race, gender, and disability. For instance, some political parties have run all-female candidate lists. How far can we go in the public sector to redress embedded imbalances? Completely balanced practices such as anonymised applications and equal opportunities monitoring only reduce inequality at a very slow, incremental rate.
- Census data is coming out soon. We need to look carefully at that data and be very transparent about our current board composition.

## GOAL 4 - Leadership:

- There was agreement that definitely, we need more ethnic minority people on social care boards.
- There was consensus that ethnic minority people in social care workforce often find career progress difficult. Organisations need to address why BAME people leave.
- Ethnic minority people face barriers to career progression for example they are regularly told "You're not quite ready yet", by a management team which is entirely White, so decisions are made for BAME people by White people. "We as people of colour are not represented and we're not allowed in positions of management."

## Goal 5 - Accountability:

- Robust, transparent and speedy complaints system. There were calls for resources for dedicated advocacy services “for people to be heard better.” There was also a call for commitment to spreading the word about the powers of the Public Service Ombudsman for Wales and encouraging people to use that office when possible.
- “Very often Social Services seem to be a law unto themselves; a group is required to support users to hold them accountable.”
- Participants also stress the need to address organisational culture and culture of disbelief of BAME experiences in the social care sector and underrepresentation of BAME people in EDI roles and as evaluators in complaints. One person said, “People in power do not like BAME carers or elderly asking questions or challenging them.” Most often the people who judge complaints about racism are White, do not understand what racism is and are remiss to understand an experience as racism, more often taking the side of the social care worker or organisation. When there is a battle of perceptions, the default is that the (White) worker or organisation wins.
- There were calls for 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.

## Goal 6 - Data and analysis:

- There were no specific comments on data and analysis relating to social care, many of the comments in the health section above would apply here.

## EYST Organisational Response:

We appreciate the emphasis on improving data and including lived experience within that endeavour. We also appreciate the dual emphasis on developing the workforce and improving experiences for ethnic minority users of social care services and recognition of the urgent need to close the legislation and policy implementation gap. However, we would note the scale of these issues is large and will require sufficient resources and attention at all levels of social care as well as clear targets and effective monitoring systems to achieve.

- A forthcoming report by EHRC will show the segregation of BAME social care workers into lower paid and less secure positions with private providers (as opposed to local

authority or NHS). A specific action must address this dynamic – both addressing the fact of this stratification and why it is happening but also addressing the larger structural issue that care workers on public vs. private contracts get paid differently (and have differential job security) for the same work.

- We call for specific actions around supporting the progression of ethnic minority workers in Social Care (not simply increasing diversity in workforce). EYST’s previous engagement and research shows that ethnic minority health and social care workers are often passed over for promotion and feel unsafe to raise any grievances or put their head above the parapet in any way for fear of dismissal or recrimination by their employers.
- The REAP pledges commitment to tracking BAME leadership on relevant boards such as SSIW and taking action where they find they need to. We are surprised that hasn’t already taken place considering that the Reflecting Wales in Running Wales strategy has been in place since 2019 - this raises the real possibility that the REAP will become another strategy on a shelf which then lacks any meaningful implementation.
- We suggest that in order to achieve the first goal of ethnic minority people feeling confident to access social care services, a specific action is needed around resourcing effective advocacy services for ethnic minority people to raise complaint and seek redress when they feel that social care services have not met required standards of care.

## Education

The education goals were discussed in most of EYST’s consultation sessions and when polled, attendees identified education as one of their top priorities amongst all the policy sections. There was broad agreement with the goals overall, however, participants also called for clearer, sharper actions, outcomes and deadlines relating to training and implementation of new practices. They asked the questions – Who is monitoring? Who is implementing? Below are some of their comments as they relate to specific education related goals and actions.

**GOAL: To improve the experiences of Black, Asian and Minority Ethnic learners and teachers in schools by taking an inclusive and anti-racist approach to teaching and school experience.**

**On racist incidents in schools:** Stronger mechanisms and increased competence to address racist incidents and racial bullying in schools were extremely important to

participants in all of EYST's consultation sessions. One pupil who attended EYST's session for under 18s said, "My goal is to go to school but not receive any racism." Another child called for "more teachers who can deal with racism." There were many comments about the repercussions of teachers not understanding, failing to perceive or ignoring racism in schools and assertions that teachers must be trained to deal with racist incidents with competence and compassion but also that their worldview and attitudes need to change to understand the impact on pupils and the importance of addressing incidents head on each time. Importantly, several people noted that some teachers can be racist, with one child sharing that his friend had experienced racism from a teacher. It was noted that many children are scared to tell teachers that they are getting bullied. One mentioned that reporting can spur on worse bullying and being labelled a "snitch." Children fear being ostracized and having to deal with the social repercussions which is worse for minoritized children in the classroom/school. There was consensus therefore that the "Rights, Respect, Anti- Bullying Guidance" should be strengthened with the following additional points:

- To acknowledge how hard it is for children to come forward to report racist bullying and therefore to underline the importance of robust and safe mechanisms to report bullying in the school structure, which needs to become mandated by the Welsh Government. There was explicit mention of 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.
- A group of young people felt that experiences of discrimination and racism shouldn't be labelled as teasing, or regular bullying and that there should be a specific guidance for racist incidents, separate from the bullying guidance. They stressed that schools need to introduce safety and protection to the students, because the racism and discrimination makes them feel dismissed, ignored and unsafe.
- Having people who are trained and know how to facilitate necessary discussions on race and racism is very important.

### **On Curriculum:**

- Consultation participants agreed with the actions around ensuring that ethnic minority pupils see themselves reflected in curriculum content and that all pupils in Wales learn about the contributions of diverse people to Wales' society. There were many calls for more recognition within the classroom, both so pupils of colour have role models and to foster increased respect and understanding amongst all school children. There were also calls for teaching and celebrations of non-Eurocentric culture to go beyond tokenism or brief lip service. One child said, "We [celebrate] Christmas for the whole of December, but it would be nice if Eid and other celebrations were a lot more acknowledged."
- Another child noted that "Schools should teach pupils about different hairs and cultures", which also underlines the need to address uniform policy to take account of

the diverse experiences of racialised students and their cultural and ethnic needs, for instance hair braiding.

- Children also called for anti-racism and anti-bullying education in the classroom and also for bystander training in order to help bullied children who are scared to talk.
- Participants in a young person's session want more talks dealing with racism such as microaggressions, but noted a challenge relating to this goal in that their teachers tend to avoid subjects around racism.

### **On Attainment:**

- There was a query about how Gypsy, Roma and Traveller people would be consulted in the plan to raise their attainment.
- Several people called for an action specifically addressing the impact of Covid, school closures and online learning on attainment. They noted the disproportionate negative impact on pupils in low income families, asylum seeking families, in overcrowded houses or who were digitally excluded. One child said, "I found it hard for learning online because I didn't have any help." Another said, "Since lockdown I feel everyone including me and my friends are running at different paces."

**“My goal is to go to school but not receive any racism.”**

**GOAL: To improve the diversity of the teaching workforce and embed anti-racist professional learning**

- EYST consultation participants generally welcomed this goal and agreed this is an important goal to achieve, with particular focus on this from young people and children. One child said, "I would like a lot more diverse teachers ... a lot more."
- Participants also called for teachers to be better educated, trained and have better understanding regarding race and racism as well as current issues, with one child specifically referencing the need for culturally competent teachers.
- Attendees also stressed the importance of training for teachers to respond to racist incidents. However, many attendees wanted to see clear timelines for development and implementation of this training.
- Consultees also called to see plans for positive action on recruitment.

## **GOAL: To improve understanding of diversity and racism in the wider education sector**

- Consultees stressed the point that SMART 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.
- They agree the manner in which ESTYN evaluates diversity, inclusion and equalities in schools must be overhauled. To date, ESTYN inspections have given short shrift to equalities considerations, even though it has been a field they should have been evaluating.
- Staff in the wider education sector, including ESTYN staff, should also become more diverse through positive action in recruitment if necessary.
- 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. Examples such as hair braiding, long hair for Sikh men and henna.
- Gaslighting is also common in the classroom and needs to be addressed as it makes the classroom experience for BAME students tiring and uncomfortable.
- In our youth consultations, there was explicit mention of a need for safe spaces where ethnic minority pupils could go and get help, and that these should possibly be facilitated by youth workers instead of teachers, as these relationships need to be based on trust.
- More voices of the communities are needed – for example as governors – to highlight cultural needs, however, there is the need to remember to implement policy as it means nothing unless it is implemented rigorously by organisations.

## **GOALS relating to Further Education**

- Participants in EYST consultations didn't specifically reference the goals around further education.

## GOALS relating to Higher Education

- One young consultation participant suggested University scholarships should be made available specifically for low-income ethnic minority people.
- Another young person observed that websites where young people can report sexual harassment anonymously have been known to work, so employing similar tactics for racial discrimination in universities will shed a light on what is occurring in HE institutions in Wales.
- The overall concern was that Universities and education systems should be held more accountable for racism in their institutions and there should be a clearer framework in place to address it, as well as a stronger regulatory framework including HEFCW, ESTYN and other public bodies.

## EYST Organisational Response:

- We are glad to see several of the recommendations that EYST made in its 2018 paper “Experiences of Racism and ‘Race’ in Schools in Wales<sup>2</sup>” reflected in the REAP’s education goals and actions, including actions on decolonising the curriculum and strengthening teacher training around racial literacy, as well as actions around strengthening schools’ response to racist incidents, regular anti-racism education and diversifying the workforce.
- The actions in the REAP also show welcomed synergy with recommendations put forward in Race Alliance Wales’ recent paper “Show us you Care: Exploring the cumulative impact of racism on racialised young people in Wales’ education system.<sup>3</sup>”
- The biggest gap in terms of current actions is that there is insufficient focus on improving the response of schools to racist incidents. We suggest that:
  - Guidance to schools on how they should record and response to racist incidents should be clarified – Welsh Government should mandate the recording, reporting and monitoring of racist incidents in schools, even if it requires a change in legislation.
  - Training on implementing the guidance should follow.
  - There must be more awareness and empowerment for students to report racist incidents, including as bystanders.

2 Wiegand, G., & Cifuentes, R. (2018). Experiences of Racism and ‘Race’ in Schools in Wales. EYST Wales: <http://eyst.org.uk/assets/experiences-of-racism-and-race-in-schools-in-wales.pdf>

3 Abramson, et al. (2021). Show Us You Care: Exploring the Cumulative Impact of Racism on Young People in Wales’ Education System. Race Alliance Wales: <https://racealliance.wales/wp-content/uploads/2021/04/Show-Us-You-Care-Full-Report-1.pdf>

- The guidance should be clearer on discipline and sanctions relating to racist incidents. EYST team members regularly hear about ethnic minority pupils being disciplined when they have been victims of racist attacks – that needs to be addressed in guidance.
  - An independent body should be created which can support both schools and pupils or parents when cases need to be escalated.
- We welcome the proposed action on a working group on disproportionality in school exclusions and the proposed inclusion of ethnic minority school pupils – this group needs to sit within a strong governance and accountability structure if it is to have any power to achieve anything.
  - We welcome the specific action acknowledging the important role of youth work. EYST’s long history of providing targeted youth work programme to ethnic minority young people across Wales supports this stance, however such work needs to be sufficiently resourced through ringfenced funding for Youth work within Local Authorities – WG may wish to review current funding arrangements with Local Authorities on youth work.
  - EYST welcomes the acceptance and commitment to implement all recommendations from the “Contributions and Cynefin” working group chaired by Professor Charlotte Williams, an important report with a holistic and cross- cutting set of recommendations. However it is crucial to adequately resource this work, to link it with existing wider work on diversity in the curriculum, to publish transparent milestones and deadlines for its implementation and to effectively monitor and regularly report on progress. Evaluation should include parent, pupil and teacher voice as well as objective measures.
  - We welcome actions around Welsh medium education most especially the action about the challenge to partners such as Urdd to ensure they promote and embody racial and ethnic inclusivity when promoting the Welsh language. Equally, specific steps need to be taken to give more ethnic minority people accessible opportunities to learn Welsh – especially given recent WG announcement that ALL future jobs will require basic Welsh skills. EYST is currently working on a commissioned piece of work by Coleg Cymraeg Cenedlaethol to explore attitudes to and experiences of Welsh language amongst young people including Welsh and non-Welsh speakers.
  - Teacher training and diversifying workforce should be two separate goals - they are quite different and entirely separate.
  - Teacher training – this must be ongoing, properly resourced and there must be a way to measure effectiveness that includes pupil and parent voice as well as independently evaluated objective measures such as quality of curriculum content, handling of racist incidents, etc.

- On diversifying workforce – we should not underestimate the opposition (amongst some teaching professionals) to BAME teachers. Like other manifestation of institutional racism, it can be hard to spot, but is often entrenched in the institutions, and clearly felt by many BAME teachers. We have heard examples of BAME teachers who can't get their ideas to be tried whereas even junior White counterparts get their ideas taken up, etc. In the words of one previous educator, "Getting hired is hard – being taken seriously, treated with respect and progressing in career is even harder."
- The aim to diversify workforce through whole of Wales is welcomed, but this should be done incrementally with an initial focus on achieving that diversity within those areas with most diverse pupil populations.
- The proposed action 'We will also make increased use of digital means to increase the number of learners who are taught by Black, Asian and Minority Ethnic teachers' may be counterproductive in the long run, as it may be used as a quick win, lowering efforts to increase the diversity of school teachers.
- Currently, the majority of the BAME workforce in education is at lower levels, such as teaching assistant - there should be a specific action around progressing and supporting teaching assistants to become qualified classroom teachers as well as financial incentives for ethnic minority people to enter the teaching profession (similar to the financial incentives offered to science and maths graduates).
- Due to a lack of current opportunities and restricted accessibility of the opportunities which do exist, there is a brain drain of young BAME teachers – going to London or other parts of England. WG should clearly communicate how valuable BAME teachers are particularly in schools with high BAME populations, and schools should in turn communicate that to the teachers themselves.
- Low turnover in schools means few progression opportunities. The hierarchal structure of schools leadership and decision making is in itself holding BAME junior teachers back.
- In addition to providing PSED and anti-racism training to school governors, there should be an action around recruiting more Black, Asian and minority ethnic governors.
- On mental health and well-being initiatives in schools – for ethnic minority pupils, it will be beneficial to fund specialist BAME organisations to deliver these. There is evidence that BAME pupils are less likely to access mainstream counselling services, and often get referred to third sector organisations (like EYST) to support.
- An additional action required is 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, we know some schools in Wales have had uniform policies that unfavourably impact Black pupils, particularly in banning specific hairstyles.

- Relating to Higher education: It is imperative that institutions and departments within institutions create action plans for addressing attainment gaps and that annual data are posted on attainment gaps (at both institution and department level) as well as outcomes for graduates of each Welsh HE institution.
- EYST team members with a great deal of experience working in schools have emphasized that it is important not to underestimate “the heavy weight of the status quo” in terms of making transformations in education. This applies in relation to transforming the curriculum, training teachers to be racially literate and effective at recognising racism as well as treatment and progress of ethnic minority educators. They stress there is a vast amount of distance to be travelled, that there will be some leaders and teachers who are resistant to change and that culture change is required in addition to policy change. The schools that are likely to be most resistant are those that have the farthest distance to travel in becoming anti-racist organisations.
- SMART performance indicators on every level, effective monitoring systems and ongoing support will be key in implementation of the action plan.

**“Getting hired is hard - being taken seriously, treated with respect and progressing in career is even harder.”**

## Employability and Skills

Employability was discussed at the following EYST-organised consultation sessions: the general session, and one session with younger people. The most salient message received was the need to consider the divergent needs of different ethnicities and not treat them as a homogenous group.

## **GOAL: To improve accessibility, relevance and performance data associated with programmes to deliver better outcomes for ethnic minority groups in relation to Welsh Government Skills Employability programmes.**

- Regarding looking at the statistical data that Welsh Government and associated bodies currently hold, the plan needs a clear remit on what specific data has been and will be measured – for example, the experiences of Bangladeshi men differ from that of other ethnic groups and also from Bangladeshi women. Is there capability to explore what kind of data has been collected and if it can be disaggregated in such a way as to be meaningful and not lump people together? If so, stipulations for such need to be made in the action plan.
- As well as gathering statistical data and making comparisons, Welsh Government and associated bodies also need to look at that data with expert race equality organisations to understand the story behind it, so we can further understand how to change it. Getting into the data is not just about counting, it's also about making meaning, which requires an understanding of people's experiences and situations.

## **GOAL: Supporting people from Black, Asian and Minority Ethnic communities through Community Employability Programmes.**

- One participant argued that employability programmes should be paid, especially for those from lower socioeconomic backgrounds.
- 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 then who do have significant skills and experience, but perhaps gained in another country.

## **GOAL: Support ethnic minority people undertaking Apprenticeships.**

- One participant stated that for apprenticeships “Where WG advertises and how is important” – there are many opportunities for engaging young people, especially from low socioeconomic backgrounds. For instance, the wage may be low, but they can build transferable skills – however the current advertising is not being done in the right way.

- Websites and traditional forms of marketing are often in inaccessible language - when one consultee asked if there is a central database of opportunities, another noted there is, but it is difficult to access and understand.
- One young participant called for WG to implement a target for apprenticeships for BAME people.

## **EYST Organisational Response:**

- Overall we found this section to be relatively weak compared to other sections and overly generic in its proposed aims and actions. The overall aim of the WG Employability Plan ‘delivering an individualised approach to employability support, and promoting inclusivity, requiring organisations who deliver our programmes to demonstrate commitment to diversity, inclusivity and equality’ is surely something which should be happening as a minimum requirement anyway.
- We are also surprised to see the introductory section mention the creation of one EDI role within Apprenticeships – this is a drop in the ocean and suggests that the scale of the challenge has not been fully taken on board.
- The language of this section shows an evident lack of co-production to date in the design and delivery of employability programmes – there is acknowledgement of lack of awareness amongst and lack of reach to ethnic minority communities – but no recognition of why this has happened – undertaking an ‘anti-racist review’ or with ‘anti-racism as a lens’ should be more specifically defined as to what this means in practice.
- 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. WG 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.
- In relation to the goal around collecting and analysing data from employability programmes –we would have assumed that this is already in place particularly for large programmes such as Communities for Work and Working Wales – so the question is what if anything additional is being committed to and how will this make a difference?
- We welcome a focus on the efficacy of Careers Wales and Working Wales in reaching and supporting ethnic minority people effectively, but suggest 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.

- The goal to 'Test new employability approaches to anti-racism' – should that be 'test new anti-racism approaches to employability'? Furthermore, the actions for this goal should specify that they will be carried out collaboratively with ethnic minority-led groups.

## Social Partnership and Fair Work

### Response from our Consultation

*Consultees did not respond specially to this section.*

### EYST Organisational Response:

**GOAL: We will improve workplace compliance with equality law and tackle workplace discrimination, bullying and harassment from recruitment practices and right through the career ladder.**

- We welcome the proposed focus to improve collaboration with the EHRC and other enforcement agencies but suggest that a further action is needed to strengthen the existing provision of employee advice to enable non-unionised ethnic minority employees to raise workplace grievances in the first place without fear of reprisal – in this regard we bring attention to the BAME Multilingual Helpline which has recently received continuation funding (from Lottery funding) and will be led by EYST in partnership with Citizens Advice Cymru, Promo Cymru and Women Connect First – and should continue to be supported and promoted by WG.

# Entrepreneurship

## Response from our Consultation

*Consultees did not respond specially to this section.*

### EYST Organisational Response:

- Under the goal 'To ensure that contracted Business Wales services are reflective of the population of Wales', we particularly welcome the specificity of the action 'New tenders to deliver Business Wales services will include a requirement that asks bidders how they aim to reflect the demography of the population they serve in their client base and staffing, in particular for public facing roles such as advisors and mentors' and would like to see a similar action specified across the REAP for all major WG contracts and programmes.

# Housing and Accommodation

Housing and Accommodation Goals were discussed in two sessions: general consultation session and the session with children under 18.

## Response from our Consultation

### On Diverse Workforce:

- Participants noted that organisations may need guidance on achieving a more diverse workforce, especially in recruiting in geographical areas outside Swansea, Newport, and Cardiff. One action point may be developing 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.
- Children consulted noted that:
  - Disabled people need more access to appropriate housing
  - There aren't enough houses for poorer people in particular
  - We need more police patrols to reduce anti social behaviour

## EYST Organisational Response:

- In general, we welcome the overall aims focused on achieving a more representative workforce, increased race awareness, better engagement with minority ethnic tenants and tackling poverty. However, the proposed actions lack any focus on the fourth aim of tackling poverty. In fact spiralling housing costs is a key cause of poverty so we recommend actions should include a wider review of the cost of rental costs in Wales, and any mitigating actions which WG could put in place.
- In terms of representative workforce, the proposed actions should go further - If WG is serious about achieving an Anti-Racist Wales by 2030 it should mandate that all boards of organisations including Housing Providers which receive any funding from WG should be reflective of the communities they serve by that date – 9 years is plenty long enough to achieve that.
- In terms of training and building cultural competence of housing providers, this is welcomed however this training should always be done by and with ethnic minority people and organisations, should be face to face not online, and should always be done alongside not instead of proactive steps to achieve a more representative workforce. It would not be acceptable for an all-male board to receive gender equality training and for this to be seen as progress towards gender equality. The same is true of all-white boards in terms of race equality.
- There should be a specific goal about meeting the housing needs of the growing ethnic minority older population, including reviewing the need for, effectiveness and sustainability of culturally specific sheltered housing (for example, Red Sea House in Cardiff and Swan Gardens in Swansea), and forecasting future needs.
- WG should require that housing advice providers who receive WG funding e.g Shelter, CABs) create specific roles for people who speak different languages, understand racism, and can meet the needs of ethnic minority people. A review of the Advice Fund should assess to what extent this fund is meeting these needs.
- Housing providers should also be mandated to undertake and publish an ethnicity pay gap review, as part of a wider salary review and pay gap exercise – there seem 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.

# Culture, Heritage and Sport

## Response from our Consultation

- Participants noted the lack of SMART targets making it difficult to measure progress towards these.
- The second Goal of Funding was noted as being vital, and it was felt that funders in particular should be encouraged or required to support small projects run by small organisations “instead of giving funding over and over again to large and established organisations.”
- Furthermore, there is a need to distinguish between specific BAME groups and target specific actions towards specific racial groups, celebrating difference and making sure it is most suited to community rather than generalisation is so important.

### On Culture:

- Surrounding the culture of racism, it is not enough to say that racism is not tolerated, that is not to say that that isn't important, but how are you going to support that? Welsh Government need to be more open about Wales' racist past and the worse sides of history should be known to better understand.
- The use of language is also important and action should be included around maintaining anti-racist language in advertising and public spaces.
- Furthermore, for older young people, creating non-alcohol-based spaces and events to take part in Welsh culture would help BAME people feel more involved in Welsh life.
- Unconscious bias training should also be employed to make sure that these spaces are not ones in which racism is being reproduced.

### On Heritage:

- When asked 'What does a good representation of a diverse Wales look like?', participants commented that celebrating Welsh culture is good, but it needs to be made more accessible and intersectional. The example was given of the Eisteddfod in particular and Wales in general, they both have a rich and diverse history that is not as whitewashed as it is made out to be, and which needs to be explored and showcased.
- National events to encourage BAME participation in Welsh culture would help too, like a national Eisteddfod or other event types that encourage diverse interpretations of what it meant to be Welsh.

- Consultees noted that an additional action point should be around ensuring a social media presence and marketing which is anti-racist would be helpful.
- Intersectional community hubs/ events that redefine what it means to be ‘Welsh and X’ would be helpful in helping community ties.
- Public life should be accessible to everyone including things such as cultural holidays, uniform policy, and access to cultural foods.

### **On Sports:**

- There needs to be 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.
- Harassment towards BAME people in sports has resulted in racialised people feeling discouraged from participating in sports.
- It was widely agreed that specific initiatives that encourage women and girls to join sports are needed and should be stated in the action plan.

## **EYST Organisational Response:**

- We support all of the proposed goals and actions in this section and welcome the proposed framework. The only additional but important point we would make is that there is heavy reference across this section to involving and engaging with 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.
- 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 diverse population and to embed anti-racist objectives into its ways of working and business plans.

# Hateful Attitudes

## Response from our Consultation

The topic of hate crime and hateful attitudes was discussed at most of the consultation sessions:

**GOAL: 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.**

- Consultees agreed with the goal of becoming an anti-racist country and said that for that to happen we need to tackle institutionalised racism which acts as a protective wall for those with hateful attitudes.
- Some made the point that the REAP should be more specific about what is meant by ‘perpetrators’ and ‘bystanders’ – is this the general public or not?
- Furthermore, while the aim to better support victims of racially motivated hate crime was welcomed, there was widespread feeling that it was not often worth reporting hate crime, with the burden of doing so greater than what they expect to gain. One person said “I’ve stopped reporting hate crime as it’s a waste of time and I’m just a crime reference number.”
- In terms of hate crime reporting and supporting there is a need for better systems in place for when things go wrong – there is a need to promote the pathways that exist - but also improve those pathways too.
- Regarding hate crime, it is not only victims who need to report more, but police also need to record hate crime more accurately and also improve the way they respond to cases and interact with victims.
- Another point made was about the over saturation of white presenting people in Equality, Diversity, and Inclusion roles – this impacts people of colour as white people are then responsible for determining if racism occurs, there needs to be a process to let BAME people decide if an incident is racist or not.
- Improve training for all frontline public sector workers around diversity and inclusion and make it mandatory across Wales. Specifically, anti-racist training is needed that is not a tick-box exercises that is embedded, enacted, and practised with accountability to demonstrate effectiveness.

- Interventions for perpetrators must focus on outcomes.
- Respondents in our consultation with participants from mid and West Wales stated that they would like to see more concrete actions taken in response to hate crime - for example the action taken by some Premiere football clubs to have a blackout on social media to protest racist trolling was given as a positive example to follow.
- Participants noted the importance of space for conversation about hate crime and sharing positive experiences. One participant gave the example of footballers as role models taking the knee and how this had provoked many positive conversations.
- It was widely agreed that schools in particular need to do more to challenge and prevent hateful attitudes; it was felt that currently the norm in schools is to ignore or deny racism.
- The vast majority of YP within the forum agreed to having been exposed to a hateful attitude in their life e.g. school, home, shopping. They noted that young people are scared to talk about or report these incidents for fear of retribution or social ostracization.
- In terms of bystanders, there needs to be a concerted programme to equip individuals in how not to be a bystander, because human nature is not to step in. One person noted they had received excellent training on allyship for LGBTQ+ people followed by positive action.
- Participants remarked that the people putting together REAP are coming from a good place, however the REAP will however fall on its face unless people at the very top will take action. How do 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? Public Sector leaders by no means have the reach and influence of footballers e.g. taking the knee - but they do have some. Do they do enough with it?

## **GOAL: Tackle racism through building cohesive and integrated communities.**

- It was suggested that the requirement 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. It was widely agreed that leaders have a strong responsibility to lead by example and “it doesn’t help if our leaders are advocating hate speech.” Some stated that government and public leaders need to be more confident to reject far right views too.
- A few community cohesion representatives from Powys, West Wales and NW Wales pointed to rising English/ Welsh tensions including some tension around the language

but also around ownership of second homes.

- The vast majority of children consulted reported having been exposed to a hateful attitude in their life e.g. school, home, shopping, but that those experiences had never been taken seriously, reported or responded to.

## **EYST Organisational Response:**

- While we understand that Criminal Justice is not devolved, an additional action should be for WG to work more closely with Criminal Justice partners – perhaps through the Hate Crime Board Cymru - to examine and understand the experience of victims of hate crime and how it can be improved. The current REAP focuses quite narrowly on the role of Victim Support/ the Wales Hate Crime Support Centre, whereas, this can only function as at best a sticking plaster on a wound. Initial police response, CPS and the Judiciary's role in dealing with hate crimes and incidents should be examined and strengthened.
- We welcome the proposed action to develop work with hate crime perpetrators to better understand how to reduce racial abuse – however we would like to know more about this and how ethnic minority people and groups will be involved in this –the envisaged scale or timescale of the proposed work should also be clarified.
- In general, links between 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 BAME group should not be expected to represent the diversity of the sector.
- 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 this plan.
- The goal of tackling racism through building cohesive and integrated communities should go beyond a narrow focus on the WG's Community Cohesion programme and officers. An additional action should be to undertake a review of all WG funded programmes to assess their potential impact on Community Cohesion – similar to an Equality Impact Assessment. For example, the WG's significant funding to supporting Volunteering and the Voluntary Sector has clear links to community cohesion. So does funding for Supported Housing and Violence against women. Additionally, public bodies should be reminded of their duties under the Public Sector Equality Duty, the Socio-Economic Duty, and to specifically consider the community cohesion impacts of

their funding decisions and delivery models.

- We welcome the review of the WG's Community Cohesion Programme – any revised programme should have more clearly defined objectives which align to those of An Anti-Racist Wales. Currently the Community Cohesion Coordinator roles are spread very thinly as they try to cover all the protected characteristics.
- To improve community cohesion, the importance of making community spaces available – In EYST's 2018 "Belonging and Living in Wales" report (based on surveys from 143 ethnic minority respondents from across Wales, many noted the lack of community spaces for neighbours to congregate as detrimental to community cohesion. Likewise, many also blamed shortage of funding for community groups as a result of austerity.
- We welcome the development of a CJiW race equality plan, but also suggest that each partner/arm within the CJiW partnership board should also develop its own REAP (ideally in collaboration and alignment with each other). Data collection, understanding baselines and understanding the stories behind the baselines should be a big part of this.

## Welsh Language

### Response from our Community Consultation

- There was considerable feeling amongst consultees felt that increasing requirements for Welsh language in particularly for public sector jobs were discriminatory and presents a barrier to people from ethnic minority backgrounds who were far less likely to have this skill – in contrast, they welcomed examples of job adverts where the requirement was for a 'willingness' to learn Welsh while on the job.
- It was also felt that opportunities for people from ethnic minority backgrounds to learn Welsh should be increased.

### EYST Organisational Response:

- In addition to the above comments, we suggest that the WG'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.

- Furthermore, all WG jobs should include on the job opportunities to gain Welsh language skills.
- In relation to commissioning research on the attitudes of ethnic minority people towards the Welsh language, we would draw attention to the piece of research with EYST are currently undertaking on behalf of Coleg Cymraeg, into the views and experiences of young ethnic minority people towards the Welsh language and Welsh medium education – expected completion date Oct 2021.

# Environment

## Response from our Community Consultation

- The experience of the covid pandemic has brought increased awareness of the importance of access to countryside and greenery as a wellbeing factor. Much of the population struggled in accessing green spaces, particularly those who live in poorer areas, with fewer green spaces and financial constraints to accessing public transport.
- We need stronger commitment to reducing or subsidising the cost of public transport, as green spaces are otherwise inaccessible especially to those living in rural areas.
- Marketing of rural and green destinations across Wales needs to be made more welcoming and inclusive to people from ethnic minority backgrounds.
- The REAP needs to do more in specifically addressing climate change and the disproportionate effects it has on poor and ethnic minority people e.g. the links between pollution and asthma.
- Social housing, which has high levels of ethnic minority tenancy needs to improve planning to ensure better access to green spaces.
- An additional environmental consideration for housing and the environment should be proximity and access to culturally specific food and places of worship.

## EYST Organisational Response:

- It is disappointing how short this section is compared to other sections, and it suggests that the importance of environment in determining life outcomes is sufficiently understood or recognised – in fact the brevity of this section is illustrative of the wider problem which is the gulf between the environmental sector and the race sector or

between 'green' and 'brown' issues.

- In fact WG's programme for government presents clear opportunities for ensuring meaningful engagement of ethnic minority communities in its focus on the climate and nature emergency.
- WG should scrutinise the work of Natural Resources Wales and that of the Wales Public Body Equality Partnership to identify any opportunities to integrated anti-racist objectives into their respective work programmes and regulatory framework.
- The Future Generations Act requires WG to act in ways which safeguard our future generations and this should fully involve ethnic minority people – 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.
- 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.
- More research is needed on the impact of environmental racism – better data is needed on disproportionate health impacts of environmental factors including air pollutants, (in)access to green spaces, proximity to brown sites, waste treatment plants, industrial areas or motorways.

## Cross-Cutting Issues

- In relation to the action about having a single 'map' of ethnic minority communities and groups, we would reference the online map<sup>4</sup> which has already been created by us via our All Wales BAME Engagement programme and is currently in the process of being updated (completion date August 2021).
- We would also comment that any such maps need to have an annual refresh in order to ensure they remain current – and this needs to be appropriately resourced.
- In relation to reviewing funding approaches, we would add that there is a body of expertise within the Wales Funders Forum, WG's Grants Centre of Excellence and the TSPC Funding and Compliance Subgroup which should all be accessed with a view to undertaking a Wales wide review of funding for the race sector.
- The goal around improving support for complainants and victims of racisms should

4 <http://www.eyst.org.uk/bame-map.php>

include undertaking a wholesale review of WG 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 WG-funded Advice Services. - the point is money is already spent by WG for these services but they are not accessible or effective when it comes to ethnic minority people.

- The goal on Volunteering should include an action to review the impact and scope of the WG funded Volunteering in Wales Grant programme managed by WCVA, and how it can be better shaped and focused in the future to increase support to ethnic minority volunteers.

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

See Above.

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

*Need to define 'Anti-Racism'* - Anti-racism is used as term throughout, but there is no definition given of what this means in practice or what the principles of anti-racism are (not just 'not racist' / 'not discriminatory'), not even in the terminology appendix of plan. Especially when related to processes, policies, and behaviours, to be able to hold to account it must be specific and detailed to use it to critique.

*What makes this different?* In every consultation session, bar the ones for children or young people, participants observed we've had so many conversations like this without change – why should people believe this one will be any different?

*REAP as a 'tick box' exercise?* Many participants referred to the danger of actions relating to the REAP becoming tick box exercises and several referred to observed or expected resistance to change.

*Danger of Homogenising* – It was noted that in fields of health, education, employability and skills, there must be attention to dynamics, outcomes and experiences of different ethnicities and different solutions for specific ethnicities. It is also important to consider different sexualities and abilities but also importantly, diversity within the BAME category, ensuring that voices from different communities and identities are heard. This should be specific if the WG are to truly lean to intersectionality as racism oppresses different sub-sections of BAME people differently.

*Positive Action* - There is no clear definition on the scope of positive action – it seems to be seen as just target setting in ways actions written – also the actions should be stronger and should go beyond increasing understanding to mandated implementation of positive action.

## **EYST Organisational Response:**

- A good deal of the outcomes and actions are vague – Many of the outcome are high, level aspirational (almost vision type) outcomes, but in many cases the incremental steps and milestones in the journey between actions and outcomes is not addressed. (Risk of becoming “pie-in-the-sky” rather than a clear path with milestones that can be tracked and evaluated.
- There are multiple references to reviews that have yet to be undertaken or strategies yet to be written (e.g. Under Tackling Health Inequalities: ‘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 CVB, 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’). It is impossible to evaluate the impact those will have, or if the actions that come from them will be deliverable or if they will result in expected outcomes By adopting such a meta- approach, the plan risks becoming devoid of detail and tangible measures.
- Perhaps the biggest challenge to the plans’ implementation is the lack of specific commitments on resources to do so - where, when and how will the money to deliver the plan be made available?
- Implementation gap – there is a significant and increasingly conspicuous implementation gap between Welsh Government policies and strategies when compared to practices and programmes. How do Welsh Government propose to address and avoid this? For instance, what has come of Reflecting Wales in Running Wales – in the past two years?
- How to turn a big ship? A potential barrier and challenge is the weight of the status quo and resistance from established leaders and senior civil servants in continuing to do things they way they have always been done.
- What about the middle managers and front-line workers? There is a strong emphasis on leadership which is needed – but it is not clear how the actions will be applied to the different tiers – middle tier managers and frontline workers – ultimately it is the frontline workers that will impact most directly on the experiences of services for people.

**5. 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?**

**Response from our Consultation Session:**

- Participants in EYST’s general consultation session noted that there is an overarching question of whether and how the action plan will be properly resourced. Many of the goals and associated actions will require a lot of money for learning, development and training – all of which will also require devotion of staff time. It is imperative that organizations/departments have access to additional funds to implement the plan. Otherwise, lack of funds will become a barrier to execution.
- They also noted that different resources are needed to engage with different communities and people: “People have different ways that they like to be engaged with and responds to different things, therefore, if there is alternative information or material that needs to be clear.”
- Accessibility needs to underpin everything that is done in the action plan and all types of work moving forward. – including consideration of access needs of disabled people, LGBTQ+ and all other protected characteristics.

**EYST Organisational Response:**

- To truly achieve this vision, every single Welsh Government programme and area of work needs to be aligned to the REAP with specific actions identified and integrated into the ‘business as usual’ of WG. This is a mammoth task, but is the only way in which an Anti-Racist Wales can be achieved.

**6. 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?**

**Response from our Consultation Session:**

- The paper lacked reference throughout the whole document to socio-economic disadvantage and poverty especially as it has been a key factor arising under Covid-19.
- LGBTQ+ and Gypsy, Roma and Traveller needs need to be more explicit especially

because of the multiple disadvantages experienced by people at these intersections, for example asylum seeking LGBTQ+ people.

- A further note concerning consulting with BAME people of all ages and gender. This process should also consider different sexualities and abilities but also importantly, diversity within the BAME category, ensuring that voices from different communities and identities are heard. This should be specific if the WG are to truly lean to intersectionality as racism oppresses different subsections of BAME people differently.
- We need to remember that the overall population is made up of diverse sectors including age, gender, sexuality etc. The REAP needs to continuously look to support all intersections and improve access and resources to services - we need a shift to a more inclusive vision and mindset.

## **EYST Organisational Response:**

- There needs to be more focus throughout on the impact of poverty and a specific action should be for WG to mandate the Real Living Wage in all of its directly funded or subsidised programmes.
- The plan seemed to prioritise gender over other protected characteristics (other than race) and it would be helpful to specifically mention and other protected characteristics wherever one specific characteristic is mentioned.
- Also although intersectionality has become the latest fashionable term, it is important to remember we are talking about multiple disadvantage and multiple barriers contributing to systemic inequality.

## **7. 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?**

## **Response from our Consultation Session:**

- Senior leadership across Welsh Government must take this on fully, and there must be SMART targets throughout.
- The Action Plan is also unclear on who would be held accountable – especially as it is not a bill or act – sanctions are important. The Action Plan would be better if it were to be enshrined in law / have clear links to specific sections of the law to uphold and

reinforce it.

- In terms of accountability for implementation, organisations need to be held to account in relation to their equality and employment data including their ethnicity recruitment and progression rates and ethnicity pay gap.
- More BME people are needed as senior leaders and as board members. More voices of the communities are needed highlighting cultural needs, however, there is the need to remember to implement policy as it means nothing
- Policy means nothing without implementation, and regulatory bodies must play a key role – People were very worried about it all falling apart due to lack of accountability and a current lack of clear sanctions for lack of implementation.
- For example, 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 BAME employees to senior positions.

## **EYST Organisational Response:**

- ‘We plan to change the Steering Group, which has overseen the development of the plan, into an Accountability Group’. The document sets out that the Steering Group will be turned into an Accountability Group – what is this change beyond a change of name?
- How will membership of the Group be decided? How will this be democratic? How will be people of diverse backgrounds and intersections be represented – especially people from lower income groups – all of these questions need answering.
- 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.

**8. 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?**

In order to not further disadvantage ethnic minority people from gaining and progressing within employment and progressing within public and political life in Wales, it is important that efforts are redoubled to offer Black, Asian and ethnic minority people opportunities to learn and improve their Welsh.

It is also recommended that WG consider widening their approach to one which supports not only bilingualism in Wales but multilingualism, recognising and valuing the multiple languages spoken within Wales which make up its rich cultural heritage and landscape.

**9. Please also explain how you believe the proposed draft regulations or the proposal in respect of the revised trading order 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.**

See above.

**10. 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.**

## **Response from our Consultation Session:**

- Overall there was a mixed response and perspectives.

- A few people stated they didn't like the term BAME or minority ethnic as they both generalized all groups. One comment was, "Bundling together all minority groups is itself meaningless, in my opinion."
- Particularly amongst younger age groups, some did prefer the term 'People of Colour', but also recognised that the term can be problematic, and some strongly opposed people of colour due to connotations of the historically disparaging use of the term 'coloured'.
- Lumping people together in one group makes it harder to see the individual differences between people, and the differences within ethnicities e.g. the category Asian is huge - Mongolian, Chinese, Malaysian – our features are all different.
- Different ethnicities will have different experiences, and these are not always bad. For example, Indian and Chinese employment rates are higher than their white counterparts in the UK.
- There are elements of cross-racism between different ethnicities that needs to be taken into account too.
- There should be a shift away from the terms BAME/BME as it postulates White as a default and every other ethnicity as other.
- Instead of terms like BAME, possibly more accessible language like 'hard to reach' however, this does run the risk of downplaying the racial aspect to discrimination and ignores agencies' deficiencies in not reaching certain groups. The term 'seldom heard' is a bit better, as this entails a critique of organisation's static, stagnant communication, and engagement problem. "There needs to be commitment to employ the people who look and sound like those we want to hear from."
- The grouping of BAME is too reductive. There needs to be specific action points for specific ethnicity groups especially regarding policing, economic provisions and more. There is no monolithic experience, so the grouping needs to reflect this as different ethnicities have different experiences.

## **EYST Organisational Response:**

- While we recognised that there are a range of opinions and perspectives on this question, we support the use of the term racialised people, or ethnic minorities/ minority ethnic/ ethnic minority people/ people from ethnic minority backgrounds.
- The term 'racialised' emphasises the common shared experience of people from a

range of backgrounds who are primarily defined by their race—so racialised - in particular contexts and settings.

- We also support the use of ‘people from ethnic minority backgrounds’ as this recognises the diversity of backgrounds and ethnicities as well as the fact that we are not talking about the white majority.
- We find the term BAME and the term ‘Black, Asian and Minority Ethnic’ to be somewhat non-sensical as Black and Asian are themselves minority ethnic categories. It would only make sense if it was Black, Asian and other minority ethnic people.

## About EYST

*EYST Wales is an award-winning Wales-wide charity established in 2005 which aims to support ethnic minority young people, families and individuals living in Wales and help them to contribute, participate and feel a valued part of Wales. It does this through a range of services targeted variously at ethnic minority young people, ethnic minority families, refugees and asylum seekers and also the wider public. We are a team of 60 staff with 5 core service areas: 1) Black, Asian and minority ethnic Young People; 2) Black, Asian and Minority Ethnic Families; 3) Refugees and Asylum Seekers; 4) Black, Asian and Minority Ethnic Community groups and; 5) Tackling Racism in the Wider community.*

*EYST Wales has been funded by Welsh Government since 2017 to deliver the All Wales BAME (Black, Asian and Minority Ethnic) Engagement Programme, aimed at gathering the views and experiences of minority ethnic people living in Wales and improving the evidence base from which to positively influence public policies and services to better reflect the needs of ethnic minority communities.*

## » Methodology of Consultation:

To inform this consultation response, EYST held six consultation sessions between May and July of 2021: a general session for all public; a session for children under 18 with Children’s Commissioner Sally Holland; a session for older people and carers with Older Person’s Commissioner Helena Herklots; two sessions for young people aged 16-24; and a session for people who live/work in North, Mid or West Wales. We also shared a survey based on consultation content and discussion format with the BAME Engagement Programme mailing list as well as participants who requested to be able to provide follow up answers. The consultation sessions began with a presentation outlining the REAP values/vision and co-production process before focusing on specific policy areas, goals and actions. In the general session, attendees selected breakout rooms. In the other sessions, attendees voted on priority policy areas to focus on in whole group discussion. A total of 183 participants took part across the 6 consultation sessions.

## » Table of Consultation Sessions:

<b>Date</b>	<b>Title of Consultation</b>	<b>Number of Attendees</b>
19/05/21	General Consultation	58
20/05/21	Under 18s Children’s Consultation	33
26/05/21	Older Person’s 50+ Consultation	29
02/06/21	Young Person’s (16–24) Consultation	10
25/06/21	Swansea Girls Group YP Consultation	10
29/06/21	North/West/Mid Wales Consultation	43
<b>TOTAL</b>		<b>183</b>

EYST's organisational response is based on our wider knowledge and insight gleaned from our practical expertise in specific policy areas.

We are happy for our response to be made public.

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