

**Draft response to the consultation on Welsh Government's
An Anti-Racist Wales: The Race Equality Action Plan for Wales**

Question 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?

The vision, purpose values and the future (more envisaged than imaginary) reflect our underlying ethos and therefore cannot be disagreed with.

The events of 2020 refocused our attention to address the inequalities and inequities that many members of our minority ethnic communities experience in their daily lives. As a Council we have already begun to have the difficult conversations, to reevaluate our policies and practices as well as working to shape the future of the Council to improve life for our all our citizens.

Realisation of the vision and values will be dependent on a range of issues: a shared understanding; effective communication; community involvement; buy in from all sectors; respect and understanding of our differences; sufficient resources (people and financial); advice and support and education, in all its forms.

Question 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:

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

The goals and actions in the Race Equality Action Plan appear to be a direct response to the evidence amassed over the last year which highlighted the strength of feeling of inequality, inequity and racism of policies and practices and society in general.

The collection and analysis of data (performance, workforce or service user) is a key feature across all policy areas. Standardisation of a framework for use across all service areas and organisations would help ensure those who are struggling to get to grips with data collection have guidance and those who are more adept do so in the knowledge that the collection of data is appropriate and can be easily comparable.

Leadership and Representation

A single target for public sector bodies in relation to recruiting ethnic minority staff will not accurately reflect the individual circumstances for those bodies with a small diverse demographic and so may struggle to achieve the target.

There does not appear to be any clarity as to which bodies are subject to the various actions within this section: the terms public sector bodies, public bodies, public services all appearing to be used interchangeably. It is not clear therefore if action would be applied personally to Leaders and/or Chief Executives within local, government.

Following an enquiry to Welsh Government it was confirmed that the use of terminology will be addressed in the final version of the Race Equality Action Plan and the leadership commitments specially intended for local, government are included in the local government section.

Therefore the understanding is that personal commitments and accountability which are a feature for bodies identified in this section do not include local government and as such commitments and accountability for Leaders/Chief Executives are included in the local government section.

Education

This policy area is comprehensive with clear goals, actions and accompanying narrative.

The recognition of and emphasis placed on the various frameworks and reporting arrangements will help ensure that appropriate weight will be given to them by schools, governors, local authorities and the inspectorates to instil confidence amongst pupils, parents and the wider community.

Local Government

The goals and action complement and enhance the requirements of the Local Government and Elections (Wales) Act 2021 albeit through an ethnic minority lens.

The focus on analysis of workforce data will assist in the better understanding of the local position and provide a systematic and uniform approach for benchmarking and improvement for local government.

As there are no outcomes identified it is difficult to determine whether the actions will be appropriate.

Question 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?

Education – embedding anti-racism in curriculum delivery would ensure a more inclusive approach by schools: celebrating the contribution of ethnic minorities in terms of their history, culture and lived experiences would help to foster greater awareness and understanding of others. Rather than one off events this should be incorporated into the delivery of the curriculum across the school year, for example Black History Month, Gypsy Traveller Month, Chinese New Year, Ramadan and EID

Training could be delivered by those who understand what racism actually means, those that have lived through it, those that can influence others through detailed personal experiences and challenges that are faced on a daily basis. This will give teachers and students an insight of the real `live` issues that some of our community are having to deal with throughout their lives when encountering racism.

Question 4

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

The date quoted should be 2030

Challenges that could stop, or at least limit, the goals and actions achieving anti-racism will include:

Resources – although a number of actions are already in train the lack of/limited resources may affected their effective and timely implementation. The increased demands on budgets and workforce to meet the wide ranging actions may be detrimental to the anti-racism agenda. Support and agreement are not always sufficient to ensure successful implementation.

Leadership – without a firm commitment to the Action Plan timescales will slip and more harm than good will be done in the long run; reinforcing calls of racism and damaging the seeds of confidence that have grown within communities over recent months.

Societal behaviour – changing behaviour take time and space – eight years may not be long enough.

Communication - campaigns will need to be effective and appropriate, from national, regional and local sources, to ensure a shared understanding.

Buy in – the importance of the agenda needs to be understood/communicated to and within public bodies and to communities.

Time – or lack of... so much to do in such a short period of time.

Lack of standardisation (education) – a standardised policy for schools for reporting racist incidents to local authorities as well as the standardisation of definitions of racist behaviour (currently subjective by each school) would be beneficial.

Standardisation of policies and procedures to provide a framework of good practice in schools across Wales would provide clarity and focus which would help in achieving the goals of anti-racism set for 2030; standardised definitions, reporting systems, IT systems used to gather data would all help to reinforce actions of Race Equality Action Plan.

A model of an anti-racist school in the 21st century should be provided as an exemplar for all schools to work towards across Wales to ensure standards are raised/ procedures are followed.

Reporting systems should be consistent across all Welsh local authorities where racial incidents can be recorded and monitored accurately. The same reporting criteria must be used, and this will enable targeting to become more focussed

Curriculum – a clear framework for a more integrated approach to anti-racism, cultural and diversity teaching within the new curriculum – using a range of methods including lived experience and whole school approach rather than in silos.

In order to deliver the goals and actions, schools must be given sufficient funding to provide suitable training. Training must be continuous and not seen as one off sessions. The whole plan must change teachers and children's views and therefore must be embedded into the school curriculum and not to be seen as one off sessions. There has to be a meaning behind the delivery and children and schools must understand why they are delivering it and what they want to achieve, as opposed to just an awareness exercise

Question 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?

Funding –essential to ensure the goals and actions are achieved. As stated previously some of the actions are already in train but additional or new funding will ensure timely progress is made and evidence the commitment to the Action Plan.

Support – pan Wales support for anti-racism training/advice/mentoring for workforce/communities would help ensure a consistent approach.

Training – essential for workforce (including senior officers) and elected members to attend training/meetings. Basic mandatory training for all with tailored training sessions as required. This should be replicated within the school environment with governors, head teachers, teachers and other school staff undertaking training to reinforce a whole school ethos of anti-racism and diversity.

Community role models – community members to support services/schools (voluntarily or remunerated); building confidence of staff/pupils as well as providing opportunities for community members. For example, the Vulnerable Learner Service employ female teaching assistants from different ethnic and cultural backgrounds from local communities. Not only are they role models for teachers, pupils and parents but are encouraged to undertake training to further their own careers, some becoming teachers themselves.

Staff forum – enable engagement with staff to assist with monitoring progress and provide feedback.

Staff time – to attend training /meetings; to enable sufficient time for planning and implementation of action plan, or merging into current processes wherever possible.

Question 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?

While there some intersectionality referenced in the Action Plan the intersectionality of race and disability seems to be overlooked in nearly all policy areas – environment and cross cutting goals being the exception.

The disadvantages and impacts experienced by disabled people as a consequence of the pandemic and reported in the media has like the impacts on race highlighted the inequities that are faced on a daily basis. To be a member of an ethnic minority with a disability, where a disability has yet to be diagnosed, where a disability is considered shameful or support has yet to be sought/offered, only exacerbates the issues faced.

Question 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?

Accountability and monitoring of progress is welcomed and essential. However we would not be able to support the proposed steering group 'refocus' to hold local government and other public bodies to account. The Council has its own governance arrangements; scrutiny and cabinet, complemented by internal/external groups where appropriate, along with external scrutiny bodies for example Estyn, Equality and Human Right Commission, Care inspectorate Wales, etc. which would be better placed to provide oversight.

We are mindful that progress must be made and would support the commitment to report progress in a way that does not create an extra burden for already stretched councils; possibly incorporate actions into existing plans and reported through established reporting frameworks.

Measuring of racial incidents in schools will be a key feature of the Race Equality Action Plan – however support for schools to identify and record/report racial incidents without recrimination will be essential.

A change in behaviour will be key to the success of the Race Equality Action Plan but it will not be simple to measure.

Quantitative measures such as an increase in the number of ethnic minority staff in organisations, are straightforward but will only give half the picture; qualitative data is essential to gather too. Historically this has been difficult to obtain but if the Race Equality Action Plan is successful engagement should become easier as communities increase in confidence and positive changes become more visible.

Understanding people's experience of hate crime from its occurrence, through its reporting and investigation to court proceedings will be one of the main area where success can be measured.

Question 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?

The Race Equality Action Plan highlights the opportunities available to pupils and adults from ethnic minority backgrounds to learn Welsh via Welsh medium education or adult learning courses. While having no guarantee of take up ensuring access is available will help meet the aims of the Government's Cymraeg 2050.

It is important to see the Welsh language and culture considered in the same way as other languages and cultures thereby ensuring a more robust approach to belonging in a diverse Wales can be achieved.

Question 9

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

adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

As stated above appropriate and additional resources will be required to realise the actions thus ensuring commitment to the Race Equality Action Plan and its outcomes are visible.

Question 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.

While the term Black, Asian and Minority Ethnic has been used by when making reference to a number of different communities it is not one that is supported by the communities themselves.

One of the problems highlighted with using BME/BAME terminology is that the terms are not always associated with White ethnic minorities such as Gypsy, Roma and Traveller of Irish Heritage groups. These groups are among the most marginalised and disadvantaged communities and some argue that these descriptions marginalise these communities even further.

The Council has been advised locally that the preference is the use of minority ethnic communities or individual ethnic minority communities by name.

Question 11

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

Communication will be key to the success of the Race Equality Action Plan; the narrative, the Plan itself, progress, updates etc.