

#### About the Welsh Local Government Association

The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, the three national park authorities and the three fire and rescue authorities are associate members.

The WLGA is a politically led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA also appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.

The WLGA works closely with and is often advised by professional advisors and professional associations from local government, however, the WLGA is the representative body for local government and provides the collective, political voice of local government in Wales.

# The effectiveness of Welsh Government actions to deliver the plan, including what is being done to 'lead by example' in taking a pro-active and cross-governmental approach to racism.

The actions set out in the plan lay out an ambitious road map for an anti-racist Wales, which is a vision that has been welcomed by local government. The minister has met with local authority cabinet portfolio leads on a number of occasions, and the Welsh Government's political leadership, through these meetings and 'one-off' events such as the anti-racism summit, have been welcomed by local government.

Feedback from across the sector suggests the plan would have benefited from better local authority engagement when actions, themes and delivery timelines were being developed. While the WLGA and local government did contribute to the draft-REAP, there was little communication about Welsh Government's expectations for service delivery and input from local authorities in regards to what realistic delivery target would be, and who the ARWAP identifies as being leads or key delivery partners. The communication of the plan at an operational level has also been somewhat siloed.

This has contributed to some uncertainty across local government as how these actions will be coordinated and what the expectations of Welsh Government are in their delivery, particularly as the questions raised about the statutory nature of the plan, and how it interfaces with pre-existing local government strategies (such as SEPs) have not been fully addressed. The plan would also benefit from greater clarity as to who it is being aimed, and to whom the various actions apply. While the plan's section on local government is fairly short, there are a range of themes which cut across local council services, however in many of these instances, local authorities are not identified as key or lead partner, resulting in some uncertainty over the expectations of Welsh Government, and the remit and responsibilities or action leads.

In response to the actions set out in the ARWAP, the WLGA has expanded its Improvement Offer to reflect anti-racism as an emerging council improvement need. This includes a dedicated session on the Equality Act tailored specifically for councillors and their unique roles, a workshop on positive action, delivered by a legally qualified professional and aimed at local authority HR teams, and an "Introduction to Anti-Racism workshop" also for councillors. These sessions have been proactively accessed by a number of different councils, who are looking to both increase their understanding of anti-racism and also better comply with the general equality duty set out in the equality act. A number of councils have also sought to independently procured their own training.

### The progress and monitoring arrangements for the Plan, including the role of the public sector (local authorities, health, education), third sector and where applicable, the private sector.

As has been raised by the WLGA in engagement with Welsh Government, local government is subject to a range of equality-related statutory reporting processes, the most relevant being those related to the setting of the council's Strategic Equality Plans (SEP) and related equality objectives. Most local councils across Wales are on the same 4-year SEP cycles beginning again in April 2024. A number of local authorities have highlighted their intention to integrate a number of ARWAP actions, along with other Welsh Government Equality Strategies, such as the LGBTQ+ Action Plan, into new SEPs and associated action plans. Within education, local government has a crucial role to play in delivering and supporting the delivery of *Curriculum for Wales* through schools, via education support services and youth work and community education. This includes supporting children and young people's voice via Youth Fora, school councils and other participation mechanisms, enabling and empowering children and young people to play a role in shaping the 'offer' and not just by being passive recipients.

The recent report "Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group", chaired by Professor Charlotte Williams "maps a way forward in how – across each Area of Learning and Experience – the diverse experiences and contributions of Black, Asian and Minority Ethnic peoples in Wales is made integral" (p. 3, black-asian-minority-ethnic-communities-contributions-cynefin-new-curriculum-workinggroup-final-report.pdf (gov.wales) ). This represents a shift in enriching children and young people's knowledge of ethnic minority communities and their contribution to the history of Wales. Local government remains committed to these principles through its work with schools and the wider education family and, though not currently having a remit for youth work, works closely with Diversity and Anti-Racist Professional Learning (DARPL) in raising awareness of anti-racist practice across the workforce.

#### The progress made by the Racial Disparity Unit, and whether there are gaps in data collection and analysis of data is being carried out effectively.

The WLGA has had an initial meeting with the Race Disparity Unit but has not been engaged around what work they are currently undertaking, or how this work can support the implementation of the plan within local government.

## What channels of communication have been established to ensure people with lived experience are informed of the plan's progress and what changes are happening as a result of the plan.

Local Councils have various forums relating to participation and community engagement (for example citizenship panels and youth councils), however the WLGA is not aware of specific channels of communication that currently exist to specifically communicate progress of the ARWAP, although the WLGA understands that Cardiff Council has utilised its pre-existing Race Equality Taskforce.

As has been outlined in previous consultation responses, local council's resources are particularly strained, and most do not have the resources to be able to launch and manage specific channels of communication relating to specific strategies.

Council communication strategies may be identified as an area of improvement, particularly given additional avenues of public participation with local democracy, such as those established via the Local Government and Elections Act (2021)

The WLGA are observers on Welsh Government's own external accountability group and feedback to local councils via a number of our local authority professional networks.

## The effectiveness of the Plan in its first year, including whether actions have been delivered, what the key outcomes have been so far and to determine why any outstanding actions have not been implemented.

The plan has been welcomed by WLGA leadership and local government more broadly. The WLGA has been able to utilise funding from within the Improvement Programme to identify anti-racism, particularly in relation to the themes of leadership and workforce representation, as an improvement need within the sector. To reflect this the WLGA has expanded its improvement training offer, and now freely offers the following workshops to local councils;

- Introduction to Anti-Racism
- Positive Action in recruitment and retention
- Introduction to the Equality Act for Councillors

These sessions have enjoyed a good take up across local government, and have acted as a catalyst within local authorities for anti-racism and raising awareness of the action plan more broadly.

However the efficacy of the plan in its first year has been impacted by mixed, and siloed, communications relating to Welsh Government expectations, and the applicability of specific themes to local government. Welsh Government's own housing team, has generated and circulated an alternative action plan, developed in conjunction with the WLGA and local authority officers. While this has been welcomed by local government housing colleagues, as this represents a more achievable delivery timeline, this also presents a number of questions about the status of the plan's other themes, particularly as a number of actions within the plan are already near their 'completed by' deadline.

A number of local councils have also highlighted uncertainty around WG communications regarding the availability of any forthcoming support from Welsh Government to assist in the implementation of the action plan across the sector, particularly on actions relating to training. This uncertainty has meant that in some instances local government has held off on progressing resource intensive actions, such as those pertaining to training, until Welsh Government's own position becomes clear.

### Help further understanding of what other interventions are needed to support delivery of the plan and whether there are barriers to implementing the plan.

Welsh Government could introduce a number of interventions to support delivery of the plan;

- Improved communication around Welsh Government expectations of local government's responsibilities within the plan, and revisiting the list of "key partners" identified within the plan to ensure they are reflective of those expectations. Local Councils would also appreciate the opportunity to contribute to this exercise.
- A clear position statement pertaining to any forthcoming Welsh Government support so that Local Government can plan appropriately.
- Clearer guidance relating to operationalising anti-racism in practice. Welsh Government has agreed to share the results of its review of its HR policies with local government via the WLGA's HRD network, but further additional guidance, possibly coproduced with the DARPL network would help local government independently progress certain actions within the plan.
- Greater consideration of already existing local government statutory plans and strategies, such as Strategic Equality Plans their annual reports, and the amendment of the plan's deadlines to accommodate local council's new strategic equality plan cycles.

#### Any additional comments related to intersectionality within the plan.

The Welsh Government has published a number of action plans, which have clear implications on protected characteristics, i.e. the LGBTQ+ Action Plan, Disability Rights Taskforce etc. The plan would benefit from making the implicit intersectionality of these themes more explicit within the plans, possibly by harmonising actions across plans.