

Anti-racist Wales inquiry | Cymru Wrth-hiliol ymchwiliad

We are aware that the Senedd's Equality and Social Justice Committee is holding an inquiry to better understand issues relating to the implementation and delivery of the Anti-Racist Wales Action Plan, the purpose of which is to eradicate racism in Wales.

Race Council Cymru (RCC) is delighted to be invited to share our views on the issues around the overall implementation and delivery of the plan, as well as some concerns that stakeholders have raised in areas including health, education, housing and crime and justice.

Please see RCC 's written evidence in response to the terms of reference below that are relevant to our work:

1. **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.**

RCC is proud to see that drawing on Black, Asian and Minority Ethnic communities' experiences of racism, and race inequality, the plan sets out a series of actions from across Government with actions focused policy areas across government, including, health, culture, homes and places, employability and skills, education as well as a focus on leadership and representation within the Welsh Government and across public services. In terms of what is being done to 'lead by example' in taking a pro-active and cross-governmental approach to racism we are proud of the work in Education, Crime and Justice and within the third sector.

In terms of **education**, RCC welcomed the [report](#), by the Black, Asian and Minority Ethnic Communities, Contributions and *Cynefin* in the New Curriculum Working Group, chaired by Professor Charlotte Williams OBE, which made 51 recommendations in total. The report highlighted the actions the Welsh Government has taken over the last year, including:

- Making the learning of Black, Asian and Minority Ethnic histories mandatory in the new Curriculum, which was rolled out from September 2022.
- Introducing new incentives to attract more people from Black, Asian and Minority Ethnic backgrounds into teaching;
- Introducing new learning materials to support teachers to teach Black, Asian and Minority Ethnic histories and contributions within the new Curriculum;
- The setting up of the Diversity and Anti-Racism Professional Learning project, to provide a national model for professional learning for those working in education to develop an understanding and development of anti-racist practice;
- Launching the new Betty Campbell MBE Professional Teaching Award to promote the work schools are doing to teach the importance of inclusion.

In terms of what is being done to lead by example, [Jubilee Park Primary School](#) has pioneered a

whole school approach to tackling racism.

As well as [Llanwern High School in Newport](#), which has its own diversity club and was the first winner of the Betty Campbell MBE award.

Cardiff University has also become a supporting organisation of Race Alliance Wales as part of its commitment to becoming an actively anti-racist institution. As a supporting organisation, the University will share ideas and support the objectives of Race Alliance Wales and have the opportunity to meet with other individuals and organisations interested in achieving race equality in Wales. The Welsh Government had committed over £1m to support the FE sector to develop anti-racist culture and practices in 2022-23, this has included the development of unique anti-racism blended learning modules designed for students in the FE sector, which was launched in June this year. The curriculum is in the form of a metaverse – the first anti-racist virtual world. This innovative development provides a vast, accessible, immersive 3D environment learning experience developed by CAVC and produced by MX Reality in collaboration with ethnic minority experts from schools, colleges, universities and third parties. The extension of the Diversity and Anti-Racist Professional Learning (DARPL) programme to FE, to ensure that staff at all levels have access to high quality professional learning to help them engage with anti-racist concepts and principles is also a great pro-active and cross-governmental approach to racism.

We have also worked with Coleg Gwent delivering bespoke antiracism to all staff in 22/23 through a Professional Learning Welsh Government Fund for the FE sector to realise the ambition of the ARWAP. The training provided all staff with the opportunity to engage with the core principles of anti-racism, ensuring that educators are aligned, well-prepared and knowledgeable about the short and long term aims of this work, and why it is so important. This enormous endeavour is just one step on our journey to becoming an Anti-racist Wales as we strive to find more innovative ways to improve the world around us, which is the key to the work at RCC.

Despite the progress being made in the education sector to tackle racism, Welsh government figures show that for the 2021-22 academic year, of the 26,600 teachers in Wales, 25,915 of them said they were white. Surprisingly, there are only seven black or brown head teachers in Wales today. We still have some way to go to ensure that teachers in Wales are representation of the learners they are serving.

Crime and Justice: In terms of the evidence and supporting data from across the Criminal Justice System including Policing, there has been clear inequality and disproportionality in relation to the experiences of people from an ethnic minority and this is reflected in wider evidence of racism within society. The Anti-Racism Action Plan for the Criminal Justice System in Wales has been drawn up in the best way possible, through significant engagement and co-production with the individuals, groups and communities in Wales that are most affected by racial disparity and with those with lived experience of the impact of racism. This action plan reflects a determination across all of the organisations represented on the Criminal Justice Board in Wales (CJBiW) to do all it can to root out any racism in Justice in Wales.

Despite the Anti-Racism Action Plan for the Criminal Justice System in Wales being an enormously significant development, it is disappointing that in Wales the percentage of Stop and Searches for ethnic minority people in CJIB Data Group, 2022 was 8.95% despite the total ethnic minority population in Wales being 5%. This means that the number of Stop and Searches are not proportionate to the population.

More likely to be sent to prison than White people (*Prison Reform Trust, 2021*):

- Black people, 53%
- Asian people, 55%
- other ethnic minority groups, 81%

Snapshot of evidence

- In 2020 to 2021, there were 3,052 race hate crimes in Wales.
- This was a 16% increase from 2019 to 2020 - UK Government, 2021
- Race hate crimes comprise around 66% of all hate crimes recorded in Wales in 2020 to 2021 - UK Government, 2021
- There is clear overrepresentation of ethnic minority people in our justice system and under-representation of staff particularly at senior levels - Prison Reform Trust, 2021
- Inspectors found that prison staff underestimate the cultural requirements of Gypsy, Roma or Traveller and ethnic minority people in prison and lack training and confidence on supporting ethnic minority people and supporting cultural issues - Prison Reform Trust, 2021
- The number of Muslims in prison has more than doubled over the past 18 years making up 17% of the prison population despite making up only 5% of general population Prison Reform Trust, 2021
- Young ethnic minority people make up 53% of those remanded in custody and comprise 51% of all children and young people who are confined in Young Offender Institutions - Williams, 2020
- Ethnic minority people in prison often report more negatively about their experience in prison and relationships with staff and are more likely to experience restraint and segregation - Prison Reform Trust, 2021
- Research highlights that in Wales, ethnic minority people are over-represented at every stage of the criminal justice system - Wales Centre for Public Policy, 2021

Institutions are reflective of society where racism exists and the current global and local public discontent has shone a spotlight on racial disproportionality. According to the data for 2020/21, 56 out of every 1,000 black people were stopped and searched in Wales, compared to 28 per 1,000 people from a mixed ethnic background, 16 per 1,000 Asian people, and eight per 1,000 white people. This needs better scrutiny and more accountability to ensure these figures decrease dramatically over the next year of the ARWAP.

2. 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.

In terms of the progress and monitoring arrangements for the Plan, including the role of the public, third and private sectors, the setting up of Third Sector Support Wales is a unique partnership supporting local, regional and national charitable and voluntary action. The Welsh Government is continuing to commit considerable funding through both the Third Sector Support Wales network and

Community Facilities Programme which will allow hyper-local projects as well as wider-ranging organisations to evolve and grow in their areas, ensuring that they remain fit-for-purpose and available for anyone who requires them. Diverse Cymru have received Welsh Government funding to provide support to vulnerable Black, Asian, and Minoritised Ethnic people across Wales who require mental health support.

Other pioneering work to help realise the plan includes, Diverse Cymru and NHS Wales carrying out an audit of the [All-Wales NHS Workforce Policies](#) through an Anti-racist lens. This work was identified as a priority action in the [Anti-racist Wales Action Plan](#). This work is pivotal and gaining the lived experience from NHS Wales staff who self-identify as Black, Asian or minoritised ethnic people is even more vital. This audit and recommendations will be based on the experiences and views of Black, Asian, and minoritised ethnic people who work in NHS Wales organisations whose views and experiences are central to this project and will lead to changes in All-Wales NHS Workforce Policies and procedures.

In Health: The Welsh government's initial targets include:

- Introducing a performance goal linked to anti-racism for leaders
- Reverse mentoring and anti-racism training so leaders improve their understanding of racism
- Employers to improve their understanding and knowledge of the Equality Act and the Positive Action section within it so they can recruit more people from ethnic minority backgrounds to make up 20% of the workforce at all levels of government
- Resource and support the existing ethnic minority staff networks. "The actions set out in the plan will help promote a fairer employment market, a fairer education and training system, an equalising of racial opportunities and outcomes in health "

In work, health and education. We are more likely to die in pregnancy and giving birth. The pay gap between white and Black Asian and minority ethnic women is huge.

Housing: In housing, we see that Anti-racism and hate crime training will be offered to private residential landlords and agents in Wales. This is a positive move as it means that Landlords would then be able to respond quickly and offer appropriate support where tenants have experienced racism and/or hate crime. Some organisations such as [Rent Smart Wales](#) has already start this non-mandatory training.

3. 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 Race Disparity Unit oversees a programme of evidence that is focused on Black, Asian and Minority Ethnic people, Migrants, Refugees, Asylum Seekers, Travellers, Roma and Gypsies. The aim is to improve the availability, quality, granularity and accessibility of evidence of individuals with the above protected and associated characteristics so that we fully understand the level and types of inequalities across Wales.

While some progress has been made in scoping and piloting a data collection of equality data from Public Sector Bodies in Wales, Wales equality evidence audit and gaps analysis leading to further priorities, includes paper on sources, strengths and weaknesses per Unit advice and guidance materials on sources there are future recommendations for priorities. Research has also been carried out into the current descriptions of characteristics, what they mean and the barriers to improving existing equality data collection, reporting and use and how these could be addressed. There are still major gaps in examining how and whether data on pay gaps can be collected and published for different protected and associated characteristics. Data collection and analysis of data will be carried out effectively when the following actions are taken:

- 4.03 Publish an analysis of all social care statistics by ethnicity
- 4.04 Adults receiving social care Census to include ethnicity
- 4.05 Review Social Care Research and Development strategy from an equalities (particularly race) perspective.
- 4.06 Identify the gaps in evidence in relation to all domains including criminal justice data collected and reported on ethnicity
- 4.08 Leadership and organisational culture change: A study of antiracist Wales culture change efforts - WG45645 (*gov.wales*)

This will enable decision makers across Wales to develop better informed policies and measure their impact. It will also drive us towards better outcomes for people with protected and associated characteristics and contribute to a more equal Wales as set out in the Well-being of Future Generations (Wales) Act 2015. This will also provide clear challenge to the Welsh Government and Public Sector Bodies around the evidence they need to monitor and the actions that need to be taken as a result of the evidence presented. Ensuring visible data feeds through to real change.

There is a real lack of evidence on equality, however there is sufficient evidence to show us that inequality exists and action is required. Linked to trust there may be a lack of confidence in communities that improved evidence will lead to change in individuals' lives and experiences. It is important to report to accountability groups so that they can use the evidence with confidence to challenge policies and organisations so that real change can be achieved.

Another issue in data collection and analysis of data is being carried out effectively is that Minority populations are less visible in evidence and it is often difficult to break down survey data for small populations as sample sizes are not large enough to provide estimates for these groups. Some characteristics or combinations of characteristic are not collected in survey or administrative data.

4. 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.

Many channels of communication have been established to ensure people with lived experience are informed of the plan's progress. For example, the An Anti-Racist Wales (ARWAP) Stakeholder Bulletin provides a weekly update of community news, events, training, resources, and other useful information for stakeholder engagement, and wider distribution to communities.

There have also been various networks set up who all help to drive forward the ARWAP such as the [Criminal Justice Anti-Racism Action Plan for Wales Community Engagement Network](#), [Multicultural Hubs etc.](#) There are a number of communications teams covering major departments and portfolios, such as Climate Change, Health and Social Services, Education, Economy and Social Justice and Communities. These deliver a broad range of communications activities to Ministers and departments, including strategic communications planning and other services for those areas. The communications activities for the Welsh Government as a whole are prioritised according to the priorities set out in the Programme for Government. The priorities have been disseminated via social media and the media in general. Through cross collaboration with various grassroots organisations the plan's progress has been disseminated however, there is more that needs to be done to ensure that the government's plans are far reaching. For example, local authorities, Citizens advice bureau etc. need to play a pivotal role and acting as conduits for the Plan's progress. Media broadcasters all need to continue to celebrate the government's ambition of an antiracist Wales and why this is so important to our shared history. There is a need for a whole nation approach to tackling racism and this means taking an all hands on deck approach to realise the government's ambition. A targeted advertising campaign/ social media reels in various language spoken across Wales including BSL around the ARWAP would also help to ensure people with lived experience are informed of the plan's progress and what changes are happening as a result of the plan.

5. 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.

In relation to ethnic minority people's resilience and success despite racism experienced.

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 can be measured through the following:

In relation to ethnic minority people's resilience and success despite racism experienced – Because the Welsh Government have funded and supported community-led organisations in an open and fair way, we see a massive investment in bettering the lives of these groups which helps to build confidence and foster positive relations amongst different community groups. We also see that policy development and the design of service provision now includes a diverse range of voices from Black, Asian and Minority Ethnic communities at regional and national level, using their lived experiences to find creative solutions to policy and service development and delivery

In relation to ethnic minority people's experience of racism in every-day life

Black, Asian and Minority Ethnic people are aware of the complaints procedures when accessing public services and are able to access those in the language which they require when needed without any fear, barriers or retribution. The issue here is that there are still sentiments that no action will be taken when racism occurs within many communities so many complaints are never made.

In delivering actions, the police service in Wales should be seen to be proactively tackling racism and working with Black, Asian and Minority Ethnic people and the wider community to improve community cohesion in the delivery of police services. This includes the elimination of Physical and online Hate crime. This is yet to be realised.

In terms of the justice process in dealing with racism, this needs more scrutiny in collaboration with Black, Asian and Minority Ethnic communities and funding targeted at community leaders who are valued for their contributions to Wales.

In relation to ethnic minority people's experience of racism in service delivery

Black, Asian and Minority Ethnic students and their carers still don't have confidence that education settings have effective policies to prevent racist bullying/micro aggressions and that these are dealt with effectively when they do occur. Many institutions across Wales do not have an anti-racism policy with clear escalation routes to advisory services, therefore many such incidents go unreported leaving the culprits free to reoffend.

More needs to be done to ensure that Black, Asian and Minority Ethnic people experience improved access to public services which are equitable and culturally appropriate to their needs. This also includes public sector providers being culturally aware and competent in delivering services to Black, Asian and Minority Ethnic people which recognises the differences amongst ethnic minority groups. This requires further efforts by the Welsh Government to ensure that public sector providers understand the mental health impact and inherited trauma that racism creates on the lives of those affected thus adopting a zero tolerance to racial discrimination or inequality in public sector service delivery. Public sector providers will need to be clear on which services they provide, their services users and the outcomes of any issues of racism faced needs to be taken seriously and used as a case in point for why the need to eradicate racism is so important.

In relation to ethnic minority people's experience of racism in the workplace/racism in gaining jobs and opportunities.

We know that the public sector workforce in Wales does not represent the population it serves at all levels of the organisation so this needs to be addressed through unbiased recruitment and training for all hiring managers. This can be measured through improved identification and promotion of practice that works in reducing employment inequalities, discrimination and barriers for Black, Asian and Minority Ethnic people in all aspects of recruitment, selection and career progression. It's clear that some leaders and senior management in public and third sector are visibly demonstrating how they are working to embed anti-racism within their organisations as a mandatory aspect of their performance management. This needs to be consistent across the board and annual audits need to take place with penalties for those organisations who fail to embed anti-racist practices within their organisations. To do this, all staff in public sector and funded bodies will have to receive mandatory training on anti-racism and Allyship in 2 phases. The Welsh Government can monitor this through a points system which organisations are scored on how actively anti-racist they are thus breaking down barriers for ethnic minority staff who are often marginalised in the workplace.

In relation to ethnic minority people's experience when there is a lack of visible role models in positions of power there are some outstanding actions that have not been implemented for example, Public, private and third sector organisations still do not have senior leadership teams that are representative and inclusive. Just 51 of the top 1,097 workplace roles in the UK are held by black, Asian and minority ethnic people, that amounts to just 4.6%, despite the fact that black, Asian and minority ethnic groups make up 14% of the population.

Ethnic minority women are particularly poorly represented, taking up only 10 of the top positions. There is one Black female Deputy Principal at an FE College in Wales, which is the largest FE College in Wales and third largest in the UK, with over 30,000 students and 1,000 staff. It is therefore imperative that public, private and third sector organisations develop Black, Asian and Minority Ethnic people to take up 'positions of power'.

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

Thanks to the Welsh Government's support for the plan, more than £2.8m has been shared between 22 local, regional, national or independently run culture, heritage and sport organisations across Wales, to be spent over the next three years. £1.67m has also been awarded to the Welsh Government's cultural and sport arm's length bodies with the aim of reinforcing the importance of teaching past and present experiences and contributions of Black, Asian and Minority Ethnic communities across Wales. Some other interventions needed to support delivery of the plan is around mandatory ethnicity pays gap reporting, modelled on the current gender pay disclosure requirements, which would be a transformative step to address racial inequality at work and overcome practical difficulties in the workplace. Establishing a standard ethnicity pay reporting framework would be more challenging than was the case even for gender pay gap reporting given that sample sizes for ethnic minorities groups are so small across Wales with few ethnically diverse colleagues in senior roles. Gender pay gap reporting has driven transparency and progress, and the same is needed for ethnicity pay gap reporting. Ethnicity pay reporting is an important lever for businesses and their stakeholders to assess if and where inequality based on ethnicity exists in their workforce. That's why we believe it is so important that businesses both capture and learn from this data. Mandatory reporting of data, and the associated narrative that shows understanding of the data and the actions being taken to improve, for both ethnicity and gender pay, will help create fairer workplaces and societies and kick-start real change.

It must be a collective goal that the ARWAP supports this intervention so that organisations truly reflect the communities we live in given businesses the tools they need to see the current reality and where changes need to happen.

Concerns around the legality of collecting ethnicity data, poor response rates from employees and ensuring employee anonymity were among the most common barriers to publishing ethnicity pay data.

Other interventions such as enhancing the learning and development of all community leaders and making available a programme for ethnic minority staff within organisations that helps improve the life chances for people of all ages, through learning, personal development and active citizenship are needed to support delivery of the plan. By developing the skills and confidence of collective workforces, this will strengthen organisations capacity to respond to the opportunities and challenges inherent within this ambitious ARWAP. This intervention will build the capacity of

Community leaders, practitioners, and active citizens to support community empowerment. By developing shared learning actions and embedding best practice across Wales, we will build stronger, more resilient communities.

More funding should be invested into youth work, family learning and other early intervention work with children, young people and families as well as Community-based adult learning, including adult literacies and English for Speakers of Other Languages (ESOL)

As well as learning for vulnerable and disadvantaged groups in the community, for example, people with disabilities, care leavers or offenders; • volunteer development; and Learning support and guidance in the community. Key community planning partners should be encouraged to work together and with people and communities across Wales and within localities to implement, review and report on the ARWAP.

Other interventions needed to support delivery of the plan includes expanding the availability of opportunities for community leaders to be involved in policy development through recommendations and feedback from trusted partners. This can be done via roundtable events & mentoring circles etc. There is also a need to set quotas for mandatory equalities training for all private and public sector organisations starting with universities and colleges, learners included.

7. Given the importance of intersectionality, the inquiry will also consider how people's intersecting identities have been considered when developing and implementing the Plan.

Visibility and representation of underrepresented communities across Wales is necessary. Each community should have a seat at the table, these seats should no longer be reserved for solely those from white privileged backgrounds who are often very detached as to what is happening across society. We will continue to work together with our partners across Wales as we believe that change requires teamwork, bringing together those with specialist knowledge and living experience, and skills in human connection. The ARWAP requires transparency, authenticity, and courageous conversations to occur; change will not happen without these. We should be role modelling and championing anti-racism so we can be the drivers of the change we seek.

Given the importance of intersectionality, people's intersecting identities have been considered to an extent when developing and implementing the Plan. But it is important to note that in terms of rurality individual's geographic location is considered a category for either advantage or disadvantage in intersectionality. People living in rural areas face challenges in regard to the access and availability of services. The geographic dispersion of the population means that individuals must travel farther to access services and that service providers delivering services such as home health care are challenged in their ability to bring services to individuals living in rural areas, growing older in rural areas is especially challenging due to limited access to the support of both formal service and informal support from family members

Poverty and disability can also be a challenge as people living in rural areas are more likely than those in more densely populated areas to live in poverty with limited access to getting around. Having lower than the national level incomes in rural area has life course consequences in that many older adults in rural areas come into late life with fewer resources as compared to their counterparts in more densely populated areas. Recognising that there are different kinds of

oppression that members of different minority communities experience is vital to pursuing a design approach that practices a reparative reframing of anti-racist approaches through an intersectional lens.

Resources:

<https://www.sociology.cam.ac.uk/antiracism-intersectionality-and-struggle-dignity>

<https://www.gov.wales/anti-racist-wales-action-plan>

[Criminal Justice Anti-Racism Action Plan for Wales - GOV.UK \(www.gov.uk\)
socsci-10-00137-v2 \(1\).pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614443/socsci-10-00137-v2_1.pdf)



Professor Uzo Iwobi CBE FLSW
Founder & CEO Race Council Cymru
Fellow Learned Society of Wales