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Y Gweinidog Cyfiawnder Cymdeithasol a'r Prif Chwip  
Minister for Social Justice and Chief Whip



Llywodraeth Cymru  
Welsh Government

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Jenny Rathbone MS  
Chair,  
Equality and Social Justice Committee

24 November 2023

Dear Jenny

I welcome the Equality and Social Justice Committee inquiry into the Anti-racist Wales Action Plan (ArWAP). In advance of appearing before the Committee on Monday 4th December 2023, please find attached evidence for each of the terms of reference. Evidence specific to Health, Education, Housing, and Crime and Justice has been approved by the respective Ministers.

Detailed and specific data related to Education, Health, Housing, and Crime and Justice is attached as Annex 1. The work of the Race Disparity Evidence Unit (RDEU) runs across the policy areas. Additional RDEU evidence is submitted as Annex 2.

The first year of implementing the ArWAP has been very much focused on laying the foundations for deeper cultural and systemic change. We have developed our governance structures, processes, and policies to provide a firm foundation for further progress. The next stage the ArWAP will focus strongly on implementation and delivery.

I remain deeply committed to creating an anti-racist Wales by 2030, and to promoting equality, diversity, and inclusion in all its forms.

Yours sincerely,

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Minister for Social Justice and Chief Whip

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

# Written evidence paper to the Equality and Social Justice Committee for Inquiry into the implementation of the Anti-racist Wales Action Plan on Monday 4 December 2023

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## 1. Cross-government and cross-sector action to deliver the Anti-racist Wales Action Plan

I am pleased to share the progress on the implementation of the Anti-racist Wales Action Plan (ArWAP).

The ArWAP has a robust governance and accountability structure which is led and overseen by the External Accountability Group (EAG). The group is co-chaired by the Permanent Secretary and by the academic Emmanuel Ogbonna, and it meets bi-monthly. The group consists of eight external anti-racism experts and eleven community representatives, providing both support and constructive challenge to ensure accountability. There is also a cross-government Internal Support and Challenge Group (ISCG) which supports delivery across all groups within Welsh Government. An Implementation Team is in place to lead the coordination of the cross-government ArWAP delivery and includes a diversity of people with lived experience of racism. In addition, each policy area within the plan has established sub-groups with policy officials, experts and community representatives to support delivery of the commitments within the plan, and to provide a further accountability mechanism.

I have held bilateral meetings with all Cabinet ministers to reinforce the need for, and importance of cross-governmental action to drive progress. All Ministers are wholly committed to the delivery of the plan.

Welsh Government is providing a strong and visible leadership role in driving the ArWAP forward. I have taken proactive steps to engage all public sector organisations in taking responsibility for implementing the ArWAP objectives. Welsh Government hosted the Anti-racist Wales One Public Sector Leadership Summit in May, where I emphasised the pivotal shift needed from rhetoric to tangible action.

Welsh Government is in the process of recruiting for ArWAP Regional Forums, which will facilitate the understanding of lived experience and establish direct engagement with Black, Asian and Minority Ethnic people across Wales.

For more detailed evidence and specific data related to Education, Health, Housing, and Crime and Justice, please refer to **Annex 1**.

## 2. Progress and monitoring arrangements for the ArWAP

The following comprehensive mechanisms are in place to both drive and track the implementation of the ArWAP across the Welsh Government:

1. Regular Reporting: Each policy area provides regular reporting, providing updates on their progress and contributions to ArWAP goals.

- II. **Accountability Measures:** The External Accountability Group convenes bi-monthly, ensuring policy areas adhere to the commitments outlined in the Plan.
- III. **Engagement with Communities:** Quarterly meetings with Wales Race Forum representatives and monthly webinars facilitate direct reporting on ArWAP's progress, ensuring community perspectives are central to the delivery of the plan.
- IV. **Local Engagement:** Regional Forums will be established to empower local communities to actively participate in monitoring ArWAP's impact and provide insight and expertise.
- V. **Measuring Impact:** The Race Disparity Evidence Unit is developing a framework to track progress and gauge ArWAP's impact across the broader public sector in Wales.
- VI. **Role of Public and Third Sectors:** Local authorities, health, education, and the third sector, represented respectively in our governance structures, actively contribute to and monitor ArWAP's implementation. The WLGA, WCVA, Wales TUC, EHRC are all members of the External Accountability Group, actively contributes insights, represents their respective sectors to ensure ArWAP progress.
- VII. **Enhancing Progress Tracking:** Transparent communication channels, including regional forums, encourage public engagement, while the integration of ArWAP into grant-funded schemes emphasises our commitment to anti-racist principles. Business Wales' implementation of their Anti-racist Action Plan sets a notable example for ongoing implementation across sectors.

### **3. Race Disparity Evidence Unit and data collection and analysis**

The Race Disparity Evidence Unit (RDEU) are improving the availability, quality, granularity, and accessibility of equality, race and disability evidence so that we understand racial inequalities across Wales. The RDEU has been progressing three programmes: delivery of evidence projects, development of an ArWAP evaluation framework and supporting others with their ArWAP evidence.

The projects being delivered by the RDEU include a data audit of protected characteristic gaps in Welsh Government statistics. Research is being scoped exploring the enablers to equality data collection. A pilot survey was conducted on leader diversity in public sector bodies and how workforce diversity data is collected. A feasibility assessment of an ethnicity sample boost to the National Survey for Wales is underway. An ethnicity Census statistical release was published in July 2023. An ethnicity sub-report of the Wellbeing of Wales report was published in September 2023.

The RDEU is developing an evaluation framework which will outline what key measures that exist already and what is needed to establish additional common measures across and within policy areas. This work is being carried out in partnership with the EAG evidence sub-group involving measurement experts and will be published early 2024. The RDEU will focus on collecting lived experiences of people from ethnic minority backgrounds to measure and understand impact. The

Unit is seeking to work closely with those with lived experience to ensure their views are included.

The RDEU is represented within the various structures in the ArWAP governance structure, including the EAG and ISCG and policy working groups, sharing both evidence and learning from within Welsh Government and external partners. They engage with policy and analytical colleagues across all policy areas to ensure evidence is considered from the outset of implementation. Important in this work is highlighting the need for consistent approaches to collecting ethnicity data.

The RDEU's work has established that there are considerable gaps in the availability and granularity of ethnicity data to support outcome measurement. The extent of these gaps range across policy areas. The EAG and evidence mapping has also highlighted a need for more lived experience evidence to be planned and used. The various published and on-going RDEU projects will address some priority evidence gaps and the ArWAP evaluation framework will provide the roadmap for how to address quantitative and lived experience evidence gaps.

See also **Annex 2** for more detailed evidence on the RDEU's work against this ToR.

### **3. Involvement of people with lived experience in the implementation of the ArWAP**

Co-production with those with lived experience was central to the development of the ArWAP. This co-productive approach underpins the delivery of the plan.

The ArWAP and its governance structure are shaped by experts and diverse representatives with lived experience; experts and community representatives with lived experience of racism lead the EAG and provide constructive challenge and support in the implementation of the plan.

The Anti-racist Wales Stakeholder Bulletin reaches over a thousand subscribers, fostering engagement across individuals, public, third, and private sector organisations.

The ArWAP One Welsh Public Sector Leadership Summit brought together over 200 senior leaders and representatives from across the devolved and non-devolved public service in Wales. The report from the summit highlights the broad representation of public services and stakeholders, including individuals from Black and Minority Ethnic backgrounds: - [One Welsh Public Service Approach to Anti-Racism Summit: outcome report 2023 | GOV.WALES](#).

The Wales Race Forum remains a pivotal channel for direct communication with key Black, Asian and Minority Ethnic organizations, where meetings are chaired regularly.

Monthly webinars, launched in September, serve as platforms for stakeholders across sectors to track ArWAP's progress and ensure the continual engagement of those with lived experiences in shaping the delivery of the plan.

Several policy areas have enlisted community mentors to guide and advise on implementation, including the Childcare team who have appointed ten mentors with lived experiences to inform progress and co-shape their work.

I expect Regional Forums to be established next year to capture lived experiences and facilitate direct engagement with Black, Asian and Minority Ethnic people across Wales.

These initiatives mark significant strides forward in Welsh Government's commitment to wide engagement, transparency, diverse representation, and communication in driving ArWAP's goals forward.

#### **4. Progress on delivery of the ArWAP**

In its first year, the Anti-racist Wales Action Plan (ArWAP) has made good progress in fostering awareness and integrating anti-racist policies across sectors. This includes increased dialogue on anti-racist principles, policy integration in sectors including health and education, and the establishment of the Internal Support and Challenge Group and External Accountability Group (EAG) to facilitate diverse engagement.

However, challenges persist in fully implementing planned actions. Laying the initial foundation, such as the implementation team and governance structure has taken longer than anticipated.

The first Annual Report, to be published in December captures both progress and challenges. Moving forward, addressing these challenges will be crucial to realising the full potential and impact of the ArWAP and ensuring the ongoing progress in eliminating racism across Welsh sectors and ensuring an anti-racist Wales.

#### **6. Further interventions and barriers in implementing the plan**

To effectively support the Anti-racist Wales Action Plan (ArWAP), a number of interventions are required:

- I. **Capacity Building:** It is imperative to invest in comprehensive training programmes across sectors. These programmes should focus on building a nuanced understanding of anti-racist principles amongst staff and familiarising them with the available levers and tools.
- II. **Community Engagement:** The development and implementation of policy-specific initiatives aimed at active co-production with local communities are necessary. Such initiatives will foster a sense of ownership and inclusivity in relation to driving forward anti-racism.
- III. **Data Collection and Monitoring:** Strengthening data collection mechanisms is crucial to monitoring the impact of anti-racist policies. This will ensure an accurate assessment of progress and help identify areas that require immediate attention.
- IV. **Public Awareness Campaigns:** Launching targeted public awareness campaigns is vital to educating the broader population on the importance of anti-racist practices.

- V. Collaboration with the Third and Private Sectors: Strengthening collaboration with the third and private sectors is essential. Encouraging these sectors to adopt anti-racist practices within their organisations will contribute significantly to broader societal change.

Despite the progress in delivery of the ArWAP, there are some challenges and potential barriers and the current budgetary context is challenging.

Embedding anti-racism within organisations and dismantling racist structures requires changes in governance structures and operational frameworks – this takes time, resources, and commitment.

Understanding both the further interventions needed and barriers is crucial for refining the ArWAP and ensuring a holistic approach to effectively eliminating racism. Continuous evaluation, stakeholder collaboration, and a proactive response to challenges will contribute to the Plan's overall success.

## 7. Intersectionality

The importance of intersectionality is integral to the ArWAP. Within Welsh Government training has been provided by [Professor Nelarine Cornelius](#), for a shared understanding of intersectionality as the combined effects of simultaneous factors such as class, gender, socio-economic status, disability, sexuality and nationality. This combination of factors can improve or worsen outcomes for people and are considered in its interconnectedness. All policy sub-groups report to the External Accountability Group on the intersectional outcomes within their policy areas.

During the co-production stage of ArWAP, some concerns were expressed the focus was only on one protected group, and that this took a simplistic approach to the different ways racism works to impact on ethnic minority women, children, older people, disabled people, and other protected groups. Many commented that an awareness of how these differing characteristics interplay, to create greater disparities, was not sufficiently visible in the draft Plan. Kimberlé Crenshaw, a Black feminist, coined the term 'intersectionality' to describe the combined effect of multiple forms of oppression, and how they interplay and are interconnected (Crenshaw K, 1989.).

We recognise that ethnic minority women, for example, carry a heavier burden in their experience of racism, for example through their direct experience with maternity services, or in leading engagement with schools or social services on behalf of their elders and families. We also recognise that young ethnic minority men, for example, are more likely than other groups to be stopped and searched by the police. Similarly, the systems and processes that impact on refugees and migrant workers are very different to those affecting ethnic minority people with the permanent right to live in Britain. Socio-economic circumstances or 'class' plays an additional role in keeping ethnic minority people oppressed. Ethnic minority people in Wales are more than twice as likely as White people to live in the 10 per cent most deprived parts of Wales (20.6 per cent of ethnic minority people compared to 8.3 per cent of White people). Black people are most likely to live in the 10 per cent most deprived parts of

Wales, with 35 per cent of all Black people living in these areas. More than 1 in 10 people living in the 10 per cent most deprived areas are from ethnic minority groups, despite only making up 5 per cent of the total population in Wales (Welsh Government, 2020).

This understanding is crucial when formulating and executing policies within the ArWAP. Intersectionality highlights the need to recognise that discrimination and advantages are not solely based on one identity but result from a complex interaction of multiple social categorisations. Clear guidance has been provided that there is a need to consider how respective policy areas within ArWAP account for these intersections to ensure that they adequately address the diverse experiences and challenges faced by different groups based on their intersecting identities. This approach ensures comprehensive and inclusive implementation of the plan, accounting for the varied experiences and inequalities encountered by different demographic groups.

# Annex 1

## Education and Welsh Language

- **Schools and the education workforce** are recruiting teachers from ethnic minority communities. The Initial Teacher Education (ITE) Black, Asian and Minority Ethnic recruitment plan identifies actions and where work is ongoing collaboration with the ITE sector.
- Our ITE incentive scheme for ethnic minority student teachers is available for a second year with a grant of up to £5,000, paid in two instalments to eligible students starting their post graduate ITE programmes in academic year 2023/24.
- The Welsh Government has worked with the Open University to expand the secondary subjects on offer under the alternative ITE routes, offering part-time PGCEs and employment based PGCEs (the Salaried PGCE) to student teachers unable to access full-time ITE qualifications. The additional subjects are available from this academic year (Academic Year 2023/24).
- Welsh Government provides training and salary contribution grants to eligible student teachers undertaking our pan-Wales employment based PGCE (the Salaried PGCE) and we have committed to continuing this grant funding for new student teachers for a further two academic years, AY2024/25 and AY2025/26. This approach supports student teachers unable to access full-time ITE provision, and schools to develop their workforce from within their community.
- Welsh Government continues to support our ITE Community Mentors, providing each ITE Partnership in Wales funding to enable them to access individuals with the lived experience and knowledge to support and challenge the implementation of their individual Black, Asian and Minority Ethnic ITE recruitment plans.
- The Welsh Government's Diversity and Anti-Racist Professional Learning (DARPL) project formally launched in autumn 2022 and is crucial to realising the Curriculum for Wales and achieving high standards and aspirations for all.
- The project is having a growing impact across the whole of Wales, with 20,000 leaders and educators engaging in live events, consultations and asynchronous resources during the 22/23 academic year alone.
- Work to collate a range of engagement and impact information in relation to DARPL is ongoing. DARPL anti-racist provision for senior leaders and governors from the school sector received endorsement from the National Academy for Educational Leadership in May 2023.
- The DARPL project progressed to phase 2 implementation in September 2023. This includes the extension of the DARPL virtual campus; refinement of the longitudinal community of practice, bespoke work with education consortia and local authorities and a key focus on wider dissemination, including international outreach.,
- DARPL representatives delivered a keynote address and drop-in sessions at the British Educational Research Association (BERA) annual conference in September and a DARPL representative attended the International Jamaica and UK Leadership Conference, to present on DARPL focused collaborations between Wales and Jamaica.
- Wales has led the way by becoming the first part of the UK to make it mandatory to teach Black, Asian and Minority Ethnic histories and experiences in the new Curriculum for Wales. The roll out to primary schools began in September 2022,



from September 2023, curriculum for Wales is being taught in schools and settings across Wales and our phased roll-out will continue on a year-by-year basis in secondary schools.

- In order to support delivery of our new Curriculum for Wales and our student teachers, Welsh Government has worked with the ITE sector to develop the refreshed Criteria for Accreditation of ITE programmes in Wales. The refreshed criteria explicitly require all programmes of ITE in Wales to be anti-racist and provides student teachers with the tools to create anti-racist learning environments for our children and young people.
- The Welsh Government's new Professional teaching award: The Betty Campbell MBE award, for promoting the contributions and perspectives of Black, Asian, and Minority Ethnic communities was awarded for the first time in 2022 to Llanwern High School, Newport.
- The Welsh Government will publish its new non-statutory Gypsy, Roma, Traveller school guidance in November. Using effective practice examples, the guidance will help teachers improve their knowledge and understanding of the needs of Gypsy, Roma, and Traveller pupils and address challenges which can be experienced by pupils; and how to break down barriers to understanding of their cultures. This includes ideas for engaging with local communities.
- In **Further Education (FE)**, a dedicated steering group has been established to ensure that the programme of work is co-produced by those with lived experience and expertise on anti-racism.
- Every FE institution in Wales now has an anti-racist action plan in place, supported by guidance commissioned from the Black Leadership Group.
- A unique FE anti-racist curriculum "metaverse" is being developed, led by Cardiff and Vale College, and will be rolled out across Wales from 2023/24 onwards.
- The DARPL programme is being extended to the FE sector from 2022/23 onwards, starting with a professional learning series for senior leaders.
- In the Higher Education sector, the Anti-Racist Wales Action Plan is being implemented by the Higher Education Funding Council for Wales (HEFCW). Noteworthy achievements to date include the establishment of a robust anti-racism network, the publication of race equality reports, and the provision of guidance on monitoring inequalities.
- From April 2024, this responsibility will shift to the Commission for Tertiary Education and Research which will have a broad range of powers, including regulatory responsibility for tertiary and higher education in Wales.
- We support provision of improvement funding to local authorities and the Higher Education Funding Council for Wales
- The Education Workforce Council are working with organisations such as Careers Wales to provide advice and promote careers in education.
- We continue to work with Education Workforce Council (EWC) to develop reporting of ethnic minority applications and acceptances on to ITE qualifications as part of their ongoing monthly monitoring and reporting processes.
- To enhance capacity building and sustainability moving forward, DARPL phase 2 will involve a significant investment in middle tier consultative work. This work is already well underway, with positive engagement from regional consortia, local authorities, Qualifications Wales and Estyn during the early part of the autumn term.

- In the sphere of **Welsh Language**, Cymraeg 2050 officials convened a group of key stakeholders to standardise a set of Welsh medium terminology with guidance.
- The Welsh Government's Knowledge and Analytics Service published an in-depth analysis of Census 2021 data in relation to Welsh speakers' ethnicity.
- A panel event, the first of its kind in Wales, to learn about the experiences of ethnic minority Welsh speakers was commissioned by Cymraeg 2050 Division's partner, Coleg Cymraeg Cenedlaethol, in conjunction with Cardiff and Vale College. The event, Perthyn, at the Senedd on 20 March 2023 was well-attended and well-received by participants.
- The National Centre for Learning Welsh is continuously reviewing its anti-racism work and is in the process of developing an overarching Equality, Diversity and Inclusion strategy.

## Health and Social Care

In Health and Social Services, the establishment of an Implementation and Challenge Board chaired by Judith Paget, Chief Executive of NHS Wales and Director General of the Health and Social Services Group in Welsh Government has provided a strong governance and accountability mechanism to accelerate the Anti-racist Wales Action Plan (ArWAP) action implementation.

Moreover, this demonstration of leadership at the highest level within the Group has ensured that the anti-racist actions have retained profile due to the cycle of scrutiny, and enabled policy leads to take forward actions with key partners. The Board has invited external partners and stakeholders to present the barriers and challenges that they face with ArWAP implementation and to act as a critical friend.

The Social Care ArWAP working group brings together partners, key stakeholders and members of the EAG to ensure collective accountability and to provide assurance to the EDI Implementation and Challenge Board that social care actions are delivering against the goals in the plan.

- Progress and challenges with the implementation of actions in the **Health and Social Care chapters** of the ArWAP are monitored by tailored accountability mechanisms including a Social Care Working Group and a Health and Social Services Implementation and Challenge Board. These mechanisms have sustained high level buy in by the Executive Directors Team who have worked, via the Board, to provide a collective approach in addressing systemic barriers and resourcing issues.
- For the first time in 22/23, each NHS Wales Board Chair had to respond to the Minister for Health and Social Services to outline what steps they, and their Board members had taken, to demonstrate anti-racism leadership within their NHS organisation.
- Each Board member in each NHS Organisation in Wales had to identify a personal development objective to include anti-racism. Every NHS organisation has also had to develop an anti-racism action plan and commit to reporting and acting on the disparity in workforce experience.

- The work of the Social Care Working Group is routinely reported to the social care senior leadership team, and the group is attended by senior members of the social care sector. Delivery is also a part of the Social Care Wales business plan and is reported quarterly to the Board.
- Workforce data for health and social care will be analysed and reported for the first time by the introduction of the Workforce Race Equality Standard (WRES) with indicators measuring inequities in leadership and career progression, CPD and training, disciplinary and capability processes, and Bullying, harassment and discrimination.
- Diverse Cymru have completed an audit of all-Wales NHS workforce policies through an anti-racist lens. Recommendations from the audit will be incorporated into the protocol for the development and review of all Wales NHS Workforce Policies and key principles and recommendations will be shared for use in local policy review and design processes.
- In September 2023, the Welsh Government appointed an Equality, Diversity and Inclusion manager within the Maternity and Neonatal policy team, to take forward the maternity and neonatal action points in the ArWAP. The manager is a midwife representing the global majority and will continue to work with key community stakeholder groups to ensure sustainable solutions are implemented for key issues. She is currently scoping a national framework for maternity and neonatal voices to influence policy and service delivery.
- The EDI manager has worked with the Royal college of Midwives to initiate a peer support forum (Inclusive Maternity Wales) to provide guidance, and empowerment to the global majority workforce. In partnership with the Royal College of Midwives (RCM), trends and themes will be reported Heads/Director of Midwifery in Wales meetings and to the Chief Midwifery officer to inform future policy plans.
- AA WRES function has been established within Health and Social Services Group, (HSSG) working in collaboration with delivering partners across the NHS and Social Care. This function is led by Professor Anton Emmanuel who previously led the WRES in NHS England since 2020. The WRES when fully implemented will identify and measure progress on race equality indicators for the workforce across Secondary, Primary and Social Care.
- The inaugural WRES data collection for secondary care will be in April 2024, with data collection for primary care and social care commencing before October 2024. Reports for will be produced at an Organisational and national level. The requirement to report this data in the NHS is mandated through the NHS Performance Framework and will include data across protected characteristics.
- In December 2022, funding was announced for the implementation phase of Digital Maternity Cymru to tackle the lack of reliable data to track clinical patterns and poor outcomes in real time on an ethnicity basis, ensuring clinical decision-makers receive timely alerts to allow for intervention and escalation. It will also enable a robust national dashboard with key data based on mother and baby's ethnicity to ensure work is prioritised to tackle poor outcomes.
- In line with the commitment we gave in the Anti-Racist Wales Action Plan, we are continuing to work with the Mental Health Ethnic Minorities Task and Finish Group to address the barriers faced by minority ethnic communities and to support better access to services. We are planning to consult on a new Mental

Health Strategy at the end of the year and this will include a specific focus on supporting those with protected characteristics.

- Promoting cultural competency is a key priority in the existing Mental Health Delivery Plan for Wales – and we have provided Diverse Cymru with additional funding to continue to deliver their cultural competency scheme and training. This funding ends in March 2024. Promoting cultural competency will remain key priority in the new Mental Health Strategy for Wales – and this will also be supported by the Health Education and Improvement Wales (HEIW) and Social Care Wales [Strategic Mental Health Workforce Plan](#).
- Other key areas of work include the development of guidance (by Improvement Cymru) to improve access to and the provision of psychological interventions to people from Black, Asian and minority ethnic communities in Wales. It is anticipated this work will be published by the end of 2023.
- Recognising the needs of specific groups, the Welsh Government also continues to fund Traumatic Stress Wales (£1.2million annually), which aims to improve the health and wellbeing of people of all ages living in Wales at risk of developing, or with, post-traumatic stress disorder (PTSD) or complex post-traumatic stress disorder (CPTSD). Traumatic Stress Wales has a specific work stream focussing on the needs of asylum seekers, refugees and migrants (involving those with lived experience).
- A fundamental aim of our work to develop the successor to Together for Mental Health will be to reduce inequalities in access and outcomes for all groups where there is a barrier to accessing support. This will include actions to ensure services meet the all-Wales standards for communication and information, and also language and other protected characteristics. We continue to make available resources in multiple languages – to support access to healthcare – which has included translating resources such as the **National Centre for Mental Health Toolkit for people who have been exposed to traumatic events, and materials to promote the** CALL mental health helpline (into over 20 languages). CALL also uses Language Line – which means anyone calling the helpline can access support and advice in their preferred language. We are also working with Public Health Wales to implement the recommendations from the HEAR 2 Report on access to interpreters amongst asylum seekers, refugees and migrants.
- In terms of ongoing monitoring of impacts: There are ongoing monitoring arrangements in place for initiatives such as 111 press 2 and the CALL Mental Health Helpline. We are also working with partners to develop the Mental Health Core Data Set. We are prioritising demographic data – such as age, gender and ethnicity – which will support our ability to plan services based on the needs and demands of our population. We understand the need to have data publicly available and we are working towards having an initial national dashboard on mental health activity, as soon as possible. As we develop our successor Mental Health Strategy, we will consider what further action we can take. This will be subject to formal consultation at the end of the year.
- More broadly, we know there are data gaps when it comes to health inequalities. These gaps make it difficult to assess need, accurately target and prioritise interventions and evaluate their impact on the people of Wales. Furthermore, the potential impact of data in tackling health inequalities could be amplified if datasets were brought together more effectively. Work is being undertaken by a data sub-group (of the main NHS Health Inequalities Group) to consider how to address the current gaps and inform future interventions and policy. By

addressing these gaps in data, the NHS Health Inequalities Group will ensure a health inequalities focus is embedded across the priority work of NHS Wales organisations.

- Since its establishment in April 2023, the Citizen's Voice Body for Wales known by the operating name, Llais, has highlighted the need for foundational grounding in antiracism frameworks and approaches to facilitate ongoing self-reflection, accountability, and attention to racial equity, and provide questions to guide such reflection and consideration. By adopting these approaches Llais aims to be more accessible and more inclusive in both employment and workforce practice, and in capturing the lived experiences of Black, Asians and Minority Ethnic people.
- In social care, the Association of Directors of Social Services Cymru (ADSSC) have completed a project to map out the existing cultural, language, and interpretation/translation, needs of minority ethnic people using social care services to aid current and future service planning and the provision of spoken and written translations. This work involved securing baseline of numbers and nature of complaints in relation to lack of provision to compare with changes sought. The report can be found here: [Delivering Social Care in an Anti-Racist Wales \(adss.cymru\)](https://adss.cymru)
- Welsh Government social services officials have worked with their statistics colleagues to undertake an analysis of all Welsh Government social services published statistics that contain an ethnicity measure, and the intersection with other protected characteristics. This analysis identified areas where further development was required and made recommendations about how to fill any gaps in the published data. The new Adults Receiving Care and Support Census now collects data about all adults who use social services and includes data points on ethnicity so that we have better intelligence on minority ethnic people who receive a social service and the types of services they receive.
- The Welsh Government has also identified data gaps and what action can be taken to improve the data quality of race and ethnicity identities (alongside the other protected characteristics). The Welsh Government is working with Social Care Wales to review and revise the Social Care Research and Development Strategy in respect of matters relating to minority ethnic social care users and the social care workforce (including lived experiences).
- This will improve the development, collation, and use of evidence in Wales and link to any gaps in research that can assist with the delivery of all the above social care Goals and Actions in this Plan.
- The Welsh Government is also working closely with Social Care Wales to make sure there is diversity of their public appointments through their current Board recruitment exercise. The Welsh Government social services directorate is also reviewing the membership of all stakeholder groups to set expectations of representation from ethnic minority communities.

## Housing

- The Registered Social Housing diversity report for 2021 reveals a 6% representation of ethnic minority people on boards, slightly surpassing the general population. This marks a 4% increase since 2014. However, the report

notes the lack of diversity among housing association chairs and emphasises the need for greater inclusivity in leadership positions.

- The Get into Housing project offers paid work placements to long-term unemployed individuals from minority ethnic communities in Cardiff, aligning with the Anti-racist Wales Action Plan goals. Furthermore, starting from 2023-24, housing organisations receiving grants will be required to have an Equality & Diversity policy in place, with focused attention on implementation.
- Some Registered Social Landlords in Wales are continuing to deliver the pathway to board project. The project is a continuous professional development opportunity designed to better equip individuals from minority ethnic communities who want to contribute to the leadership of an organisation.
- Progress has been made in training staff in housing organisations. As at March 2023, Tai Pawb had trained 547 people on equality, diversity and inclusion with 92% of attendees, recommending the training to others.
- The Ending Homelessness National Advisory Board successfully recruited independent members from a Black, Asian, and Minority Ethnic background. The advert for the expression of interest for the Chair of the Board was shared with equality organisations, such as Disability Wales, Stonewall Cymru, Women's Equality Network, Ethnic Minorities and Youth Support Team Wales to encourage a more diverse field of candidates.
- A workforce recruitment campaign to encourage a diverse range of people to join the homelessness and housing support sector launched in February 2023. Whilst the outcome from this campaign will emerge more fully over time, it is worth noting at this stage the number of users to the jobs site in March 2023 was 19,101 compared with 574 prior to the campaign. Initial feedback has included an increase in the diversity, number and quality of applicants.

## Crime and Justice

- Our Anti-racist Action Plan includes a specific chapter on Crime and Justice, outlining the work Welsh Government are taking forward, including on hate crime and highlighting the importance of anti-racism whenever we engage with the UK Government on justice issues. It highlights joint work by the Criminal Justice in Wales partners, including Policing in Wales, HM Courts and tribunals Service and Her Majesty's Prison and Probation Service in Wales, on a specific anti-racism plan for the criminal justice system in Wales. This Criminal Justice Anti-racism Action Plan for Wales (CJARAP) launched on 8 September 2022, and was co-produced with ethnic minority people across Wales. The CJARAP complements the Welsh Government's Anti-Racist Wales Action Plan and we have agreed an approach for managing the interface between delivery of the two plans.
- To achieve a more culturally competent and anti-racist criminal justice system, the Race Equality Taskforce, responsible for implementing the CJARAP, has established a "Cultural competency, Education and Training" workstream. This is focused on identifying the effective and evidence-led training and education packages related to race that are currently available to employees across the criminal justice workforce in Wales.
- We have worked with the police and other criminal justice partners to create the Criminal Justice Anti-Racism Action Plan for Wales (CJARAP) which launched in September 2022. It sets out seven commitments to realise an anti-racist justice system in Wales in practice. The CJARAP complements ArWAP, and we have



agreed an approach for managing the interface between delivery of the two plans.

- An Independent panel provides oversight on the CJARAP and had its first meeting in January 2023. A 2-year Implementation Plan has been developed to drive forward progress on realizing commitments in the plan.
- We are supporting victims of racially motivated hate crime by funding the Wales Hate Support Centre, run by Victim Support Cymru. This provides free, confidential support and advocacy for those who have experienced racist hate crime, including intersectional hate crimes.
- We are working to eliminate hateful attitudes through roll out of our anti-hate crime communications campaign, Hate Hurts Wales, which will run until at least March 2024.
- Funding is provided to the Holocaust Memorial Day Trust to employ a support worker in Wales to encourage community commemorations in Wales for Holocaust Memorial Day 2024.
- Our Community Cohesion Programme funds eight teams across Wales to provide front-line support to communities, to help monitor and mitigate tensions. The programme will be funded until 2025/2026.
- We are supporting criminal justice partners to strengthen the evidence base to identify racial disparity within the justice system. As part of the work to monitor progress on implementing the CJARAP a race disparity dashboard has been developed which will be populated by data from each of the criminal justice partners that have committed to the CJARAP.
- The Welsh Government funded Wales Hate Support Centre has developed a Lived Experience Advocacy Forum (LEAF) to continually seek improvement of the service. LEAF is made up of past service users, including representation across the five strands of hate crime. LEAF provides the Centre with valuable feedback, which is used to review the service, such as the Centre's complaints procedures and identifying barriers to reporting hate crime. The Forum members also helped to inform the development of the most recent phase of the Welsh Government anti-hate crime campaign, Hate Hurts Wales.
- In terms of crime and justice an Independent Oversight and Advisory Panel will feed in individual lived experiences and monitor the delivery of the 7 commitments in the [Criminal Justice Anti-racism Action Plan for Wales](#) (CJARAP) which is being led by Criminal Justice in Wales partners with support from Welsh Government. It will test whether the plan is making a real difference at both grassroots and operational levels. A draft two-year Implementation Plan has been developed to bridge the implementation gap and an annual report will set out the progress each justice partner is making towards these commitments.
- As part of the work to monitor progress on implementing the CJARAP a race disparity dashboard has been developed which will be populated by data from each of the criminal justice partners that have committed to the CJARAP. This will be used to measure the effectiveness of the plan.
- Welsh Government officials from the Race Disparity Unit are represented on the CJARAP Data and Performance workstream and they will ensure that the work of this workstream coordinates with work being taken forward in the Race Disparity Evidence Unit.
- Welsh Government will continue to hold criminal justice partners accountable for progress and encourage change.

## Annex 2

### Race Disparity Evidence Unit

The projects the Race Disparity Evidence Unit (RDEU) has been delivering/has delivered are:

- A data audit of protected characteristics statistics published by Welsh Government that has established where gaps exist (the first phase will be published early 2024). The second phase of this work involves looking at statistics that are collected but not published internally and seek to understand why they are not published and encourage people to do so where it is possible to.
- Alongside the audit the unit is scoping a complementary research project to explore the challenges and barriers to the collection of equality data across a range of evidence. This project aims to identify solutions to these challenges to support analysts to tackle them.
- A pilot survey of the diversity of leaders in public sector bodies and how workforce diversity data is collected was conducted to inform future work around workforce and public leader diversity. Alongside the survey a literature review is appraising strategies to increase diversity, barriers to recruitment, retention and career progression, methods for monitoring diversity and the benefits and impacts of diversity. The survey was issued in summer 2023 and a report on the pilot is due early in 2024; this will include recommendations for an ongoing regular collection of equality information on Public Sector Bodies Boards.
- A feasibility assessment of an ethnicity sample boost to the National Survey for Wales is being undertaken. For this an in-house rapid review of potential sample boost options has been completed, and a technical assessment of sampling approaches has been commissioned..
- A Census statistical release was published on July 5th, 2023. This provides summary data on ethnic groups by health, housing, education outcomes and economic status for individuals and households who were usual residents of Wales at the time of the census, on 21 March 2021. This will form one of the baselines for the evaluation of the ArWAP. The RDEY is exploring options for further data analysis using Census data e.g., intersectionality.
- An ethnicity sub-report of the Wellbeing of Wales annual report was published on September 28<sup>th</sup>, 2023.

The RDEU work on developing a framework to set out how to measure and evaluate the impact of the ArWAP across Welsh Government and the wider public sector is being carried out in partnership with the EAG evidence subgroup involving members who have an interest and expertise in measurement. The draft framework currently sets out how the ArWAP intends to elicit change from action to goals, evidence of seeing the desired change and the overall aim of an anti-racist Wales.



The development of such a framework relies heavily on the collection of high-quality data and evidence to measure changes to practices and outcomes within policy areas as well as overall outcomes for people.

The RDEU will focus on collecting lived experiences of people from ethnic minority backgrounds in order to measure and understand impact and progress on-the-ground. The unit is seeking to work closely with those with lived experience (using connections through the EAG research and evidence subgroup) to ensure their views are included.

Whilst the unit acknowledge this is a key aspect of its work, this type of research is time and resource intensive and the unit is considering carefully how to deliver this work effectively. It is also important to note some of the challenges in this such as ensuring that we do not overburden participants and ensuring adequate remuneration, and that we act upon the evidence we gather. The unit works closely with colleagues in the equality and disability evidence units who are developing an approach to co-producing research including addressing and overcoming the challenges.

The RDEU supports policy areas and analysts to measure progress within their areas and to:

- Highlight the importance of having a consistent approach to the collection of ethnicity data;
- understand what ethnicity data and evidence is being collected and identify gaps;
- provide advice, guidance and support to policy and analytical colleagues in the collection and analysis of ethnicity data and evidence;
- disseminate lessons learnt about good practice and challenges;
- influence the collection of ethnicity data and evidence and ensure it supports the aim of developing measurement indicators to show the impact of the plan;
- mainstream the collection of ethnicity data and evidence throughout research being undertaken by Welsh Government.

The various published and on-going RDEU projects will address some of the priority gaps in evidence in turn feed into the evaluation framework. The ArWAP evaluation framework will provide the roadmap for how to address gaps in both quantitative and lived experience evidence for the ArWAP.

The RDEU recognise that the task of improving the collection of ethnicity data and evidence and evaluating the impact of ArWAP is considerable and cannot be undertaken without close partnership with a wide range of internal and external stakeholders, including public sector partners and those with lived experience. The following example is just one of the many ways they are working with others to address gaps by influencing the collection of ethnicity data and evidence and ensure it supports the evaluation of the impact of the ArWAP:

### *Case Study: Education and the RDEU*

- Further Education policy colleagues wanted to undertake qualitative research designed to better understand the lived experiences of ethnic minority learners and staff in the Further Education, apprenticeship and adult learning sectors, including their experiences of racial discrimination and harassment and their views on what needs to change to achieve the anti-racist Wales ambition. They supported colleagues to specify, procure and quality assure the work to ensure it put the lived experiences of ethnic minority people at the centre of the design and delivery of the research, both by ensuring that ethnic minority people play lead roles in delivering this contract, and by ensuring that the outcomes of the qualitative research are used to shape the continued delivery of anti-racist actions for the FE sector.
- They are using the lessons learnt from undertaking this piece of lived experience research both in procuring and conducting the research to inform our own practice and disseminate this to policy and analytical colleagues. This research was [published](#) on October 5th, 2023.

Following publication of the ArWAP evaluation framework, the RDEU will continue to work with policy areas to support them to improve priority evidence and performance measures in their areas. In later phases of the data audit the RDEU will look beyond the scope of the ArWAP, with a view to improve ethnicity evidence in partnership with analytical colleagues more widely.