

Consultation response to the draft Race Equality Action Plan the Bevan Foundation

The Bevan Foundation is Wales' most influential think-tank. We aim to end poverty and inequality by working with people to find effective solutions and by inspiring governments, organisations and communities to take action.

We are grateful for the opportunity to respond to the draft Race Equality Action Plan. Our extensive work on migration and integration provides us with some insights into the difficulties faced by those who have migrated to Wales, and their experiences of racism and discrimination. Our response draws on this experience, and also on discussions with our partners South Riverside Community Development Centre (submitted as a separate response).

Overall we see the plan as an extremely important step in tackling racism and discrimination. In doing so, the plan sets out a wide range of significant challenges that are a mix of socio-economic problems that are combined with racism and discrimination. Addressing the issues facing people from BAME communities therefore requires a nuanced approach that both solves wider societal issues and eliminates racism. For example, improving the housing of people with BAME backgrounds who live in the private rented sector requires a combination of action to improve the quality and affordability of housing *irrespective of ethnicity* as well as action to stop discrimination within the provision of housing.

Does the vision, purpose, values and the imagined future to 2030 reflect what you would like to see achieved by 2030? What may get in the way to realise the vision and values? What may help to realise the vision and values?

1. We welcome the Welsh Government's vision of an anti-racist Wales by 2030 and its plan to realise it. The ambitions in the plan demonstrate the Welsh Government's commitment to tackling racial inequality, racism and discrimination and are a powerful acknowledgment of the issues that continue to persist across society.
2. Whilst supporting the plan, we are concerned that the vision of an anti-racist Wales lacks detail on what an anti-racist society looks like. It is also unclear about the extent to which it includes 'everyone' who experiences racism including migrants.
3. The plan is comprehensive and reflects the considerable work and engagement that has been undertaken to compile it. However, the plan will not be realised unless it is sufficiently resourced and its impact can be

measured. We understand that the plan is at a draft stage, but we stress that a final plan should proposals for delivery. One of the key messages from our discussions with community groups is the need for measurable impacts, without which trust in the Welsh Government's commitment and ability to deliver could be seriously undermined.

4. We particularly welcome the creation of the Race Disparity Unit and feel this will help with collecting more insights through data and so be able to monitor progress and demonstrate impact. However, measuring racism can be particularly difficult. For example using recorded hate crime as an indicator of community tensions is problematic because of the levels of hate incidents which go unreported - would an increase in reporting be seen as a success because of greater awareness of hate crime or would it indicate a rise in racist abuse and violence? The final plan will need to set out clearly the indicators to be used to measure success and how these will be interpreted.
5. While supportive of the outcomes, we are particularly concerned that some will be difficult (and in some cases impossible) to deliver, particularly without some form of UK-wide approach, and to a certain extent, international support. One example is the vision that *hate crime in the media, including social media, will no longer occur*. Unfortunately, Welsh Government action alone will not be enough to eradicate racism from the media and success will be extremely difficult to measure. Failure to achieve these outcomes could undermine people's overall faith in the plan.
6. Although there is a clear case for change, the plan provides little detail of how it will engage with wider society and organisations across the public, private and third sectors to garner support for its vision.

Question 2: Views on the policy goals

7. The plan focuses on 13 policy areas and 5 cross-cutting goals. We are concerned that while it is important to address all areas, the plan should have a greater focus on the key areas of concern to the community e.g. health, housing, education and employment. While an overarching plan on tackling racism is welcomed, given the importance of these four areas it may be necessary to develop separate plans in each of the key policy areas to ensure targeted and measurable action.
8. We welcome the inclusion of action to improve cohesion but we are concerned that its vital importance will be diluted because of the large number and range of other actions. The action plan aims to ensure that people from ethnic minority backgrounds are treated equally and are free from discrimination and racism, that they can access services and contribute socially and economically, free from barriers. A cohesion strategy would set out how to develop sustained, meaningful and

constructive contact between different people, regardless of their background.

Education

9. Education is a key policy goal and actions to improve the experiences of Black, Asian and Minority Ethnic learners and teachers and improve understanding of diversity and racism in the education sector is welcomed.
10. Schools have been at the centre of celebrating diversity but more could be done to support pupils and teachers. All those working within the education sector should receive training and guidance to enable them to decolonise the education system and adequately support both victims and perpetrators of racist abuse.
11. In our previous work issues were raised about the underreporting of racism in schools. The Welsh Government should commission an analysis of how schools currently deal with racism and the further support and guidance that is required to address it.

Health

12. Access to health is a key priority and we welcome the actions set out in the draft plan. However, actions set out in the plan will be taken at a time when the NHS faces one of the biggest challenges in its history. We are concerned that without sufficient resources and buy-in across the NHS implementing the proposed actions will be difficult. The final plan must include details of resources and how impact will be measured.
13. It is important that the actions set out in the plan becomes part of the narrative of the NHS post-pandemic recovery. For instance, action on creating a more diverse workforce should sit at the heart of a strategy of recovery.

Housing

14. We welcome the proposed actions to increase representation of ethnic minority people in senior leadership and at all levels of the workforce within the housing sector and to ensure that housing and accommodation standards, provision and services advance race equality, embed anti-racism, equality and human rights, and meets the needs of different and diverse ethnic minority groups.
15. We would recommend that this approach is not just confined to housing – an increase in representation of people with ethnic minority backgrounds at senior levels in all areas of public life is needed, along with embedding anti-racist practices in all standards and services and meeting diverse needs.
16. However, these are essentially management issues. Based on the feedback from the community and our previous work with migrants, the priority is to

address issues related to poor quality and affordability of housing within the private rented sector – which is especially important to BAME groups - and we therefore welcome the proposed private sector action plan.

17. The action plan includes a commitment to support people with No Recourse to Public Funds and EU Citizens who have not yet applied for EU Settled Status to access shelter and the services which they are entitled to receive. However, support must be extended to other migrants who may also face issues when accessing accommodation.
18. We have called for training on migrant rights for front line service providers and we are pleased to see training delivered to 400 local authority housing and social services officers to ensure they understand these rights. This training should be of a high standard to ensure that officers have a good grasp of the complex legislative framework. It should also include unconscious bias training and guidance and support on how to use Language Line. Training should be provided on a regular basis to ensure officers are kept up to date with any changes.

Employment, income and entrepreneurship

19. We welcome the actions to improve employment, income and entrepreneurship opportunities, however we are concerned that the plan does not provide much detail on how it will address issues across the private sector. We are particularly concerned that the plan does not provide any details on how it will protect the rights of migrant workers who are often concentrated in the economic sectors with the worst terms and conditions e.g. food manufacture and hospitality.
20. Providing opportunities for entrepreneurship will be welcomed as many people from ethnic minority and migrant backgrounds would like to explore these options. However, many will face issues around access to finance and the plan lacks detail on how these barriers will be addressed.

Are there any goals which are missing?

Language

21. Within individual policy areas there is information on addressing support around language. However, as a result of our work on migration, integration and with the community it is clear that access to language skills and support is crucial and should be an overarching policy goal. Language can and does act as a significant barrier to accessing health, education, housing and housing.
22. People who face a language deficit face significant difficulties exercising their human rights. They can become trapped in poverty, can have fewer opportunities to develop social connections which can lead to loneliness, isolation and poor mental and physical health.

23. The final plan should include a specific policy on access to language.

Migrants and the hostile environment

24. We are concerned that the plan lacks very little detail on protecting migrant rights, particularly in the context of the hostile environment and changes to the immigration system. Through our work examining this issue we have found that many people from migrant backgrounds will face additional barriers as a result of right to work checks, when finding accommodation and trying to access health care.

This plan has been developed in co-construction, and discussions around language and identity have shown that many people do not consider the term 'BAME' to be appropriate. As a result we refer to Black, Asian and Minority Ethnic people or particular ethnic minority people in the Plan. However, we recognise that this term is also problematic and, where possible, being more specific to the particular race or ethnicity an individual or community identifies with is generally preferred. However, there are times where it is necessary to make reference to all those people who share the experience of being subject to racism. We have used the term Black, Asian and Minority Ethnic people for this purpose. What are your views on this term and is there an alternative you would prefer? Welsh speakers may wish to consider suitable terminology in both languages.

25. We agree that the use of the term 'BAME' has become particularly problematic. By grouping all minority ethnic groups together it does not reflect the diversity of those being described and excludes those who identify as having mixed identity or want the option to self-describe.

26. While we agree that there are issues with the term we also believe that choosing an alternative is inherently difficult and believe that individuals should have their personal preference respected.

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

27. The length, breadth and complexity of the full and summary draft action plan makes it very difficult for wider audiences to engage with. The 'easy read' version is too simplistic.

28. The Welsh Government should ensure that the final plan is less complex. We suggest an outcome-focused action plan accompanied by a separate 'technical' document which includes the detail around each action.

29. Considering the positive feedback from the consultation, it could prove worthwhile to carry out information sessions so community groups can find out about the plan and its actions.

Bevan Foundation

20th July 2021