

## Consultation Response Form

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## Consultation questions

The Action Plan has three distinct areas we would like you to give us your thoughts on. They include the vision setting pages, the policy themes with their goals and actions and the governance section.

You may want to comment on one or all of these areas.

Below are some questions that may guide your responses:

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

We would certainly like to see the vision, purpose and values achieved by 2030. Wales would be all the better for it. But a great deal of resource and support will be required for it to be a success.

**The ongoing effects of COVID-19** remain a barrier to success. The pandemic is known to have disproportionately impacted those from Black, Asian and Minority ethnic communities with many unable to work from home and therefore were more exposed to the virus. Recovery from the pandemic is almost certainly going to lead to furthering of austerity as UK Government looks to balance its budget, potentially impacting Welsh Government's own budget. Austerity has previously also disproportionately impacted minority ethnic people, with many living in less well-off communities who bore the brunt of cuts to services. This was fundamentally unequal and if the same thing happens again, it will negatively impact the chances of the Race Equality Action Plan's success.

Another barrier, echoing the response from the Equalities and Human Rights Coalition, facilitated by WCVA, is the **lack of a clear definition of 'racism' and 'anti-racism'** in the Plan. As the Coalition notes, racism is far more than 'overt acts of racial hatred', it is 'the casual insensitivities, the widely accepted perceptions based on untruths and a general lack of understanding of the lived experiences of ethnically diverse people'. To ensure Wales becomes anti-racist by 2030, Welsh Government needs to spell out exactly what it thinks anti-racism means. This, and ensuring the Plan's success in general, will mean much more engagement with the public. Anti-racism is not uppermost in most people's day-to-day lives. An extensive programme

of public engagement will be necessary to help people realise the extent of the problem and feel invested in becoming part of the solution. The [National Principles for Public Engagement](#), endorsed by Welsh Government, can help with this. The goals of the Future Generations Act could also be emphasised as part of this engagement – as we have [previously stated](#), the sector feels the Act is ‘remote’ from the realities of people’s lives, and this may present an opportunity to bring it into sharper focus.

**Investing further in the voluntary sector** is also necessary to further increase the chances of the Plan’s success. The sector works more closely with grassroots communities, including seldom-heard people – which includes many people from Black, Asian and Minority ethnic backgrounds – than any other. **Secure, multi-year funding cycles** would allow sector organisations and volunteers, particularly those working specifically with Black, Asian and Minority ethnic communities, to further enhance the participation of Black, Asian and Minority ethnic people in communities across the country. As shown by the initial volunteering response to the pandemic, volunteering is key in bringing people together of all sorts of backgrounds. On the subject of the sector’s engagement with grassroots communities, we would like to highlight the role the tools developed by the [Better Futures Wales project](#) could be in creating positive, anti-racist communities. There is also potentially a role here for projects funded by any future **Community Wealth Fund**.

Organisations across Wales must be further encouraged to **co-produce and co-design** their services with their service users. In establishing these relationships that people of all backgrounds can come together and form a shared ownership of services and projects and enhanced respect for each other, eventually contributing to making Wales a less racist country. The [2021 Voluntary Sector Manifesto](#) advocated for a **Community Empowerment Act**. This would improve levels of co-production, emphasize place-based development and improve rights for organisations seeking a transfer of community assets. Many volunteering activities will not directly aim to improve community cohesion, and will have different primary purpose. However, these groups can potentially play a role in bringing together the community and should be recognised in any plan, alongside more groups which more obviously have community development and integration in their functions. Such an act would be hugely beneficial for community cohesion in general, thereby helping create an anti-racist Wales.

There will need to be a **benchmark** set out to measure the impact of all the Plan’s actions, so that its success, or otherwise, can be measured. Without this, how can it be seen what is working and what is not?

Finally, a note on the **Social Partnership and Public Procurement (Wales) Bill**, which appears to be set to be a key plank of Welsh Government’s legislative programme for the next few years. WCVA supports the main thrust of the Bill and certainly fair working rights are a key element in creating an anti-racist country. However, this will be made far more difficult if the sector does not receive an increased number of seats on the Social Partnership Council. As [previously noted by WCVA](#), Trade Unions get half the seats, yet minority ethnic membership of Trade Unions is under 9% while only a third of Welsh workers are members of Trade Unions. This means potentially a huge, diverse range of voices will go unheard by the SPC. One way to resolve this is to

ensure that the SPC better represents the diversity of Wales, ensuring that community and voluntary organisations are able to get their voices heard.

**2. We would like your views on the goals and actions. To comment on some or all of the goals, actions and outcomes please reflect on the below:**

**(a) Does the explanation (narrative / background) make clear why we have chosen the goals and actions in this policy area?**

WCVA is disappointed in how little recognition the Plan offers on the informal volunteering work done by Black, Asian and Minority ethnic individuals for their respective communities – just a couple of sentences on page 102 and the final goal of the tables. This poses the challenge of how we can measure Welsh Government success in recognising these efforts when there is no timescale or concrete actions to do so. It's possible volunteers could be given time credits and a reward system will be co-created – but with whom? What would those rewards be – and is this recognition enough? Could receiving an award be tied with eligibility for funding (as mentioned on page 102) to formalise volunteering efforts?

WCVA feels volunteering, both formal and informal, should have been highlighted within the section 'the case for change', alongside workforce experience under 'governance for implementation', and either given its own heading or be strongly intertwined with other relevant policy goals.

**(b) Is it missing any priorities, background or other information?**

**(c) Do you agree with the selected goals and actions? What would you add or take away in relation the actions?**

A specific goal around community cohesion would be welcome. A Community Cohesion Programme is referenced in the Plan, but without any mention of the role volunteering could play in it. WCVA would welcome discussions with Welsh Government around how volunteering could help make the programme a success.

**(d) Will each goal and associated actions create the desired outcomes we have stated? If not, what would you want to change so that we achieve changes that are truly anti-racist in the time scales stated?**

**(e) How could the positive or negative effect be increased, or mitigated?**

- **Education:**

On page 69, it's mentioned that Welsh Government will 'challenge' grant partners, such as the Urdd, Mentrau Iaith, Mudiad Meithrin and RhAG to 'consider their role in articulating positive attitudes around race, ethnicity, equality in addition to Welsh

language and culture heritage'. Organisations such as these may well need additional support to undertake activity such as this.

Much positive integration and equality work is done primarily through volunteering, yet this is nowhere to be found under this heading. Volunteering is already and will continue to be part of the solution to tackling anti-racism in children, young people and adult education settings, and should be recognised as such.

- **Hateful crime and justice:**

Comments elsewhere in this response regarding cohesive communities, in particular a Community Cohesion Act, are all relevant to this goal.

- **Housing and accommodation:**

The voluntary sector supports fair and equal access to housing. There might be a need for specific support for housing providers and agencies working with people who are homeless to implement the plan.

- **Employment and income:**

WCVA administers Active Inclusion through the European Social Fund. Black and Minority Ethnic Communities are among the participant groups set by the European Commission.

It would be useful to see the final plan recognise the key learning and best practice that groups that help deliver employability activities to the Black and Minority Ethnic population can provide. These groups, such as Ethnic Youth Support Team, have a deep understanding of the barriers faced by Black and Minority Ethnic people in accessing work. This, in turn, helps address cross-cutting themes such as poverty, social inclusion and sustainability.

- **Health:**

WCVA echoes Marie Curie's comments about the importance of compassionate and sensitive data collection in health. It is vital people know exactly why their data is being collected and what it might be used for. Training for relevant staff may be necessary.

We are unsure where [Helpforce Cymru](#), a collaboration of partners working to raise the profile and strategic role volunteering in health and social care, sits among the 'health services and outcomes' section. Will there be expectation to meet the same anti-racism standards and goals as the NHS and will there be a chance to receive the same training?

- **Social Care:**

The importance of equitable access to health, social care and well-being support services has been an issue routinely reported and magnified during the pandemic. The vision, within the context of health and social care, is important in terms of working together; where health and social care provision is available and reachable and considers cultural needs and language from the first point of contact; citizen engagement in service design through to service delivery, and evaluation of services.

The Values are those we would expect to be adopted in health and social care, as is the importance placed on the lived experience to inform, change, and innovate. However, from a well-being perspective we would suggest this should be added as a cross-cutting goal, in line with the Well-being of Future Generations Act, as it has a role to play across the policy areas set out on page 9 of the summary document.

Better support for unpaid Black, Asian and Minority ethnic carers from public, private and third sector is mentioned as a desired outcome (Goal 2). However, there is no mention of training and support being provided to voluntary sector organisations to achieve this under 'actions'. It could be an oversight, but equal training and support must be provided to voluntary sector social care service providers, alongside public ones, in order to ensure the completion of this goal in a way that doesn't put voluntary/charity organisation under enormous amounts of pressure to figure it out on their own. It would be helpful if, as part of any such training, managers were made familiar with Social Care Wales' principles of [Compassionate Leadership](#). There is huge merit to be found in collaborative training - examples include Academi Wales and One Welsh Public Service programmes.

Volunteer experiences would provide valuable insight under 'ambitions for future research' (p64), but these do not appear to be being considered.

- **Leadership and representation:**

As a goal exists for senior leadership and boards of public bodies across the country to be trained to a certain level of diversity and inclusion standards (including "CEOs of all public bodies to identify one inclusion and diversity objective, which a focus on anti-racism") then it would make sense for voluntary sector representatives, such as CVCs, to also have the opportunity to also receive training to adhere these standards.

The goal around enabling the development of Black, Asian and Minority ethnic community leaders is very welcome. In seeking to achieve this, Welsh Government must consider previous research undertaken on place-based theory, looking at how a sense of pride in the place they live can empower communities and create leaders. WCVA's report on [Empowering Communities](#) has more on this.

We welcome the ambition for public bodies to use their spending power to improve leadership and representation across the public, private and voluntary sectors – but we

will need a timescale to measure success, and enough time for the sector to adjust to any new requirements, along with appropriate support to do so.

- **Arts, Culture, Sports and Heritage:**

To ensure the action to ‘increase ethnic diversity in the workforce at all levels, and specifically in leadership teams and on boards, as well as in paid and unpaid planning, design, curation and decision-making roles’, it will be necessary to make sure there is

systemic monitoring of progression of paid roles, ensuring there no discrimination in terms of promotions and available opportunities for employees from ethnically diverse communities. Resources – both time and funding – will need to be allocated to enable effective engagement with Black, Asian and Minority Ethnic communities. Training in engagement and facilitation may be required for the staff of public bodies.

Regarding funding, grant-assessing panels must be diverse and reflect the population, and resources should be available for grant funders to promote schemes to Black, Asian and Minority Ethnic communities.

Under Goal 3, we would like to see annual celebration and acknowledgement of the contribution of ethnically diverse communities in sport, heritage and culture, profiling role models.

Under Goal 5, as well as structured volunteering programmes, paid internships and apprenticeships should be considered as a way to involve people from Black, Asian and Minority Ethnic Communities in cultural and sporting activities.

- **Environment**

The ‘environment’ goal is surprisingly short, stating only an ambition to remove barriers to encourage more people from Black, Asian and Minority ethnic backgrounds to become involved in Local Places for Nature Programmes. We certainly back this aim, but there is so much more that could be done, including, but not limited to, increased involvement of Black, Asian and Minority ethnic communities in community environmental initiatives, from taking part in community litter picks to running community energy schemes.

Urban environments, where so many people live and work, are as critical to day-to-day life as countryside environments. Welsh Government and the sector have already had conversations about town regeneration. So many of our town centres are beginning to fail, with boarded up stores abounding. Referring back to the point about place-based leadership made earlier, there is an opportunity to develop community leaders to work co-productively with local authorities and Welsh Government to greatly improve our urban environments, from making use of empty

town centre properties to running local market stalls. They could also help with the Future Generations Commissioner's request for Welsh Government to ensure everyone lives within minutes of green space.

Welsh Government has declared a climate emergency and has recently appointed a Minister and Deputy Minister for Climate Change, so it seems odd this section makes no mention of the climate and nature emergency. It would be useful to see actions dedicated to increasing the diversity of people involved in contributing ideas and actions to battling climate change.

- **Welsh Language:**

As much joined-up commitment to the Welsh Language across policy objectives is appropriate and helpful. Please refer back to our comments under the 'Education' section about the need for support for Welsh Government's Welsh Language grant partners, and also see some words from Mentrau Iaith Cymru later in this response.

- **Local democracy:**

The importance of encouraging the widest possible engagement in local democracy is supported by the voluntary sector. Informal volunteering, acting as a community anchor or activist, involvement in local democracy via faith communities, and links to town and community councils are all relevant.

- **Cross-cutting issues:**

We welcome the inclusion of **informal volunteering** as a cross-cutting theme, and the aspiration to reflect the additional and often unrecognised efforts by volunteers from minority groups. This is of notable importance in regard to the Goals for social care, education and community cohesion.

The [Spectrum of Volunteer Participation](#) produced by Eden Communities clearly illustrates the range of ways in which both informal and formal volunteers can contribute to individual and community well-being. **WCVA recommends that both informal and formal volunteering should be given equal recognition in the strategy.**

The UK-wide Investing in Volunteers (IiV) quality standards measures seven benchmarks of quality. In Wales, 93 organisations have achieved the IiV standard, listed [here](#). Quality area 3 (Volunteer Inclusion) requires organisations to ensure that there is a positive approach to inclusion, equity and diversity and a proactive approach to making volunteering accessible. **WCVA recommends that Investing in Volunteers is referenced by Welsh Government in the final strategy** as a tool for embedding best practice in equality and diversity in volunteering.

WCVA, WLGA and the Wales Centre for Public Policy partnered to publish [Volunteering and well-being in the pandemic – implications for policy and practice](#), which highlights a blend of informal and formal volunteering activity, which characterised aspects of the impactful volunteer response during the pandemic. It also recognises the positive effects on well-being for the volunteer themselves, as well as the person who is being helped, and provides evidence that suggests that areas that had invested in social cohesion pre-pandemic – such as through specific programmes – appear to have remained more cohesive during the pandemic than others. Similarly, existing infrastructure played an important role in coordinating the volunteer response and contributing to community wellbeing. This ranged from local, physical spaces in the form of church halls and community cafés, to local governance in the form of town and community councils, county and borough councils, to third sector organisations such as charities, county voluntary councils (CVCs), and umbrella bodies. In light of this evidence, **WCVA recommends that the funding of appropriate infrastructure is pivotal to unlocking the full potential of volunteering**, which is also included in the consultation document as a proposed cross-cutting theme.

Finally, it would be helpful if, during the budget setting process and in the final Budget document, the **Minister for Finance and Local Government could set out how her decisions have been influenced** by the actions set out in the Plan.

### **3. Are there any goals and actions that you can think of that are missing? Who should deliver on them and what actions would help to deliver them?**

Wales Coop Centre have stated that Digital Inclusion should be a goal and we back them on this. COVID-19 exposed that those that are digitally excluded include a disproportionate number of those from Black, Asian and Minority ethnic communities as well as older people and those suffering with poverty and health issues. To ensure Wales becomes a non-racist nation, it is vital that everyone has equality of access to digital services.

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

Much of what we said under Q1 applies here. However, we would also like to draw attention to some comments we received from Race Equality First, which we will quote here.

‘It is certainly a positive that Welsh Government has acknowledged the issue of institutional racism and structural inequality in the REAP, especially when the 2021 Report by the Commission on Race and Ethnic Disparities (CRED) explicitly denied the existence of institutional racism in the UK and consequently, the lived experiences of many Black, Asian and Minority ethnic communities living in the UK, concluding that Britain is no longer a country where the system is deliberately rigged against Black, Asian and Minority ethnic communities.



'The main challenge that *will* stop the goals and actions achieving anti-racism by 2025 is if the plan is implemented without underpinning the actions and recommendations in the action plan that have a legal duty. For instance, civil society is still frustrated that there is only an [expectation](#) for schools to record prejudice-related incidents in Welsh schools rather than a legal duty to do so. Research conducted by Show Racism the Red Card shows that racism is still a [reality](#) faced by many Black, Asian and Minority ethnic children in their day-to-day school lives. Furthermore, [evidence](#) from Estyn shows that only a minority of schools in Wales keep useful records about bullying, often only recording what they regard as serious.

'Of course, there is the Public Sector Equality Duty (PSED) which requires public authorities and other bodies carrying out public functions to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and [foster good relations](#). However, there are concerns that the PSED has not been brought to bear fully in the public sector in Wales, particularly in education. This is because: the attainment of Black, Asian and Minority ethnic children continues to be hampered by experiences of racism in their everyday school life, with no or little action taken to address this racism; by the lack of role models in an education workforce that does not reflect the ethnically diverse profile of Wales, and by a curriculum that has failed to [represent](#) Black, Asian and Minority ethnic communities' histories and contributions to Welsh society.'

'We therefore feel that this example really illustrates the need for genuine accountability from the very top to be incorporated in this honest discussion about racial inequality in Wales and how things can improve – only then can we achieve an 'anti-racist' Wales.'

**5. What resources (this could include funding, staff time, training, access to support or advocacy services among other things) do you think will be necessary in achieving the goals and actions outlined?**

Much of this has been explored already, but to recap it will be necessary to further invest in the voluntary sector to give organisations the secure footing they need to continue working with hard-to-reach people, many of whom are from Black, Asian and

Minority ethnic communities backgrounds, and encourage them to participate in community life. Public bodies should be supported to co-produce and co-design services to create a shared understanding and respect with their service users. And training may be necessary to support them in this, and in streaming the Values of the Plan into organisations all across the country.

**6. Do you feel the Race Equality Action Plan adequately covers the intersection of race with other protected characteristics, such as religion or belief, disability, age, sexual orientation, gender reassignment, sex, and marriage and civil partnership? If not, how can we improve this?**

As noted by Race Equality First, the Plan could have also acknowledged the ways in which the experiences of LGBTQIA+ asylum seekers are compounded by racial and sexual orientation inequalities intersecting with one another. For instance, some LGBTQIA+ asylum seekers have been housed in unsuitable accommodation, sharing with people who are not accepting of their identity, some incidences have resulted in [hate crime, physical violence and intimidation](#). Also, the Plan could have acknowledged further the impact of intersectionality in the health care section. Black women are [five times more likely](#) to suffer maternal death and Asian women twice as likely, compared to White women in the UK. Welsh specific data on this does not appear to exist, however.

**7. Please see the section on Governance. What suggestions can you provide for measuring success in creating an anti-racist Wales and for strengthening the accountability for implementation?**

For the Plan to have most chance of success, the actions and recommendations must be the foundations of a legal duty, with clear paths of accountability. Without this, the actions and recommendations become more easily-ignored 'nice to haves', rather than requirements that could change Wales for the better.

**8. We would like to know your views on the effects that these proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

Mentrau Iaith Cymru have provided WCVA with the following:

'Mentrau Iaith Cymru and the network of 22 Mentrau Iaith across Wales fully support the vision within the Race and Equality Action Plan which seeks to promote access to opportunities to use the Welsh language within Black, Asian and ethnic minority communities across Wales.

'As a network of Mentrau Iaith we are currently learning from the varied experiences of Welsh speakers from Black, Asian and ethnic minority communities to ensure our own services are as inclusive as possible to members of these communities. The goal within the Action Plan which states the intention to better understand the barriers and opportunities for Black, Asian and ethnic minority people is to be welcomed, in addition to the numerous actions. As Welsh Government grant-funded organisations we welcome the opportunity to address and consider any barriers for Black, Asian and ethnic minority communities to accessing Welsh language activities or opportunities and are committed to promote anti-racism within our work across communities. The range of short, medium and long term proposed actions provide a

comprehensive approach to ensuring that the Welsh language is as inclusive as possible by considering the role of education, opportunities within the community to use the language and the development of appropriate terminology within the Welsh language to discuss anti-racism.

‘As a network of organisations we have begun to assess and consider our own role within the process of ensuring that Black, Asian and ethnic minority communities have equal access to opportunities to use the Welsh language and are represented within our organisations. The Action Plan certainly supports this process and sets clear outcomes which are achievable. This process has also highlighted the crucial role those organisations representing Black, Asian and ethnic minority communities have in terms of reflecting the linguistic diversity of Wales and the Welsh language in particular. We would therefore welcome the inclusion of an action which provides an opportunity for Welsh language organisations to fully engage with those organisations supporting and representing Black, Asian and ethnic minority communities.

‘In addition, the Action Plan would be further enhanced by an action which requires organisations that support and represent Black, Asian and ethnic minority communities to develop their own Welsh language services and provisions including the promotion of their services through the medium of Welsh. It is felt that these further actions would support the development of a strong link between the Welsh language and our Black, Asian and ethnic minority communities.’

9. **Please also explain how you believe the proposed draft regulations or the proposal in respect of the revised trading order could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**
  
10. **This plan has been developed in co-construction, and discussions around language and identity have shown that many people do not consider the term ‘BAME’ to be appropriate. As a result we refer to Black, Asian and Minority Ethnic people or particular ethnic minority people in the Plan. However, we recognise that this term is also problematic and, where possible, being more specific to the particular race or ethnicity an individual or community identifies with is generally preferred. However, there are times where it is necessary to make reference to all those people who share the experience of being subject to racism. We have used the term Black, Asian and Minority Ethnic people for this purpose. What are your views on this term and is there an alternative you would prefer? Welsh speakers may wish to consider suitable terminology in both languages.**

WCVA recognises the problematic nature of BAME/BME, and is currently consulting with key stakeholders as to terminology it could use while we wait for the final version of the Action Plan to be published.

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

WCVA would be pleased to further discuss its response with Ministers, officials or Committees.

We thank the organisations and groups who took the time to contribute their own evidence to our response. These include Business in the Community, Race Equality First, Wales Coop Centre, the National Advice Network, the Equality and Human Rights Coalition, Marie Curie Cancer Care, Mentrau Iaith Cymru and Torfaen Voluntary Alliance.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: