

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?**

The Council agrees with the vision, purpose, values, and the imagined future. The REAP is very comprehensive and has considered the evidence provided including the rapid reviews of existing evidence provided by the Wales Centre for Public Policy and the academics. However, the Council questions if both the vision and purpose are needed or if they over complicate the end goal by having multiple layers of strategic statements. We believe it could potentially create unnecessary layers of commitments when it comes to evidencing progress against the plan.

Councils are already under immense pressure to balance priorities and conflicting issues with reduced funding and workforce, so although this is a fully supported action plan, capacity and resource is likely to be a barrier. Buy in and strong leadership at the top of ALL organisations is a must if we want to ensure we meet the outcomes in the action plan.

The vision, purpose and values may be seen by some as idealistic and given the history and evolution of racism and the processes of overcoming it, the time frame may be unrealistic. Having said that, it is essential to act decisively and with firm intent of change. The main barrier to this process will be the “invincible ignorance” of sections of the population and the deeply entrenched prejudices of individuals and unconscious bias. Education, both formal and accidental is the

primary tool going forward and more leaders from minority ethnic groups will help realise a Wales which is anti-racist.

The plan mentions there are important links with other work WG are undertaking, and opportunities to progress your anti-racist agenda through these initiatives. **It is important to considered how the REAP Vision and values integrate with other strategies and plans including WG, EHRC, SEPs etc.**

Strategic Equality Plan: 2020-2024
Community Cohesion National Delivery Plan
Action on Disability: The Right to Independent Living
Advancing Gender Equality in Wales Plan
Enabling Gypsies, Roma and Travellers
Tackling Hate Crimes and Incidents: Framework for Action
Nation of Sanctuary – Refugee and Asylum Seeker Plan
A More Equal Wales: The Socio-economic Duty
LGBT+ Report and Action Plan
etc

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:

The Action Plan contains a number of statements, termed as ‘outcomes’, which are attributed to each of the goals, however it should be noted that these appear different to the statements set out in the ‘Envisaged Future by 2030’. Overall, we feel that the current draft plan is made up of many layers of strategic statements, creating repetition and duplication. Surely there is an opportunity to streamline the plan and make it much more focussed, both to the reader and those expected to deliver and report against it.

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

In general, the Council agrees that the explanation is clear, if read in conjunction with the evidence and rapid reviews.

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

We would suggest that the issue of rurality is missing, specifically the extra layer it can add to isolation issues. Other gaps may be identified over time.

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

The Council agrees and assumes the actions will evolve with each review of the plan and evaluation of progress to date.

However, are there potentially too many policy goals in the plan to realistically achieve. Would it be better to focus on a smaller amount and get

these right, rather than trying to do a light touch approach to many goals, especially given resources and capacity of public the sector.

In relation to social care, we need to ensure that minority ethnic groups receive care and support that is culturally appropriate.

(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?

The Council would suggest it is a step in the right direction. However, we feel that a lot of the statements that are being termed as 'Outcomes' just re-affirm completion/implementation of 'Actions' and do NOT outline the actual outcome/ impact for minority ethnic groups.

It is imperative you engage with Black, Asian and Minority Ethnic members of the community and align with education at all levels. Follow the good practice already in existence, of reviewing and evaluating progress to date on a timely basis to allow for changes to the plan to be made and realigned to intended outcomes.

It may take a longer period than the one envisaged (2030) to fully realise an anti-racist Wales, particularly when it comes to deeply entrenched racist beliefs/unconscious bias/ institutional racism.

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

Education: More work on anti-bullying initiatives (on the basis of race) in schools.

Hateful crime and justice:

Housing and accommodation:

Employment and income:

Health:

Social Care: The emphasis on leaders modelling and championing anti-racism in their sectors is strongly welcomed. Perhaps more can be done regarding the low levels of trust between Gypsy, Roma and Traveller populations and social workers (historically linked to 'removal' policies (BASW, 2021)). There is work to be done by local authorities to increase social worker education and training to improve knowledge and practice. Reiteration of key anti-racist themes must appear more prominently in local policies, procedures, and guidance for example. Social work needs to recognise the paradox of adverse racism – social workers, by nature of their professional status, publicly sympathise with victims of injustice, support the principle of equality and regard themselves as non-prejudiced, but who may actually possess negative feelings, views and beliefs about certain minority groups, such as the Traveller community. Improved support and advocacy for ethnic minority groups must come from ethnic minority advocacy organisations.

Leadership and representation: We need more minority ethnic people to assume leadership positions. Furthermore, Leadership composition in public sector organisations must reflect the communities they serve.

Arts, Culture, Sports and Heritage:

Environment:

Welsh Language:

Local democracy:

Cross-cutting issues: The Council welcomes the action to significantly improve impact assessments so that we move away from a tick box exercise ensuring that our approach is non-racist, for example, to one where we can deliver specific positive outcomes that directly benefit minority ethnic groups.

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?

The action plan is very comprehensive and notes the vast range from 19.1% of the population in Cardiff is Black, Asian and Minority Ethnic, compared to 1.4% in Powys. However sometimes having an even smaller minority population can be even more isolating and an even bigger impact than communities that have a larger percentage. From our perspective, the plan does not currently address the intersectionality issue of rurality and race equality.

How do you see the role of the Community Safety partnership aiding the delivery of the action plan?

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

As stated in the Council's response to question one, resource and local government priorities are going to be a key challenge.

Another challenge is willingness and commitment of leaders and decision makers to be the driving force behind implementation of the plan – often it will fall to a minority group of people within an organisation and they get held accountable for progress, whereas to make real change everyone needs to play their part.

As mentioned earlier, work needs to be done on deep-seated racist beliefs and racist stereotyping across all sectors. In all sectors including social care, action

needs to be taken to ensure that public bodies workforce have the cultural competence to work effectively with people from minority ethnic groups.

Recruiting Black, Asian and Minority Ethnic teachers especially to rural mid Wales will be another challenge.

Entrenched opinions and outdated approaches to matters such as recruitment and “image” within organisations.

In Powys we have the added layer of rural challenge and the implementation of the plan where the population is predominantly white and the Black, Asian and Minority Ethnic community is widely dispersed. Anecdotal feedback tells us in areas where isolation is an issue for all residents, it can be exacerbated by race.

Engagement with minority groups can be a barrier.

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?

The Council welcomes any support given but in particular notes that funding, staff time, training resources and access to support or advocacy services will all be necessary if we want to actual make a change.

All councils will be in the same position, some worse than others, so it makes sense that WG lead on providing workplace education and training e.g., E-Learning module for staff and another targeted at councillors, possibly even virtual teams training/raising awareness sessions. **We don't have specialist in-house training for these types of topics, and this is critical if we want to change staff culture and awareness.**

If we really want to achieve the goals in the action plan, then funding is extremely important as otherwise it just becomes an add on to an officers already full workload.

There must not be a total reliance on a particular sector e.g. third or local authorities but rather a cross-sector approach that involves WG, LAs, Private and voluntary sectors across the board.

6. Do you feel the Race Equality Action Plan adequately covers the intersection of race with other protected characteristics (PCs), such as

religion or belief, disability, age, sexual orientation, gender reassignment, sex, and marriage and civil partnership? If not, how can we improve this?

The Council acknowledges intersectionality is mentioned a few times including the link with Socio-economic inequality.

There is a long path ahead on this question as it is a matter of visible and invisible characteristics and an understanding that one might feel prejudiced against on different levels.

A grass root example of where it can be improved is schools currently only have to report statistics on bullying related to racism and not any of the other protected characteristics. More of the actions need to integrate Intersectionality.

It is worth noting that the LGBT population (as are some other PCs e.g. disability) is higher in Powys than Black, Asian and Minority Ethnic population, and how this impacts on equality across supporting different protected characteristics.

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?

With regards monitoring, the Council agrees with your approach to using people voice as the main indicator of success and thinks this should be the basis of the framework. As a Council we want to ensure that our understanding of how well we are implementing the plan is informed by people's voices. Engagement with hard-to-reach groups can be difficult, especially if you add rurality into the mix, but it is important to listen to the voices of ALL Black, Asian and Minority Ethnic people, not just the larger pockets of Black, Asian and Minority Ethnic people.

To measure success nationally, WG need to ensure public bodies are in a position to accept common data standards, definitions and for systems to be set up accordingly. Most organisations have their own data sets on the information systems they use e.g. WCCIS etc that do not capture the information in an uniformed way so it does not allow for a proper comparator when looking at longer term outcomes?

As previously mentioned, under 2d, the Council feels the outcomes are weak therefore it is difficult to know exactly what you plan to measure.

The encouragement for implementation needs to be a balance of 'carrot and stick' that encourages implementation and discourages a negligent, 'laissez faire' attitude to the status quo.

Liaise with inspection bodies e.g. Estyn to see how they can aid achieving the vision through their remit. Liaise with EHRC and WG in relation to their performance indicator frameworks.

Presumably measures/indicators will be similar to the examples below and follow WG performance framework:

Building on an already mentioned topic, percentage of Black, Asian and Minority Ethnic teachers recruited into Welsh Schools by 2025. However, this measure needs objectives and actions in order to increase percentage.

Others:

Percentage of local authority employees who self-identify as a member of the Black, Asian and Minority Ethnic people demographic (part of the statutory annual employment monitoring report under the PSED).

Mapping of demographics in post at various employment grades

Percentage of residents who report a high incidence of feeling part of their community (<https://www.senseofcommunity.com/soc-index/>)

Comparative pupil attainment levels

Average household income

Educational representation

Number of complaints received regarding racially aggravated incidents.

Equality of representation in public positions e.g. councillors

The Council is supportive of the idea of services being made available for minority ethnic groups to report instances of racism and receive support and action.

8. We would like to know your views on the effects that the draft regulations or the proposal in respect of the revised trading order 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?

The Council believes the aim of the REAP to use the Welsh language as a tool to improve integration between communities and improve access and take-up of Welsh language education and training by the Black, Asian and Minority Ethnic groups would lead to a positive impact on the Welsh language.

Investigating barriers to the take up of the language by the Black, Asian and Minority Ethnic groups is a key first step in achieving this. Linking the Action Plans Goals to the Cymraeg 2050 strategy and Welsh in Education Strategic Plans would also help in mainstreaming the goals and help lead to a positive impact.

Ensuring the correct terminology is used and shared will aid integration between communities and help encourage positive discourse and through that, encourage more take-up of more opportunities to learn and use the language.

- 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.**

The Council believes this could be improved by listening and acting on the evidence gained from discussions around how local authorities engage with the Black, Asian and Minority Ethnic people as part of their strategy to increase provision and take-up of Welsh-medium education.

Work could be undertaken with partners promoting and providing Welsh-medium education, from pre-school through to post-16 and further education to promote the opportunities and benefits of bilingualism/multilingualism, ensuring a consistent message and approach in order to dispel assumptions that Welsh-medium education isn't an option for children from Black, Asian and Minority Ethnic homes where English may not be spoken.

- 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.**

The Council suggest whatever language is used it needs to be discussed with Black, Asian and Minority Ethnic people. As a Council we are happy to use

whatever term is deemed to be appropriate and supported by the Black, Asian and Minority Ethnic people.

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:

Linking to the 'Equality and Inclusion future funding' the Council would like to have assurance that the funding and services made available through this mechanism are accessible to the rural areas of Powys. Often services based in Swansea, Wrexham Cardiff etc take on areas that are miles away and, do not offer the service equitability. Perhaps a rural hub (outreach) in central mid Wales would be a good option? Actual visibility and not an extensive unrealistic journey to access. Digital solutions should not be relied on for everything or be a substitute instead of an alternative.

Consideration to the differing baselines of urban and rural communities.

The Cohesion Team has developed links between communities and local authorities, as well as helping to mainstream cohesion into policies. Current funding for the Cohesion team is short term (March 31 2022). In order to support the longer term aims of the REAP, should funding for the work of the Cohesion team be longer term also? Is there also scope to embed this work further by having a Co-ordinator/Officer within each local authority rather than one small team covering 4 Local Authority areas.

The Community Cohesion programme has shown how impactful it is to have staff in post to work with Local Authorities and communities to aid cohesion. It would be helpful if there were similar posts created to mainstream race equality and undertake the work outlined in the REAP.

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: