



Wales Safer Communities Network response to: Welsh Government - Race Equality Action Plan

Response submitted via email

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Introduction to the Wales Safer Communities Network

The Wales Safer Communities Network was established in January 2021 following the recommendations of the Welsh Government's Working Together for Safer Communities Review. The Network aims to become the strategic voice for community safety in Wales, working collaboratively to champion and support community safety partnership working, and influence the shaping and development of national policy and local practice.

The Network is committed to working across Wales to help build safe, cohesive and integrated communities where differences are respected, inequalities reduced and appropriate services and support are in place, supported by a clear governance structure. There is a lot of work already taking place across Wales some of which is included in the plan where we are already engaged and will continue to do so.

This response is on behalf of the Network and not WLGA. We understand a separate complementary response will be submitted by WLGA.

Consultation questions

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?

Overall, we agree with the ambitions outlined in the vision, purpose, values and the imagined future in the plan.

However, we consider there are a number of things that may get in the way. The first of these links to the general public and to achieve the vision they will need to buy into the plan. Therefore, a cross-cutting goal around wider education and public engagement may help to realise ambitions.

Secondly, there is a potential risk that UK Government policy and actions could counteract against Wales plans. For example, the impact of the housing of asylum seekers at Penally has included Britain First recruiting a Wales representative to raise their profile and an increased targeting of hotels and other establishments where refugees and asylum seekers may be temporarily resident.

The imagined future provides a range of additional challenges and is likely to be outside the control of the Welsh Government, for example stopping all hate crime in the media and social



media, or tackled institutional racism in pop culture and sport. Notably, the online world has no borders and the Welsh Government may wish to consider opportunities to engage with UK and global leaders and social media companies and set actions around this. There has been a reminder of the societal challenges and scale of the response required, with the offensive racist abuse of English footballers, fans and families following the UEFA Euro championship final.

Removing the stigma of disability in ethnic communities will have diminished, whilst we agree with this action, we do not see how this will be achieved through any of the actions in the action plan. These can be cultural differences, suggesting that part of the plan in the action is to try to change some of the cultures themselves which could be seen as an unintended racist element in the action plan.

We agree with the idea of using an anonymous website so that young people and elders can share their experience of racism in a safe way. However, existing opportunities could be considered, such as the charity Crimestoppers whose anonymous users are more ethnically diverse than the general population and have a dedicated website for young people, called Fearless.Org. In addition, we question the use of the word elders, as in some communities the term elder is saved for a small, identified group or individual. We think this should refer to older people as this would be more inclusive. Furthermore, whilst we acknowledge that underreporting by young people is high, we think that experiences of all ages should be sought.

There is also the action that Black, Asian and Minority Ethnic people “will “speak with one voice”” (page 18). This contradicts other parts of the action plan which refers to Black, Asian and Minority people not being one group, but a collection of different communities, groups and individuals all with their own views, ideas and opinions which should be heard and incorporated.

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?**
- (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?**
- (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: Whilst there is reference in the Crime and Justice actions around the Female Offending and Youth Justice Blueprints, there is no specific mention of education in prison or youth secure settings, despite it being a devolved matter, which could include improving access to assist in rehabilitation and prevent future offending. Developing new skills and breaking down barriers that may bring reconciliation and break the cycles of crime through other achievements.

There is also an opportunity to reference alignment to the All Wales School Liaison Core Programme known as Schoolbeat Cymru.

Hateful crime and justice: In this response, we are responding to the section headed Crime, justice, hateful attitudes and community cohesion. The first issue is that much of the criminal justice system is non-devolved and therefore outside of the power and legislation of the Welsh Government.

In regard to the first action around a campaign to raise awareness of hate crime and its impact. We suggest this needs to be done sensitively and carefully to avoid racism becoming a 'badge of honour' to certain individuals and a reward to racist behaviour, especially from the far-right groups.

We agree in principle with enhancing support for those who have experienced racist hate crime through a refreshed Wales Hate Support Centre. It is unclear from the information provided what costs this will bring and what the outcomes are from the Centre. There is also only a focus on racist hate crime, which seems to not take into account that there may be hate crimes that are intersectional and involve race and gender, race and disability etc. If the only focus is on race then it risks hate crimes which may appear to be more around one of the other characteristics from being identified to the same extent, especially concerning when race may be a secondary contributing factor for the hate crime.

We agree with working with perpetrators of hate crime to reduce and prevent future hate crimes. Given that some hate crimes are linked to extremism that there is no mention of Contest Cymru, particularly Prevent and Contest would appear to be a gap in the action plan. It means it is unclear how this programme of work will link together, which risks duplication but also leaving gaps between two separate systems.

The Police, Crime, Sentencing and Courts Bill which is currently going through Westminster has led to the Criminal Justice Alliance raising concerns that it will deepen racial inequalities ([Coalition warns new policing and sentencing bill will deepen racial inequality | Criminal Justice Alliance](#)). Whilst there will be an opportunity for devolved elements to be responded to by the Welsh Government, those for the non-devolved are outside of the Welsh Government control. The Bill could therefore undermine the actions, aims and purpose of the action plan. The Welsh Government will be able to input to the Bill but it is unclear how much influence on non-devolved matters there will be, this also applies for the outcome of engagement in the criminal justice policy making process which is part of the action plan.

Whilst we agree in principle with the actions. When they involve non-devolved matters we are concerned that the criminal justice system in Wales is at risk of being set up to fail as they have to comply with legislation set by the UK Government, which recently received a report that goes against many of the views within the Welsh Race Equality Action Plan. The idea of mitigating against the impact of UK legislation appears to be a noble idea, but without more detail on how this will be done it could be costly and take the focus away from other areas and reduce resources and support going to the individuals and communities themselves.

We are concerned that the action plan appears to suggest that VAWDASV data is not being collected. A requirement for regional VAWDASV strategies has been in place following the

VAWDASV (Wales) Act. These are still in their early stages and so should be given an opportunity to deliver ahead of other actions being demanded which may skew the focus away from local knowledge and information.

There is also nothing in the action plan around ensuring there is justice and support for victims of VAWDASV who do not have recourse to public funds. They may also be victims of forms of exploitation and without the availability of support and services there is a real risk that the victims will have no method for them to escape the abuse and exploitation.

We note the mention of Criminal Justice in Wales, however there is no mention of the other partnerships involved including the Policing and Partnership Board, Contest Cymru Board, Safer Communities Board, Community Safety Partnerships, Public Service Boards to name just a few. There is an opportunity for all to work to promote an anti-racist Wales, but the full range of partnerships involved in community safety need to be acknowledged and engaged with at high strategic to operational levels.

There is no mention of prison services in Wales, beyond the new blueprint for female and youth offending. This along with no mention of probation and the rehabilitation of offenders, a disproportionate number of whom come from Black, Asian and Ethnic Minority communities would appear to be a gap in the action plan and could result in further disruption to the plans around community cohesion. An explanation of how this plan aligns or replaces the 'Framework to Support Positive Change for those At Risk of Reoffending' would be useful ([framework-to-support-positive-change-for-those-at-risk-of-offending.pdf \(gov.wales\)](#))

Housing and accommodation: We were pleased to see that there is a commitment to increase the reporting of hate crime. However, there are currently issues with hate crime ASB with court delays and additional pressure on the police, LA's and RSL's to provide support whilst the last line of evictions has been blocked and is now facing a backlog. More reporting will assist in identifying the level of the problem but it will not improve it without the additional support and services, including advocacy to resolve and take through the appropriate routes. This needs resourcing in both finances and people who are fully trained and can take a Public Health approach to resolution.

There appears to be no mention of Rent Smart Wales which is meant to be improving the experience for those renting whether in private or social housing. As it already has certain powers through legislation this would appear to be an omission and risk missing an opportunity where Welsh Government have devolved power and have created something separate for Wales.

Employment and income: No comment

Health: In regard to Health Services and Health Outcomes, there are just a few points that we wish to raise.

- 1) There is no mention of health services going into prisons or those in prison accessing other health services. As there is evidence that there are disproportionately number of Black, Asian and Ethnic Minorities within the prison system this would appear to have been missed. Prison nurses for example are provided through primary care.
- 2) A reference to the key support role of school nurses could be included within the plan.



- 3) There are no actions in regard to carers or young carers. Whilst this may not directly impact on feeling safe in the community. The additional burden or lack of access to services could result in increased use of illegal substances, increased anger and frustration of young people resulting in ASB or being more susceptible to County Lines and other forms of exploitation.

Social Care: There is an issue around the academic courses to professionalise social care. Whilst we agree with the professionalisation and the additional safeguards that this brings with it. Due to the qualifications being so academic they are not suitable for many ESOL, this was raised by the Cardiff & Vale Regional Workforce Partnership whilst they were being developed. The legislation to bring in the registration and professionalism is already well underway for social care workers. The Social Services and Wellbeing (Wales) Act 2014 includes the requirement for provision to be made in the language of choice. If social care workers cannot be registered, due to the qualifications, then the only option is for Direct Payments to be utilised and for provision to be through the unregulated Personal Assistants route. This potentially opens a route for organised crime and opportunistic crime (including abuse and exploitation) through the lack of oversight and regulation. It is also likely to impact on the amount of data that is available around the social care workforce from Black, Asian and Minority Ethnic communities. It also reduces the pool of Black, Asian and Minority Ethnic social care workforce who can progress into management.

Leadership and representation: No comments

Arts, Culture, Sports and Heritage: No comments

Environment: No comments

Welsh Language: No comments

Local democracy: No comment, assuming that this is referring to the Local Government section. We understand a response will be submitted by colleagues from WLGA in regards to this section of the plan.

Cross-cutting issues: There were a few comments on this section:

- The development of a map of Black, Asian and Minority Ethnic groups sounds like a good idea, however, how will it be maintained as groups are likely to come and go as the community uses them or doesn't. It also risks doing the opposite of some points in the document which is not to view the different communities as one with only one view, as there are likely to be many different voices and views from within the different communities.
- Consistent and sustainable funding for all services is an ongoing challenge, with short term funding around community cohesion services for example being an issue for community safety, limiting the amount of support and services being provided to the full range of communities especially the more socio-economic challenged areas, which unfortunately also contain higher numbers of people from Black, Asian and Minority Ethnic groups.
- There is already legislation for Equality Impact Assessments and Equality and Health Impact Assessments, both state that they need to be developed in consultation and



whilst the documents they link to are being developed. This is already being carried out by a number of statutory partners, however we note that Welsh Government consultations only normally ask about the impact on the Welsh language and not around protected characteristics which would bring in the development of the Assessments into the process as well as publishing the draft Assessments as part of the consultation.

- Time-credits involve ongoing costs and are not allowed for asylum seekers or those without recourse to public funds (DWP). Therefore, potentially leaving people further excluded. Where they have been used in the community there have been issues, with an amnesty by one organisation resulting in thousands being returned by people saying they volunteered for the community and had just been putting them in a drawer. There need to be opportunities to spend that work for both the community and businesses. COVID stopped almost all opportunity to spend with at least one Council discussing no longer proceeding with their time-credits scheme as it was not meeting the needs of the local community.

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?

Please see comments against each of the categories under question 2. In addition, there is a lack of focus on community safety. Community safety is important for community cohesion, people's wellbeing and reducing crime and anti-social behaviour and yet is not mentioned once in the action plan, suggesting silo working is likely to be the case with VAWDASV, ASB, Housing etc all working in their own spaces rather than working holistically with people. There also appears to be a lack of a Public Health approach around prevention, utilising information on ACE's and Trauma Informed Approaches. The structure around all of these is already in place, they may just need more sustainable funding and additional resources to deliver additionality.

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

There seems to be confusion around the dates for implementation between 2025 and 2030, this could result in a lack of focus and confusion.

The delivery needs to utilise the existing partnership governance structures, if not then the delay in setting up new ones and working out how they link to the existing, many of which are required through legislation could cause unnecessary delays, confusion and a lack of ownership.

The apparent lack of data collection that has already been completed, given the amount that appears to be required to take place. Putting in data sharing agreements takes time and could lead to delays, especially if being taken out of the existing partnership arrangements.

There is also the issue around non-devolved matters as already mentioned and the limitations this currently places on Welsh Government, which means an action may be negatively impacted due to UK legislation.

There needs to be a focus on the Principles and Ways of Working from the Wellbeing of Future Generations (Wales) Act 2015, which should bring together all of the work and is



already required under legislation to be utilised, considered and responded to by all statutory bodies in Wales.

As a Network we believe that listening to and responding to the lived experiences of people is important. We also have a strong belief in delivering through evidence-based practice and through the sharing of best practice across the whole of Wales. There is a risk with so many actions that it could be a post-code lottery for Black, Asian and Minority Ethnic individuals and communities which of the actions are undertaken where they live, and if they are based on clear evidence-bases or singular ideas not founded in previous learning resulting in lessons previously learned being ignored and repeated.

A lack of funding for the range of projects. Statutory bodies and the third sector are impacted by the years of austerity, the impacts of COVID (which are still being fully understood) and future finances following Brexit adding additional financial insecurities. If funding is taken away from other areas it could lead to increased inequalities, especially an issue where intersectionalities occur.

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?

This is almost impossible to estimate with the action plan in its current form, where it appears to not take into account what is already delivering and could be added to, eg community safety, community cohesion, Contest. It is clear that there will need to be additional resources to deliver the action plan, but without linking in with existing resources as mentioned before there is a risk of duplication and leaving gaps.

There is one resource area which we already know there is a shortage in for community safety, which is data analysts. There is increased data capture across all partners in community safety, but with reduced funding leading to limited access to data analysts the ability to integrate, consider all data in its totality is limited. Given the cross-cutting themes of both community safety and the race equality action plan the need for joined up thinking to develop the data evidence base is key for both elements.

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?

No, we do not think that the intersectionality has been adequately covered. For example, there does not appear to be any acknowledgement around the challenges for those of a different sexual orientation who may be subject to discrimination from within their own communities as well as from those from outside. Leading to hate crimes within the communities themselves.

The stigma around disability and especially around mental health does not appear to have been reflected in the action plan. This opens those who fall within these to exploitation from within and outside their own communities. For example, a needle exchange was being planned for part of a Welsh city, a number of those who needed the service from within the

minority ethnic community asked for it not to be set up in their area as they wouldn't be able to use it as it would bring shame on them and their families if they were seen to access it.

There appears to be minimal mention around socio-economic factors and the need to reduce poverty, which disproportionately affects Black, Asian and Minority Ethnic communities. Poverty has a wide ranging impact, including on the risks of exploitation and criminality.

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?

The Governance section felt very light in detail against the rest of the action plan. For local governance arrangements as mentioned we would suggest utilising the partnership governance arrangements that are already in place, such as community safety partnerships, public service boards, and regional partnership boards. There are already a large number of arrangements and requirements on statutory bodies, it is unclear what benefit the suggested arrangements will have and how they will collect and reflect the full scale of views and opinions from across all Black, Asian and Minority Ethnic communities from across Wales.

We agree with the development of a Race Disparity Unit and an Equality Data and Evidence Unit, however it is not clear from the action plan what difference these two units will make to Black, Asian and Minority Ethnic individuals and communities themselves across Wales or how it will link in with existing data collection and analysis or governance arrangements. The resources for these may be better used in funding the resources needed to deliver on the actions in the plan itself.

We think that there is an issue with how the action plan is currently written. For example, an increase in reporting of racial hate crimes is an outcome, rather than reducing racial hate crimes through interventions such as education programmes which would deliver a better outcome for potential future victims and demonstrate that Wales is an Anti-Racist country. Increased numbers without action may demonstrate the opposite.

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?

No comments – please see the WLGA response.



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.

No comments

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.

No comments

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:

Throughout the action plan, there is a lot around data collection and data sharing. The Wales Data Analysis, Innovation and Improvement Network which is a Partner Network of the Wales Safer Communities Board recently met and are beginning to look at the barriers and possible solutions around data sharing across Wales. One of the suggestions is for Welsh Government to endorse and approve some of the platforms for data, so that all partners know that they meet certain standards and have the right levels for anonymity, good governance and fully compliant with data governance and protection legislation and best practice, such as the SAIL Databank. There is also the issue of if all the data is being collected what will it be used for, people need to know what change it will bring about otherwise they may not co-operate and may see it as a tick box exercise rather than being purposeful.

Community safety is a priority concern for many people in Wales, and the public services delivered by statutory bodies, including local authorities, directly influence how safe people feel in their local area.

There is a statutory duty for Local Authorities to have a Community Safety Partnership in place, these involve the Local Authority, Police, Fire and Rescue, Health Boards and Probation Services. The partnerships work to offer an effective multi-agency approach to community safety priorities such as violence, substance misuse, domestic abuse and anti-social behaviour at local, regional and national levels.

The lack of any mention of community safety, which could bring together a number of the threads is disappointing to note. This seems to be a continuing trend within Welsh Government



and UK Government not to view all of community safety in a holistic manner and therefore not to see it as a priority. Leading to funding for only the areas that are most in the spotlight and therefore miss many of the preventative elements for lower level actions that increases community safety and prevents and reduces some of the more costly elements of community safety.