Wales Centre for Public Policy
Canolfan Polisi Cyhoeddus Cymru

# Improving race equality in Wales: Summary report

**Jack Price, Manon Roberts and Amanda Hill-Dixon**

March 2021

# Our Mission

The Wales Centre for Public Policy helps to improve policy making and public services by supporting ministers and public service leaders to access and apply rigorous independent evidence about what works. It works in partnership with leading researchers and policy experts to synthesise and mobilise existing evidence and identify gaps where there is a need to generate new knowledge.

The Centre is independent of government but works closely with policy makers and practitioners to develop fresh thinking about how to address strategic challenges in health and social care, education, housing, the economy and other devolved responsibilities. It:

- Supports Welsh Government Ministers to identify, access and use authoritative evidence and independent expertise that can help inform and improve policy;
- Works with public services to access, generate, evaluate and apply evidence about what works in addressing key economic and societal challenges; and
- Draws on its work with Ministers and public services, to advance understanding of how evidence can inform and improve policy making and public services and contribute to theories of policy making and implementation.

Through secondments, PhD placements and its Research Apprenticeship programme, the Centre also helps to build capacity among researchers to engage in policy relevant research which has impact.

For further information please visit our website at [www.wcpp.org.uk](http://www.wcpp.org.uk)

## Core Funders

**Cardiff University** was founded in 1883. Located in a thriving capital city, Cardiff is an ambitious and innovative university, which is intent on building strong international relationships while demonstrating its commitment to Wales.

**Economic and Social Research Council (ESRC)** is part of UK Research and Innovation, a new organisation that brings together the UK's seven research councils, Innovate UK and Research England to maximise the contribution of each council and create the best environment for research and innovation to flourish.

**Welsh Government** is the devolved government of Wales, responsible for key areas of public life, including health, education, local government, and the environment.

# Contents

# Summary

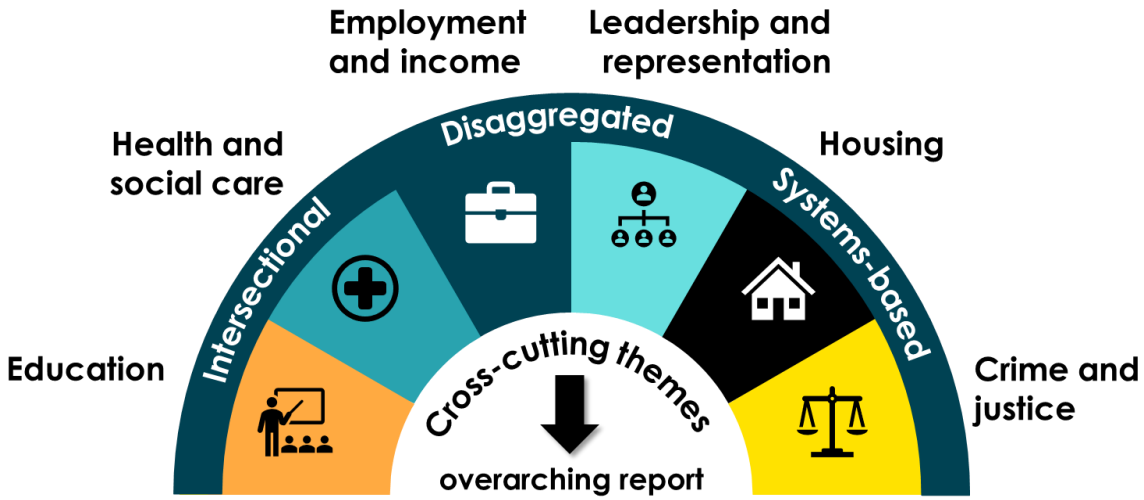

- The Wales Centre for Public Policy has produced evidence reviews on six discrete policy areas to inform the Welsh Government's Race Equality Action Plan. This report summarises the overarching and cross-cutting themes highlighted by the reviews and discussions at an expert roundtable.
- Our evidence reviews show the need for improved **data collection, monitoring and reporting**, and disaggregation of this data, to better understand the specific needs of minority ethnic sub-groups. This can be achieved through oversampling and/or interventions to increase response rates, but it will require investment of additional funding.
- Buy-in and commitment from organisational **leadership,** and better **representation** of people from Black, Asian and minority ethnic backgrounds at leadership level, are also important.
- Research suggests that while it is important to avoid being too prescriptive, management buy-in can be secured by a mixture of 'carrot' and 'stick' approaches that combine incentives with accountability mechanisms such as performance management.
- **Changes to progression and recruitment practices**, such as name blind applications and diverse short-lists and panels, can help to increase the proportion of Black, Asian or minority ethnic employees and (future) leaders.
- **Changing organisational culture** is a long-term project but is necessary to tackle racial inequalities that are often embedded in organisations. Multi-year planning that establishes clear targets, accountability mechanisms and opportunities for the voices of employees to be heard and acted on may be most effective.
- Greater **engagement and outreach** with racial and ethnic minority communities, including more opportunities for co-design and co-production, should be at the heart of policy design, delivery, and evaluation.
- **Implementation** must be seen as an iterative process which requires careful preparation, and reflection and refinement over time.
- The Race Equality Action Plan should be approached as a long-term project with adaptable, outcomes-focused targets that can be refined over the course of its lifespan.

# Introduction

The Welsh Government has made a commitment to publish a Race Equality Action Plan designed to tackle structural racial and ethnic inequalities in Wales (Welsh Government, 2020). The Deputy Minister and Chief Whip asked the Wales Centre for Public Policy to undertake evidence reviews to inform the development of the Action Plan across six key policy areas: **leadership and representation, housing and accommodation, education, health and social care, employment and income** and **crime and justice** (see reference list).

In addition to the evidence reviews on these six topics, this report summarises the cross-cutting themes and overarching messages highlighted by our research (see Figure 1), and recommends principles that can help ensure effective implementation of the actions contained in the action plan.

**Figure 1: Key policy areas and principles underlying the overarching report**




# Key concepts

Our six evidence reviews explore how to tackle inequalities between racial and ethnic groups. We understand 'race' and 'ethnicity' as social constructs rather than representing biological distinctions between groups of people, but we know that they nevertheless have significant consequences for people's life experiences and outcomes. We also recognise that while race and ethnicity are the focus of our reviews, these should not be seen in isolation from other aspects of people's social

identities, which will also affect their experiences and outcomes within the policy areas we have covered. These other aspects include gender, class, socio-economic and employment status, sexual orientation, disability, and migration status, among other things. Because of this, wherever possible, it is important to take an intersectional perspective which recognises the ways in which these multiple characteristics interact to shape people's experiences and outcomes, rather than focusing on one characteristic or policy area in isolation.

We also recognise that different ethnic minority groups are affected by racism and disadvantage in different ways, and that the phrase 'Black, Asian and minority ethnic' can obscure as much as it illuminates. While data gaps and other practical limitations mean that fully disaggregating evidence and recommendations by ethnic group and other intersectional characteristics is sometimes difficult, we have done so wherever possible, and recommend that this approach underpins the Welsh Government's analysis and action to address racial and ethnic inequalities.

Recognising this, in writing our reviews we actively avoid using the acronyms 'BAME' or 'BME', except where this describes the name of an organisation or network, because we recognise that these are contested terms and can be experienced as stigmatising, depersonalising, and 'othering'. Instead, we have referred to specific people and communities of people wherever possible. Where this is not possible, we use the term 'Black, Asian and minority ethnic', but recognise that this term, and any other overarching category, is imperfect.

While government policy is important, we also recognise that effective action will require interventions that are both 'top-down' and 'bottom-up'. They need to be led by and, where possible, co-produced with communities, and address institutional, personally mediated and internalised racial bias.

- **Institutional racial bias** refers to the ways in which systems, processes and practices embed or replicate discrimination within organisations. Literature, including the Stephen Lawrence Inquiry, establishes that this is often unintended or 'unwitting', but is the result of certain working practices that lead to racially biased outcomes (MacPherson, 1999).

- **Personally mediated racial bias** refers to discriminatory behaviour on the part of individuals and groups e.g. hate speech or racist abuse.

- **Internalised racial bias** includes attitudes, beliefs and values held by individuals that affect the perception of oneself and others in accordance with racial stereotypes or discriminatory attitudes.

Experts recommend that taking effective action in these areas requires a shift from a 'non-racist' to an 'anti-racist' approach. This means moving from a position where systems are designed so that they do not contribute to increasing racial bias (non-racist) to a position where efforts are actively made to mitigate racial bias; and to reduce racial inequalities in systems (anti-racist), between groups and at the individual level.

# Approach

The six policy areas were selected in consultation with Welsh Government officials, academic experts and the Race Equality Action Plan Steering Group. A small number of policy areas were selected to ensure the research focused on key areas of priority, that would likely have the greatest impact on the lives of Black, Asian and minority ethnic individuals in Wales.

For each of our six policy-specific evidence reviews, we undertook a four-part process to identify key actions and recommendations for inclusion in the Race Equality Action Plan:

- First, we analysed the best available evidence, policy reports and reviews which make recommendations for reducing race inequality in Wales and the UK, to identify recurring recommendations or 'types' of interventions.
- We then tested and refined these with academic experts.
- Next, we conducted a further rapid review of academic and grey literature evidence related to each of these interventions, with the aim of establishing which of these recommendations are likely to have the greatest impact, if they are included in the Race Equality Action Plan.
- Finally, the reports were peer reviewed by experts in the field.

We also convened a roundtable attended by Welsh Government officials and eighteen academic and practice-based experts, and attended a series of Welsh Government-organised 'policy deep dive' sessions to discuss findings in each policy area with a range of officials, stakeholders, community organisations, and people with lived experience.

Although our evidence reviews discussed 'what works' in tackling race inequality in discrete policy areas, we also highlighted interconnections between different policy areas and note where action in one area could have knock-on effects on others. This

report builds on those interconnections and draws out common themes and types of recommendation.

# Overarching themes

Our research highlighted a number of key areas for action across policy areas (see Figure 2). These will be important to bear in mind in designing and implementing the Race Equality Action Plan. These actions are often system-wide. Success in addressing the overarching themes we have identified will also contribute to success in implementing the policy area-specific recommendations in the individual reports.

**Figure 2: Overarching themes**


# Data collection and disaggregation

Our six evidence reviews consistently found that data availability and quality are limiting factors in understanding the extent, nature, and causes of racial disparities, and in evaluating and designing effective policies to counteract them. This includes routinely captured administrative data on how service user outcomes differ between ethnic groups in different policy areas, as well as data collected as part of evaluations into what sort of interventions might be most effective. It is also important to have data on the differences that exist within, as well as between, different ethnic groups, and data which can be disaggregated beyond a simple 'White'/'Black, Asian and minority ethnic' dichotomy.

The quality of data collection and availability, including the level of disaggregation which is possible, have also been highlighted as areas for improvement in recent reports including the First Minister's BAME Covid-19 Advisory Subgroup (Ogbonna,

2020), and a recent publication by Race Alliance Wales (Usmani et. al., 2021). It also determines how effectively policies can be designed and evaluated (Hatch et. al., 2020a).

Disaggregation allows policy responses to better respond to need by giving a more granular picture of each group and subgroup's experiences. For instance, data in Wales show that homeownership rates are lower for people from Black, Asian and minority ethnic backgrounds than for people from White backgrounds (Statistics for Wales, 2020). However, this is very likely to mask significant differences between ethnic minority groups. In England, for example, people from Indian backgrounds have a homeownership rate 6% above White British people, whereas people from White Other backgrounds have among the lowest homeownership rates of all ethnic groups (UK Government, 2019).

Similarly, broad categories have been utilised to analyse the progress made by colleges and universities in widening access, increasing participation and narrowing outcome gaps for students from Black, Asian and minority ethnic backgrounds. This enables comparisons between broad groups of students but results in certain minority ethnic groups, which are significantly underrepresented in further and higher education, such as Gypsy, Roma and Traveller students, not always being visible in official statistics (Arday and Mirza, 2018; Arday, 2020).

Disaggregating data can be challenging to achieve. In Wales, the proportion of residents from a Black, Asian and minority ethnic background remains quite low. As a result, achieving data of sufficient quality to be disaggregated without causing issues with anonymity will require oversampling, particularly outside of the more diverse coastal cities of South Wales.[1] (Oversampling is where data are collected from certain groups at a rate disproportionately above their rate in the general population, in order to make reliable statistical observations about them). In parts of Wales where the Black, Asian and minority ethnic population is very low (including much of rural Wales), this will require significant investment as well as, in most cases, outreach to ethnic minority groups to allow data to be collected. Even then, it likely that there will be cases where data quality is not sufficient to be able to usefully disaggregate.

[1] Estimates based on Annual Population Survey and Local Labour Force Survey data suggest that 5.5% of people in Wales are from a Black, Asian or minority ethnic background (although this figure does not appear to include White Non-British ethnicities) (Stats Wales, 2021). The proportion varies by local authority, and it is notable that in only 4 of 22 local authorities (Cardiff, Newport, Swansea and Carmarthenshire) are the data considered sufficiently robust. Data anonymity issues arise where so few responses are received for a particular category that there is considered to be a risk that individuals could be identified based on their response, meaning that it can be difficult to identify trends in some data.

Further disaggregation — for instance, by age, geographical region, migration status, or gender — has been recommended for English statistics, and could be considered to improve the quality of Welsh data (Women and Equalities Committee, 2018). Again, the challenges of small sample sizes and necessary investment to achieve sufficient samples will need to be considered.

Oversampling is a costly endeavour which third-party or non-governmental organisations (including the private sector) may not be able to afford. However, the Welsh Government should be able to commit the resources to collect, produce and publish high-quality, robust and reliable data disaggregated by ethnicity which can then be used by other organisations to inform their policies; and to explore when and whether they need to oversample to collect further information for their own use.

This will require data to be routinely collected, monitored, and publicly reported by the Welsh Government, possibly in partnership with local authorities. One way to do this could be through emulating the UK Government's Ethnicity Facts and Figures Service, which collates a range of cross-governmental statistics. This service has been well-received and allows users to easily access relevant datasets (Women and Equalities Committee, 2018).

In addition to the costs of disaggregation, our evidence reviews identified a range of other challenges to effective collection and use of data in Wales. Collection of data about protected characteristics is voluntary in most cases, and some people choose not to answer these questions, or choose to answer by selecting the option of 'other'. For some groups, particularly Gypsy, Roma and Traveller communities, this reflects a longstanding distrust of the state as a result of historical discrimination, particularly when combined with a lack of transparency, and suspicion about how the data will be used (Greenfields, 2009; Greenfields et. al., 2016).[2] Reticence to voluntarily provide ethnicity-related information can also stem from having to repeatedly submit the same information across different forms and services.

Improving data quality and the response rate from under-represented groups will therefore require building trust with minority communities, for instance through renewed engagement, as well as clearly explaining the purpose of seeking these data at the point of collection.[3] Better data sharing procedures could also improve data quality, by reducing the number of times individuals are asked to volunteer the

[2] Many members of the Gypsy, Roma and Traveller communities might also identify with a different ethnic group, such as White British or Irish, on official documents, sometimes as an attempt to 'conceal' their identities from the state.

[3] This might include committing to using data collected to redress inequalities, rather than using them to uphold discriminatory practices within areas such as the criminal justice system.

same information, but would face potential privacy concerns, and may be costly and difficult to implement in light of data protection legislation.

Some organisations, including the NHS, still use the 2001 census categories to identify ethnic groups. This can mean that data are difficult to compare across organisations. To increase data comparability, all public organisations should be encouraged to use the most up-to-date classifications.[4] The upcoming 2021 census provides a good opportunity to harmonise data collection standards across all public service organisations, particularly as the 2021 classifications can now account for those who identify as being Welsh from a minority ethnic background (Ogbonna, 2020; BBC News, 2020).

Finally, it will be important to audit data gaps to ensure that race and ethnicity data are available where they are needed. We have flagged some areas within our six policy-specific reports where more or better quality data would help to inform a policy response, but an in-depth, dedicated approach will be needed to ensure that all areas are identified.

# Leadership and representation

Diverse and inclusive leadership and representation within organisations is the subject of one of the evidence reviews we produced (Showunmi and Price, 2020). It has also emerged as a key cross-cutting theme across the other five policy areas, with leadership commitment or 'buy-in' and visible representation of people from Black, Asian or minority ethnic backgrounds in organisational leadership seen as crucial to the success of strategies seeking to address racial disparities (Hatch et. al., 2020b). While most recommendations in this area require action by individual organisations, the Welsh Government can set an example and use policies such as recognition/reward schemes and procurement standards to encourage other organisations to take action.

Buy-in by senior leaders is best achieved when race equality measures are not perceived to conflict with managerial autonomy or responsibility; measures which are perceived to restrict the decision-making capability of leaders will be met with resistance (Dobbin and Kalev, 2016). It is therefore important to ensure that measures to increase representation are seen as complementary to and connected with 'everyday' work and leaders' objectives (Showunmi and Price, 2020).

[4] Issues with the 2001 census categories include the absence of a 'Gypsy/Roma/Traveller' identification, and the inclusion of the Chinese ethnicity in the 'Other' category rather than 'Asian' per the 2011 categorisation.

Evidence suggests a mixture of 'carrot' and 'stick' approaches is beneficial in increasing leadership commitment. Interventions such as training, experience of diversity, and target-setting and accountability activities are important (see Table 1). Evidence from NHS England suggests that putting clear, measurable targets in place, with leaders accountable for progress against them, has led to improvements (Showunmi and Price, 2020). This echoes the success of similar initiatives in the private sector. Sky, for example, recently set a target for 20% of its workforce to be from a Black, Asian or minority ethnic background by 2025 (Booth, 2021).

### Table 1: Principles for securing leader buy-in

| Principle | Example practice |
|---|---|
| **Engagement: Engage managers in solving the problem** | Mentoring, leaders taking an active interest in supporting mentees.<br>Recruitment programmes targeting racial and ethnic minority groups at colleges and universities, particularly where this involves outreach by leaders.<br>Developing a clear business case for diversity interventions. |
| **Contact: Expose managers to people from different racial and ethnic groups** | Self-managed teams, which allow people in different roles and functions to work together as equals on projects, and increase contact among different groups.<br>Cross-training – rotating through departments to increase exposure to diversity. |
| **Social accountability: Encourage social accountability for change** | Publication of within-workplace data by race and ethnicity such as pay, progression, representation at different levels, and incidents of racial discrimination, bullying, harassment, or abuse.<br>Development and measurement of diversity and inclusion key performance indicators.<br>Calling out racist behaviour.<br>Establishing diversity task forces. |
| **Target middle managers** | Ensuring that all employees understand diversity and inclusion as a priority, through senior leader role-modelling and messaging about its ethical principles, strategic and operational importance. |

| | |
|---|---|
| | Recognising and appropriately resourcing diversity and inclusion initiatives, including time, materials, and money. |
| | Reduce resistance by giving managers control in decision-making, emphasising management agency. |
| | Supporting people managers, e.g. training about issues affecting ethnic and racial minorities, and skills training to promote inclusive environments. |

Source: Hatch et. al., 2020b. Adapted from Dobbin & Kalev (2016) and Gifford et al. (2019).

Ensuring adequate progression pathways are available also helps to increase the representation of Black, Asian and minority ethnic staff members at leadership level. There are often few formal progression pathways within the Welsh public service, particularly to senior leadership level (Price et. al., 2020). This inhibits the formation of talent 'pipelines', with a formal pool of skilled individuals prepared to take on more senior roles. Measures to ensure racial equality could be built into new strategies to encourage career progression. These could include mentoring or reverse mentoring (where senior members of staff are paired with more junior staff members from an ethnic minority background), and wider advertising and targeting of development opportunities (Hatch et. al., 2020a; Showunmi and Price, 2020). Specific leadership programmes and wider access to secondments could also support people from Black, Asian or minority ethnic backgrounds into leadership positions (Hatch et. al., 2020a).

Increasing the representation of people from Black, Asian and minority ethnic backgrounds in leadership positions – and more widely throughout organisations – can also be achieved through inclusive recruitment practices and policies (Park et. al., 2020; Showunmi and Price, 2020). It is recognised that recruitment practices could be improved to both attract a wider range of applicants and to make sure that more diverse groups of people are recruited. A range of interventions will be required at all stages of the recruitment process to achieve these improvements (see Table 2). Successful implementation of these interventions, however, will also require recognition of any racial or ethnic disparities within organisations. The Senedd, for instance, put in place an action plan and a range of interventions in response to the finding that 70% of its staff from Black, Asian and minority ethnic backgrounds were concentrated in lower pay grades (Showunmi and Price, 2020).

### Table 2: Improving recruitment practices

| Recruitment stage | Possible interventions |
|---|---|
| **Pre-recruitment and role design** | Consider how skill and experience requirements can be measured and demonstrated, including through experience in other areas or through informal or 'non-traditional' means.<br><br>Ensure that job specifications are written in clear and concise language.<br><br>Consider how pay and conditions (including flexible, remote or part-time working) could affect the range of people who apply.<br><br>Use community engagement and role models to create a 'pipeline' of talent that can be drawn on for recruitment purposes.<br><br>All job specifications should emphasise the importance of creating and sustaining inclusive working environments within the organisation. |
| **Advertising and attracting applicants** | Advertise job positions across a range of traditional and social media, including specialist or community-based publications and platforms.<br><br>Use outreach events to provide information about organisations and attract more diverse audiences to apply.<br><br>Mobilise formal or informal networks to attract applicants.<br><br>Consider using 'diversity clauses' when using recruitment or headhunting agencies. |
| **Shortlisting** | Consider structural measures to mitigate potential biases e.g. anonymising features of applications (such as name, gender, address, ethnicity or educational institutions attended). |
| **Interviewing** | Consider implementing more diverse interview panels to make candidates feel more comfortable and to mitigate bias.<br><br>Flexible format interviews that adapt to individuals' skills and work histories e.g. focusing on transferable skills rather than sector-specific competencies.<br><br>Interviews should be conducted inclusively and 'generously', without expecting candidates to already be familiar with institutional norms. |

| | |
|---|---|
| | Ensure that practical barriers to participation are minimised, e.g. by offering to cover travel expenses, or enabling virtual interviews. |
| **Overall** | Be aware of where 'positive action' is lawful and be confident in using it if appropriate.<br><br>Ensure that all unsuccessful candidates are given constructive feedback allowing them to perform better in subsequent interviews.<br><br>Give successful candidates access to appropriate 'onboarding' procedures designed to share institutional norms, expectations, and culture. |

Source: Adapted from Park et. al. (2020) and Showunmi and Price (2020).

It is important to note that many of these interventions represent acknowledged 'best practice' but have not yet been evaluated thoroughly. The lack of existing evidence should not necessarily prevent action, however, if interventions are carefully evaluated over time to assess their effectiveness and are discontinued if they are shown to be ineffective.

# Changing organisational cultures

Changes in recruitment practices and organisational leadership will only succeed if matched with longer-term changes in organisational cultures and systems. This will require sustained commitment and action to ensure that institutional practices and personal attitudes and actions aim at reducing racial inequalities. Organisational change was a second issue that was found to be relevant right across the policy areas that we reviewed.

Stakeholders, including at the roundtable which we convened, routinely describe the change that is needed as a shift towards an 'anti-racist' point of view, meaning one which actively tries to redress racial inequalities, rather than simply avoiding overt racial bias or taking a 'non-racist' stance. While not every organisation can or should address every aspect of racial disparity within society, there is value in adopting a more pro-active and purposeful approach to tackling racial inequalities within organisations.

Experts at the roundtable we convened shared understandable frustrations about the rate of change; while others emphasised that this will need to be a long-term project if it is to prove sustainable and successful. Parallels can be drawn with efforts to increase the representation of women in organisations, which has taken sustained

commitment over a number of years but is now recognised as a priority. An example of this is the progress made within the Civil Service, where over a number of years gender equality has improved as a result of a range of programmes and interventions (Ethnic Dimension Research & Consultancy, 2014).

Therefore, multi-year planning that puts in place clear, measurable targets with visible leadership commitment will be important (Showunmi and Price, 2020). Accountability and transparency of information will also help ensure wider organisational buy-in. The success of Athena SWAN, a gender equality charter for higher education institutions, shows that progress can be made with clear metrics and with appropriate incentives — for instance, some funding bodies require an Athena SWAN accreditation (Hatch et. al. 2020a). Similar schemes and accreditations could help organisations make progress in racial equality, and were recommended in the McGregor-Smith review (McGregor-Smith, 2017), as well by participants in our roundtable.

Simple messaging that demonstrates the need for culture change can also be effective. The 'explain or reform' principle introduced by the Lammy Review, which advocates that criminal justice system agencies should either explain racial disparities with evidence or put in place reforms to address them, is a straightforward and easily-digestible message which could lead to thoroughgoing change if implemented widely within areas of the Welsh Government's competence (Lammy, 2017; Roberts, 2020). Importantly, this principle could be implemented with oversight from the Welsh Government or an independent body, which could ensure action is taken where needed.

Training and development are often assumed to be useful in changing organisational culture, but there is an ongoing debate over the effectiveness of current methods of delivery. Some experts and practitioners see training in concepts such as 'whiteness' or 'white privilege' as valuable contributions to changing organisational cultures (Hatch et. al., 2020a).[5] However, there is limited evidence that these interventions achieve their aims and some indications that it may be counterproductive in increasing sympathy with disadvantaged people from minority backgrounds (Cooley et. al., 2019). Evaluations of unconscious bias programmes, a popular intervention, suggest that it has not changed individual behaviour (Atewologun et. al., 2019).[6]

[5] White privilege refers to the systemic and systematic advantage associated with being White, or the systematic disadvantages afforded to other racial groups which is embedded within some societies.

[6] Indeed, measurements of unconscious bias do not appear to be predictive of individual behaviour (Carlsson and Agerström, 2016) and changes to measured unconscious bias do not appear to change subsequent behaviour (Forscher et. al., 2019).

It is particularly important to ensure that training is delivered in an effective way as evidence points to the risk of a backfire effect if racial stereotyping is accidentally normalised, or negative racial attitudes are seen as difficult to overcome (Gifford et. al., 2019). While training is likely to form part of measures to change organisational cultures, there needs to be a careful and planned approach to implementation. Active mitigation of unintended consequences, a focus on taking action, and a more reflective and empathetic approach to training (for example through perspective taking methods) contribute towards this, alongside ongoing evaluation of any programmes that are implemented (Hatch et. al., 2020b).

Other possibilities include delivering training that increases contact between groups and encourages open discussion of differing experiences, including those that challenge organisational wisdom (Hatch et. al., 2020a). And while current approaches may not be as effective as they could be, there is a need to incorporate changes aimed at addressing racial inequalities into organisational and individual performance management, and therefore into training and professional development opportunities.

More broadly, there is some evidence that increasing participatory decision-making and more inclusive leadership styles could help to change organisational cultures. Staff networks for Black, Asian and minority ethnic employees and strong communication links between networks, employees and senior management can help to foster dialogue in the workplace, particularly if they are given free rein to diverge from ‘official’ messaging and represent concerns openly (Hatch et. al., 2020a; 2020b). These networks could also contribute to ongoing cultural shifts by making it more acceptable to talk about racial issues.

Inclusive leadership, which devolves some elements of decision-making and encourages leaders to consult with and listen to employees, has been recommended by Academi Wales (Academi Wales, 2017). As public service organisations transition to new leadership models, ensuring that there are opportunities for the voices of Black, Asian and minority ethnic employees to be heard and acted upon could helpfully contribute to changing systems within the context of a wider refresh of organisational leadership. This could also support more ‘positive’ and co-operative workplace environments, acknowledging that stress, overwork, and blame-focused work environments can limit engagement and foster in/outgroup behaviours (Hatch et. al., 2020b).

# Engagement and outreach

A final cross-cutting theme that emerged across our evidence reviews is the importance of engaging with Black, Asian and minority ethnic communities and individuals in the design and implementation of policies and strategies to tackle race and ethnic inequalities. This can take many forms, including 'co-production' or 'co-design', where stakeholders are directly involved in planning, designing, implementing, and evaluating policies (McKercher, 2019).[7] These approaches are particularly useful in allowing policymakers to draw on experience and expertise from service users and target groups, as well as promoting buy-in among stakeholders. However, other forms of participatory decision-making, including refining and expanding existing consultative processes, will also help to gauge the need for new policies, what those policies should seek to achieve, and how they can best be implemented.

Different policy areas will benefit from differing levels of community involvement and participation, but all our evidence reviews suggest that interventions will be more effective if they are based on an understanding of the lived experiences of racial and ethnic minority people and are developed with communities, rather than being imposed upon them. This could mean, for instance, inviting parents and students to help formulate school diversity policies (Arday, 2020), and ensuring that health and care services are designed, planned and delivered in a 'culturally competent' way that is relevant to the communities they serve (Hatch et. al., 2020a).

It is likely that a mixture of 'top-down' and 'bottom-up' approaches combining different levels of community and stakeholder involvement will lead to the best outcomes. There is a continuing need for technical expertise, and government is still best-placed to deliver broad strategy, and in some areas there is likely to be very limited scope for co-design or co-production (although consultative practices are likely to be more broadly applicable).[8] In such cases, an approach that allows for centralised decision-making and goal-setting, while giving local actors scope to implement these goals in a flexible way, with successes fed back to the centre, could be useful. Natural Resources Wales is experimenting with such an approach through their process for Area Statements, which could inform the way in which the Race Equality Action Plan is implemented (Price et. al., 2021). In other cases, particularly where interventions

[7] Co-production involves a greater degree of stakeholder decision-making than co-design, where decision-making power rests with the co-ordinating body.

[8] These may include highly technical areas such as building safety regulations or medical directives, or where there is a justified need to make a rapid decision.

are targeted at a community or local level, more formalised co-design, co-production, or co-implementation, could lead to better outcomes. For example, there could be a continuing role for the Race Equality Action Plan Steering Group to continue to meet in order to hold the Welsh Government to account for its implementation of the plan and achievement of its objectives.

In this spirit, partnership working and multi-agency collaboration can also be leveraged to improve service delivery and reduce racial disparities. This was highlighted as particularly important in reducing youth offending and disproportionality in the youth justice system (Roberts, 2020). Including teams and organisations that have direct contact with service users, or using multi-agency working to collaborate across different policy 'silos', can lead to a more co-ordinated and impactful policy response.

Improving service delivery will also require active outreach and efforts to reach currently under-served communities. For instance, there is some evidence that members of Black, Asian or minority ethnic communities may not be aware of legal protections – including homelessness prevention periods and the right to social housing (Price, 2020). Successful outreach will require awareness of particular cultural contexts and should be rooted in local communities.

Equally, however, if there is a lack of trust in institutions to treat people fairly, then this will impede engagement. This is particularly apparent in the criminal justice system where there is a known 'trust deficit'. Black, Asian and minority ethnic people are known to be less convinced that the justice system is fair, and this may contribute to less favourable outcomes, including a higher risk of reoffending (Roberts, 2020). Similarly, members of the Gypsy, Roma and Traveller communities will commonly conceal their identities in official records for fear of persecution, which may have an impact on the services that are provided by local authorities (Price, 2020). Building trust will require an openness to change and genuine commitment on the part of service providers, in addition to open communication about the purpose of data collection or particular policies that aim to reassure service users.

# Implementation principles

Implementation has been flagged as an area of particular importance to improving racial equality. This reflects the fact that many of the recommendations highlighted in our evidence reviews have been known for some time and yet there has been a lack of progress across a number of metrics.

Our research, together with expert testimony at our roundtable event, indicate that successful implementation will require a number of key 'ingredients', which include leadership commitment and accountability mechanisms, as well as sufficient resource (meaning money, time, and capacity) to make a difference. In addition, successful implementation will require a process-based approach.

The Education Endowment Foundation has produced a guide for schools that sets out a four-stage approach to implementation, aspects of which could be applied to the context of race equality (see Table 3).

### Table 3: Policy implementation process

| Stage | Detail |
|---|---|
| **Explore** | Identify a key priority (or priorities) which need to be changed.<br>Explore (e.g. through research and discussion, including with experts by experience) possible policies and interventions.<br>Consider how policies and interventions might 'fit' within the policy area context. |
| **Prepare** | Make a plan for change which can be adapted in light of organisational and context readiness, and which is 'clear, logical and well specified'.<br>Begin practical preparations for implementation e.g. investment, assigning responsibility, staff training, or infrastructure. |
| **Deliver** | Follow initial training and preparation with ongoing support.<br>Lead flexibly and adapt to circumstances.<br>Use data to ensure 'faithful' implementation and monitor progress against targets. |
| **Sustain** | Incentivise good practice through rewarding successful implementation and consider sanctions for poor practice.<br>Ensure that scaling up and sustaining interventions are part of the original planning process.<br>Treat scaling up as part of a new implementation process. |

Source: Adapted from Sharples et. al. (2019).

These stages are designed to repeat in a cyclical pattern as policies are rolled out, and highlight how implementation should be seen as an ongoing and iterative process (which can move back and forth) rather than a single 'event'. Implementation (understood as putting policies into practice) is only one 'stage'. Exploration,

preparation, and sustaining change are equally important. Our evidence reviews, as well as ongoing consultation with stakeholders, have contributed towards the exploratory stage, for instance, giving an idea of which policies might be possible. Preparing a deliverable plan, including selecting a manageable number of interventions, and putting in place the logistics to ensure effective implementation will be the next phase as the Race Equality Action Plan progresses.

Plans should be rethought and adapted to circumstances at all stages during the implementation process. If an intervention is not working, then stopping it and redeploying resources might be the best outcome. This should not be shied away from – particularly in the case of interventions which may lack a robust evidence base, or those which may lead to unexpected outcomes, given the nature of complex systems.

Sustaining implementation also means ensuring that resources are committed to a programme over the long term. The Scottish Race Equality Action plan has a 15-year lifecycle, and a similar period will be needed to achieve and measure impact in realising race and ethnic equality in Wales.

Research also indicates that implementation will need to take into account complexity and the sometimes unpredictable way in which systems respond to change, as well as the ways in which behavioural change can be encouraged (Greenhalgh and Papousti, 2019). These challenges show the difficulties of assuming that a 'linear' approach to implementation will succeed, but the authors also stress that these can be managed by adaptive, relationship-focused implementation approaches, as well as leadership by example.

# Conclusion

The recurring themes we identify in this report cut across the policy areas that we studied, and highlight the importance of an integrated, strategic approach to the Welsh Government's Race Equality Action Plan. Improved data collection, inclusive and representative leadership, organisational culture change, and better community engagement and outreach, will all play an important role in ensuring that policy-specific interventions succeed, as well as being important components of successful implementation more generally. And taking an adaptable, long-term, and strategic approach to implementation will help ensure that interventions contribute to improvements in the lives of Black, Asian and minority ethnic people in Wales.

# References

## WCPP reports on race equality


Arday, J. (2020). **Improving Race Equality in Education**. Cardiff: Wales Centre for Public Policy.

Hatch, S., Woodhead, C., Moriarty, J., Rhead, R., and Connor, L. (2020a). **Improving Race Equality in Health and Social Care.** Cardiff: Wales Centre for Public Policy.

Hatch, S., Woodhead, C., Rhead, R., and Connor, L. (2020b). **Improving Race Equality in Employment and Income.** Cardiff: Wales Centre for Public Policy.

Price, J. (2020). **Improving Race Equality in Housing and Accommodation.** Cardiff: Wales Centre for Public Policy.

Roberts, M. (2020). **Improving Race Equality in Crime and Justice.** Cardiff: Wales Centre for Public Policy.

Showunmi, V., and Price, J. (2020). **Improving Race Equality in Leadership and Representation**. Cardiff: Wales Centre for Public Policy.


## Full reference list


Academi Wales. (2017). **Leading in the Welsh Public Service – a leadership behaviours framework for senior leaders.** Retrieved from: **https://academiwales.gov.wales/Repository/resource/9bd24aea-760a-4a7d-a654-6143fab2ef73/en**

Arday, J., and Mirza, H. (Eds.) (2018). **Dismantling Race in Higher Education: Racism, Whiteness and Decolonising the Academy.** London: Palgrave Macmillan.

Atewologun, D., Cornish, T., and Tresh, F. (2018). **Unconscious bias training: An assessment of the evidence for effectiveness**. Equality and Human Rights Commission. Retrieved from: **https://www.ucd.ie/equality/t4media/ub_an_assessment_of_evidence_for_effectiveness.pdf**

BBC News. (3 March 2020). **Census 2021: Asian and Black Welsh terms to be added to survey**. Retrieved from: **https://www.bbc.co.uk/news/uk-wales-politics-51720344**

Booth, R. (21 January 2021). **Sky aims for one in five staff from minority backgrounds by 2025**. The Guardian. Retrieved from: **https://www.theguardian.com/business/2021/jan/21/sky-aims-for-one-in-five-staff-from-minority-backgrounds-by-2025**

Carlsson, R., and Agerström, J. (2016). **A closer look at the discrimination outcomes in the IAT literature.** Scandinavian Journal of Psychology, 57, 278-287

Cooley, E., Brown-Iannuzzi, J. L., Lei, R. F., and Cipolli, W. III. (2019). **Complex intersections of race and class: Among social liberals, learning about White privilege reduces sympathy, increases blame, and decreases external attributions for White people struggling with poverty.** Journal of Experimental Psychology: General, 148(12), 2218–2228. **https://doi.org/10.1037/xge0000605**

Dobbin, F., and Kalev, A. (2016). **Why diversity programs fail.** Harvard Business Review, 94(7): 14.

Ethnic Dimension Research & Consultancy. (2014). **Identifying and Removing Barriers to Talented BAME Staff Progression in the Civil Service**. Retrieved from: **https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/417250/Ethnic_Dimension_Blockages_to_Talented_BAME_staff_Progression_in_the_Civil_Service_Final_16.12.14__1_.pdf**

Forscher, P.S., Lai, C.K., Axt, J.R., Ebersole, C.R., Herman, M., Devine, P.G., and Nosek, B.A. (2019). **A Meta-Analysis of Procedures to Change Implicit Measures.** Journal of Personality and Social Psychology: Attitudes and Social Cognition, 117(3), 522-559. Retrieved from: **https://doi.org/10.1037/pspa0000160**

Gifford J, G. M., Young J., and Urwin, P. (2019). **Diversity management that works: an evidence-based review.** CIPD. Retrieved from: **https://www.cipd.co.uk/Images/7926-diversity-and-inclusion-report-revised_tcm18-65334.pdf**

Greenfields, M. (2009). **Gypsies, Travellers and accommodation.** Race Equality Foundation. Retrieved from: **http://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/housing-brief10_0.pdf**

Greenfields, M., Jones, H., Chastney, B., Murdoch, A., Hargreaves, M., Diaconescu, I., Kirkby, A., Nuttall, E., Ruston, S., Spencer, S., Jones, T., Willers, M., Compton, J., Shepherd, C., and Richardson, J. (2016). **Best Practice for assessing the accommodation needs of Gypsies and Travellers**. Retrieved from:

**https://www.gypsy-traveller.org/wp-content/uploads/2020/02/Best-Practice-for-Gypsy-and-Traveller-Assessment-of-Accommodation-Needs.pdf**

Greenhalgh, T., and Papousti, C. (2019). **Spreading and scaling up innovation and improvement**. British Medical Journal 365. Retrieved from: **https://doi.org/10.1136/bmj.l2068**

Lammy, D. (2017). **The Lammy Review: An independent review into the treatment of, and outcomes for, Black, Asian and Minority Ethnic individuals in the Criminal Justice System**. Retrieved from: **https://www.gov.uk/government/publications/lammy-review-final-report**

McKercher, K. (2019). **What is co-design and co-production?** Co-production Network for Wales. Retrieved from **https://info.copronet.wales/what-is-co-design-and-co-production-by-kelly-ann-mckercher/**

MacPherson, Sir W. (1999). **The Stephen Lawrence Inquiry: Report**. UK Government. Retrieved from: **https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/277111/4262.pdf**

McGregor-Smith, R. (2017). **Race in the workplace: The McGregor-Smith review.** Report for Department for Business, Energy and Industrial Strategy. Retrieved from: **https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/594336/raceinworkplace-mcgregor-smith-review.pdf**

Ogbonna, E. (Chair). (2020). **First Minister's Black, Asian and Minority Ethnic Covid-19 Advisory Group: Report of the Socioeconomic Subgroup.** Welsh Government. Retrieved from: **https://gov.wales/sites/default/files/publications/2020-06/first-ministers-bame-covid-19-advisory-group-report-of-the-socioeconomic-subgroup.pdf**

Park, M., Price, J., and Taylor-Collins, E. (2020). **Increasing diversity in public appointments through recruitment**. Wales Centre for Public Policy. Retrieved from: **https://www.wcpp.org.uk/wp-content/uploads/2020/11/Increasing-diversity-in-public-appointments-through-recruitment-1-2.pdf**

Price, J., Roberts, M. and Bristow, D. (2021). **Towards a Just Transition in Wales**. Wales Centre for Public Policy. Retrieved from: **https://www.wcpp.org.uk/publication/achieving-a-just-transition-in-wales/**

Sharples, J., Albers, B., Fraser, S., and Kime, S. (2019). **Putting Evidence to Work: A School's Guide to Implementation. Guidance Report.** Education Endowment

Foundation. Retrieved from: **https://educationendowmentfoundation.org.uk/public/files/Publications/Implementation/EEF_Implementation_Guidance_Report_2019.pdf**

Statistics for Wales. (2020). **Housing tenure by protected characteristics.** Retrieved from: **https://gov.wales/ad-hoc-statistical-requests-31-august-11-september-2020**

Stats Wales. (2021). **Ethnicity by area and ethnic group.** Retrieved from: **https://statswales.gov.wales/Catalogue/Equality-and-Diversity/Ethnicity/ethnicity-by-area-ethnicgroup**

UK Government. (2019). **Ethnicity Facts and Figures: Housing.** Retrieved from: **https://www.ethnicity-facts-figures.service.gov.uk/housing**

Usmani, L., Abramson, J., Ibarra-Abreu, C., Omanje, F., Li, J.H.Y., and Scharaga, R. (2021). **Do the Right Thing: achieving equity in racialized representation in public and political life in Wales**. Race Alliance Wales. Retrieved from: **https://racealliance.wales/wp-content/uploads/2021/01/RAW-Research-paper-160121.pdf**

Welsh Government. (2020). **Now is the time for action on racial inequality: Welsh Government lays out route to systemic and sustainable change for Wales**. Press Release. Retrieved from: **https://gov.wales/now-time-action-racial-inequality-welsh-government-lays-out-route-systemic-and-sustainable-change**

Women and Equalities Committee. (2018). **Race Disparity Audit: Third Report of Session 2017-19**. House of Commons. Retrieved from: **https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/562/562.pdf**

## Author Details

**Dr Jack Price** is a Research Officer at the Wales Centre for Public Policy.

**Manon Roberts** is a Research Associate at the Wales Centre for Public Policy.

**Amanda Hill-Dixon** is a Senior Research Fellow at the Wales Centre for Public Policy.

For further information please contact:
**Dr Jack Price**
Wales Centre for Public Policy
+44 (0) 29 2087 5345
**info@wcpp.org.uk**



Wales Centre
for Public Policy
Canolfan Polisi
Cyhoeddus Cymru