



An Anti-Racist Wales The Race Equality Action Plan for Wales

The Board of Community Health Councils (the Board) is pleased to submit this consultation response on behalf of Community Health Councils (CHCs) in Wales.

CHCs are independent bodies that reflect the views and represent the interests of people living in Wales in their National Health Service (NHS). CHCs encourage and support people to have a voice in the design, planning and delivery of NHS services.

There are 7 CHCs in Wales. Each one is made up of local volunteer members who live in the communities they serve, supported by a small team of paid staff. Each CHC:

- Carries out regular visits to health services to hear from people using the service (and the people providing care) to influence the changes that can make a big difference
- Reaches out more widely to people within local communities to provide information, and to gather views and experiences of NHS services.
- CHCs use what they hear to check how services are performing overall and to make sure the NHS takes action to make things better where this is needed
- Gets involved with health service managers when they are thinking about making changes to the way services are delivered so that people and communities have their say from the start

- Provides a complaints advocacy service that is free, independent and confidential to help people to raise their concerns about NHS care and treatment.

The Board of CHCs (the Board) exists to support, assist, advise and manage the performance of CHCs. It represents the collective views of CHCs across Wales.

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?

The vision and values do reflect what this movement would like to see achieved by 2030.

The vision section talks about developing shared understanding about race, creating equitable outcomes and celebrating difference. These presume a joint journey for all people living in Wales.

More work needs to be done to ensure that the vision and values are owned and shared by everyone.

Welsh Government should consider resourcing behavioral change work programs to give this valuable work the best chance of success.

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?

The narrative/background information clearly describes why the various goals and actions have been proposed.

The plan acknowledges that extant strategies and legislation have failed to produce materially different outcomes and experiences for Black and Ethnic Minority Groups.

The plan could be strengthened further if organisations were asked to share any challenges encountered in delivering on current strategies and legislation so that action is also tailored to address these.

Likewise, positive feedback from organisations could also be used to strengthen the plan.

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

We do not feel that any information is missing, other than that identified above.

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

Yes, we agree with all goals and actions included within the action plan. We think there needs to be sufficient resources invested into national behavioural change work to developed understanding across the population.

**(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?**

We do not feel that any additional information should be included within the action plan other than that previously discussed above.

We feel it is important that the actions within the plan are acted upon and make a real difference. We therefore propose that authorities report annually to the Accountability Group.

With respect to Health and Social Care, we welcome the proposal to amend the accountability framework to make clear the requirements to address racism and to report upon this within medium term plans and annual plan reports.

We also welcome the use of public statements as they will

give the public confidence that action is being taken across Wales.

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

As above.

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?

n/a

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

We were pleased to read that the action plan has included training. We feel it is essential that the appropriate training is developed and delivered to ensure senior leaders are able to act within the plan.

We feel that service user involvement is essential, therefore authorities should review and consider how they let the public know how they can get involved.

We also welcome the proposal to independently review the complaints process. People need to understand how to complain and be reassured that if they speak out, they will be

heard.

The Citizens Voice Body will be well placed to ensure that everyone has a voice but to achieve this in health and social care, provided it is properly equipped to do so.

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?

In order for the action plan to be effective, it is important to ensure senior leaders understand their role within the action plan and that sufficient training is provided.

The Citizens Voice Body will be able to support the public to have a voice and if required, raise complaints about health and social care services.

We feel that it is essential that sufficient resources are made available to ensure effective training can be offered to underrepresented groups, particularly those who might experience intersectional racism.

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?

We consider that the action plan does consider all protected characteristics and intersections between these.

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?

We are pleased to note that leaders will be held personally accountable and that plans will be included within IMTP's. We would reinforce the importance of engaging with leaders early and prior to the Action Plan coming into force for the reasons already described above.

We are further pleased to note that an Accountability group will be introduced and we feel the scope of the group is appropriate.

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

We feel that the action plan has considered the Welsh language and the associated actions will support the use of the language.

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

We have suggested, above, that behavioural change engagement and communication work programmes should be undertaken to give the plan the best chance of success.

Messaging needs to be sensitively managed so that no group of people feel excluded.

9. Please also explain how you believe the proposed policy approach 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.

n/a

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?

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.

It might be helpful to have a service area specific document which include cross cutting themes so organisations have all the relevant information in documents applicable only to them.

Where there are overlaps these could be cross referenced to the main document.

The difference between positive action, affirmative action and positive discrimination could be elaborated upon further so that organisations are equipped to take the right action.

With respect to communication and marketing of the actions

within the plan, members of the public might also find it challenging to understand the differences. It will therefore need to be made clear.

We note that Health and Social Care will be expected to meet the requirements of the plan earlier than other bodies.

It is not clear whether this would include organisations funded by the Welsh Government Health and Social Care department or solely those providing Health and Care Services directly to patients and members of the public.

An estimated timescale for when other Welsh Government funded bodies might be expected to meet the requirements would also be helpful to enable forward planning.

Board of CHC's Contact details



Board of Community Health Councils in
Wales
33 / 35 Cathedral Road
Cardiff
CF11 9HB



02920 235 558



@waleschc.org.uk



www.communityhealthcouncils.org.uk



@CHC_Wales