Unit 33

The Enterprise Centre

Tondu, Bridgend

CF32 9BS

21/07/2021

Email only

Response to the Welsh Government Race Equality Action Plan

About UCU Wales

The University and College Union (UCU Wales) represents almost 7,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, and postgraduates in universities, colleges, adult education and training organisations across Wales. UCU Wales is a politically autonomous but integral part of UCU, the largest post-school union in the world. We welcome this opportunity to respond to Welsh Governments Race Equality Action Plan.

Overview of Our Response

Our consultation response to the Welsh Government's Race and Equality Action Plan has been developed and agreed through structured interviews with black members, the UCU Wales Equality Committee, black students and people of colour who possess relevant experiences and expertise in the third and private sector.

To preserve the integrity of their response, we frequently quote interviewees directly and develop concrete recommendations within the narrative which they set.

Whilst the picture that they paint is frequently complex, there are several key take-aways;

1: The Race Equality Action Plan (REAP) must be seen as a roadmap and not an end in itself

2: Since so much depends on local implementation, the voices of black staff and students must be central to that process. However, in prioritising action, there is a difference between 'asking for solutions' and acting upon issues which people "are telling you needs to change".

3: Whereas it can be difficult to identify any single point of departure, change from the inside (institutional process and culture) and from above (governance, funding and accountability) are all crucial.

4: Given that the plan is situated in a context of multi-generational racism, failure to achieve the plans ambitions will merely reinforce the message that change is impossible. It is thus essential that the plan is properly resourced to succeed!

QUESTION 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?

All interviewees welcomed the vision of an 'anti-racist Wales' as an improvement on what they considered to be a more passive and limited model of 'equality'. Similarly, they believed that Welsh Government did well to accept that structural racism exists, contrasting this with the position in England. However, there was a feeling that the plan lacked concrete steps and measurable outcomes. Acknowledging its emphasis on locally negotiated implementation and change, one University Equality Committee member said, **"The danger is that it (the Race Equality Action Plan) is seen as a final product and not a map". To that end, the expectation that decision makers will engage in a process of co-design needs to be made clear.**

UCU Wales supports WTUC's suggestion that the Welsh Government confirms a method of implementation by October 2021.

Almost all the interviewees described their experiences of multi-generational racism which was reproduced from early years onwards. One University Black Lives Matter activist said, "I've lived through this from the moment that I could understand what they (racists) were saying. It got worse after 9/11 but now we can see all that happening to our children before us". She elaborated by saying that "any action plan needs to sanction and reality check – sense check and self-check". The idea that the REAP should be used to consolidate anti-racist practice whilst providing the platform for further constructive challenge is a theme that runs throughout.

Whilst most interviewees acknowledged the need for a systems-wide intersectional approach, it was also suggested that intersectionality needs to be understood as a tool for achieving an accurate understanding of how racisms lived experience can vary. This reflected a feeling that previous approaches had sometimes diluted focus by seeking to simultaneously address multiple forms of oppression. One interviewee quipped, "had we progressed over the past 30 years then we could talk about 'anti-oppression', but we have not progressed so let's talk about anti-racism". Another interviewee talked about the need to "recognize that the experience of race and racism is not homogenous" whilst welcoming the plans dedicated focus in anti racism.

This points to a singular principle that meaningful change can only be achieved by;

1: pushing from outside, within and above, when,

2: black voices are not only heard but enabled to inform;

3: action which is commensurate to the scale of the problem.

Interviewees cited examples of past government projects which had failed to deliver any benefit principally because people of color were not involved directly in the process of power with two contrasting that experience to the positive method in which Welsh Government have developed REAP. The feeling was that a plan ceases to be a platitude when the people it serves becomes its co-architects. To quote a leading Welsh community organizer who I interviewed, "in dealing with power, those who experience racism are frequently the best experts on anti-racism".

However, in understanding the nuance, many of those to whom I spoke (including the interviewee quoted above) warned against making those who experience racism responsible for the solution. Stretching beyond the immediate question of allyship, there was a definite view that the institution must drive change; "prioritize action - what are people telling us needs to be changed?" and "also act upon what you know already!". This was contrasted with any practice which demands that people of color submit packaged policy solutions.

Finally, one interviewee pointed to the emotional burden and trauma which accompanies both the experience of racism and fight against it. Consequently, institutions will need to review and revisit the support offered to survivors and those engaged in intense anti-racist work.

QUESTION 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?

Accountability

Several interviewees talked about how reputational pressure on institutions can serve to support the implementation of the plan. A member of a University equality committee observed that "Black Lives Matter (BLM) has generalized an appetite to know what is being done concretely to bring about change". However, public ownership of anti-racism can only be achieved if people at large were engaged with information around progress. Public facing transparency and accountability must serve as vital elements in this process.

It also follows that if accountability is to be meaningful, information must be accessible. This precludes the possibility of 'burying progress in an annual report'. **Rather, in sharing this information, a way must be found which reflects institutions commitment to the communities which they serve**. However, thought needs to be given to how complaints of racism are recorded and published. It is an established fact that any effective initiative designed to raise awareness will generate an increase in complaints in the first instance. Given that this can serve as an indicator of growing confidence in the organizations willingness to take racism seriously, it might be considered perverse to publish overall levels as (for instance) a comparative league table.

From within – resource, prestige and decolonization

In terms of identifying good practice, at least one Welsh institutions has conducted extensive internal consultations in developing Strategic Race Equality plans. In Cardiff University, each school was visited during an exercise where 10 action points were refined from an initial list of 60. Schools were then engaged to develop a plan around how they would address racism. Participants felt that this approach was very useful in as far as it broadened responsibility and ownership. Furthermore, the fact that levels of engagement were variable, with some schools emerging ahead of others, enabled the institution to target resources more effectively. This gave rise to a sense of momentum with staff feeling confident that the "project wouldn't just be dropped".

With respect to the wider university community, a number of black staff felt that institutions require meaningful forums in which black students can raise their voice. Crucially where this occurs, a decision maker must be in the room to actively listen. "Students are standing up and have a lot to say – deep culture change means listening to them". A second interviewee suggested, "**if Student BLM are protesting outside the building, a decision-maker needs to invite them into the room to talk, listen and act**".

Multiple concerns were expressed around black staff involvement. In one institution, it was reported that the Dean of Equalities is on long-term sick whilst the lead of the Equality Group has "burnt out". Similarly, in assessing the work of university Equality Committees in general, one member remarked "it is the same people who turn up – not those who need to be there". Exploring this question in further interviews, it was strongly suggested that committee presenteeism can reflect a lack of institutional progress. "Why would people bother turning up if they don't see any change and any action?". **Whilst acknowledging the excellent work which has gone before, confidence and participation will only be built where resources are invested into launching the plan locally.**

Some of these difficulties were attributed to emotional and workload pressures that frequently fall upon those who volunteer to undertake race equality work. Either way, it is clear that committees will require greater institutional support if they are to assist in the adaptation and delivery of this incredibly ambitious plan.

It is suggested that this might be addressed by;

1: increased facility time and administrative support for both university and trade union representatives. "This should be a core priority and cannot simply be added to somebody's workload. It's not about commitment - its about being able to do the job".

2: free flow of information

3: enhancing role and prestige of committee members to mainstream genuine change.

4: Welsh Government advice or guidance around safeguarding volunteers who undertake the intense emotional labour attached to delivering the plan

Similarly, there is a need to ensure cross cutting solutions capable of borrowing the best from outside the sector. UCU Wales supports WTUC's proposal for greater engagement with the Workforce Partnership Council and the TUC's Anti-Racism Task Force**. In the same manner, clear expectations must be built into the CTER**

legislation, Reform and Recovery Plan and ALN regulations (see below – Governance and Government) to ensure a seamless line of sight across all areas of government activity. The Race Equality Action Plan cannot be allowed to sit in it's own silo.

In FE the situation is complicated by a lack of colligate culture and what was described as a typically more hierarchical management structure. "Universities can support various committees because people are there to sit on them. FE has been whittled down to the point that we don't have the resources to support action".

Following on from these difficulties, it is also suggested that reporting systems are broken in at least one HE institution. A lack of processing capacity means that some complaints are not addressed or recorded. This has led to severe underreporting. Likewise, a black college lecturer described his difficulty in obtaining a copy of his college equality strategy, neither being able to obtain an online or paper version despite multiple requests.

Whilst the situation varies between institutions, in South and West Wales, FE typically serves a high proportion of black students with back academic staff, leaders and governors severely underrepresented. One interviewee initially attributed this to poor advertising. However, we also discussed the possibility that people of color might not wish to join institutions which are so obviously white. **Either way, we concluded that further investigation is required around this issue, feeling that this should be a priority for the professional regulator (Education Work Force Council).**

In relation to work-based learning, UCU supports WTUC's suggestion that the Apprenticeship Strategic Equality & Diversity Lead must be more radical in their actions and approach towards apprenticeship programmes. Raising awareness and undertaking considerable engagements with people from Black, Asian and Minority Ethnic communities, as well as representative organisations and apprenticeship provider networks are effective, however, the outcome of these engagements, as well as the action plan, must guarantee employment security for BAME apprentices. "In order for the Welsh Government to achieve increased performance levels, higher satisfaction and clear awareness of career choices for apprentices within black communities, they must act to enhance their job security".

Concerns were also raised that black staff will only raise their voice where they see a real possibility of wide ranging structural transformation. As it stands, many younger academics are reluctant to place their heads above the parapet. "Because BME are a minority in these institutions, I have seen staff and students literally walking down the concourse with their heads down". It was argued that in both FE and HE, there is an urgent need to raise the profile and standing of black staff. Furthermore, one interviewee described informal power networks within HE which were not always welcoming of black staff. **Following on from the excellent work of Professor Ogbonna in prefiguring aspects if REAP, it was suggested that Welsh Government could take a more active role in supporting black academics.**

Moreover, there is a subtler argument relating to the decolonization agenda which suggests that racism cannot be tackled if the intellectual and philosophical basis of the institution remains exclusively 'white' or Eurocentric. In its current form, the Race Equality Action plan makes little or no reference to decolonization in either HE

or FE. This points to a crucial question - how can anti-racism be achieved if established narratives remain dominant and one system of knowledge is privileged over another? Qualifying this point, two black academics spoke about the need to adopt a careful approach. "We don't want people to think that we are into ripping it up. It's about discovering other perspectives and new knowledge. It's a university – it's what we are paid to do". Conversely, another experienced academic said "how can we have change if the curriculum is white? We need to show different perspectives".

Another practical remedy might be found in greater use of reflective practice. For instance, it was pointed out that no institution would run an all-male shortlist. Consequently, one interviewee suggested that all institutional processes should be audited to ensure parity across the piece to ensure that race is brought up to the level of other equality stream.

As a UCU Wales supports WTUC's proposal for the mandatory introduction of anti-racism questions during job interviews.

Question 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?

Governance & Government - from above

All interviewees identified the relationship between governance and institutional change. Whereas the focus for change differed between whole institution and (frequently, more robust) government action, several clear themes emerged;

1: there must be clarity around where this work sits

2: is it on the agenda in every key decision making forum?

3: who is tasked with driving this work forward? It was argued that institutions need to explicitly assign responsibility

Aside from Welsh Governments support and the need to formulate a cross-cutting strategy, funding was seen as the key incentive towards promoting institutional engagement and systems change. This lever should operate both to support useful initiatives and punish inaction/bad behavior. As one interviewee said, "There should be a clear duty linked to funding bodies HEFCW (in future, CTER) and Welsh Government. If you say that you're going to get there you should have the money when you arrive. If you employed a builder, you wouldn't pay when you saw a pile of bricks".

Whereas the majority of interviewees militated against institution-wide financial penalties, there was unanimous support for writing progress into senior performance objectives and renumeration. It was felt that HFCW's closed-doors approach to resolving poor practices, described as 'meetings without coffee', did not carry sufficient force or visibility to support a culture of change. On responding to a question around how funders reward existing good practice, one interviewee said "Don't worry – they'll be happy to talk about success. You're only

going to find the hidden stuff if people think that something will be done". UCU Wales strongly believes that the best way to support institutions is to ensure that the plan aligns with all active streams of government. In PCET, this will include CTER, the ALN Regulations, Social Partnership and Procurement Act (SPPA) and the Reform & Recovery Plan. Thought should also be given to Corporate Joint Committees which touches upon skills planning as well as qualification reform (Qualified for Life), both in terms of assessment content and impact. For instance, there is evidence that high stakes summative testing such as GCSE's and A Levels combine with background disadvantage to negatively impact outcomes for some BME students. **Either way, the feeling is that leaders will be less likely to depend upon arguments around institutional autonomy if it is clear that the plan touches upon every aspect of their planning and operations.**

Identifying possible metrics, UCU Wales proposes;

1: Reduction in the Ethnicity pay-gap

2: Reduction in awarding gaps

3: Increase in staff diversity

4: Increase in reporting racist incidents (demonstrating a culture of trust in which staff and students feel confident that their complaint will be dealt with)

5: Reduction in racial disparities between professional development opportunities

6: Reduction in promotion gaps

7: Reduction in racial disparities in engagement and experience

8: Reduction in non-continuation and progression gaps for students.

In the case of CETR, SPPA and CJC's, alignment can be achieved either through ministerial remit, the appointment of a dedicated board member and/or convening a dedicated subcommittee to report back to the board. This is crucial given that UCU has detected a tendency for organizations to recuse themselves from obligations (such as the Equality Act's Socio Economic Duty) on the basis that they are 'insufficiently strategic'. **Whilst mindful of proportionality, we feel that any organization in receipt of significant amounts of public funding should expect to be covered by the plan.** Moreover, UCU Wales believes that this expectation should be welcomed with enthusiasm.

With respect to university and college governance, it is clear that a standing agenda item on its own will not suffice. Crucially, as well as clear reporting, transparency and accessible information, the experiences of black staff and students must inform metrics around lived anti-racist priorities. As well as proofing against 'measuring the wrong thing' this can then be linked to institutional governance at every level. As with every other aspect of this plan, interviewees all agreed that change will be near impossible unless people of color are 1: in the room, 2: enabled to speak freely and 3: enjoy parity of credentials with other committee members. All of this points to a need to adapt corporate governance structures and processes towards delivery of the plan. By this method, structural change can crystallize around positive purpose. **In FE, where the proportion of black academic staff is both**

underrepresented and barely visible in leadership, this duty must be extended to Boards of Governors. One interviewee proposed that FE colleges actively recruit black academics from a HE background. This should be of particular interest given the increasing policy emphasis on collaboration within PCET.

Related to governance, any prospective cuts to departments or courses which touch upon anti-racism (such as social science and critical studies) must be impact assessed. Similarly, in terms of promoting a culture of curiosity and challenge, government must take steps to establish staffs individual right to academic freedom. Whilst the positive ambition of decolonization will not be achieved overnight, it is unlikely to be achieved at all if institutions place 'efficiency' ahead of free thinking and investigation. **To that end, CETR must incorporate an individual right to academic freedom as exists in the Irish Republic and practically everywhere else in Europe.**

UCU Wales is concerned by weaknesses in the Employability and Skills section (pages Page 80 to 83). The repetitious actions to "review" or "evaluate" data are unclear and insufficiently proactive to achieve improved performance levels, employee satisfaction and awareness of career choices. Furthermore, whilst crucial in many respects, a greater percentage of Black and Asian individuals employed in the sector does not, of itself, guarantee parity or job satisfaction. Racism must be linked as a component part in wider social processes such as deskilling, managerialism and diminished professional autonomy. Whereas we did not have sufficient opportunity to explore the issue, there was anecdotal evidence that the experiences of senior black staff differ substantially from black early career academics (many of whom work under precarious conditions). As mentioned, UCU Wales supports WTUC's call for better representation of Trade Unions within the Social Partnership structures, utilising the Workforce Partnership Council.

UCU shares TUC Wales concern that the timeframe for the completed actions is November 2021 anticipated actions and outcomes is missing.

Question 4

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

<u>Promising and not delivering – a warning!</u>

In responses to my question; "How can we empower people of color in the institution?", interviewees reiterated the need to acknowledge that racism exists and act coherently.

The author of this response recalls his own experience of racism in a Welsh University. As a member of an institution, I noted how the Vice Chancellor and students union (in which I held office) both protested the institutions equality credentials. However, anybody visiting the student toilets would immediately be confronted with the most egregious hate graffiti including casual use of the 'N word', swastikas and exhortations to "gas all Jews". I took action to address this but, being from a Jewish background, it caused me to quip to my friend Ahmed that "were we strung up from the balcony, there are people on this campus who would happily

dance around our bodies". 12 years later, when I visited the same campus (in 2019) the hate graffiti was back. Being situated in the foyer of the main building, the toilets are frequently used by students, staff and visitors.

Concurring with the experiences of many of our interviewees, this tells me two things. The first is that, as with the toilets, racism accretes and reproduces outside plain sight and accountability. The second is that change in the absence of commitment can all too often prove ephemeral. After all, hate which is written in a university toilet does not simply remain there. It exists in the minds of its authors - some of whom will graduate to teach, police and work in HR or government. Similarly, to differing degrees it is tolerated by those who ignore the hateful words as well as carried away by others who suffer its threat and insult. With REAP, Welsh Government has made it clear that there can be no question accepting such 'phenomena' as the inevitable consequence of living in a racialised society. Consequently, in order to secure and consolidate an anti-racist post compulsory education system, institutions and government must enable challenge as one of its most valuable resources.

Visible campaigns which work their way into the fabric of the institution will prompt discussions and make challenge more permissible. However, and beyond messaging, where challenge arises, it is essential that it is enthusiastically welcomed with proper engagement. Following on from an earlier point, it is absolutely crucial that "protestors outside be invited into the room". Any concerns about 'outside influences' or youthful excess should be secondary to listening and asking the right question.

Crucially, we also discussed the catastrophic impact of not delivering on promises, suggesting that this would set things back even further than failing to commit in the first place. **Institutional culture is partly governed by word of mouth. News spreads fast so if it is concluded that promises are empty, this will then become the institutional experience. This can only serve to legitimize racism.**

The Race Equality Action Plan is a bold blueprint for an anti-racist Wales. Once embarked upon, it must be seen through to the end. Challenge must be welcomed and action must be visible. UCU Wales is committed to working with institutions and government to ensure that the cycle of generational racism is broken for once and for all.