

Consultation Response Form

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Question 1: Do you agree with the proposed draft Equality Objectives in Chapter 5?

We agree with the proposed draft equality objectives in general terms. However, the final version needs to be clearer on some of the particulars, for example, which of the high level aims the pay difference / pay gap objective falls within. This is important because pay difference is identified as a specific area of the Welsh equality regulations. There should therefore be a more explicit reference in the final plan.

Additionally, equality 'Objective 1' on p25 is not the same as equality 'Objective 1' in the example on p27, so it is not clear which one the consultation is focusing on.

Question 2: Do you think there are any areas of inequality that are not addressed by draft Equality Objectives and that are of particular importance to you?

In the draft SEP there is a reference to intersectionality (p24), but it is unclear how the intersections will be incorporated in the objectives and how actions for intersectional groups would be prioritised. Further clarification would help public bodies' understanding and aid alignment.

We agree with the statement on p19 that the provision of accessible services, including health, mental health, social care, education and transport needed to feature more strongly.

Question 3: Are there any emerging trends / issues / evidence regarding inequality in Wales that you feel should be addressed as a priority?

In Section two, 'the equality landscape', the Welsh Government commits to exploring the links between current and emerging policy development. However there is no reference to the following Welsh Government legislation:

- **Violence Against Women Domestic Abuse and Sexual Violence (Wales) Act 2015.** The VAWDASV guidance considers the specific needs, issues and barriers that may be experienced by people with protected characteristics, and who may be marginalised or excluded, including women, BME people, children and young people, older people, migrants, refugees and asylum seekers, disabled people and those who are LGBT+.
- **Social Services and Well-being (Wales) Act 2014** and the links to adults and children at risk and safeguarding requirements places on listed public bodies. We suggest that this should be addressed in the final version of the Plan.

Question 4: What are your thoughts regarding the approach of developing Equality Objectives that contribute to longer term, aspirational aims?

We welcome the Welsh Government's long-term approach to the development of Equality Objectives. It would be helpful if the document referenced the timeframes that the Welsh Government is using in its definition of long-term. Research conducted by Policy Forum Wales on Welsh Public Service Boards (PSBs) Well-being assessments questioned the length of time some PSBs considered to be long-term. An explanation of the timeframes would aid other public bodies' understanding.

Question 5: Do you agree with the intended approach to develop a small number of key actions under each Objective, linked to the 6 domains in Is Wales Fairer? 2018, as exemplars to demonstrate how the objectives will be achieved?

HEFCW would need further information to answer this question, in order for us to understand how key actions under each objective will be identified, prioritised and who will be involved in the decision making process.

Additionally, many Welsh Government programmes or projects form part of a wider system and cut across a number of domains. For example, to initiate change within the apprenticeship system would need coordinated action by pre- and post-education providers and employers, with actions cutting across education and work domains. Therefore, attributing actions against domains might inadvertently inhibit integration if looking at issues in isolation and not as a complete system.

Question 6: Do you agree with the intention to continue to align Equality and Inclusion funding with the Strategic Equality Objectives?

N/A

Question 7: We would like to know your views on the effects that the proposed Strategic Equality Objectives 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 might we build momentum and increase any positive impact of these effects, or where you think there might be negative effects, what can we do to mitigate them?

The draft SEP references the Welsh Government's intention 'to sustain and reinforce that principle through our new Strategic Equality Objectives and ensure they serve to promote and protect the Welsh language'. HEFCW welcomes this approach, recognising that Welsh Language and equality issues intersect and will need to be considered at all stages of SEP planning and implementation.

Question 8: Please also explain how you believe the proposed Strategic Equality Objectives could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

The SEP could consider including additional detail as to the Welsh Government's approach to embedding Welsh Language within the objectives and actions.