

Advancing LGBTQ+ equality: LGBTQ+ Action Plan for Wales

HEFCW's response to the [Welsh Government consultation](#) on the LGBTQ+ Action Plan for Wales.

Consultation questions

The Action Plan has six main themes: Human Rights and Recognition; Safety; Home and Communities; Health and Social Care; Education; and the Workplace. We would like your thoughts on the proposed actions within each theme. You may want to comment on one or all of these areas.

Please use the following questions as the basis of your response. You are welcome to add additional comments or information if you wish.

Question 1

Do you think the Action Plan will increase equality for LGBTQ+ people and what do you think the priorities should be?

- i. The action plan confirms Welsh Government's intentions in supporting LGBTQ+ people. The actions are clear. It would be helpful to understand the duration of the plan and the outcomes anticipated.

Question 2

Do you agree with the overarching aims? What would you add or take away in relation the overarching aims?

- i. The LGBTQ+ action plan could be strengthened if it included an overarching vision and purpose. Greater alignment with, and reference to, other Welsh Government new and emerging strategies, including but not limited to the recently published 'Race Equality Action Plan for Wales 2021', would take account of intersectionality dimensions and a more holistic approach to supporting people with protected characteristics.
- ii. We suggest the Action Plan could be strengthened by clear alignment to legislation such as Equality Act 2010, PSED and Socio-Economic Duty and the Well-being and Future Generations (Wales) Act 2015 vision, goals and ways of working.

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- iii. There may be some inconsistency in the heading 'Overarching Aims' and accompanying table that refer to 'Overarching Actions' p7. The document is also referred to as a policy framework (p4). We suggest that consistent use of language would avoid confusion.

Question 3

Do you agree with the proposed actions? What would you add or take away in relation the actions?

HEFCW's response focuses on our role as a public sector employer and as the regulator of higher education in Wales only. We are not the regulator of equality, diversity and inclusion.

- i. The proposed action for the Welsh Government (WG) to 'Work with colleges and universities in Wales to ensure that they are LGBTQ+ inclusive environments for learners and staff, identifying and building on best practice' could go further to provide greater clarity and increase the potential opportunities to make progress.
- ii. We suggest the action plan under the education theme should be strengthened by:
 - detailing HEFCW's function, which it is anticipated will be incorporated into the new post-16 Commission for Tertiary Education and Research, in supporting the WG through our regulatory, funding and influencing role to progress positive LGTBQ+ actions across the HE system in Wales.
 - Changing the action to include 'Safe and inclusive' rather than just focusing on 'Inclusive' environments.
- iii. We note there are limited actions under the 'Employment' theme. We suggest further actions for Welsh sector public bodies would strengthen this area. As a public sector body employer we welcome the support from Trade Unions to create a more consistent approach to private workplace training resources which support workplaces to become more LGBTQ+ inclusive.

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Question 4

What are the key challenges that could stop the aims and actions being achieved?

- i. We consider ensuring a Welsh Government-wide approach to delivering the action plan is essential to successful delivery. To achieve this, all Ministerial portfolios should include a commitment to contributing to the action plan.
- ii. As stated above, we suggest the WG includes a clear vision and purpose in the LGBTQ+ action plan.
- iii. Inclusion of clear timelines with goals set in the short, medium and long-term.
- iv. We welcome the acknowledgement and reference to other plans in the LGBTQ+ action plan. We suggest that the Welsh Government could provide further explanation of how the LGBTQ+ action plan complements and intersects with other WG actions plans to take account of the intersectional approach recommendation detailed on page five.
- v. We recommend the action plan should be strengthened by the inclusion of a governance structure that provides a transparent approach to oversight and scrutiny of the LGBTQ+ action plan.
- vi. We suggest the LGBTQ+ action plan should be referenced in the Welsh Government Strategic Equality Plan 2020 -24 which would strengthen strategic alignment. We note that the EHRC Wales has recommended Strategic Equality Plans be reviewed to take account of Covid-19 impacts.
- vii. It will be important to ensure that effective, transparent and ongoing equality impact assessment informs all Welsh Government policy development.

Question 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 aims and actions outlined?

- i. We would welcome the Welsh Government facilitating a cross-education system network to identify what additional resources are needed, provide an opportunity to improve understanding and inclusion of LGBTQ+ people and to

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share practice and expectations. HEFCW would be happy to be involved as a member of this group.

Question 6

Do you feel the LGBTQ+ Action Plan adequately covers the intersection of LGBTQ+ with other protected characteristics, such as race, religion or belief, disability, age, sex, and marriage and civil partnership? If not, how can we improve this?

- i. We welcome the recommendation on page five to adopt an intersectional approach. However, it's unclear how the plan is going to achieve this in its current form. The action for Higher Education does not reference intersectionality and would be strengthened by including a specific reference.
- ii. We note that the commitment to intersectionality does not include socio-economic considerations. Research suggest that hate crimes are affected by socio-economic status: in one study, low-income LGBTQ+ people of colour were found to experience more physical violence than middle-class White respondents (Meyer, 2010¹). We recommend that that plan should take account of socio-economic factors, which also supports the WG socio-economic duty.

Question 7

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.

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

¹ Meyer, D., 2010. Evaluating the severity of hate-motivated violence: Intersectional differences among LGBT hate crime victims. *Sociology*, 44(5), pp.980-995.

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- i. No comment though we expect that a fully integrated impact assessment by the Welsh Government taking account of equality, Welsh language and the Well-being of Future Generations Act would identify positive and/or negative impacts

Question 8

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.

- i. As above

Question 9

This plan has been developed in co-construction, and discussions around language and identity have shown that the acronym LGBTQ+ should be used. This stands for lesbian, gay, bisexual, transgender and queer/questioning people, with the + representing other sexual identities. As a result we refer to LGBTQ+ people in the Plan.

What are your views on this term and is there an alternative you would prefer? Welsh speakers may wish to consider suitable terminology in both languages.

- i. We agree with the Welsh Government and its Expert Panel that we should use the acronym LGBTQ+ in relation to this work if this is the result of the involvement of people with these lived experiences. Additionally, we agree with both the panel and the Welsh Government that *'there are different views and usages across communities, and that practice is likely to change again in future'*. We suggest that where possible, being more specific to the particular identity an individual or community identifies with would be preferred in relation to data collection and the development of

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support and intervention. This would strengthen the plan's approach to intersectionality.

Question 10

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:

- i. No comment

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Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.