Submission to the National Assembly Communities, Equality and Local Government Committee

Strand One - An Inquiry into the links between tackling poverty and addressing inequality

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A. Introduction

1. The [Race Council Cymru](#) (RCC) is the overarching/umbrella body established in Wales to bring together key organisations working to combat prejudice, race discrimination, harassment, abuse and violence. The key aims of the RCC are to work towards the elimination of racial discrimination and to promote equality of opportunity and good race relations between people from different racial backgrounds. Integral to the work of the RCC is partnership working with local and national statutory and voluntary agencies. RCC represents Ethnic Minority Communities across Wales on the Third Sector Partnership Council (TSPC) which is facilitated by WCVA and has produced this paper in consultation with Third Sector groups on the Tackling Poverty Action Groups and RCC Primary Stakeholders Forum.

2. This response has been prepared by Phil Offord, in his capacity as Training Manager for the RCC, in consultation with the RCC volunteer Chief Executive officer, Mrs Uzo Iwobi OBE. Mrs Iwobi is a former Commissioner to the Commission for Racial Equality UK and has worked tirelessly in the sphere of race equality to challenge racism and promote community cohesion. For further comment in relation to this response, or for clarification regarding any of the content of this paper, Mrs Iwobi can be contacted on email at uzo@racecouncilcymru.org.uk . Mrs Iwobi is also available to provide oral testimony following this submission.

B. Poverty and Inequality

3. The bulk of recent research conducted in the UK, into the correlation between poverty and inequality, has been carried out or commissioned by the Joseph Rowntree Foundation (JRF); largely as part of their Poverty and Ethnicity programme. This research has been taken into account in the preparation of this submission, which will compare various Welsh Government strategy and policy documents: Tackling Poverty Action Plan; the Strategic Equality Plan and Equality Objectives; the Communities First programme; and some other relevant government strategies[1].

4. In considering poverty and inequality this response paper will focus on poverty and ethnicity – how Black, Asian, and other Minority Ethnic (BAME) communities are disproportionately affected – and to what extent the various Welsh Government papers and strategies acknowledge and address those issues.

5. In the same way that the diversity represented amongst pupils in a local school will tend to reflect the diversity of the local population, so those children receiving free school meals (prior to the introduction of free school meals for primary age children) will have some correlation with the levels of poverty within the local community. Figures for 2010/11 of primary and secondary school children aged 5 and over in receipt of free school meals (Owen, 2013, p.35) show that just over 18% of white children were eligible for free school meals compared with over 47% of children identifying as Black or Black British. However, this is not representative of all children of BAME communities; for example, the figure is less than 17% for Asian or

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[1] For example: *Getting on Together – a Community Cohesion Strategy for Wales* (2009) and *Child Poverty Strategy for Wales* (2011)

Asian British children and, breaking that down further, only around 5% for Indian children.

6. According to Platt (2006, p.76) significant differences in educational attainment are indicative of historical issues of access and marginalisation and of future outcomes, i.e. that education is linked with employment and, consequently, with poverty.

7. However, Platt (2006, p.76) goes on to reference further research that has shown that these differences "are relatively insensitive to socioeconomic status as indicated by receipt of free school meals. While all those receiving free school meals do worse than their ethnic group counterparts not receiving free school meals, the differences were much more important for some groups than others."

8. If poverty is understood to be influenced, somewhat, by employment opportunities, which in turn are influenced, in part, by educational attainment, then this provides at least some explanation for differences in levels of poverty between ethnic groups. However, Platt (2006, p.76) cites research that has also identified "persistent differences that cannot be put down to such human capital causes – however well or variously defined – leaving clear 'ethnic penalties' at least for some groups".

9. Owen's (2013) research describes evidence of the poverty experienced by BAME communities in Wales. In terms of employment, he found that the employment rate, which measures the percentage of the population aged 16 to 64 that is working, was highest for White British people and lowest for Black African, Bangladeshi and Pakistani people (p.14). Owen also describes the unemployment rate as "another indicator of labour market exclusion for minority ethnic groups". The overall unemployment rate for minority ethnic groups was about one-and-a-half times that for white people. The findings also showed marked variations between individual ethnic groups; e.g. the unemployment rate for Chinese and Indian people was lower than that for White people, but the rates for Black or Black British and mixed parentage people were twice the White rate - a pattern repeated for long-term unemployment – the percentage of people aged over 16 who had been unemployed for over a year. This was highest for people of mixed White and Black parentage, Black Caribbean and Black African people (p.14).

10. Hirst & Rinne (2014, p.9) make reference to Platt (2011) identifying issues central to the Poverty and Ethnicity (P&E) research programme: that of intersectionality (that a combination of factors impact on ethnic groups, often to differing degrees in influencing poverty outcomes); and that the variation in poverty within ethnic groups is often greater than that between ethnic groups.

11. Platt's research (2006) further highlights that employment and income earning opportunities are also affected by racism in the workplace – not necessarily direct or overt racism – whether this is at the point of external recruitment or internal selection for a post, affecting promotion opportunities. Employed people from BAME communities may experience discrimination from colleagues, leading to low self-esteem and isolation, or from clients or customers, resulting in underperformance and potential loss of bonuses (p.77).

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13. Holtom et al (2013) conducted a Wales-specific study that found a strong association between poverty and ethnicity, but little evidence that ethnicity is the *cause* of poverty. They identified five factors that were particularly powerful in explaining differences in the levels and experiences of poverty across ethnic groups – place; human capital; social capital; entitlements; and attitudes, thinking and choices (p.7). (The main exception to this was Racism and discrimination, either directly linked to people's ethnicity, or to their appearance or religion, was the main exception.)The report provides recommendations in relation to all five of these factors, with an important additional recommendation to ensure that strategies to reduce poverty within particular ethnic groups are part of population-wide anti-poverty strategies (p.8).

14. The Joseph Rowntree Foundation continues to produce research papers on poverty and ethnicity as part of an ongoing phased programme of study into the topic. In one blog on their website, Barnard (2014) discloses that "racism was not something we asked the researchers to focus on. But it emerged as a key theme from every single study." They found racism had a detrimental impact on social networks, opportunities for work and training, promotion; some BAME people were directed towards work for which they were overqualified; people were intimidated and reluctant to leave their own area for work or to access services; racist bullying and low expectations of BAME children detrimentally affected their education; it affected the take-up of formal care for children and older people amongst BAME people; and racism from front-line staff, such as receptionists, affects access to vital services, e.g. healthcare.

C. How effectively the Tackling Poverty Action Plan, Strategic Equality Plan and other government strategies work together

15. It is evident from the range of government strategies, programs, and various action plans, designed to improve the quality of life for people in all communities across Wales, that there is a clear intention to recognise the diversity of those communities and acknowledge the potential for greater impact of poverty on people who may be more vulnerable; for example disabled people, members of Gay and Trans communities, people of various faiths or religious beliefs, people for whom English is a second language, and people who have migrated to Wales from Europe or elsewhere, as well as the issues faced by the longstanding BAME communities in Wales.

16. The Strategic Equality Plan (2012-2016) specifically lists the groups of people covered by the protected characteristics under the Equality Act 2010, and asserts "the Welsh specific equality duties are designed to ensure that public services and employment are fair and accessible to individuals with protected characteristics" (p.3), including of course the protected characteristics of 'race' and 'religion & belief'.

17. The Foreword from Minister also affirms the commitment in the Strategic Equality Plan to removing the barriers "which need to be removed to ensure that we all have equal opportunities". The Minister asserts that "this plan highlights what the Welsh Government will focus on to deliver this" (p.3).

18. The Strategic Equality Plan makes reference to inclusion and valuing diversity in line with its legislative requirements: "The Welsh Government is working hard to deliver on our commitment to ensure that every citizen has the opportunity to contribute to the social and economic life of Wales. We will focus particularly on those with protected characteristics under the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation" (p.7).

19. The Strategic Equality Plan also alludes to the Welsh Government's "track record of commitment to social justice and equality of opportunity" (pp.8-9) and it makes the point that "the current economic and financial climate make it even more important that we retain our commitment to tackling poverty by prioritising the needs of the poorest and protecting those most vulnerable to poverty and marginalisation". It specifically states that the framework for these endeavours will be The Equality Objectives, together with the 'Tackling Poverty Action Plan (2012-2016)', suggesting a positive 'joined up' approach.

20. Specific issues affecting BAME people are acknowledged in the Strategic Equality Plan and can be identified in most of the Equality Objectives, such as: improved measures to help people understand and exercise their rights and make informed choices; identify and address the causes of ethnicity-related differences in pay and employment; reduce the incidence of hate crime; put the needs of service users at the heart of delivery in key public services ensuring they are responsive to the needs of people with protected characteristics; improve the engagement and participation of under-represented groups in public appointments; and to create a more inclusive workplace that promotes equality of opportunity for staff with protected characteristics (p.15).

21. The Tackling Poverty Action Plan 2012-2016 makes reference to the Flying Start programme – which provides free quality part-time childcare, health visitors, parenting programmes and applies to children aged 0-3 and their families – targeted on children in the most deprived areas (p.5). Reference is also made to the expansion of Flying Start across Wales to target families of appropriately aged children living in Income Benefit households. The crossover links to the Strategic Equality Plan are that the Flying Start Team will implement new systems to report on take-up of elements of the programme by some of the "hardest to reach" groups, including ethnic minority families (p.9).

22. Usually, when an organisation refers to "hard to reach" groups, it is more an indication of the organisation's lack of will or failure to recognise that its provision of services to certain sections of the community is disproportionate, rather than the individual members of minority communities being difficult. Where barriers exist, the onus is on the organisation to identify and remove these barriers in order to ameliorate engagement with all sections of the community. Using language such as "hard to reach" erroneously implies that the fault rests with community members.

23. Educational attainment specifically underachievement within certain minority ethnic groups, such as Pakistani, Bangladeshi, African Caribbean

and Gypsy Traveller children, is identified in the Tackling Poverty Action Plan and it states that the Strategic Equality Plan provides detailed actions planned to address this underachievement. This will take the form of information analysis to highlight where "interventions are needed to drive up attainment amongst those ethnic minority groups who are underachieving, including patterns of school exclusions" (p.11).

24. Analysis of information and subsequent identification of where interventions are required is only the first step. Such interventions need to be specifically targeted and individually tailored to be effective.

25. In the Strategic Equality Objectives progress table, under the heading Detailed Actions and Timescales, four main planned actions are recorded, concerning: collection of data on minority ethnic pupil attainment and attendance, assessing the impact of the Minority Ethnic Achievement Grant along with the Grant for the Education of Gypsy and Traveller Children; research on differences in attainment, progress, and exclusions between the different ethnic groups and any link between attainment and exclusion; involvement of local authorities with their local schools regarding intelligent use of data to accomplish targeted interventions; collection of best practice examples regarding minority ethnic achievement.

26. The last recorded update on progress shows "analysis on attainment is nearing completion and further analysis of available evidence will be considered and an appropriate action plan to be devised by March 2013. The impact of encouraging local authorities to collect and utilise appropriate data to target will provide a rolling aggregated outcome. It is envisaged that meaningful data will not, therefore be available for the first three years, but can be reviewed annually thereafter. Best practice case studies will be sought by October 2013. This update implies that the interventions "that are needed to drive up attainment amongst those minority ethnic pupils who are underachieving" are yet to be deployed.

27. Within the Tackling Poverty Action Plan is further cross-reference to the Strategic Equality Plan, reiterating the objective to "reduce the numbers of disengaged young people, including actions tailored to reduce the over-representation of certain ethnic groups […] among those who are disengaged." A number of actions are recorded in the progress table of the Strategic Equality Objectives, from data collection and analysis by reviewing public appointments diversity monitoring procedures, working with other agencies or support networks to identify individual potential that can be developed through coaching and mentoring, to looking at prior examples of good practice and achievement. The only recorded comment about progress on each of the actions areas to-date is "Monitoring data is already collected and will be analysed to evaluate the impact of these actions on both the diversity of applicants and those appointed." More information is required on progress.

28. The Tackling poverty action plan also suggests "other actions include monitoring traineeship / apprenticeship by ethnic minority and disabled young people as well as young men and young women" (p.15). The positive progress reported in the Strategic Equality Objectives amounts to "Monitor and review Apprenticeship delivery annually from 2013 for gender, ethnicity

and disability to ensure it continues to reflect demand and addresses any specific equality issues arising" (p.24).

29. The follow-up document – "Building Resilient Communities : Taking forward the Tackling Poverty Action Plan" – contains several references to traineeships and/or apprenticeships: Traineeships for 16–17 year olds and Steps to Employment for 18 plus; Pathways to Apprenticeship for people aged 16-24 years; Young Recruits Programme, paying a subsidy for employers to increase apprenticeship opportunities; and the Welsh Government's Apprenticeship scheme, providing Modern Apprentices employment and training opportunities (p.19). There is no reference to monitoring the demographics of people benefiting from these traineeships and apprenticeships and therefore less likelihood of identifying any continued disadvantage for BAME people.

30. The Building Resilient Communities document makes much reference to the Communities First programme which, it says, has a key role to play in "tackling worklessness, by supporting individuals and families within their own communities" (p.11). Clearly, people from BAME communities may benefit from this as much as people from any other part of the wider community, and the extent of this would be evident if appropriate monitoring would take place.

31. The document goes on to say that "Models are currently being developed to further enhance the support the programme can offer in this area […] by reaching "hard to reach" groups" (p.11). An inference from this sentence is that it would include people from BAME communities although further information on these models and their development is scant. Once more, by referring to "hard to reach" groups, the document uses language usually employed by people from majority groups or organisations to describe people from minority communities traditionally marginalised by the majority groups or organisations; again, the implication being that it is the minority at fault.

32. The Building Resilient Communities document identifies the significant number of parents, "often from black and minority ethnic communities", for whom English or Welsh is a second language (p.14). It then hints at the development of a new policy "to help these parents so that they can better support their children's learning and have the confidence to move into work and training". This will provide a potential route out of poverty. More detail on the development of this policy and its practical application would be useful.

33. The document also reveals that there will be an increase in "the grant available up until 2014" and that there will be changes made to "better support the education of gypsy and traveller and ethnic minority children who are at a higher risk of being in poverty" (p.15). The changes made are not specified and it is not clear how those children from BAME communities who are at higher risk of being in poverty will be identified and/or their progress out of poverty monitored.

34. There is reference to 'Positive weightings', in the Building Resilient Communities document, when appraising grants to support businesses, to allow for the impact of bringing "hard to reach groups back into work"

(p.19). Whilst acknowledging that this document outlines a strategic approach, rather than being at a tactical/practical application level, more detail on this would be valuable, in particular around which groups are considered to be eligible, and the recording and monitoring of progress for people from those groups in returning to work.

35. There is a clear link between this document and the Strategic Equality Plan in relation to the almost 20% of young people in Wales aged 16–24 who are not in education, employment or training (NEET): "We know that some […] minority ethnic young people […] are less likely to be in employment or training than others in their age group and this is reported in our Strategic Equality Plan" (p.17). The Strategic Equality Plan identifies that "tailored action is required to reduce the over-representation of certain ethnic groups […] among those who are NEET" (p.38-39), to be included within policy recommendations. This tailored action also includes: data collection regarding delivery of NEET Programmes to ensure information is obtained on protected groups; protected groups to be considered in a review of young people who are NEET; and data/evidence regarding protected groups, including specific equality issues arising, to be collated and incorporated in NEET projects/programmes in 2014/15, highlighting any areas of best practice.

36. The latest update – Building Resilient Communities: Taking forward the Tackling Poverty Action Plan Annual Report 2014 – contains an acknowledgement of "the close links between poverty and certain groups with protected characteristics" (p.8). It advises: "When considering approaches to address poverty it is important to acknowledge and focus on groups with protected characteristics at greater risk, such as […] some minority ethnic groups" (p.8). This is the only reference in the document to BAME communities.

37. There is an allusion to a 'joined-up' approach and a commitment in the original Action Plan to dovetail with the Strategic Equality Plan (p.8). It also identifies that "Equal opportunities is a Cross Cutting Theme in all key European funding programmes, and provides an opportunity to target those furthest from the labour market with specific action" (p.8). Clearly, this will have the potential for positively impacting on measures to reduce poverty among people in BAME communities, significant numbers of whom could be included in "those furthest from the labour market".

38. It is important that the phrase "equal opportunities is a cross-cutting theme" does not become a bland meaningless "cover-all" concept, which permits complacency and a loss of focus on actions specifically intended to identify and reduce disadvantage amongst people in BAME communities.

39. The Communities First Programme is one of the Welsh Government's principal strategies to tackle poverty in Wales. Despite the evident connection between ethnicity and poverty, there is no explicit reference to minority ethnic communities within the Communities First Programme Guidance 2013. The focus is more on identified clusters of geographical deprived communities, although it does state "there is now increased emphasis on ensuring that the most vulnerable individuals, families and groups in those communities are supported" (p.2) and proposes that

Performance Indicators will be used in all areas to measure and evaluate activity and outcomes (p.6).

40. It is appropriate that these Performance Indicators should include a demographic breakdown of the communities, to identify any potential ethnicity-related differences in relation activity and outcomes.

41. Included within the 2013 guidance for the Communities First Programme, is a list of requirements that all Clusters must fulfil (p.10). One of these (with its evident conflict of wording between "should" and "must") is that "Clusters should target resources to the most vulnerable groups". If some of the most vulnerable groups include people from certain minority ethnic communities, then a demographically designed performance indicator would help to address this.

42. A further requirement that Clusters *must* fulfil is that under-represented groups *should* (must?) be involved in the decision-making and management of the work of Clusters as well as being beneficiaries of the programme. It is not clear how under-represented groups would be identified, and therefore the existence of under-representation acknowledged, nor is it clear how representation would be monitored or recorded.

43. The Welsh Government's (2009) publication "Getting On Together – a Community Cohesion Strategy for Wales" recognises that people living with poverty and deprivation may experience exclusion and isolation in a community, as well as prejudice and discrimination towards people now covered by the protected characteristics of the Equality Act 2010, but there is no content relating to people from BAME communities and their frequent disproportionate disadvantage.

D. Summary

44. The combination of Welsh Government initiatives designed to tackle poverty, if delivered as intended, will no doubt improve the lives of people across all communities affected by it. The day-to-day experience of living in poverty will feel very much the same, whether experienced by a member of the BAME communities, or by a member of the majority community. If effective, efforts targeting the most vulnerable and disadvantaged people should provide support for individual needs irrespective of their ethnicity. It is evident that poverty affects a greater percentage of BAME people overall compared with the wider White community. To understand whether government initiatives are addressing this disproportionate situation, it is necessary to maintain a focus on monitoring demographic aspects of the service users receiving support.

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