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**Ymateb i Ymgynghoriad / Consultation Response**

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<b>Enw / Name:</b>	Owen Evans
<b>Rôl / Role:</b>	His Majesty's Chief Inspector of Education and Training in Wales
<b>E-bost / Email:</b>	<a href="mailto:ChiefInspector@estyn.gov.uk">ChiefInspector@estyn.gov.uk</a>
<b>Rhif Ffôn / Tel No:</b>	029 2044 6446
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**Background information about Estyn**

Estyn is the Office of His Majesty's Inspectorate for Education and Training in Wales. As a Crown body, we are independent of the Welsh Government.

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000<sup>1</sup> and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by those receiving education and training in Wales;
- Quality of leadership and management of those education and training providers, including whether the financial resources made available to those providing education and training are managed efficiently and used in a way which provides value for money;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary, secondary, special and all age schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and initial teacher training.

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

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<sup>1</sup> This act to be replaced by the Tertiary Education and Research (Wales) Act 2022 from 1 April 2024 when the quality provisions are commenced.

## Response

### Introduction

We welcome the inquiry looking at the implementation and delivery of the Anti-racist Wales Action Plan. Our responses have solely focused on the policy area relating to education and training. Overall, we suggest an evaluation of how well the plan is being implemented in education institutions across Wales and to consider how it should be modified and developed further to achieve its vision of Wales as an anti-racist nation. Though our inspection and thematic work, Estyn has the potential to provide ongoing evidence on the quality of work being undertaken in education and training providers in Wales.

As public sector organisations in Wales set their equalities objectives for 2024-2028 over the next few months, we would urge the Welsh Government to work more closely with the Equality and Human Rights Commission to use this opportunity to promote the ambition for an Anti-racist Wales.

## Comments from Estyn

### Invitation to contribute to the inquiry

- Consider the effectiveness of Welsh Government actions to deliver the plan, including what is being done to 'lead by example' in taking a pro-active and cross-governmental approach to racism

Welsh Government appear to be taking a proactive role in ensuring that relevant actions are being undertaken to deliver the plan. Estyn is actively supporting the Welsh Government to do this. For example, in relation to the action to ensure that an Anti-racist culture and practices are embedded in every FE institution and adult learning provider in Wales, we have been working with the Black Leadership Group, Colegau Cymru, Welsh Government and other stakeholders to support the actions that relate to further education.

Through our inspection activity we find that the action to ensure that the curriculum is anti-racist is beginning to have an impact in schools but has yet to be fully embedded. In our inspections, we have identified some positive practice in this area, for example in Jubilee Park Primary School. This practice related to how the school had reviewed the curriculum and their work around creating an inclusive ethos in general. More information on this can be found on pages 9 and 10 of their inspection report as well as through an effective practice case study included in the links below.

[Inspection report Jubilee Park Primary School 2022 \(gov.wales\)](#)  
[A Journey Towards an Anti-Racist Curriculum | Estyn \(gov.wales\)](#)

Another example of where this practice is effective is in Rhayader CIW Primary School. The most recent inspection report for the school notes: 'The school welcomes visitors and organises educational visits effectively to enrich and extend pupils' understanding of important aspects of their learning. For example, they took part in a 'Cynefin' project, which involved researching the legacy of migrant workers and their families who moved into the Rhayader area to build the Elan Dam. This enriches pupils' knowledge and understanding of their history and the local area.'

A key ongoing challenge for the education and training workforce is to grow the number of educators from diverse ethnic backgrounds, including those who progress into leadership positions. Estyn's workforce is drawn from the education workforce so this is

also a challenge for us. This year we are piloting a development programme for potential future inspectors from Black, Asian and minority ethnic backgrounds to try to try and lead by example and contribute towards addressing this challenge.

- Consider progress and monitoring arrangements for the Plan, including the role of the public sector (local authorities, health, education), third sector and where applicable, the private sector

Overall, we do not feel that the progress and monitoring arrangements of the plan for education are clear enough. The plan refers to the anti-racist Wales implementation team and the independent accountability group. The terms of reference for the external accountability identify that it will regularly invite organisations such as Estyn to account for progress against the plan, but we have not had any involvement in the group. We are also not involved in the planned internal support and challenge group but feel that our experience, evidence and position as a non-ministerial department of the civil service would make us a valuable addition to those discussions.

The degree to which the actions outlined have been met within the specified timescales does not appear to have been reported on. The role of the public sector could be strengthened through asking them for an evaluation of how well they have been contributing to the plan and where they believe further developments are necessary.

- Examine the progress of the Racial Disparity Unit, and determine whether there are gaps in data collection and analysis of data is being carried out effectively

We have had little experience of the work of the race disparity unit so are unable to offer sufficient commentary. However, we would find it useful to have sight of the range of qualitative and quantitative data that is available. Our own experience has been that some of the data provided has been inaccurate. For example, in the original consultation document for the anti-racist Wales action plan, it was reported that there were no headteachers in Wales from a Black, Asian or Minority Ethnic background. We knew this to be inaccurate as we were aware of at least one headteacher in Wales at the time, who had been a headteacher for some time.

We have identified previously that data that may be collected is not always readily available to identify disparities and support improvement. For example, in our review of the 16-19 curriculum<sup>2</sup> in 2022 we made a recommendation to Welsh Government to 'Improve the quality of data collected and shared to enable full analysis of learners' destinations at 16 and beyond and their outcomes, including by a learner's protected characteristics, additional learning needs, preferred language of learning and engagement in key initiatives such as the Seren programme'.

- Explore what channels of communication has been established to ensure people with lived experience are informed of the plan's progress and what changes are happening as a result of the plan

Through our involvement with the Anti-Racist Wales FE Steering Group, we are aware of some consultation that was undertaken with people with lived experiences. However, we have little awareness of similar consultations regarding the plan's progress in other areas of the plan.

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<sup>2</sup> [A review of the current 16-19 curriculum in Wales \(gov.wales\)](#)

- Evaluate the effectiveness of the Plan in its first year, including whether actions have been delivered, what the key outcomes have been so far and to determine why any outstanding actions have not been implemented.

We would welcome ongoing reports on the progress of the plan at regular intervals. Currently, we have had not received any information as to how well the plan has been progressing. It would be useful for the Welsh Government to evaluate the effectiveness of the plan in its first year and to address any outstanding actions and modify the plan appropriately for the following year. This should be published and shared with all key stakeholders.

- Help further understanding of what other interventions are needed to support delivery of the plan and whether there are barriers to implementing the plan.

We suggest that the Welsh Government should ask education institutions to report on what actions they are taking to support the delivery of the plan, how they are monitoring those actions and what impact the actions are having. For example, in Estyn we have revised the actions in our strategic equality plan to take account of Welsh Government's race equality action plan, and we are currently in the process of incorporating it within our revised strategic equality plan for 2024-2028. If Welsh Government were to receive and analyse this information from other institutions too, it would enable them to more readily identify any areas of their plan that need further development.

Public sector organisations will be developing their new strategic equality plans for April 2024. This is an ideal opportunity to ensure that key actions to deliver an Anti-Racist Wales are captured. Welsh Government could work closely with the Equality and Human Rights Commission to ensure this aspect is embedded in plans. It was disappointing that the recent letter we received from the EHRC about updating our plan made no mention of the Anti-Racist Wales Action plan.

Estyn's thematic report on the teaching of Welsh History including Black, Asian and Minority Ethnic history, identity and culture<sup>3</sup> made a number of recommendations which fed into [Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group: final report | GOV.WALES](#). This recommended that 'The Welsh Government to commission Estyn within three years of implementation of the Curriculum for Wales to carry out a preliminary review aimed to consider the ways in which schools are beginning to develop curricula that reflect the cross-cutting theme of diversity and what types of further support they may need. The Working Group recommend that within five years a full thematic review be commissioned by the Welsh Government.' We hope that Welsh Government will appropriately identify these reviews as priorities in our future remit letters which will help understand the current situation and any barriers in implementation.

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<sup>3</sup> [The teaching of Welsh history including Black, Asian and Minority Ethnic history, identity and culture | Estyn \(gov.wales\)](#)