

## Review of progress against our Strategic Equality Plan 2022-2023

### 1. Background

There has been considerable work carried out nationally and within Estyn to work towards a more equal Wales. Evidence which has been used to inform this review of our [Estyn Strategic Equality Plan 2020 - 2024 \(gov.wales\)](#) include:

- [WG Anti-racist action plan](#)
- [WG LGBTQ action plan](#)
- [Black, Asian and Minority Ethnic Communities, Contributions and Cynefin in the New Curriculum Working Group](#)
- [Towards anti-racist further education: qualitative research on the lived experiences of learners and staff | GOV.WALES](#)

### 2. Key achievements against our equality objectives

*Objective 1: We will promote equal opportunities and ensure fair treatment for our entire workforce, staff and contracted inspectors, tackling bullying and discrimination whenever it occurs.*

- Increased focus on staff training, for example on inclusive language and bullying and harassment
- Updated our guide to inclusive language as part of our writing guidance for inspectors
- Focus on mental health and bullying and harassment through sign up to Time to Change pledge, creation of mental health first aiders and creation of anti-bullying champions who people can talk to confidentially
- Reviewed our anti-bullying policy to develop the [new Dignity at work policy](#) which was published in April 2023
- Increased diversity of the board membership
- Strengthened our equality impact assessment arrangements, including when we plan thematic reviews
- Continued to deliver mandatory equality and diversity training to all staff, including as part of induction
- Promoted our peer inspector programme through the Anti-racist Wales All Wales Connect Group
- Continued to monitor the diversity of our workforce
- Carry out an [equal pay audit](#) every three years with the last one being carried out in 2022
- Made use of government procurement frameworks, for which suppliers have already been vetted in

*Objective 2: We will evaluate issues relating to equality, diversity, and inclusion during inspection and in our thematic work, sharing good practice and making recommendations for improvement where needed.*

- Publication of relevant national thematic reviews – [ALN implementation](#), [equity of curriculum experiences in EOTAS](#), [peer on peer sexual harassment of 16-18 year old learners in FE colleges](#)
- Built the role of the equality and inclusion group in identifying emerging issues from inspection and influence practice
- Launched our ethnic minority leadership programme to support ethnic minority practitioners to understand our role and take steps towards becoming our future peer inspectors
- Introduced our 'parent reports' to make our school and PRU inspection reports more accessible and continue to accessibility check all our reports.
- We continue to engage with stakeholders who represent learners from the range of protected characteristics to inform our work
- Our equalities lead inspector continues to provide updates for inspectors on key developments
- Through our inspections, we have considered work to increase the representation and teaching in relation to diversity within the new Curriculum for Wales and published case studies where appropriate, for example [Jubilee Park's journey towards an anti-racist curriculum](#)

### **3. Reviewing our approach to our strategic equality plan**

In September 2022, we reviewed our Strategic Equality Plan in light of the Anti-Racist Wales Action Plan.

We agreed that our plan could be improved as follows:

- actions should be linked to relevant sub objectives so that we can sense check whether they are likely to bring about the desired change
- name who or which groups are responsible, this ensures ownership of actions
- identify time frames and monitoring approaches - to help us keep on track
- revise wording that gives the impression that the plan is vague or that we are attempting to say that we “already do things”, as this can sound defensive and is unnecessary

- revise wording and supplement actions to ensure the SEP comprehensively covers our response to the WG Anti-Racist Action Plan (see below)
- monitor/revise annually or whenever significant amendments to equalities policy are published by WG, for example in preparation for the LGBTQ+ action plan

A summary of our revised action plan is attached at Appendix A and we have been working against it as an internal document. The review also considered our approach to reporting by exception in inspection reports in relation to work to support inclusion and consider the experiences of learners with the range of protected characteristics. The updated Strategic equality plan will be monitored and progress will help to inform our new strategic equality plan for 2024-2028.

## Summary of our revised Strategic Equality Plan 2020-2024 (updated September 2022)

### Equality Objectives 2020-2024

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| 1   | <b>Objective 1:</b><br><b>We will promote equal opportunities and ensure fair treatment for our entire workforce, staff and contracted inspectors, tackling bullying and discrimination whenever it occurs.</b>  |
| 1.1 | <b>We will continue to develop ways to increase the diversity of our workforce including within our Senior Civil Service (SCS) and board membership with the aim of proportionately representing the population of Wales.</b> <ol style="list-style-type: none"> <li>1. Review our recruitment processes to ensure that they are anti-racist<sup>b</sup></li> <li>2. Limit the impact of unconscious bias in our recruitment practices, for example through the continued use of blind sifting for recruitment<sup>a</sup></li> <li>3. Improve the reach of all advertised posts, including the use of social media, to raise awareness of our vacancies to candidates from under-represented groups<sup>a</sup></li> <li>4. Undertake internal surveys of staff and external surveys of job applicants and those who leave the workforce, on a regular basis to identify the movement in the diversity of our workforce and potential workforce and to identify any necessary changes to practice<sup>a</sup></li> <li>5. Devise and implement leadership development opportunities, targeting aspiring senior leaders from underrepresented groups in the education workforce, in particular those who are Black, Asian or Minority Ethnic, to develop their skills in education leadership, inspection and to develop an understanding of policy development processes within public bodies such as Estyn<sup>c</sup></li> <li>6. Work with staff and those in other organisations to develop and learn from best practice to secure exemplary anti-racist recruitment, retention and progression practices, including ways to ensure ethnic minority staff feel valued, empowered and enabled to progress to the next level<sup>b</sup></li> </ol> |
| 1.2 | <b>We will tackle any unfair treatment and inappropriate behaviour to reduce discrimination, bullying and</b> <ol style="list-style-type: none"> <li>1. Continue to promote positive mental health and tackle mental health stigma and discrimination in line with our “Time to Change” pledge<sup>a</sup></li> <li>2. Continue to increase awareness of equalities, diversity and inclusion matters through communications in staff newsletter and intranet and training, including all induction programmes<sup>a</sup></li> <li>3. Ensure that all employees undertake training to increase understanding of and reduce inappropriate behaviour and discrimination, bullying and harassment generally and to create a sizeable shift in culture towards values and behaviours for anti-racism<sup>x</sup></li> </ol>  |

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|                    | <p><b>harassment of our staff particularly those with protected characteristics.</b></p>   | <ol style="list-style-type: none"> <li>4. Ensure all managers undertake training <ol style="list-style-type: none"> <li>i. in how to deal with allegations of bullying, discrimination, harassment and victimisation appropriately and to develop the skills of mediation to support them in discharging their duties under Estyn’s Bullying &amp; Harassment Policy<sup>d</sup></li> <li>ii. to raise their awareness and understanding of equality and diversity, including unconscious bias<sup>a</sup></li> <li>iii. developed by Welsh Government for public bodies as a result of the Anti-Racist Action Plan 2022, for example on managing intersectional teams<sup>b</sup></li> </ol> </li> <li>5. Develop opportunities for managers to be involved in reverse mentoring and coaching with community leaders<sup>b</sup></li> <li>6. Review and further develop our Anti-Bullying and Harassment Policy and processes, in co-construction with staff, to ensure they provide an appropriate process for tackling all forms of bullying, harassment, and discrimination, where it occurs<sup>δ</sup></li> <li>7. Review our Continuing Performance Management system and make any amendments necessary in light of any revised behaviours’ framework published by Academi Wales as part of WG actions under the Anti Racist Action Plan<sup>β</sup> and revisions to Estyn’s Anti-bullying and Harassment Policy<sup>δ</sup></li> </ol> <p>Develop proposal for a forward programme training for external inspectors in relation to equality and diversity as part of Inspecting for the future</p> |  |
| <p><b>1.3.</b></p> | <p><b>We will continue to ensure that Equality and Diversity is embedded in discussions and decision-making within our organisation.</b></p> | <ol style="list-style-type: none"> <li>1. Carry out a review of our practices to ensure that we meet and exceed, where possible, the minimum requirements of the of the duties in the Equality Act 2010<sup>β</sup></li> <li>2. Ensure that we involve and seek the perspective of a diverse range of stakeholders, including from community groups and with lived experiences, to inform our arrangements for inspection for 2024.</li> <li>3. Strengthen our arrangements for equality impact assessments and ensure all policies are equality impact assessed prior to implementation including arrangements under the Inspection 2024 project<sup>a</sup></li> <li>4. Ensure that risk assessments consider any particular impacts for different groups of staff, including attention to higher risks for certain groups from a pandemic<sup>a</sup></li> <li>5. Require all board members to have a diversity and inclusion objective to include anti-racism as part of their performance management system<sup>β</sup></li> </ol> <p>Increase the diversity of Estyn’s strategy board ensuring that community leaders are involved in policy development and decision making with remuneration where possible and appropriate<sup>β</sup></p>   |  |

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| <p><b>1.4.</b></p>   | <p><b>We will work collaboratively with other bodies, stakeholders and those who represent minority groups to address inequalities in the education workforce in order to secure greater diversity in the education workforce</b></p> | <ol style="list-style-type: none"> <li>1. Create opportunities for practitioners from diverse and underrepresented backgrounds to become Peer Inspectors<sup>α</sup></li> <li>2. Create opportunities for under-represented groups to shadow non-executive directors on Estyn’s Strategy Board<sup>α</sup></li> <li>3. Require all our suppliers to demonstrate their commitment to equality, diversity and anti-racism and use Government frameworks and portals to ensure we take advantage of agreed public sector protocols when applying equality to the contracting process<sup>α</sup></li> <li>4. As co-lead, we will work collaboratively with others to review and revise of the criteria for accreditation of ITE programmes<sup>β</sup></li> <li>5. We will work collaboratively with other bodies, stakeholders and ethnic minority groups to<sup>β</sup> <ul style="list-style-type: none"> <li>- better understand the barriers to creating a more diverse education workforce in all sectors in Wales</li> <li>- contribute to the development of the ITE Black, Asian and minority ethnic recruitment plan</li> <li>- identify opportunities to improve retention and progression in the education workforce of underrepresented groups, for example to review current progression routes from middle leadership to senior leadership and senior leadership to headship with the aim of removing barriers</li> </ul> </li> </ol> <p>contribute to a cadre of high committed allies across public services to embed anti-racism by appointing an ally or allies within Estyn</p> |  |
| <p><b>1.5.</b></p>   | <p><b>We will ensure that we provide culturally sensitive and appropriate services<sup>β</sup></b></p>  | <ol style="list-style-type: none"> <li>1. We will work with other organisations to develop and share best practice in delivering services in culturally appropriate ways.</li> </ol> <p>We will review our service to ensure that we highlight the availability of translation and interpretation where required</p>   |  |
| <p><b>Success criteria</b></p> <ul style="list-style-type: none"> <li>• Improved representation of under-represented groups across grades and roles, including our Board and Committee</li> <li>• Reduction in discrimination, bullying and harassment as reported in the annual People Survey</li> <li>• Successfully contribute to reducing barriers to recruitment, retention and progression to achieve a diverse education workforce</li> </ul> |   |  |  |

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| 2.  | <b>We will evaluate issues relating to equality, diversity, and inclusion during inspection and in our thematic work, sharing good practice and making recommendations for improvement where needed.</b>  |   |
| 2.1 | <b>Where relevant, we will comment on outcomes for children and learners with protected characteristics, highlight the importance of high expectations of equality, diversity and inclusion and make recommendations for improvement where needed</b> | <p><b>We will</b></p> <ol style="list-style-type: none"> <li>1. Consider how <u>well</u> inspected providers: <ul style="list-style-type: none"> <li>• fulfil their duties set out in the Equality Act 2010 and, where appropriate, the extent to which they promote equality and diversity<sup>α</sup></li> <li>• provide for personal development including spiritual, moral, social and cultural development and the provision of learning support<sup>α</sup></li> <li>• help learners to understand issues relating to equality and diversity and develop the values of respect, empathy, courage and compassion, for example<sup>α</sup></li> <li>• challenge stereotypes in learners’ attitudes, choices and expectations, and how well it promotes human rights<sup>α</sup></li> <li>• ensure the progression of all learners and particular groups<sup>α</sup></li> <li>• develop a curriculum that fully reflects the local context, including designing learning activities that reflect the cultural, linguistic and ethnic diversity of Wales and the provider’s local area<sup>α</sup></li> <li>• develop a curriculum that teaches about Black, Asian and Minority ethnic stories, contributions and histories across the revised curriculum for Wales<sup>β</sup></li> </ul> </li> <li>2. Review how we use reporting requirements to strengthen the impact of our inspection activities on the outcomes and wellbeing of our learners with protected characteristics</li> <li>3. continue to undertake an ongoing programme of thematic inspections considering equality and diversity themes <sup>χ</sup></li> <li>4. promote effective practice raised during inspection and in relevant thematic reports<sup>α</sup></li> <li>5. make recommendations for improvement where needed<sup>α</sup></li> <li>6. follow up on recommendations to the Welsh Government in thematic reports<sup>α</sup></li> <li>7. Pilot approaches to collecting more routine data on protected characteristics as part of national surveys in relation to thematic reports or inspection 2024 to consider how we might incorporate this into questionnaires for provider inspections from 2024.</li> </ol> |
| 2.2 | <b>We will continue to engage with other bodies, stakeholders and groups who</b>  | <ol style="list-style-type: none"> <li>1. We will ensure that the work of the Equalities and Inclusion Group and feedback from interested stakeholders influences future work planning including inspection development, inspector training and the forward thematic inspection programme<sup>α</sup></li> <li>2. Make communication methods and reports more accessible to a wider audience and easier to understand<sup>α</sup></li> </ol>  |

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|                   | <p><b>champion specific protected characteristics internally and externally in order to consider how we and those we inspect can improve policies and work processes to become more diverse and meet the needs of a diverse Wales</b></p>                               | <ol style="list-style-type: none"> <li>3. As co-leading organisation, we will work collaboratively with other bodies so that the participation, outcomes and progression of post 16 learners from different ethnic backgrounds are systematically monitored<sup>β</sup></li> <li>4. We will work collaboratively with others to contribute to the review and design of the FE curriculum that reflects an anti-racist Wales<sup>β</sup></li> <li>5. As co-leading organisation, we will work collaboratively with others to strengthen the WG's 'Rights, respect, equality' anti-bullying guidance for schools to develop anti-bullying strategies for schools and how to engage effectively with parents and carers<sup>β</sup></li> </ol> <p>Review the membership of our parent reference group to establish and take steps to ensure that it is diverse and reflects the diversity of the population of Wales as far as possible.</p>  |  |
| <p><b>2.3</b></p> | <p><b>In light of the implementation of Welsh Government's Anti-Racist Action Plan 2022. We will, in our relevant working groups, review the way we work to ensure we use all appropriate levers to secure an anti-racist education system in Wales<sup>β</sup></b></p> | <p>We will review</p> <ol style="list-style-type: none"> <li>1. handbooks for ITE to include an evaluation of the effectiveness of ITE providers' recruitment, retention and progression plans for Black, Asian and Minority Ethnic trainee teachers</li> <li>2. the support arrangement for students from ethnic minority backgrounds at all stages of the application and study process</li> <li>3. opportunities for ethnic minority ITE students to gain work experience to support future career progression</li> <li>4. how well the ITE curriculum prepares beginner teachers to become anti-racist practitioners</li> <li>5. our inspection frameworks, methodology and supplementary guidance, including guidance on for schools, PRUs and FE colleges to give effect to any amendments, where appropriate, arising out of changes to <ul style="list-style-type: none"> <li>○ the way that providers are required to report racist incidents and harassment, how they are dealt with, action taken in response and whether the incident was resolved successfully for the victim, including ensuring that we effectively capture the views of learners and teachers to of the effectiveness of approaches to dealing with homophobic, sexist and racist incidents</li> </ul> </li> </ol> |  |



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|  |  | <ul style="list-style-type: none"> <li>○ statutory guidance in respect of wellbeing to recognise the particular needs of learners from an ethnic minority or Gypsy Roma Traveller background.</li> <li>○ Welsh Government’s “Rights, respect, equality” anti-bullying guidance for schools</li> <li>○ guidance on exclusions from schools and PRUs to ensure that exclusions are used in a way that doesn’t disproportionately impact specific groups</li> <li>○ the collection of data and monitoring of participation, outcomes and progression of post 16 learners from different ethnic backgrounds</li> </ul> <ol style="list-style-type: none"> <li>6. Review our Strategic Welsh Language Plan 2020-2024 and any relevant guidance in light of any actions taken to improve the access to Welsh language by ethnic minority communities in the areas of education and language learning and that the voices of Black, Asia and Minority Ethnic Welsh speakers are heard</li> <li>7. We will review frameworks so that we consider in our inspection practice in the non-maintained sector providers’ approaches to addressing anti-racism in the new curriculum so that all children have the opportunity to explore and celebrate racial diversity in a positive and supportive way<sup>β</sup></li> <li>8. Review our guidance on Equality, human rights and English as an additional language to ensure it incorporates aligns with any changes we make to our work in response to WG Anti-Racist Action Plan.</li> <li>9. Make any necessary changes to our framework and practice for offender learning in light of any future developments to develop an antiracist criminal justice system</li> <li>10. Consider during our link visits with local authorities <ul style="list-style-type: none"> <li>○ how local authorities are ensuring equality of access to childcare and play settings</li> <li>○ how local (and national) strategies are being developed to increase the number of Black, Asian and Minority Ethnic people who attend Welsh medium education and tackle any barriers to accessing WM education</li> <li>○ the range of interventions made available to schools to meet the wellbeing needs of learners from ethnic minority backgrounds</li> </ul> </li> <li>11. Review our work in relation to provision for Welsh for adults to ensure that it captures the requirement for providers to promote access to Welsh language by ethnic minority communities in education.</li> <li>12. Consider in our sector networks, discussions with WG and link visits with providers the review and analysis of participation and outcomes for different groups of learners on employability programmes with a view to improvement in these areas</li> </ol> |  |
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|     |   | 13. Identify and publish any effective practice in tackling racism and improving the prospects, wellbeing and experiences of Black, Asian, Ethnic Minority and Gypsy, Roma, Traveller learners and teachers   |  |
| 2.4 | <b>We will provide training to inspectors on equality, diversity and inclusion and how to assess it on inspection with reference to the Equality and Human Rights Commission Guide to Regulators and Inspectorates and relevant UK and Welsh Government legislation</b> | <ol style="list-style-type: none"> <li>1. Ensure that our ongoing programme of professional learning for inspectors continues to build understanding of issues relating to equality and diversity with a particular focus on preparation for ALN reform<sup>α</sup></li> <li>2. Ensure that our professional learning offer for staff raises awareness of the implications of Welsh Government Anti-racist action plan for Estyn as an employer, a public body and an education inspectorate<sup>β</sup></li> </ol> |  |
| 2.5 | <b>We will ensure that we consider those with protected characteristics and resulting issues when agreeing and carrying out our inspection and thematic work.</b>   | <ol style="list-style-type: none"> <li>1. Undertake an equalities impact assessment on our new inspection arrangements<sup>α</sup></li> <li>2. Undertake equality impact assessments for relevant thematic reviews<sup>α</sup></li> <li>3. Review current and future research on the experiences of learners with protected characteristic to inform arrangements for 2024 and ongoing thematic work</li> </ol>   |  |

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| 2.6   | <b>We will consider the implications of the Welsh Government's LGBTQ+ action plan in our work</b> | Review our inspection guidance and wider work in light of the final LGBTQ+ action plan and identify relevant actions within working groups and this strategic equality plan. |  |
| <p><b>Success criteria</b></p> <ul style="list-style-type: none"> <li>• Our evidence reflects the lived experiences of groups of learners with protected characteristics</li> <li>• Impact of equality and diversity factors are clearly drawn out within published thematic reports</li> <li>• Evidence from inspection reports is highlighted and shared, e.g., to show good practice and identify areas for improvement related to equality and diversity issues</li> <li>• The number of recommendations accepted/ implemented from joint working groups</li> </ul> |   |  |  |

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<sup>α</sup> From original policy [Estyn Strategic Equality Plan 2020 - 2024 \(002\).pdf](#) with minor edits where necessary

<sup>χ</sup> Revision of original policy as a result of AR action plan

<sup>β</sup> Additions as a response to WG's Anti Racist Action Plan

<sup>δ</sup> As a result of actions relating to revisions to the B&H policy