

23 December 2022

Dear ,

ATISN 16902 – The Anti-Racist Wales Culture, Heritage and Sport Fund 2022/23

Thank you for your request which I received on 8 November. You asked for:

1. Information relating to the assessment and allocation of the Anti-racist Wales Culture, Heritage and Sport Fund 2022/23.
2. Information on applying the principle of 'due regard' in the allocation of grant funding, as required by the Race Relations (Amendment) Act 2000, Disability Discrimination Act 2005 and the Gender Duty of the amended Sex Discrimination Act 1975, to the allocation of grant via the Anti-Racist Wales Culture, Heritage and Sport Fund 2022/23.
3. Information gained from the use of the Integrated Impact Assessment (IIA), in particular the approach to understanding and assessing impact of the refusal or allocation.
4. What due diligence checks were made on the organisations applying for grant funding under the Anti-Racist Wales Culture, Heritage and Sport Fund 2022/23?
5. Was there a decision made during the preparation, scrutiny, assessment and allocation of funds which excluded infrastructure or core costs of any of the organisation applying for funding?
6. Information on the percentage of the total grant budget allocated to the following organisations/agencies: Amgueddfa Cymru – National Museum Wales, the Arts Council of Wales, the National Library of Wales, the Royal Commission on the Ancient and Historic Monuments of Wales and Sport Wales.
7. If any previous information had been gathered on their existing provision of culturally sensitive and appropriate services, including provision of translation and interpretation services.

Please find below the answers to your questions in the order you sent your request.

1. Information relating to the assessment and allocation of the Anti-racist Wales Culture, Heritage and Sport Fund 2022/23.

The Welsh Government published supporting guidance for applicants to the Anti-racist Wales Culture, Heritage and Sport Fund 2022/23, this included information on criteria against which applications were assessed and funding allocated. For your information a copy of the guidance is attached at Annex A.

2. Information on applying the principle of 'due regard' in the allocation of grant funding, as required by the Race Relations (Amendment) Act 2000, Disability Discrimination Act 2005 and the Gender Duty of the amended Sex Discrimination Act 1975, to the allocation of grant via the Anti-Racist Wales Culture, Heritage and Sport Fund 2022/23.

We hold no information in the specific context of the Anti-racist Wales

Culture, Heritage and Sport Fund 2022/23 in relation to this request. The principle of 'due regard' as described in the above-mentioned legislation was a key consideration throughout the development of the Anti-racist Wales Action Plan. The Action Plan was co-produced with Black, Asian and Minority ethnic organisations and communities, and members of the Race Equality Action Plan Steering group were key voices in ensuring the goals and actions in the Plan address racial inequality, eliminate unlawful racial discrimination and promote equality of opportunity. The Anti-racist Wales Culture, Heritage and Sport Fund 2022/23 was then developed to support delivery of specific goals and actions in the Culture, Heritage and Sport section of the Action Plan, giving full regard to the principles underpinning the Action Plan itself.

3. Information gained from the use of the Integrated Impact Assessment (IIA), in particular the approach to understanding and assessing impact of the refusal or allocation.

We hold no information in the specific context of the Anti-racist Wales Culture, Heritage and Sport Fund 2022/23 in relation to this request. The Integrated Impact Assessment undertaken for the Anti-racist Wales Action Plan was considered when designing the grant scheme. A copy of the impact assessment can be found here: [41912 An Anti-Racist Wales: Integrated Impact Assessment \(gov.wales\)](#).

4. What due diligence checks were made on the organisations applying for grant funding under the Anti-Racist Wales Culture, Heritage and Sport Fund 2022/23?

As part of the Welsh Government's grant pre-award process, due diligence checks were carried out on all the successful organisations. These included reviewing / checking information held by the following:

- Companies House / Companies House Disqualified Directors Register
- The Charity Commission
- The Welsh Government's PayGrants system
- The Welsh Government's Due Diligence hub
- Credit Reference Agency (Creditsafe) Information
- CIFAS National Fraud Database
- Annual accounts / Financial statements (provided by the external body or downloaded from Companies House, the Charity Commission or Creditsafe)

5. Was there a decision made during the preparation, scrutiny, assessment and allocation of funds which excluded infrastructure or core costs of any of the organisation applying for funding?

Paragraph 4.3 of the Anti-racist Wales Culture, Heritage and Sport Fund 2022/23 supporting guidance for applicants (Annex A) set out the availability of funding for 2022/23 as below:

The funding for 22/23 is for revenue costs only. A limited amount of capital funding is available from April 2023-March 2025 only. Due to limited amount of capital funding available we recommend that capital makes up no more than 10% of the proposed funding.

No 'in principle' decisions were taken to exclude from consideration the infrastructure or core costs set out by any specific organisation applying to the scheme. The availability within the scheme of revenue and capital funding in each of the relevant financial years was set out as above in the supporting guidance for applicants (Annex A) and all applications were assessed consistently against the criteria set out in the guidance. Funding was allocated accordingly, within the overall financial constraints of the scheme.

6. Information on the percentage of the total grant budget allocated to the following organisations/agencies: Amgueddfa Cymru – National Museum Wales, the Arts Council of Wales, the National Library of Wales, the Royal Commission on the Ancient and Historic Monuments of Wales and Sport Wales

Last month, the Deputy Minister for Arts and Sport, and Chief Whip announced grant awards of £4.5m over the next three years to support the delivery of the Culture, Heritage and Sport goals and actions in our Anti-Racist Wales Action Plan, and our related Programme for Government and Co-operation Agreement commitments. A copy of the written statement can be found here: [Written Statement: Delivering the Culture, Heritage and Sport goals and actions in the Anti-racist Wales Action Plan \(22 November 2022\) | GOV.WALES](#). 39% of the total grant budget allocation was awarded to our arm's length bodies, broken down as follows:

- Amgueddfa Cymru – National Museum Wales – 11%
- Arts Council of Wales – 9%
- National Library of Wales – 8%
- Royal Commission on the Ancient and Historic Monuments of Wales – 6%
- Sport Wales – 5%

7. If any previous information had been gathered on their existing provision of culturally sensitive and appropriate services, including provision of translation and interpretation services.

We are unable to respond to question 7 as this part of your request does not provide a sufficiently clear description of the information you require. In order to provide a response, further clarity would be required on what you mean by 'existing provision of culturally sensitive and appropriate services, including provision of translation and interpretation services' and what information you are seeking. The term 'culturally sensitive and appropriate service' can be interpreted in several ways, so we would need additional information specifying what information you are seeking when referring to this, including when referring to 'provision of translation and interpretation services'. We will be unable to process this part of your request without this clarification.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,
Welsh Government,

Cathays Park,
Cardiff,
CF10 3NQ

or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely



Llywodraeth Cymru
Welsh Government

**Culture Division
Welsh Government**

The Anti-racist Wales Culture, Heritage and Sport
Fund 2022/23
Supporting Guidance for Applicants

Contents

1. Introduction	2
2. Application process	2
3. Who can apply	3
4. What we will fund	3
5. Assessment criteria	6
6. Anti-racist Wales Action Plan Goals and Actions	6
7. Programme for Government Commitments	7
8. Project Delivery and Cost	8
9. Co-production/ Community support	9
10. Long-term impact	10
11. Measuring and Reporting.	10
12. Monitoring and Evaluation	11
13. Where can I get help?	11
14. Other sources of information	12

1. Introduction: The Anti-racist Wales Culture Fund

- 1.1.** The [Anti-racist Wales Action Plan](#) (ARWAP), published in June 2022 builds on previous Welsh Government initiatives on race equality, and reconfirms the Welsh Government's long-held commitment to advancing equality for all.
- 1.2.** The Welsh Government's Programme for Government emphasises the importance of representing and reflecting the history and culture of Black, Asian and Minority Ethnic people to ensure that their contribution to Wales is recognised while enabling equal access and participation. This will deliver improved outcomes for all, and will better reflect and promote a multi-cultural, vibrant and diverse Wales, which is fundamental to delivering our vision of a truly anti-racist Wales.
- 1.3.** To achieve the vision of a truly anti-racist Wales, the [Anti-racist Wales Action Plan](#), sets out clear goals and actions. The Culture, Heritage and Sport section can found on pages 55-62 and focuses on the themes of Leadership, Funding, Celebrating Cultural Diversity, the Historical Narrative and Learning about our Cultural Diversity.
- 1.4.** The Anti-racist Wales Culture, Heritage and Sport Fund will provide grant funding to support organisations to deliver the deliver the Culture Heritage and Sport goals and actions in the ARWAP and our Programme for Government commitments.
- 1.5.** Applicants should read the following guidance carefully and develop their proposals in accordance with the assessment criteria.

2. Application process

- 2.1.** The grant scheme will operate as a competitive single stage application process.
- 2.2.** The timetable for the 2022/23 grant scheme is:

Anti-racist Wales Culture Fund opens	11 July 2022
Application window	11 July – 22 August 2022
Applications assessed	August – September 2022
Decisions issued	By w/c 26th September 2022
Projects Start	October 2022

We envisage that there will be a further application window for funding in 2023 and potentially 2024, depending upon the funding available.

3. Who can apply.

3.1. In order to apply for funding you should:

- Be an organisation, or an individual working with relevant organisations based in Wales or whose activity is based in Wales.
- Be active in the Culture: Arts, Museums, Archives, Libraries, Heritage or Sport sectors, with experience of either engagement or delivery in these sectors,
- Commit to involvement in the Welsh Government evaluation of the programme.
- Be able to complete the grant funded work and claim by 31 March 2023 (or 31 March of each financial year if awarded a multi-year grant);

3.2. All provisionally successful applications will be subject to background financial checks. Failure to pass these checks may result in an unsuccessful outcome for grant funding.

3.3. All offers of grant will be subject to the Welsh Government's standard terms and conditions of the grant.

3.4. The Welsh Government policy is to make payments in arrears. However, it recognises that some organisations do not hold large reserves and do not have the resources to undertake work and receive payment afterwards. Provision of funding for committed expenditure may be considered in advance of payment but only where evidence of need is clearly established. **This must be stated at the application stage, with evidence to follow if the applicant is successful. If funding is then not spent as intended it will need to be repaid.**

4. What we will fund

4.1. Applications should demonstrate how the funded projects will meet the Culture, Heritage and Sport goals of the Anti-racist Wales Plan.

4.2. Applications of between £5,000- £150,000 per annum/financial year from

October 2022-March 2025 will be considered upon submission of the attached application form.

- 4.3.** The funding for 22/23 is for revenue costs only. A limited amount of capital funding is available from April 2023-March 2025 only. Due to limited amount of capital funding available we recommend that capital makes up no more than 10% of the proposed funding.
- 4.4.** If you have a proposal that falls slightly outside the budget range for either revenue, capital or both, please contact us to discuss whether an application could be considered. Please send these request with a clear rationale and associated budget to culture@gov.wales. This must be done at least five working days before the fund deadline.
- 4.5.** All funding from this grant scheme is discretionary with competition likely for the available funds. Submitting an application does not guarantee all, or some, of the money you apply for.
- 4.6.** Applications that are potentially scalable (where a smaller or more limited version of the project could be completed for a lower amount of funding) are advised to include information, including a cost breakdown of this option for consideration.
- 4.7.** Where an application includes the delivery of a wide range of related activities, we advise applicants to prioritise them clearly within their application and provide sufficient information for each element of the proposal to allow officials to consider them as distinct and costed projects, if needed. Providing this information may allow us to consider funding some of your higher priority activities, in the event that competition for our available budget prevents consideration of the application as a whole.
- 4.8.** All projects should be a maximum 30 months, although many projects may be of shorter duration. All projects should start by December 2022.
- 4.9.** Funding in 23/24 and 24/25 is not guaranteed and will be dependent on evidence of satisfactory and timely delivery of the projects in the preceding years.
- 4.10.** Typical revenue costs may include:

 - salaries for the staff involved in running the project, and/or payment of participants and organisers
 - costs of premises hire, transport and subsistence for those involved in the project;
 - event related costs, and insurance; and costs of materials used to organise, promote, and facilitate the project.

4.11. Typical capital costs may include:

- the purchase of equipment
- purchase of digital software and infrastructure
- exhibition build costs.

4.12. All grant applications will be assessed by the Culture Division against the priority criteria listed in section 5 of this document.

4.13. Examples of areas that can be funded under this grant scheme include, but are not limited to:

- Use and management of existing collections and/or new artefacts and archives to improve access, understanding or breakdown barriers for Black, Asian and Minority Ethnic people.
- Mentoring /training programmes
- Community projects
- Development of permanent and temporary exhibitions that tell stories through the lens of Black, Asian and Minority Ethnic people's experiences (past and present).
- Communication and awareness raising.
- Developing online content
- Website development
- Research.
- Engagement and outreach with Black, Asian and Minority Ethnic people in reviewing processes and systems as well as development of new programmes of work.

4.14. Applicants should also note the following:

- Multi-year grant projects of **up to** three years will be considered, with continuation of funding subject to successfully completing the first-year review/benchmarking exercise. Multi-year applications should demonstrate the linear progression and impact across the duration of the project. Please note, not all organisations who are successful in the application process will receive the additional years' funding. Therefore, wherever possible applicants should structure proposals so they will deliver some lasting benefits in year one, even if proposals in future years do not proceed.
- Applicants may ask for up to 10% of the grant award to support project management staff costs, however, please be aware the Welsh Government will not be responsible for any redundancy costs when the project comes to an end.
- We will not fund projects that are currently receiving other grant funding from the Welsh Government.

- We welcome applications where match funding from another organisation is in place. Please provide evidence of your match funding offer alongside your application.

5. Assessment criteria

5.1. Applications will be scored using the following scoring scale. Each assessment criteria score will be multiplied by the associated weighting factor to give a total score. More detail on each criteria can be found in sections 6-13.

	Assessment Criteria	Score	Weighting
1	Anti-racist Wales Action Plan Goals and Actions Evidence of how project contributes to the delivering of the Culture, Heritage and Sport goals and actions in the Anti-racist Wales Action Plan.	0 – 4	x 3
2	Programme for Government Commitments Evidence of how project aligns with the specific Programme for Government commitments on racial equality.	0 – 4	x 2
3	Project Delivery and Cost Evidence of how project delivery will be managed.	0 – 4	x 2
4	Co-production/Community support Evidence of Community support/Co-production for your project.	0 – 4	x 2
5	Long-term impact Evidence of long-term impact and sustainability of project.	0 – 4	x 2
6	Measuring and Reporting Information about how project activity will be measured and reported.	0 – 4	x 1

6. Criteria 1: Anti-racist Wales Action Plan Goals and Actions

6.1. Applicants will be assessed on how they deliver the Culture, Heritage and Sport goals and actions set out on page 55-62 in the [Anti-racist Wales Action Plan](#).

6.2. We anticipate that project proposals will focus on the ARWAP goals about 'Celebrating Diversity' 'The Historical Narrative' and 'Learning about our Cultural Diversity' but applications delivering against any of the Culture Heritage and Sport ARWAP goals and actions will be eligible for consideration.

6.3. The Culture Heritage and Sport ARWAP goals are included below:

Leadership

To hold publicly funded organisations accountable for the delivery of anti-racist measures and actions, as set out in this action plan.

Funding

To work with our sponsored bodies to ensure they use their spending powers to embed anti-racist practice, facilitate equality of access and outcomes, and maximise participation for Black, Asian and Minority Ethnic people

Celebrating Diversity

Support all parts of the society in Wales to embrace and celebrate its diverse cultural heritage while understanding, and recognising the right to, freedom of cultural expression.

The Historical Narrative

To work with public bodies to fully recognise their responsibility (individual and collectively) for setting the right historic narrative, promoting and delivering a balanced, authentic and decolonised account of the past – one that recognises both historical injustices and the positive impact of Black Asian and Minority Ethnic communities.

Learning about our Cultural Diversity

Identify and meet targets to deliver anti-racist education and learning; including interpretation, marketing and educational materials that recognise and celebrate the rich and diverse cultural mix of our society, encourage widespread physical and intellectual engagement and so promote anti-racist practice and principles throughout.

Score	
4	A very clear, comprehensive and compelling explanation is given of how the project will address goals and action(s) within the ARWAP.
3	A clear and convincing explanation is given of how the project will address goals and action(s) within the ARWAP

2	A somewhat clear explanation is given of how the project will address goals and action(s) within the ARWAP, but plans contain minor gaps and could be more strongly developed.
1	Links to how the project will address goals and action(s) within the ARWAP are apparent, but not fully explored.
0	No information has been provided as to how the project will address goals and action(s) within the ARWAP.

7. Criteria 2: Programme for Government Commitments:

Grant applicants will be assessed on how their project aligns with the following Welsh Government [Programme for Government \(PFG\)](#) commitments:

- *Ensure the history and culture of our Black, Asian, and Minority Ethnic communities are properly represented by investing further in our cultural sector and museum network*
- *Ensure that Black, Asian, and Minority Ethnic histories are properly reflected throughout our cultural and heritage sectors including in our National Museums.*

Score	
4	A very clear, comprehensive and compelling explanation is given of how the project will support the delivery of the specific PFG Commitments.
3	A clear and convincing explanation is given of how the project will support the delivery of the specific PFG commitments.
2	A somewhat clear explanation is given of how the project will support the delivery of the specific PFG commitments, but plans contain minor gaps and could be more strongly developed.
1	Links to how the project will support the delivery of the specific PFG commitments are apparent, but not fully explored.
0	No information has been provided as to how the project will support the delivery of the specific PFG commitments

8. Criteria 3: Project Delivery and Cost:

Grant applicants will be assessed on how their application demonstrates the delivery of key project milestones through a clear delivery plan. All activity will take place in the period October 2022 to March 2025 (this is the maximum project delivery period) , or for a shorter delivery period. All projects will start by December 2022.

All proposals will include a budget, providing a breakdown of expected costs. Costs should be the minimum level of funding necessary to deliver the project. Within the cost breakdown, proposals should also provide an explanation about how the costs

of the project are reasonable. This will need to include clear evidence of how the costs have been arrived at as set out in the application form.

Applications should provide a payment schedule which provides an estimated timeline for making claims based on your project timetable and milestones.

Applications should identify key risks and show how these will be mitigated.

Score	
4	A very clear, compelling and comprehensive explanation is given of how project delivery will be managed. This will include: the project's key milestones and explanations as to how they will be delivered, a clear budget including a well evidenced breakdown of costs, and a comprehensive risk register detailing appropriate risk mitigations.
3	A clear and convincing explanation is given of how project delivery will be managed. This will include: the project's key milestones and explanations as to how they will be delivered, a clear budget including an evidenced breakdown of costs, and a comprehensive risk register detailing appropriate risk mitigations.
2	A somewhat clear explanation is given of how project delivery will be managed. This will include: the project's key milestones and explanations as to how they will be delivered, a budget including an evidenced breakdown of costs, and a risk register detailing possible risk mitigations. But plans contain minor gaps and could be more strongly developed.
1	Details of how project delivery will be managed are provided but not fully explored. Milestones, budgetary and/ or risk information is provided but are unclear, incomplete or not fully explored.
0	No information has been provided as to how project delivery will be managed.

9. Criteria 4: Co-production/ Community support

Feedback during the development of the ARWAP consistently affirmed that co-design and working together will be essential in delivering the plan. Grant applicants will be assessed on how their proposal has or will be co-produced and/or how the project has the support of the people it is intended to engage. Further information on Co-Production can be found [here](#).

Score	
4	A very clear, comprehensive and compelling explanation is given of how the proposal demonstrates community support/co-production for

	the project.
3	A clear and convincing explanation is given of how the proposal demonstrates community support for the project.
2	A somewhat clear explanation is given of how the proposal demonstrates community support for the project but contains minor gaps and could be more strongly developed.
1	Links to how the proposal demonstrates community support for the project are apparent but not fully explored.
0	No information has been provided as to how proposal demonstrates community support for the project.

10. Criteria 5: Long-term impact:

The Welsh Government has an ambition to deliver transformational change that can be sustained over time. Grant applicants will be assessed on how their project contributes to delivering this change. Grant applicants should evidence the difference the project will make and the long-term impact they anticipate that the project will have on Black, Asian and Minority Ethnic people in Wales. Applicants should detail and how this impact will be sustained over time.

Score	
4	A very clear, comprehensive and compelling explanation is given of how the project will deliver a positive change that can be sustained in the long term.
3	A clear and convincing explanation is given of how the project will deliver a positive change that can be sustained in the long term.
2	A somewhat clear explanation is given of how the project will deliver a positive change that can be sustained in the long term, but plans contain minor gaps and could be more strongly developed.
1	Links to how the project will deliver a positive change that can be sustained in the long term are apparent but not fully explored.
0	No information has been provided as to how the project will deliver a positive change that can be sustained in the long term.

11. Criteria 6: Measuring and reporting

Projects should focus on monitoring how their activity is addressing the outputs and impacts of ARWAP. Grant applicants will be assessed on how their application details how these outcomes will be monitored including, SMART indicators which

measure the completion and success of the project including collecting data to enable assessment of performance against the wider ARWAP objectives. A SMART performance indicator will be Specific, Measurable, Achievable, Relevant and Time-bound.

Applications must also commit to involvement in the Welsh Government evaluation of the programme.

Score	
4	A very clear comprehensive and compelling explanation is given of how the project will be measured and reported.
3	A clear and convincing explanation is given of how the project will be measured and reported.
2	A somewhat clear explanation is given of how the project will be measured and reported but plans contain minor gaps and could be more strongly developed.
1	Links to how the project will be measured and reported are apparent but not fully explored.
0	No information has been provided as to how the project will be measured and reported

12. Monitoring and Evaluation

12.1 Successful applicants will be responsible for collecting monitoring and evaluation data and reporting on participation and performance and will be expected to report regularly to the Welsh Government.

12.2 All applicants must ensure that any personal data processed in relation to their grant proposals is in line with UK data protection legislation.

12.3 At the end of your project you will be required to submit a short completion report confirming how the funds were used. A template will be issued following grant award and is likely to require you to report against how your project has delivered against the outputs of ARWAP, what evaluation activity has been undertaken, and how conditions of the grant have been met.

12.4 The Welsh Government is committed to evaluating the success of this grant and intends to undertake an independent evaluation of the Culture strands of the ARWAP. It is anticipated that this research will examine the implementation and impact of the activities that have been delivered. It will assess the extent to which the outputs and outcomes can be attributed directly to the scheme activities and examine whether wider anticipated or unanticipated effects have been realised.

12.5 The Welsh Government or a third party acting on behalf of Welsh Government may contact you for the purpose of research and evaluation and/or to give feedback on your experience of the scheme. This information will be analysed and presented anonymously in line with the Privacy Notice.

13. Where can I get help?

13.1 Applicants who have any queries, including if they are unsure if they're eligible to apply for grant funding are advised to contact the Culture division central mailbox at culture@gov.wales for advice on their potential project before submitting an application.

14. Other sources of information

- [Anti-racist Wales Action Plan](#)
- [Programme for Government](#)
- [Well-being of Future Generations](#)
- [National-Principles-for-Public-Engagement-Egwyddorion-Cenedlaethol-ar-gyfer-Ymgysylltu-ar-Cyhoedd.pdf \(wcva.cymru\)](#)
- [Co-production Network for Wales \(copronet.wales\)](#)